

Modern Slavery Statement 2021/22

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Our Purpose

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

Our Bond

Our Customers are our partners

Our success depends on our customers and suppliers choosing us. Our strength lies in working closely with them to create value and trust, together with superior products, service and ideas.

Our People are our strength

Our success comes from our people. We work in a safe and satisfying environment. We choose to treat each other with trust and respect and maintain a healthy balance between work and family life. Our experience, teamwork and ability to deliver steel inspired solutions are our most valued and rewarded strengths.

Our Shareholders are our foundations

Our success is made possible by the shareholders and lenders who choose to invest in us. In return, we commit to continuing profitability and growth in value, which together make us all stronger.

Our Local Communities are our homes

Our success relies on communities supporting our business and products. In turn, we care for the environment, create wealth, respect local values, and encourage involvement. Our strength is in choosing to do what is right.

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If you have any questions about this statement, or any concerns about any form of modern slavery within BlueScope's supply chains or organisation, please contact sustainability@bluescope.com or BlueScope's Speak Up Line.

BlueScope's Speak Up Line is an externally managed service available 24 hours a day, 7 days a week. Reports to the Speak Up Line may be made anonymously. BlueScope treats all concerns raised seriously and in strict confidence. You can make a report via web: bluescopespeakup.deloitte.com.au or by email bluescopespeakup@deloitte.com.au

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About this statement

BlueScope Steel Limited (BlueScope) is committed to respecting and upholding human rights across our business practices and supply chains. We believe that everyone should be treated with dignity and respect, and we are working to ensure our business activities and practices are aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs).

We are guided by Our Purpose and Our Bond, and together these documents express our values, principles, and vision to strengthen our communities for the future. They guide our actions and decisions, and are complemented by our Code of Conduct, How We Work, which supports us in choosing to do what is right.

We recognise that for us to be the best at what we do we need to rely on strong relationships with our suppliers, both globally and locally. Our suppliers are critical resources for our business and we recognise that our success is a mutual proposition. BlueScope is committed to sustainable sourcing practices that create, protect and grow long-term environmental, social and economic value. BlueScope aims to conduct procurement and sourcing activities with integrity, in accordance with Our Bond, our Responsible Sourcing Standard and our Supplier Code of Conduct.

BlueScope businesses are required to assess their supply chains based on materiality and sustainability risk factors. We require certain existing and potential new suppliers to demonstrate that the way in which they operate aligns with BlueScope's expectations, and to commit to BlueScope's Supplier Code of Conduct.

Although we have a 'zero tolerance' approach to critical breaches of our Code, it is important to note that we do not walk away from suppliers facing genuine difficulties in achieving compliance. Our first aim is to ensure that any such difficulties are addressed and remedied, and practices are put in place to avoid recurrence. If we then believe that there is both commitment and capability of the supplier to avoid recurrence, we will usually continue to work with them unless there is any repetition. Ongoing non-compliance with our principles and expectations as communicated by us to a supplier may lead BlueScope to terminate the business relationship.

This joint modern slavery statement is made by BlueScope Steel Limited ABN 16 000 011 058 and the following entities which we have determined are reporting entities pursuant to the Australian **Modern Slavery Act 2018 (Cth)** and which are owned and controlled by BlueScope Steel Limited.

BlueScope Steel Ltd ABN 16 000 011 058

BlueScope Steel (AIS) Pty Ltd ABN 19 000 019 625

Glenbrook Holdings Pty Ltd ABN 62 007 258 059

BlueScope Distribution Pty Ltd ABN 88 096 380 068

Orrcon Manufacturing Pty Ltd ABN 15 113 998 066

BlueScope Steel Americas Holdings Pty Ltd ABN 13 073 776 271

BlueScope Steel Asia Holdings Pty Ltd ABN 25 102 832 100

BlueScope Steel (Finance) Ltd ABN 53 098 842 338

Lysaght Building Solutions Pty Ltd ABN 61 103 232 444

This statement describes the actions that BlueScope Steel Limited and its owned and controlled entities, including the reporting entities above, (together **BlueScope**) have taken during FY2022 to identify, assess and address modern slavery risks. Except where otherwise stated, references to 'we', 'us' and 'our' refer to BlueScope including the reporting entities above (and excludes Tata BlueScope JV. As Tata BlueScope Steel is not controlled by BlueScope it is not covered by this statement unless otherwise stated). This statement was approved by the Board of BlueScope Steel Limited on behalf of all reporting entities on 8 September 2022 and is signed by Mark Vassella (Managing Director and CEO) on page 04.

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A message from our Managing Director & CEO

The initiatives outlined in BlueScope's FY2022 Modern Slavery Statement demonstrate how we seek to live Our Purpose, strengthening communities for the future wherever we operate.

At all sites across 18 countries, we are proud to be an important member of the communities that are home to our employees and suppliers. We actively seek to partner with suppliers who share the core values expressed in Our Bond and the behaviours and principles in our Supplier Code of Conduct. We maintain a strong focus on supply chains, continuing to foster responsible business practices and uphold human rights through supplier engagement, risk assessment and continuous improvement.

Our 15,000 employees support the integrity of our operating practices and our relationships with third parties. In seeking to strengthen our supply chain, our approach is to foster responsible business practices and uphold human rights through supplier engagement, risk assessment and improvement. We hold ourselves accountable to the same standard that we expect from our suppliers.

This year's Statement shows how we are building on our efforts to identify, manage and, where necessary, remediate modern slavery risks in our own operations and supply chains. We highlight progress against the commitments made in our FY2021 Statement, present the results of our first assessment of modern slavery risks in our own operations, and outline the actions we have taken and the controls we have in place to manage these risks and the risks in our supply chain.

Unfortunately, global supply chain issues coupled with travel restrictions and other disruptions caused by the COVID-19 pandemic challenged our ability to adhere to our planned supplier assessment program and audits scheduled to be conducted at our own sites. However, we will reschedule this work when we can.

During the year, Port Kembla Steelworks in Australia was the first steelmaker in the Asia Pacific – and only the fourth in the world – to achieve ResponsibleSteel™ site certification, reflecting the quality of our operations and how positively we seek to engage with our customers, suppliers, employees, and communities. Certification was awarded following a rigorous independent audit assessing performance against the 12 principles of the standard, which covers a range of environmental, social and governance (ESG) criteria, including human rights and labour rights.

We continue to follow the UNGPs and in FY2022 BlueScope joined the United Nations Global Compact (UNGC) as further recognition of our commitment to human rights and good labour practices, to protecting the environment and to work against corruption.



The progress we have made this year would not have been possible without the contribution of all BlueScope people, our suppliers, partners, and communities, and I thank them all.

A handwritten signature in blue ink that reads "Mark Vassella". The signature is written in a cursive, flowing style.

Mark Vassella
Managing Director & CEO

8 September 2022

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Our structure, operations, and supply chain

BlueScope manufactures and markets a wide range of flat steel products for the domestic Australian, New Zealand, Asia Pacific, and US markets, and is a leading international supplier of steel products and solutions, principally focused on the global building and construction industry.



As a global leader in coating and painting, we directly employ approximately 15,000 people across manufacturing, processing, distribution, sales channels and functional teams. These range from small product storage sites to our core steel making facilities in Australia, New Zealand, and North America.

BlueScope Steel Limited is headquartered in Melbourne, Australia and listed on the Australian Securities Exchange. It has a number of owned and controlled entities, structured into the following businesses:

North Star

Established in 1996 in Delta, Ohio, North Star is one of the most efficient steel mills in North America. Around two million tonnes of hot rolled coil are produced annually from North Star's dual electric arc furnaces, using scrap metal, pig iron and alloys.

North Star is consistently rated as one of the top producers of flat rolled steel in North America in the annual Jacobson Survey of steel customers measuring customer satisfaction.

North Star sells approximately 90 per cent of its production in the Midwest US, with its end customer segment mix being broadly 50 per cent automotive, 35 per cent construction, 10 per cent manufacturing/industrial and 5 per cent agricultural.

This segment also includes BlueScope Recycling and Materials (BRM), a full-service, ferrous scrap metal recycler with three processing facilities in North Star's region.

Australian Steel Products (ASP)

ASP employs around 6,700 employees at approximately 100 sites, being a mix of large manufacturing plants, rollforming facilities and distribution centres across Australia.

