

BlueScope

Modern Slavery

Statement

FY2025

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About this statement

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

We are guided by Our Purpose and Our Bond, and together they 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, which supports us in choosing to do what is right.

BlueScope is also committed to responsible sourcing practices, seeking products and services that are produced responsibly and create long-term environmental, social and economic value for all stakeholders. We require key existing and potential suppliers to demonstrate that how they operate aligns with BlueScope's expectations and to commit to our Supplier Code of Conduct.

This joint Modern Slavery Statement is made by BlueScope Steel Limited ACN 000 011 058 and the following entities which we have determined are reporting entities pursuant to the Australian **Modern Slavery Act 2018 (Cth)**, each of which is incorporated in Australia and is subject to Group-wide policies relevant to modern slavery risks and which are owned and controlled by BlueScope Steel Limited.

BlueScope Steel Ltd ACN 000 011 058
BlueScope Steel (AIS) Pty Ltd ACN 000 019 625
BlueScope Distribution Pty Ltd ACN 096 380 068
Orrcon Manufacturing Pty Ltd ACN 113 998 066
BlueScope Steel Americas Holdings Pty Ltd ACN 073 776 271
BlueScope Steel Asia Holdings Pty Ltd ACN 102 832 100
BlueScope Steel (Finance) Ltd ACN 098 842 338

This Statement describes the actions that BlueScope Steel Limited and its owned and controlled entities, including the reporting entities above, have taken during FY2025 to identify, assess and address modern slavery risks. Except where otherwise stated, references to 'we', 'us', 'our', 'Group' and 'BlueScope' refer collectively to the reporting entities above, other BlueScope owned and controlled entities but excludes the non-operated Tata BlueScope Joint Venture (JV). The JV is not majority owned or solely controlled by BlueScope. Instead the JV is jointly controlled by BlueScope and its JV partner, Tata Steel, and operates using its own policies and processes rather than those of BlueScope.

This statement was approved by the Board of BlueScope Steel Limited on behalf of all reporting entities on 15 August 2025 and is signed by Mark Vassella (Managing Director and CEO) on [page 3](#).

Australian Modern Slavery Act 2018 reporting criteria	BlueScope FY2025 Modern Slavery Statement response by page
(a) Identify the reporting entity and (b) describe the structure, operations and supply chains of the reporting entity	Page 2, 8-10
(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	Page 4, 6 , 14
(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	Page 4-7 , 13
(e) Describe how the reporting entity assesses the effectiveness of such actions	Page 5 , 15
(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	Page 15
(g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Page 11-12

Modern Slavery Statement for the year ended 30 June 2025 as at 1 September 2025.
BlueScope Steel Limited ABN 16 000 011 058

A message from our Managing Director & CEO



BlueScope remains fully committed to all the applicable United Nations Guiding Principles for Business and Human Rights.

Mark Vassella

Managing Director and Chief Executive Officer, BlueScope Steel Limited

BlueScope's FY2025 Modern Slavery Statement details our commitment and progress on identifying, taking action, and mitigating the risks of modern slavery, human trafficking, and other forms of forced labour in our operations and supply chains. Importantly, the Statement highlights how effective the past 12 months of activities have been, based on a thorough review.

The Company continues to mature its approach in managing modern slavery risks whilst assessing and addressing these risks with a long-term perspective.

BlueScope is focused on sustained improvements that go beyond compliance, and a key component of this evolving framework is how we share learnings across our business and apply them to drive continuous improvement.

As you read through this year's Statement, you will see how we integrate human rights practices into our existing processes across all our regions and focus on high-risk areas for maximum impact.

This approach is demonstrated in several of the year's highlights:

- Strengthening controls around the management of contractors on our sites—an important step in ensuring that all individuals working with, or on behalf of BlueScope, are treated with dignity and respect.
- Undertaking proactive modern slavery risk assessments in Vietnam and Indonesia, demonstrating our commitment to identifying issues before they arise and improving conditions across our operations and supply chain.
- Developing a responsible sourcing good practice guide and beginning the process of using EcoVadis Sustainable Procurement Maturity assessments across our business units for an independent review of our process maturity and opportunities for improvement.