The segment specialises in flat steel products, including hot rolled coil, cold rolled coil, plate and value-added metallic coated and painted steel solutions. Its key focus is on higher value, branded products for the building and construction industry.

The Port Kembla Steelworks – in New South Wales' Illawarra region – is the largest steel production facility in Australia, with an annual crude steel production capacity of over three million tonnes.

BlueScope's branded products are market leaders in Australia, and include COLORBOND® steel, TRUECORE® steel, ZINCALUME® metallic coated steel, GALVSPAN® steel, and the LYSAGHT® brand of quality steel building products.

The ASP segment includes LYSAGHT® and FIELDERS® building products, Orrcon pipe and tube operations and steel distribution sites, and BlueScope Distribution throughout Australia.

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Building Products Asia and North America

BlueScope is a technology leader in metal coated and painted steel building products, principally focused 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 building products.

The business has an extensive footprint of metallic coating, painting and steel building product operations in Thailand, Indonesia, Vietnam, Malaysia, India, China and North America, primarily servicing the residential and non-residential building and construction industries across Asia, and the non-residential construction industry in North America.

BlueScope operates in ASEAN and North America in partnership with Nippon Steel Corporation (NSC) and in India with Tata Steel. Both are 50/50 joint ventures, with BlueScope controlling and therefore consolidating the joint venture with NSC, and jointly controlling and therefore equity accounting the joint venture with Tata Steel.

Building Products' China businesses are wholly owned by BlueScope and are comprised of metal coating, painting and Lysaght operations, and Engineered Buildings Solutions (EBS).



Buildings and Coated Products North America (BCPNA)

Buildings and Coated Products North America combines the Buildings North America (BNA), BlueScope Properties Group (BPG) and BlueScope Coated Products (BCP) businesses.

Servicing the low-rise non-residential construction segment, Buildings North America is a leader in EBS, pre-fabricating the likes of distribution centres, factories and stores. Its BUTLER® and VARCO PRUDEN® brands are highly recognised in the industry. The business partners with its builder customers to provide a complete custom steel building solution that includes design, detailing, drawings and manufacturing.

BPG develops industrial properties, predominantly warehouses and distribution centres. BPG develops a mixture of 'Build to Suit' (pre-leased) and 'Build to Demand' properties, creating value for the BNA builder network by providing access to projects.

BCP was established through the acquisition of the Coil Coatings business from Cornerstone Building Brands in late June 2022. It is the second largest metal painter in the US, with a total capacity of around 900,000 tonnes per annum across seven facilities, predominantly serving commercial and industrial construction applications.



New Zealand & Pacific Islands (NZPI)

The New Zealand & Pacific Islands business comprises the Waikato North Head mine, New Zealand Steel, Pacific Steel and the Pacific Islands businesses.

New Zealand Steel, the only fully integrated steel producer in New Zealand, uses locally sourced iron sand to manufacture about 670,000 tonnes of steel slab and billet a year at the Glenbrook steelworks south of Auckland.

NZPI produces a range of flat and long steel products for domestic and export use, and supplies all major industries including construction, manufacturing, infrastructure, packaging and agriculture.

NZPI employs around 1,500 people and includes Pacific Steel New Zealand (rolling mill and wire drawing facilities), and the Pacific Islands business, with facilities in Fiji, New Caledonia and Vanuatu which manufacture and distribute the LYSAGHT® range of products and long steel products through Pacific Steel Fiji.

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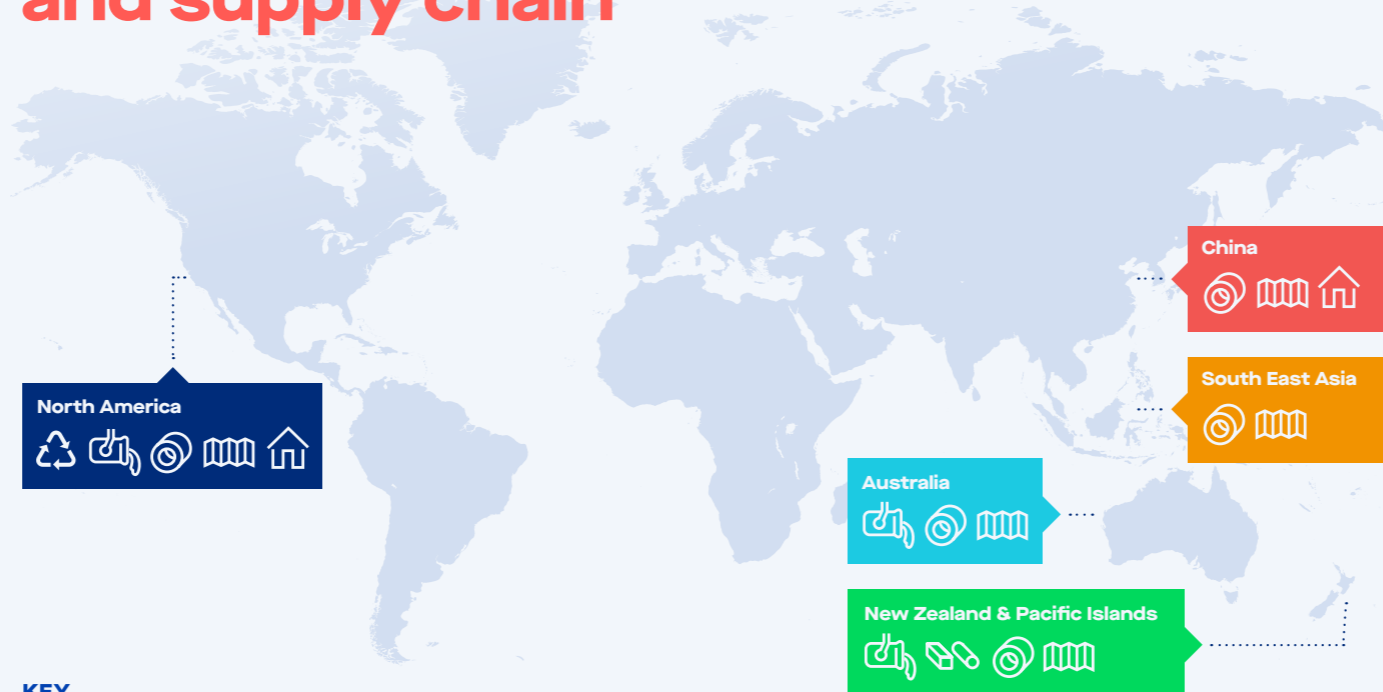
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Our global operations and supply chain



KEY

RAW MATERIALS	UPSTREAM	MIDSTREAM	DOWNSTREAM		
Recycling (scrap metal)	Steelmaking (flat products)	Metal coating and painting	Long products (rebar, wire)	Steel building materials and components	Steel buildings and systems

Our people

Workforce composition as of 30 June 2022 ¹	15,000	14,300	700	8,000	7,000
	Total employees	Full-time employees	Part-time or fixed-term employees	Salaried employees	Wages employees

Supplier spend breakdown by country risk (% global spend)

HIGH ²	
CHINA 8%	THAILAND 1%
INDONESIA 2%	VIETNAM 2%
MEXICO 1%	BRAZIL 3%
MEDIUM ²	
UNITED STATES 27%	JAPAN 7%
SOUTH KOREA 3%	OTHER 4%
LOW ²	
AUSTRALIA 37%	NEW ZEALAND 3%
SINGAPORE 1%	CANADA 1%

1 Rounded figures, excludes Tata BlueScope Steel JV, BlueScope Coated Products and BlueScope Recycling and Materials.
2 Country risk data sourced from Elevate EiQ Global Risk Landscape which assesses country risks across Labour, Health and Safety, Environment, Business Ethics and Management Systems.

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In FY2022 we continued to be a significant purchaser of goods and services in the countries within which we operate with a total procurement spend of circa A\$13 billion. Across all our business entities we continue to focus on domestic supply chains which support local jobs and economic development.

Our procurement and supplier relationship management processes are managed by business unit or country procurement teams, with a few exceptions where specific categories are managed at a group level. However, our approach to responsible sourcing, is governed by group-wide standards and processes to ensure that they are consistently applied.



For more details on our approach refer to [Our actions to assess and address modern slavery](#).

Our focus has always been, and continues to be, to engage with suppliers that share our strong values and who are committed to sustainable business practices and responsible sourcing.

We continue to work to understand and map the complex layers of our supply chain. At a high level, we have mapped the principal country of supply for the goods and services in the top 90 per cent of our supplier spend. This enables us to determine our potential sourcing risk based on source country rather than the country that our direct supplier office is based in.

Supplier breakdown of service categories

Categories (% total supplier spend)	%
Raw materials such as coal, limestone, and iron ore	27
External steel feed includes all supplier purchased steel products	27
Downstream accessories such as fasteners, guttering and brackets	12
Production materials such as paints, chemicals and rolls	8
Freight & logistics including shipping, rail and road transport	7
Services include facilities, mechanical and process services	7
Maintenance, Repairs and Operations (MRO) Supplies such as electrical and machine parts and equipment	5
Other including utilities, corporate services and packaging	7
Total	100

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Governance

- » Our commitment to sustainable governance is led from the top, with clear accountabilities for oversight and implementation of our sustainability commitments, including those that relate to modern slavery.
- » The Remuneration and Organisation Committee is responsible for approving and reviewing the Group's Social Impact priority areas (which include our modern slavery actions) and monitoring progress against the plans bi-annually.
- » The Risk and Sustainability Committee assists the Board to fulfil its responsibilities in relation to risk management, ethics and compliance, legal proceedings, corporate governance, sustainability, and insurance. This includes the Sustainable Supply Chain program, and developing the Modern Slavery Statement.
- » The Executive Leadership Team instils and monitors adherence to our values, in the interests of shareholders, employees, customers, suppliers and our communities. This includes monitoring progress of actions to manage and mitigate human rights and modern slavery risks.
- » The Social Impact Steering Committee, in consultation with internal and external stakeholders continues to oversee due diligence for social impact (which includes modern slavery), and drive continuous improvement across the Group.
- » A collaborative approach is utilised to learn from each other in identifying and managing our modern slavery risks. We share experiences, seek feedback, and regularly consult with employees, management teams, our Board, and suppliers.
- » Discussions from a business unit level up to Board committees enable us to build our knowledge and leverage each other's experiences to ensure we are all aware of what actions need to be taken.



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Risk management framework

BlueScope is committed to an integrated approach to managing key risks, including our modern slavery risks. We aim to have a proactive risk culture, ensuring a balanced approach to managing uncertainty in the delivery of strategic and commercial outcomes.









Our integrated framework of risk management, policies, procedures, and controls means that decisions are made as close as possible to the source of risk. Our leaders are empowered to own and manage risks directly, with the support of second line functions and third line independent assurance for the oversight of senior management and the Board. Each business unit's performance against the Group Risk Appetite fundamental principles is monitored quarterly, and consolidated metrics reported to the Risk & Sustainability Committee of the Board.

Our Risk Appetite statements set out the fundamental principles that govern the way we will execute our strategy and the acceptable level of risk. Understanding risk, and our appetite for types of risk, is a key consideration in our decision making.

Human rights, including modern slavery, is included as a specific component in our risk management framework under the risk appetite statement of compliance and ethical conduct. The fundamental principles relating to human rights are:

- » Do the right thing and call out where behaviours do not align with our Code of Conduct.
- » Demonstrate a commitment to preventing and remediating adverse human rights impacts associated with our business activities including through our supply chain.
- » Working to ensure our business activities are aligned with the UNGPs.

GLOBAL POLICY FRAMEWORK

Our foundations	Global documents	Business unit documents
Our Purpose + Our Bond	Policy 	Policy 
	Standard 	Standard 
	Procedure 	Procedure 
How We Work (code of conduct)	Guideline 	Guideline 
	Supporting Doc 	Supporting Doc 

Policy framework

BlueScope's Framework of Guiding Documents contains a governed suite of specific global and business unit documents, which together provide direction and instruction to our people across our global sites in carrying out their daily work activities according to required BlueScope expectations of behavior and practice. The Framework uses a document hierarchy and governance process to ensure all Guiding Documents are 'controlled', from our foundational beliefs and principles through to our work procedures, are accurate, aligned and consistent, and are made available to our people in the most relevant, efficient and straightforward manner.

- » We aim to act fairly, ethically and with integrity, helping to create lasting benefits for our customers, suppliers, people, shareholders, and community. We expect this of our people and business partners, including our third party and agent representatives, suppliers, and contractors.
- » We know that addressing modern slavery risks requires clear guidance and action. The policy framework is applied globally across all owned and controlled entities including the reporting entities, and assists our people and business partners working with us to make ethical, well-judged decisions consistent with our values and expectations of business conduct.



Refer next page for policies that are relevant to modern slavery.

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Policy framework continued

Policy	Relevance to modern slavery	How we implement this policy
Our Bond	Our Bond outlines the guiding principles strengthening our business. It identifies our key stakeholders; guides how we work together and conduct ourselves. It is the foundation of our business culture and sets the expectation for our people to be proactive and considerate in looking out for the best interests of others.	Our Bond is publicly available on our website and is published extensively on internal communication channels. Any breach of these expectations and standards will be investigated and may result in disciplinary action.
Our Code of Conduct, How We Work	Our Code of Conduct sets out what we expect of every single employee as we all live Our Purpose and Our Bond. It sets out commitments in relation to human rights including modern slavery as summarised under our Human Rights Policy. We expect that anyone we do business with will adhere to this Code of Conduct.	Our Code of Conduct is publicly available and is a mandatory training requirement for all new starters. Every BlueScope employee is required to undertake a refresher every three years. It is available in local languages to reflect the diversity of our employee base, and provided for all workers on our sites.
Human Rights Policy	<p>This policy provides the foundation of our approach to human rights including modern slavery and includes the following commitments:</p> <ul style="list-style-type: none"> » We actively protect and uphold the human rights of our people, the people we work with and the people in our communities: rights based on dignity, fairness, equality, respect and independence. » We support the elimination of all forms of forced or compulsory labour and the abolition of the worst forms of child labour and require our partners to do the same. 	This policy is available on internal communication channels. It outlines the expectations for all business partners (upstream and downstream) and holds everyone to the same standard. It also encourages reporting of all concerns – including modern slavery and human rights, and is communicated through our Code of Conduct, How We Work training.
Speak Up Policy	<p>Our Speak Up channel is established under this policy and is our key global grievance mechanism. It is available to all stakeholders, and reports can be made anonymously. Modern slavery grievances can be raised through this channel.</p> <p>The policy includes information about how to make a disclosure and reinforces the protection of those who do.</p>	This policy is publicly available on our corporate site, communicated through internal channels and promoted by posters across our sites, as well as being communicated through our Code of Conduct, How We Work training.
Supplier Code of Conduct	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 BlueScope's products and services to market. This includes our expectation of suppliers regarding labour conditions such as; child labour, forced labour, harassment and abuse, freedom of association, wages and benefits and working hours.	This policy is publicly available on our corporate site and is published on internal communication channels. We partner with suppliers large and small who share our values. We communicate this document, and our principles and expectations to suppliers and review supplier alignment with our approach to responsible sourcing.
Health, Safety, Environment and Community (HSEC) Policy	Our care and commitment to health and safety is integral to the way we do business, and it starts with each one of us. We are committed to a workplace where all people are protected; because everyone deserves to feel safe and valued.	Our HSEC policy is publicly available on our corporate site and is published extensively on internal communication channels. Any breach of these expectations and standards will be investigated and may result in disciplinary action.

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Grievance mechanisms

BlueScope encourages our employees, contractors and other stakeholders (including suppliers and their employees) to speak up if they become aware of, or reasonably suspect, that something is not right at BlueScope – including modern slavery or other labour rights violations in our operations or supply chains.

BlueScope's Speak Up channel is a global, externally managed service available 24 hours a day, 7 days a week and can be accessed online or by phone. Reports to the Speak Up channel may be made anonymously. BlueScope is committed to the protection of all people who speak up and does not tolerate retaliation or adverse action related to a report under our Speak Up policy.

During FY2022, we did not identify any modern slavery or other serious labour exploitation in our operations or supply chain. Ninety-four employee grievances (which related to bullying, discrimination, harassment, sexual harassment, and inappropriate workplace behaviour) and thirty-seven business conduct matters were received via the Speak Up channel.