This work further reflects the foundation of Our Purpose and Our Bond, which continues to guide how we engage with our diverse workforce, customers, suppliers, and communities across the 15 countries in which we operate.

I would like to thank everyone involved across the BlueScope Group who has contributed to the evolution in our ways of working to address modern slavery risks in our operations and supply chain.

A handwritten signature in blue ink that reads "M Vassella". The signature is fluid and cursive, written on a light blue background.

Mark Vassella

Managing Director & CEO

The approach and progress outlined in BlueScope's FY2025 Modern Slavery Statement demonstrates our commitment to all the applicable United Nations Guiding Principles on Business and Human Rights and brings to life how we seek to live Our Purpose and Our Bond, strengthening communities for the future in the 15 countries in which we operate.

Our Progress in FY2025

Our FY2025 program of work

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

During FY2025, the Social Impact Steering Committee completed an annual internal assessment of social impact risk topics, including those related to modern slavery. The process mapped the severity to the affected party for each human right, against the risk exposure for our industry and BlueScope businesses. Our findings did not materially change from the prior assessment, and therefore our current priority areas remain unchanged.

Social impact priorities



We've set long-term goals for each priority area and provided a summary of our key actions to date below.

Priority area	Long-term goal
Wages and benefits	All workers, including contractors, are to receive full and timely payment of wages and benefits
Hours of work	Safe and healthy working conditions
Forced labour	Eliminate all forms of forced and compulsory labour
Harassment and abuse	Respectful workplace free from harassment and abuse
Grievance mechanisms	Access to effective grievance mechanisms

Key areas of action by reporting period



Our Commitments, Actions and Measures of Effectiveness

BlueScope strives for continuous improvement as part of our commitment to respect and uphold human rights across our business practices and supply chain.

The following goals have been used to measure the effectiveness of our outcomes in FY2025

We have assessed our effectiveness against four aspirational goals (further details on page 15).

1. **Empower** our people to identify modern slavery risks
2. **Integrate** human rights practices into our existing processes
3. **Prioritise** our focus on high-risk areas for maximum impact
4. **Engage** third-parties to build capability and alignment to BlueScope values.

Our FY2025 commitments	FY2025 Actions	Measure of effectiveness
Increase policy awareness and understanding with key stakeholders in human resources and procurement	<ul style="list-style-type: none"> • Training and regular communications with procurement teams to improve understanding of relevant policies and best practice. • Webinars, conferences and direct engagement with contractors and suppliers to align with BlueScope standards. • Worker labour rights and grievance mechanism helpline communicated to all contractor workers as part of induction exercise. 	<p>Engage and Empower Improving policy understanding assists with clarity and accountability.</p> <p>Promoting message clarity and consistency through varied communication strategies.</p>
Establish a cross functional community of practice for Contractor Management	<ul style="list-style-type: none"> • Completed proactive assessment of contractor controls in Indonesia and Vietnam. • Developed an annual social compliance stewardship review for South East Asian (ASEAN) countries. • Social dialogue program for all contract workers in Vietnam, Indonesia and Malaysia. • Commenced a cross-functional collaboration group to work on the Contractor Code of Practice. 	<p>Integrate and Empower Ongoing storytelling to maximise the learnings from priority locations, and improve controls at the organisation level.</p> <p>A focused annual stewardship review will ensure more effective controls in ASEAN.</p>
Communicate and operationalise the key principles and expectations relating to working hours	<ul style="list-style-type: none"> • Communicated expectations of working hours for all workers by highlighting the new wording in our Code of Conduct. • Held supplier engagement events and Human Rights Day webinar. • Reviewed timekeeping systems in Indonesia, Vietnam and Malaysia during the reporting period. 	<p>Engage and Prioritise Embedding a regular cadence for supplier events, with participation increasing and driving robust discussion on the importance and value of responsible sourcing.</p> <p>Enhanced oversight and governance of contractor working hours in high-risk regions.</p>
Develop a maturity model for responsible sourcing best practice and use this to implement process improvement within our procurement teams	<ul style="list-style-type: none"> • Developed and implemented a good-practice guide for responsible sourcing and commenced EcoVadis Sustainable Procurement Maturity Assessments across our prioritised businesses. • Completed supplier third-party assessments in all regions. • Established Responsible Sourcing working groups in Australia, North America and ASEAN regions. 	<p>Integrate and Empower Assessing the maturity of our processes against a common framework sets the standard and allows business units to prioritise their improvement plans, given their unique operating environment.</p>