While we did not identify any modern slavery issues, we acknowledge that this does not necessarily mean it is not present, and we will continue to monitor and build the effectiveness of our mechanisms, and those of our supplier base, including the use of targeted on-site assessments to identify where continuous improvement is required. In FY2023, we will identify and trial new grievance mechanisms specifically for supply chain partners and labour hire and contract workers to ensure that everyone has access to a safe method of raising a concern.

Remediation

BlueScope has an established crisis response process that would guide the organisation through an adverse modern slavery incident, if required. This process includes an outline of roles and responsibilities, first response protocols and preparing a fit for purpose action plan – depending on the circumstance. All senior leaders globally are trained in this group-wide response process, with annual role playing and refresher training at all business unit management teams.

The process ensures the health and wellbeing of all affected parties is the priority, as well as stakeholder management.

The Social Impact Steering Committee is responsible for establishing an appropriate incident or crisis management plan for all crises relating to modern slavery or human rights and will escalate to the Chief Executive People and Managing Director and CEO if a protocol is enacted.

Further review and collaboration on a remedy framework will be conducted in FY2023.

Supporting the Sustainable Development Goals

BlueScope supports the United Nations Sustainable Development Goals (SDGs), and we align our efforts to these global imperatives to protect and care for people, act responsibly, innovate for shared benefit and use resources wisely. Our performance against these goals further complements SDG17, recognising the importance of partnership and collaboration along the steel value chain, and SDG16 which aims to reduce corruption and bribery in all its forms.

BlueScope proudly became a participant in the United Nations Global Compact (UNGC) during the year, as we seek to ensure our business practices respect and uphold human rights and good labour practices, protect the environment and work against corruption.



BlueScope's inaugural UNGC
Communication on Progress is included
in our FY2022 Sustainability Data
Supplement, available at [bluescope.com](https://www.bluescope.com)

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GRIEVANCE MECHANISMS

We expect our suppliers to uphold and respect the commitments within the BlueScope Supplier Code of Conduct. The Code clearly details our expectation for suppliers to have a robust worker employee grievance mechanism in place.

Suppliers must provide and maintain grievance mechanism channels for workers to raise issues without fear of retaliation. Grievance mechanisms should allow for anonymous submissions. Workers must be trained on how to use the grievance channels.

SpeakUp))

At BlueScope we are committed to fostering a culture of speaking up when something isn't right and protecting those that do. If you see something that is not consistent with Our Bond, our Code of Conduct, How We Work, you should speak up.

Examples of internal grievance mechanisms

- » Suggestion boxes
- » Open door policy/open dialogue
- » Meetings between workers and management
- » Worker surveys
- » Phone/app/web-based helplines

Examples of external grievance mechanisms

- » Ethics Line
- » Facilitated dialogues
- » Audits with worker interviews
- » Worker surveys
- » Phone/app/web-based helplines

Grievance mechanisms continued

BlueScope recognises the importance of grievance mechanisms to responsible business practices. The UNGPs define grievance mechanisms as any routine process through which grievances concerning business-related human rights abuse can be raised and remedied.

A grievance mechanism can only serve its purpose if the people it is intended to serve know about it, trust it and are able to use it. As such, we expect our suppliers to provide grievance mechanisms that conform to the following principles.

Effective grievance mechanisms are primarily managed and implemented internally across various stakeholder groups but are also supported by external parties, including but not limited to independent providers, industry programs, community partners, civil society organisations, and non-governmental organisations (NGOs).

The UNGPs have established effectiveness criteria for operational-level grievance mechanisms:

Legitimate

Enabling trust from the stakeholder groups for whose use they are intended, and being accountable for the fair conduct of grievance processes.

Accessible

Being known to all stakeholder groups for whose use they are intended, and providing adequate assistance for those who may face barriers to access.

Predictable

Providing a clear and known procedure with an indicative time frame for each stage, and clarity on the types of process and outcome available and means of monitoring.

Equitable

Seeking to ensure that aggrieved parties have reasonable access to sources of information, advice, and expertise necessary to engage in a grievance process on fair, informed and respectful terms.

Transparent

Keeping aggrieved parties informed about its progress and providing sufficient information about the mechanism's performance to build confidence in its effectiveness.

Rights-compatible

Ensuring that outcomes and remedies accord with internationally recognised human rights. Integrating human rights norms and standards into processes and based on principles of non-discrimination, equity, accountability, empowerment, and participation.

Source of continuous learning

Drawing on relevant measures to identify lessons for improving the mechanisms and preventing future grievances and harms.

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Modern slavery risks in operations and supply chain

We are committed to identifying, assessing, and taking action to mitigate the potential modern slavery risks in our operations and supply chain.

Potential risks in our operations³

BlueScope recognises that without proper controls, there would be a risk that we could **cause** modern slavery if we exploited our own workers. We have assessed our operations and the effectiveness of controls, and have concluded that the risk is low.

The construction sector is considered to be high risk for modern slavery, and we recognise there is a risk BlueScope could be **directly linked** (or without proper controls, could **contribute**) to modern slavery, including forced labour, through our contractors and labour hire arrangements in relation to workers at our sites.

BlueScope has non-controlled joint ventures and investments where (without proper controls) we may be **directly linked** to modern slavery through the use of exploited labour by these third parties.

Our actions in FY2022 are aligned to mitigating these potential risk areas, and we have controls in place to monitor and evaluate BlueScope's exposure throughout the year. Leadership awareness and understanding is key to a successful ongoing process for identifying and managing modern slavery issues and we are continuing to build internal capability regarding modern slavery due diligence.

Whilst there have been no instances of modern slavery identified in FY2022, BlueScope considers the following areas as key priorities for operations and supply chain, and is working on actions to ensure ongoing continuous improvement in our operations, with particular regard to more vulnerable populations including migrant workers:

- » **Hours of work** – reasonable limitation of working hours and paid holidays
- » **Wages and benefits** – accurate and timely payment
- » **Forced labour** – presence of activities which create control over a workforce
- » **Grievance mechanisms** – accessibility of mechanisms for employees, labour hire and contractors
- » **Harassment and abuse** – prevention and response to harassment in the workplace.

 **More detailed actions can be found in *Our actions to assess and address modern slavery*.**

We use the 'continuum of involvement' in the UNGPs – the authoritative global standard for how businesses should manage their involvement in potential and actual adverse impacts on human rights – to identify, understand and respond to our modern slavery risks. This sets out three ways in which a company could be involved in an adverse human rights impact including modern slavery:

Cause

Businesses may cause modern slavery where their actions or omissions directly result in modern slavery occurring. *An example of this would be if a company subjected workers in its own workforce to exploitation such as debt bondage or forced labour.*

Contribute

Businesses may contribute to modern slavery where their actions or omissions significantly facilitate or incentivise modern slavery to the extent that the exploitation would have been unlikely to occur without them. *An example of this would be if a company forced service providers to reduce costs to a level that could only be sustained by using exploited workers.*

Directly linked

Businesses may be directly linked to modern slavery where their products, services or operations are directly linked to harm carried out by a third party, such as a supplier. *An example of this would be the purchase of safety equipment that was manufactured (or whose inputs were manufactured) using forced labour.*

³ Excludes Tata BlueScope Steel JV, BlueScope Coated Products and BlueScope Recycling and Materials.

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Potential risks in our supply chain³

The Global Slavery Index states that G20 countries are importing risk of modern slavery on a massive scale. BlueScope has a complex supply chain which encompasses a large variety of goods and services sourced from across the globe. We acknowledge that we could be **directly linked** to modern slavery if any of the goods or services we procure, or their inputs, were produced, transported, or provided using modern slavery. We recognise that the risk of modern slavery may be higher in the lower tiers of our supply chain where we have less oversight.

For example, there is a risk that, within the layers of our supply chain there are victims of human trafficking particularly within the ASEAN region from which we source a large proportion of goods and services, and which has seen an increase in human trafficking and migrant labour due to conflict and the impact of the COVID-19 pandemic.

Anti-Slavery International research reveals that debt bondage/bonded labour is widespread in South Asian countries such as India and Pakistan. Although only two per cent of our direct suppliers source goods from India, it is likely that many of the goods we source have equipment and parts which are manufactured in these countries.

The risks of child labour have increased since the start of the COVID-19 pandemic as many children were unable to continue their schooling and have been forced to look for work. In many high-risk settings, children are at an increased risk of exploitation and slavery. There is a risk that BlueScope is directly linked to unacceptable forms of child labour through the supply chains of manufactured goods that we purchase.

We acknowledge the inherent risks within the complex layers of our supply chain and have implemented strong controls and robust business as usual processes to identify and mitigate against these. The global procurement lead team reviews these controls and governs the program of work.³

³ Excludes Tata BlueScope Steel JV, BlueScope Coated Products and BlueScope Recycling and Materials.

⁴ We have drawn on the risk factors described in Modern Slavery Risks, Rights & Responsibilities guide (commissioned by the Australian Council of Superannuation Investors – ACIS).

Risk profile

The below table outlines the potential high-risk categories we have identified in our supply chain.

High risk category	Operational or Supply Chain	Description of potential exposure and approach	Risk factors ⁴
Onsite contract services	Supply Chain	BlueScope utilises some higher risk services in its operations such as security, cleaning, and catering. Targeted onsite audits (which will begin again in FY2023) are used to identify gaps in process, agree action plans and remedy any situation which may not meet the standards outlined in BlueScope's policies and codes.	<ul style="list-style-type: none"> » High risk product and service categories » Vulnerable populations
Labour hire, contractors, and sub-contractors	Supply Chain	BlueScope's Supplier Code of Conduct applies to all contractors including subcontractors and details our expectations relating to labour and human rights. Medium to high-risk contractors and labour hire suppliers are prioritised for assessment and we collaborate with them on identified improvement opportunities (refer to Appendix 2).	<ul style="list-style-type: none"> » Vulnerable populations
Raw and recycled materials	Supply chain	The supply chains of raw and recycled materials are complex and, in high-risk geographies, are known to be at a high-risk of modern slavery. These suppliers are prioritised for assessment and if risks are identified we collaborate with them on improvement opportunities and on third-party on-site audits.	<ul style="list-style-type: none"> » High risk product and service categories » Vulnerable populations » High risk geography
Shipping & logistics	Supply chain	There is a medium to high-risk of labour exploitation and modern slavery in shipping and logistics and these suppliers are prioritised for assessment. Every vessel chartered directly by BlueScope continues to be governed by our Charter Party Agreement and we engage with RightShip to support our vessel selection process helping to drive standards in the industry beyond compliance.	<ul style="list-style-type: none"> » Vulnerable populations » High risk business model

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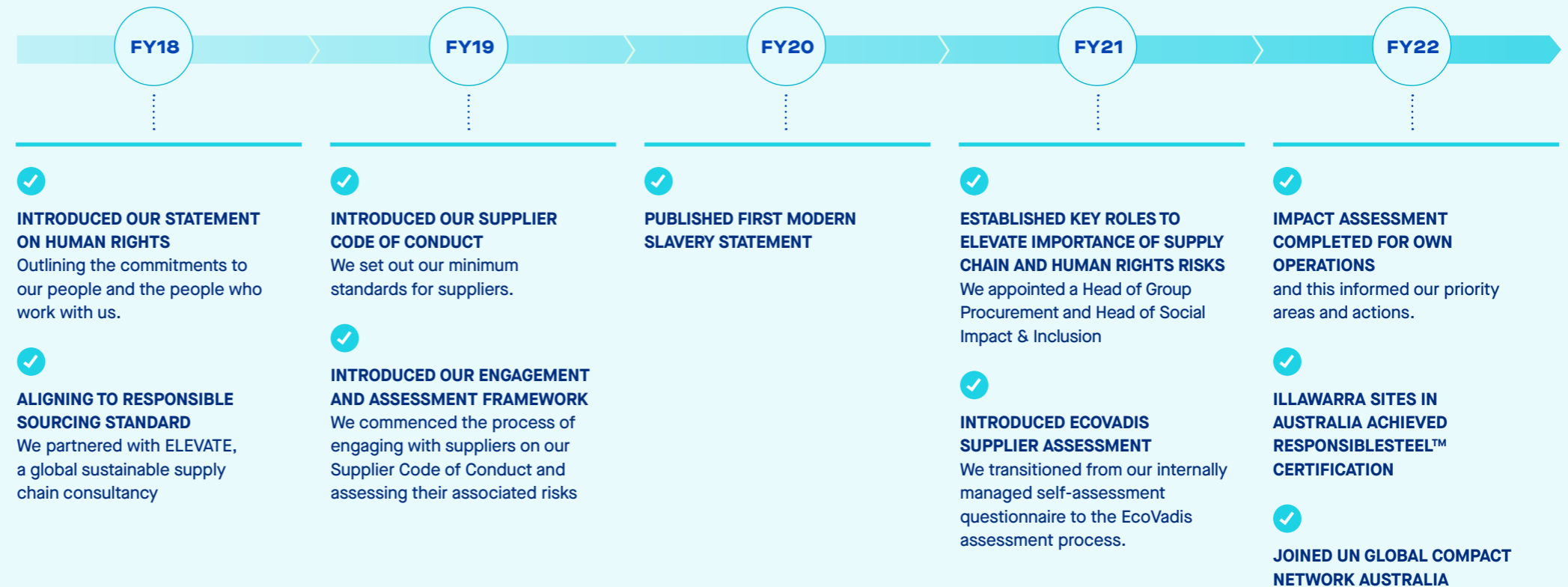
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During FY2022 we continued to undertake a number of activities to identify, assess and mitigate the modern slavery risks in our own operations and within our supply chain.

Key milestones in our journey include:



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Actions – operations

1. Approach

Following on from last year, our approach to assess and address modern slavery in our operations is based on a continuous improvement due diligence process.

The Head of Social Impact & Inclusion, Head of Group Procurement, and the Social Impact Steering Committee, in consultation with internal and external stakeholders, continue to oversee the due diligence process which meets risk assessment requirements. We understand that this is an iterative process that allows for learning and insights to be incorporated into a sustainable governance model.



OBJECTIVES

- Identify actual or potential adverse impacts
- Build awareness, understanding and buy-in from senior leaders
- Establish a process to identify, prioritise, remedy and track actions
- Develop an iterative process involving refinements of BlueScope's risk profile as more is learned
- Build capability across the business for local identification and management of issues

2. Progress and plan

FY2022 commitments	Progress
Human Rights risk assessment	✓
Review Human Rights Policy	✓
Increase human rights awareness	➤
Strengthen due diligence process	➤
Ongoing review of risk areas and learnings	➤
Establish Social Risk Network	✓

FY2023 plan
Review priority areas and risk assessment
Targeted worker voice survey deployed at own sites
Collaborate with joint venture partners regarding risk areas
Responsible sourcing education program <ul style="list-style-type: none"> » targeted at traders » targeted at onsite contract services (security and cleaning)
Explore grievance mechanisms for suppliers, contractors and sub-contractors
Develop remedy approach

✓ Completed in full
 ➤ Work in progress

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3. Detailed actions for FY2022

Conducted a human rights impact assessment for our own sites which has informed our priority focus areas as; hours of work, wages and benefits, forced labour, harassment and abuse and grievance mechanisms.

An internal assessment was completed during the year, starting with the human rights that were most relevant to our business. The Social Impact Steering Committee mapped the severity to affected party for each human right, against the risk exposure for BlueScope businesses, and then validated these findings with the Executive Leadership team (ELT), Remuneration and Organisation Committee, Board, and other internal stakeholder groups such as the People Leadership Team and the Sustainability Council.

A digital dashboard was then developed to assist ELT, senior leaders, and Board committees to understand the risk profile and activities occurring across the group.

Established a due diligence process which includes ongoing review of business unit actions and continuous improvement.

The Social Impact Steering Committee meets each month to review the actions and commitments based on the priorities mentioned above. The team discusses the progress of the plan, emerging issues, and effectiveness of actions.

Introduced the People and Payroll Governance Framework which strengthens our first- and second-line accountability for working hours, wages and benefits, and culture.