We will continue to challenge our effectiveness to ensure our metrics are relevant and fit for purpose for our business.

Our commitment to continuous improvement in FY2026

- Set defined governance standards to ensure consistent oversight of contract worker labour conditions at all operational sites.
- Complete a detailed human rights assessment with input and collaboration across all regions where we operate.
- Continue to embed a coordinated approach to supply chain labour exploitation risks across our businesses.

Own Site Audits

Our exposure to modern slavery risks varies across sites and teams. Three additional assessments have been completed at our operations during FY2025, the table below highlights the findings and themes.

Inherent risks in our operations

Our findings and governance reviews continue to demonstrate there are specific areas or practices within the Group's own operations that we consider carry heightened risk of modern slavery. These are described below, with particular regard to more vulnerable populations, such as migrant workers:

- **Contractor Management** - internal controls to manage labour providers assessed as needing improvement.
- **Working hours** - reasonable monitoring and limitation of working hours.
- **Wages and benefits** - accurate and timely payment (including paid holidays).
- **Health, Safety & Environment** - minor non conformances at site.
- **Other Labour issues** - associated with employment contract or contractor understanding of their rights.

Our approach remains centred on safeguarding people and ensuring concerns are heard and addressed.

Findings from FY2024 and FY2025 Audits and Assessments					
	Contractor Management	Working Hours	Wages & Benefits	Health, Safety & Environment	Other Labour Issues
Malaysia (2025)			●		
Indonesia (2025)	●	●	●		
Vietnam (2025)	●		●		●
Thailand (2024)	●	●	●		●
China (2024)		●			
Mexico (2024)		●		●	●

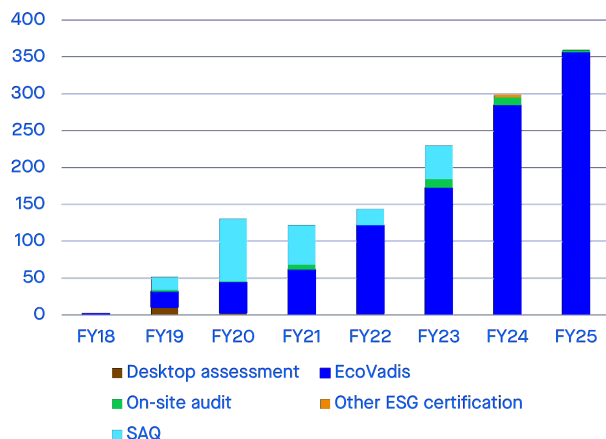
We continue to proactively conduct audits and assessments in countries where inherent modern slavery risks are high, and we are committed to sharing and applying learnings to improve our processes and controls.

Supplier Assessments

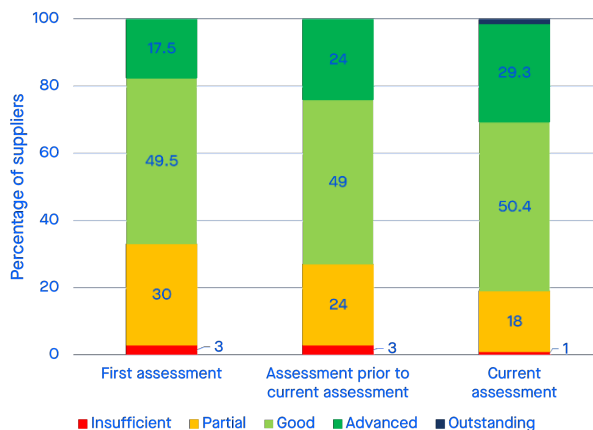
During FY2025, 336 suppliers were assessed, including EcoVadis assessments and supplier on-site audits. As shown below, the number of supplier assessments completed each year has grown consistently since the introduction of our responsible sourcing program.