This Framework applies to BlueScope Steel Limited and its controlled entities. The Framework covers the roles, responsibilities, systems, and processes for controlling people and payroll information within BlueScope. As an Australian

listed corporation, BlueScope is required to comply with the Australian Securities Exchange listing rules and the various financial regulatory regimes in each of the countries in which we have a presence. The Framework supplements the broader framework that BlueScope has implemented to manage risk in our business. That broader Integrated Risk Management Framework encompasses risk management policies, standards, and the principles for applying the three lines of accountability model within BlueScope.

Businesses are required to provide quarterly reports for review by the second line function.

Completed a series of Modern Slavery Roundtable discussions for all BlueScope senior leaders, and conducted business unit workshops on specific country risk areas (~200 employees participated in these sessions).

In order to build internal awareness and education on modern slavery, external speakers were invited to facilitate a number of roundtable discussions with senior leaders. The focus in all discussions and workshops was to create the space for learning, questions, and dialogue.

Reviewed and updated our Human Rights Policy.

The revised Human Rights Policy was updated to reflect our progress and commitment to human rights. It was expanded to include expectations of all business partners (in addition to supply chain), and also outlines our approach to due diligence for the first time. It clearly states that "We support the elimination of all forms of forced or compulsory labour and the abolition of the worst forms of child labour and require our partners to do the same."

The revised policy draft was shared with ELT and leaders from each business unit for a comprehensive review and collaboration process.

Established a Social Risk Network across all geographies to build internal capability deep into the business units.

A nominated team of employees from each country/region was invited to join the Social Risk Network throughout the year. This team was given additional training on social risk (which included human rights and modern slavery) and access to regular risk reports specific to their geographical area. The team meets once every two months to discuss these reports and share comments and concerns.

Improved internal reporting mechanism for all employee grievances, and managed via third-party speak up hotline.

Employee grievances have historically been managed by each business unit and reported each quarter. In FY2022, a third-party managed system was introduced for all grievances to facilitate real-time data management and offer more insights and analytical capability.

Modern Slavery Roundtable series was conducted to raise awareness amongst senior leaders of the global trends, and how to identify issues.

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Actions – Supply chain

1. Approach

BlueScope is committed to a sustainable supply chain that is free from labour abuse including modern slavery. Because of the spread of our business model, with multiple business units and operations across many countries, our responsible sourcing program is overseen at a corporate level, but supplier engagement and collaboration are managed at a business unit level. During the year a new Supply Chain Sustainability Manager role was established to ensure the ongoing development of our responsible sourcing program across BlueScope.



Our responsible sourcing approach includes

Policies, Standards and Controls

- » We have a Supplier Code of Conduct and a Responsible Sourcing Standard which are discussed with suppliers during contract negotiations and onboarding.

Supplier Segmentation and Assessments

- » We use a segmentation model (Refer Appendix 2) to prioritise suppliers for engagement and assessment based on overall risk and leverage.
- » Our local management and procurement teams engage with suppliers on assessments, third party audits and corrective actions.

Collaboration

- » We collaborate with our suppliers to understand the layers of our shared value chain and the modern slavery risks within it.
- » We collaborate across the industry and with NGOs to improve our understanding of the issues relating to modern slavery in our supply chain and to contribute to shared solutions.
- » We are a founding member of ResponsibleSteel™ and, through them, work with other steel industry and civil society members to develop appropriate and ambitious industry

standards, including for responsible sourcing. This work seeks to influence adoption of responsible business practices in the steel industry and to leverage the broader steel industry to influence adoption of responsible business practices in our key input material supply chains.

Education

- » Ongoing internal education across all procurement teams on responsible sourcing and modern slavery risks.
- » Ongoing internal education to senior business leaders on modern slavery and the risks within our supply chain and the potential impact of our business decisions.
- » Engagement with suppliers on the importance of responsible sourcing and the risks of modern slavery within our shared value chain.

Ongoing improvement

- » We continually review and update our responsible sourcing program and the assessment of modern slavery risks within our supply chain based on changes in the local and global markets; for instance, the ongoing evolution of the COVID-19 pandemic and its impact in specific countries, global shipping issues and global conflicts.

2. Progress and plan

- » New contracts are assessed for modern slavery exposure risk and, where relevant, include terms to address these risks.
- » We require key suppliers to monitor their compliance with the Supplier Code of Conduct.
- » We seek declarations of compliance with Conflict Minerals regulations from relevant suppliers.
- » Local procurement teams have responsibility for supplier engagement and assessment processes and for partnering with suppliers to improve collective performance. Our teams make use of a due diligence database and alert tools to help them monitor the conduct of suppliers and to support our supplier assessment work. As most of our suppliers are local to the communities and countries where we operate, our conduct documents and assessment tools have been translated into local languages.
- » Major new supply arrangements are overseen by a steering committee comprising the Chief Financial Officer and Chief Legal Officer together with representatives from relevant businesses. This includes a review of the due diligence processes completed, any modern slavery risk assessments and a plan for further engagement with the supplier on modern slavery risk management and/or corrective actions.
- » Allegations of misconduct or breaches of our performance standards by suppliers can be reported through our independent Speak Up hotline, for investigation by our Ethics and Compliance function.

We continued to use our assessment framework in FY2022 with our engagement being targeted to Priority 1 and 2 suppliers, certain specialised suppliers (those that are lower risk, but where we have higher leverage) and suppliers that have been deemed high-risk based on previous assessments.

Our primary assessment tool is EcoVadis but for some smaller suppliers we continue to engage with them to complete our Self-Assessment Questionnaire (SAQ). In FY2022 we were unable to conduct any third-party on-site audits due to the

ongoing impact of COVID-19 restrictions and lockdowns; however, we will have a significant focus on these in FY2023 and will also be engaging with a number of tier 2 suppliers based in medium to high-risk countries to undertake an onsite audit.

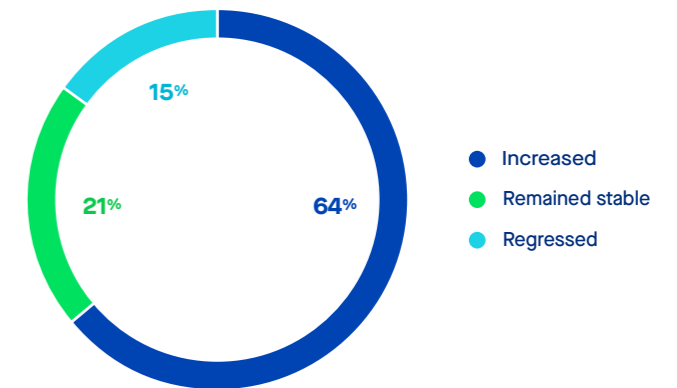
We understand that although our segmentation and assessment processes give us visibility of the responsible sourcing and modern slavery risks across tier one of our supply chain, without ongoing improvement of our suppliers' own human rights risk management programs and controls across their own supply chains there will be no reduction of risks across our shared supply chain.

For this reason, we have increased our focus on engagement with suppliers to develop and deliver on Corrective Action Plans and plan to continue this in FY2023 and beyond.

Depending on their assessment score, suppliers are required to undertake a re-assessment within 12 months (High risk score), 18 months (Medium risk score) or 24 months (Low risk score). We have seen consistent improvement in suppliers that have been re-evaluated.

Where a supplier's assessment score has remained stable or regressed, we actively work with them on corrective actions and will target specific poor performers for on-site audits in FY2023.

EcoVadis SUPPLIER ASSESSMENT SCORE IMPROVEMENT



Business unit	FY2022 Assessment target	FY2022 Assessment completed	Assessment rating		
			High risk score	Medium risk score	Low risk score
Australian Steel Products	33	48	0	14	34
North Star	15	23	0	9	14
Building Products Asia and North America	63	49 ⁵	3	9	37
New Zealand & Pacific Islands	6	8	0	1	7
Buildings and Coated Products North America	11	11	1	2	8
Total	128	139	4 3% of assessments	35 25% of assessments	100 72% of assessments

⁵ Supplier assessments in our China business were significantly impacted by lockdowns and travel restrictions. The supplier engagement process in China is focused on face-to-face engagement for education and understanding. There will be an increased focus in FY2023.

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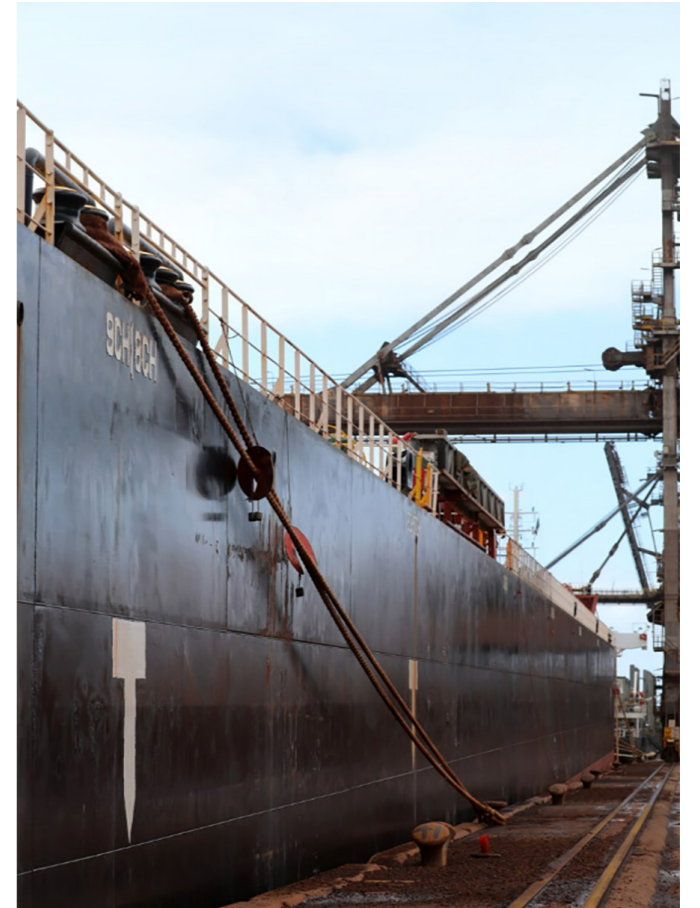
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3. Detailed actions for FY2022-23

- » We continued to use our risk-based supplier prioritisation process to engage with suppliers to identify and address risks within our shared value chain.
- » We continued our supplier assessment program and expanded use of independent assessments. One hundred and thirty-nine assessments were completed in FY2022: 115 EcoVadis assessments, 22 self-assessment questionnaires and 2 desktop assessments. Refer page 20 for the assessment rating breakdown.
- » We collaborated with buying agents (traders) to ensure that they were aware of our high responsible sourcing expectations and to identify any risks related to the suppliers that they sourced from for supply to BlueScope.
- » We continued to undertake checks on raw and recycled materials providers and include them in our ongoing assessment model.
- » We work with suppliers to identify any use of subcontractors and to ensure they understand that our Supplier Code of Conduct identifies that subcontractors might have a higher risk of labour abuse or modern slavery. These suppliers are included in our assessment model.
- » Every vessel chartered directly by BlueScope continues to be governed by our Charter Party Agreement. This document incorporates key clauses to cover anti-bribery and corruption, sanctions, modern slavery, and our Supplier Code of Conduct displaying BlueScope's commitment to sustainable sourcing practices.
- » We use the Rightship risk management tools to support our vessel selection process, helping to drive standards in the industry beyond compliance.
- » We engaged with key suppliers, such as Akzo Nobel, PPG, Blackwoods, Dell and Cargill, to better understand their own responsible sourcing programs.
- » We continued our partnerships with ELEVATE and EcoVadis to support our risk management approach and supplier assessments. We continued to use ELEVATE's up-to-date risk analytics information, and our local business knowledge, to prioritise our engagement with suppliers (refer Appendix 2 for details of supplier segmentation and assessment model).
- » We are an active member of the Be Slavery Free Fight Club and the World Steel Association Sustainability Reporting Expert Group. We also attended many other relevant presentations and events focused on human rights and modern slavery within supply chains.
- » BlueScope continues to play a leadership role in the ResponsibleSteel™ standard and certification programme, which aims to set a performance and transparency benchmark for the responsible sourcing and production of steel. This year we participated in developing further ResponsibleSteel™ requirements to improve supply chain transparency, chain of custody monitoring and responsible performance.
- » We became a member of the UNGC Network Australia's Modern Slavery Community of Practice.



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FY2023 Plan

Over the coming year we will continue to adapt to changing risks and challenges, and will focus on the following program of work:

Policies, Standards and Controls

- » We are developing a Responsible Sourcing Policy and a graphic representation of our Responsible Sourcing Framework to make it easier for our own people, and our suppliers, to understand our commitments and what we require of them.
- » We will review and update our Supplier Code of Conduct and our Responsible Sourcing Standard. The revised documents will be shared with our suppliers once they are published.

- » Develop additional responsible sourcing procedures to strengthen the responsible sourcing controls across our businesses.

Education

- » Implement formal internal responsible sourcing training pathways in our FutureScope learning platform.
- » We will continue to roll out focused internal and external training on high-risk procurement sectors.

Assessments

- » Focus on third-party on-site audits especially for suppliers that have previously received low scores through the EcoVadis or SAQ assessment process, our highest risk suppliers, and some tier 2 suppliers in medium and high-risk locations.

- » Review and update our supplier segmentation model to ensure we are focusing on the high risk parts of our supply chain.

- » Develop a supplier site evaluation guidance for BlueScope team members who visit supplier sites. This will add an additional layer to our assessment program with roll out beginning in FY2023.

Corrective actions and supplier collaboration

- » Continue to collaborate with suppliers to ensure they understand the risks of modern slavery within our shared value chain and the importance of responsible sourcing.
- » Where suppliers score poorly on assessments, we will continue to

work with them on an agreed Corrective Action Plan to improve labour and human rights controls within their own operations and within their supply chain.

- » We will collaborate with key suppliers to understand the layers of our shared value chain and we will work with them on remedy actions should instances of modern slavery be identified.

Integration

- » The integration of acquired businesses into our responsible sourcing program including supplier evaluation and assessment, education, and collaboration.



CASE STUDY

SECURITY SERVICES CHECKS IN OUR MALAYSIAN OPERATIONS

In Malaysia, security firms have found it challenging to secure local security guards, due to the high turnover rate, which in turn has created challenges for their customers including NS BlueScope Malaysia (NSBSM). The best alternative has been to engage security firms that deploy a mixture of local and migrant workers as security guards (noting that the Malaysian Government allows only Nepalis to be engaged as foreign migrant workers in the security services industry). As a result, there is risk of exploitation of these migrant workers, including risk of recruitment fees being paid by the workers to the security service providers and passports being withheld.

Our Malaysian Country Procurement Team collaborated with our security suppliers to ensure the just treatment of security guards working on BlueScope sites. The following controls were agreed and implemented:

- » No recruitment fees are collected by the Malaysian security firms from the security guards.
- » The security firms pay for the flights of the migrant security guards (and these are not paid back by the security guards). This includes flights home when they finish the work.

- » All Nepali migrant security guards engaged by NSBSM are given secure lockers (for which they retain the key) for safe keeping of their personal items including identity documents.
- » Overtime is limited as per applicable legislation and paid at the legislated overtime rate.
- » Every security guard has at least one 24-hour period of rest per week.

An ongoing audit and verification process will be implemented to ensure these controls remain in place for all security service companies across the NSBSM business in Malaysia.

This important engagement was possible due to the increased awareness and capability of our local procurement teams to address modern slavery risks in their local context.

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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.

Measuring the effectiveness of an organisation's actions in identifying and managing modern slavery risks is inherently complex. We consider an effective response to modern slavery as one that identifies current and emerging risk areas and helps us to prevent and address any involvement in harm.

We understand that raising awareness is key in addressing the risk of modern slavery. We recognise the need to continue building capacity among our employees to identify risks of modern slavery and the actions required to respond effectively.

 Refer to **Governance and policies** for more details on the governance structure.

BlueScope regularly reviews the implementation and effectiveness of our modern slavery risk management program by:

- » Measuring the number of suppliers screened and the improvement in risk scores
- » The number of grievances received and outcomes
- » Training records
- » Reviewing policies, codes, and frameworks (refer to Policy Framework)
- » Reviewing our potential risks and impact assessment every month with the Social Impact Steering Committee, and identifying emerging issues
- » Ensuring our Speak Up policy is shared with all business partners and employees
- » Conducting our internal audit program and targeted on-site assessments
- » Collaborating with suppliers to understand the level of awareness of the risks of modern slavery through the layers of our shared value chain and to put controls in place to reduce those risks. We have seen an increase in commitment from our key suppliers on responsible sourcing as reflected in the consistent reduction in Labour and Human Rights risks for suppliers that have been reassessed through our supplier assessment program.



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As outlined under *Our structure, operations and supply chain* section, BlueScope has a number of owned and controlled entities globally.

This Statement has been prepared in consultation with our key teams that collaborate across the Group to deliver on our human rights commitments, including identifying modern slavery risk, assessment and management processes for our own operations and supply chain. These teams include:

Social Impact & Inclusion

The Social Impact Steering Committee

Sustainability

Procurement

Risk

Legal

Ethics & Compliance

This Statement presents material sustainability information in line with generally accepted disclosure frameworks and BlueScope's corporate approach for reasonable and responsible disclosure.

The Statement was also reviewed and approved by BlueScope's Executive Leadership Team (which includes all reporting entities), and the BlueScope Board after consultation with the Board Risk & Sustainability Committee. The approach for this year's modern slavery statement and the final draft of this report have been shared for comment, discussion, and approval.



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Appendix 1 – Mandatory criteria reference table

The table below identifies where information relating to each of the mandatory reporting criteria under the *Australian Modern Slavery Act 2018* can be found.

<i>Australian Modern Slavery Act 2018</i> reporting criteria	BlueScope FY2022 Modern Slavery Statement response by page
(a) Identify the reporting entity and (b) describe the structure, operations and supply chains of the reporting entity	Pages 03-08
(c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Pages 14-15
(d) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Pages 16-22
(e) Describe how the reporting entity assesses the effectiveness of such actions	Pages 09-13, 23
(f) Describe the process of consultation with any entities that the reporting entity owns or controls. In the case of a reporting entity covered by a statement under section 14 – the entity giving the statement	Pages 09-13, 24
(g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Pages 26-27



If you have any questions about this statement, or any concerns about any form of modern slavery within BlueScope's supply chains or organisation, please contact sustainability@bluescope.com or BlueScope's Speak Up Line.

BlueScope's Speak Up Line is an externally managed service available 24 hours a day, 7 days a week. Reports to the Speak Up Line may be made anonymously. BlueScope treats all concerns raised seriously and in strict confidence. You can make a report via web: bluescopespeakup.deloitte.com.au or by email bluescopespeakup@deloitte.com.au

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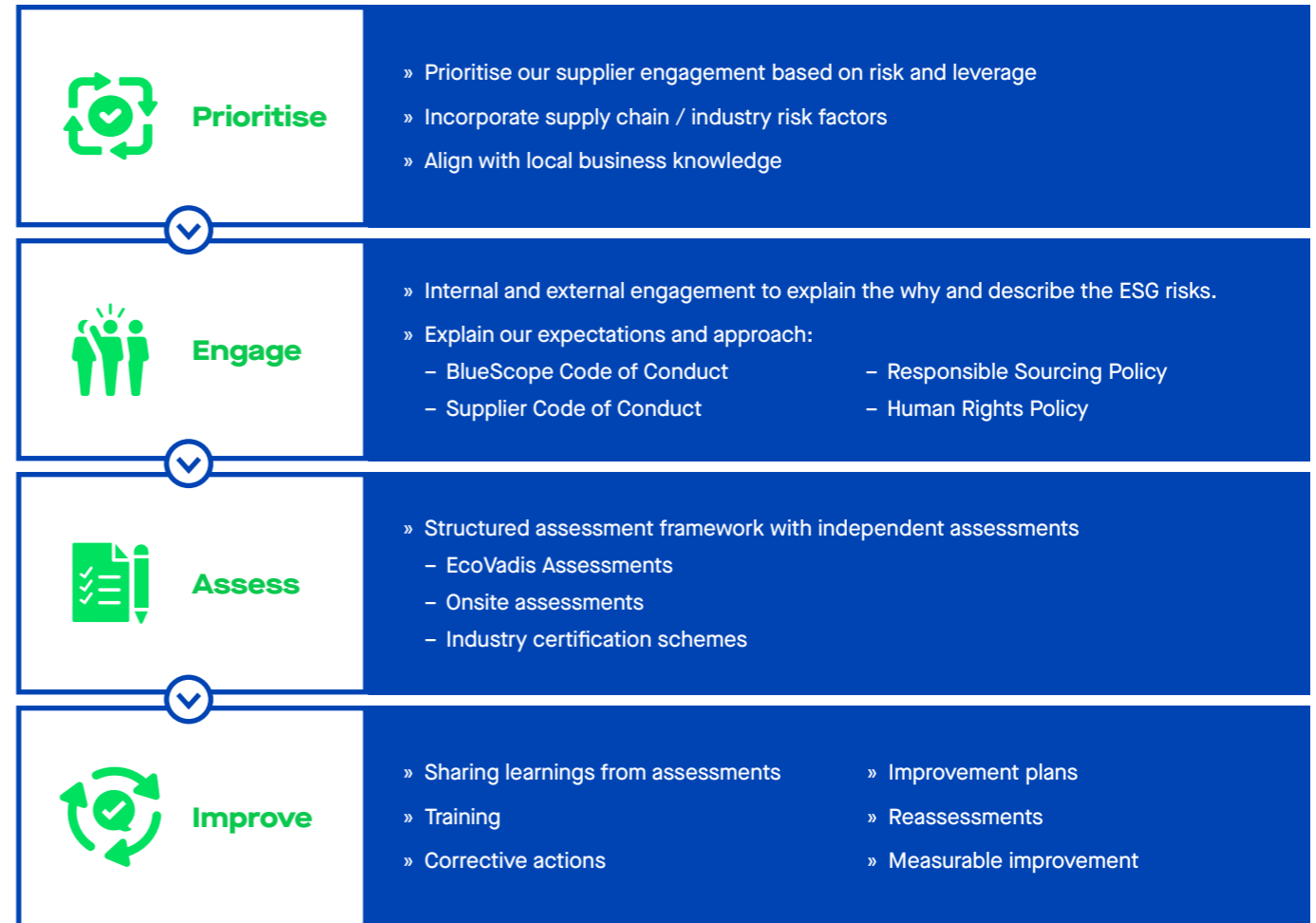
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Appendix 2 – Supplier segmentation and assessment model

BlueScope's approach is to foster responsible business practices and uphold human rights through supplier engagement, risk assessment and improvement.

We use a structured supplier segmentation process as the basis for prioritising suppliers for engagement and assessment.



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Supplier prioritisation	Assessment process	Assessment outcomes
Supplier data is sourced from each business unit and analysed based on category, source country and leverage.	<p>Desktop Assessment Where relevant, desktop due diligence will be completed on potential suppliers before engagement.</p>	<ul style="list-style-type: none"> » Accept – the business will be engaged as a potential supplier. » Unacceptable – no further engagement with the business.
Suppliers categorised as Priority 1 and 2 are then prioritised for engagement and assessment.	<p>Self-Assessment Questionnaire (SAQ) Smaller suppliers complete our SAQs which are then assessed against our standardised criteria.</p>	<ul style="list-style-type: none"> » Low risk – ongoing engagement with supplier on responsible sourcing » Medium risk – ongoing engagement with supplier on corrective actions and responsible sourcing » High risk – suppliers will be asked to complete an EcoVadis assessment and/or an onsite audit.
	<p>EcoVadis Assessment We use EcoVadis as our primary assessment tool and in FY2022 115 EcoVadis assessments were completed.</p>	<ul style="list-style-type: none"> » Low risk – ongoing engagement with supplier on responsible sourcing » Medium risk – ongoing engagement with supplier on corrective actions and responsible sourcing » High risk – suppliers will be asked to complete specified corrective actions and a follow-up EcoVadis assessment, and/or an onsite audit.
	<p>Third-party onsite audit Where there is a medium to high risk of human rights, labour or modern slavery exploitation third-party social compliance audits are undertaken.</p>	<ul style="list-style-type: none"> » Post audit follow-up and Corrective Action Plan management » Ongoing engagement » Escalation of significant issues



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