Additionally, over 365 of our suppliers have had multiple EcoVadis assessments through their sustainability journey. The chart below shows the overall improvement in maturity scores for these suppliers.

Assessments over time (some suppliers may have been assessed more than once in a year)



EcoVadis Supplier Assessment – Improvement in Maturity Score



Continuous improvement in action

Our FY2025 Stories

Supplier Third-party audit program

Our third-party audit program remains an important part of our responsible sourcing program. We focus on the quality of engagement and work extensively with suppliers to support them on understanding the audit findings and embedding improvement opportunities identified into their business. During FY2025, one of the third-party audits we undertook involved a second tier supplier.

The audit required our procurement team to engage with our direct supplier and their supplier on our reasons for requesting an audit and its purpose, including the importance of actioning any improvement opportunities identified. The audit found that the audited company’s foreign migrant workers had previously paid recruitment fees but these had been reimbursed within the last 12 months.

Another audit of a tier-two supplier conducted in late FY2024 found that the company’s foreign migrant workers had paid recruitment fees in their home country and paid a monthly fee to a local agent in the country that they were working in. In FY2025, the BlueScope procurement team continued to have extensive engagement with our direct supplier to explain the significant negative impact recruitment fees have on the lives of workers and why BlueScope does not accept workers within our supply chain paying recruitment fees regardless of whether they are legal within the countries that our suppliers operate. After several months of collaboration, the second-tier supplier confirmed that they would implement a reimbursement program and had updated their recruitment program to ensure that no new foreign migrant workers would pay recruitment fees.

BlueScope Thailand Audit and Remediation progress

As reported in the FY2024 Statement, after completing a third-party assessment of contract workers, our NS BlueScope Thailand business responded holistically to a number of labour rights findings. Throughout FY2025, immediate action was taken to implement a comprehensive remediation plan, alongside measures to address both internal controls and supplier process gaps.

At the heart of the remediation plan was a strong commitment to safeguarding workers’ wellbeing. A phased approach was adopted with cross-functional collaboration embedded to every stage to ensure robust checks and balances.

Since the initial triage, enhanced governance controls and improved working practices have been introduced. This includes operational changes such as pre-shift handover mechanisms and communication, clearer entitlements for personal and annual leave, elimination of employment-related payment deduction, strengthened grievance mechanisms and supplier capability building through summit and social impact education. Additionally, efforts are underway to consolidate labour providers to assist with greater oversight and consistency.

Contractor Management System launched in ASEAN	Collaboration to increase awareness of modern slavery
<p>Refer to Our Commitments, Actions and Measures of Effectiveness on page 5.</p> <p>The ASEAN team launched a digital Contractor Safety Management System that allows us to effectively on-board and manage contractors on our sites. Since launching in Vietnam in 2021, it has been rolled out to Thailand and Malaysia.</p> <p>The real-time tracking system provides immediate and accurate data on third-party contractors, their presence at our worksites helps track working hours which improve efficiency for better workforce management and enhanced compliance with labour laws.</p> <p>The team has an improved contractor management experience with this system and will be looking forward to sharing this experience more broadly with other BlueScope sites.</p>	<p>In FY2025, the Australian-Government funded ASEAN Australia Counter Trafficking program (ASEAN-ACT) supported us with two important knowledge sharing engagements in our ASEAN business. In November 2024, they presented at a Bonding for Responsible Sourcing supplier event that our NS BlueScope Thailand team hosted. ASEAN-ACT presented on Mitigating Risks of Human Trafficking and Forced Labour in Operations and Supply Chain. After the presentation there was lively discussion from the suppliers on risks within their supply chain and what actions they take to ensure they focus on human rights within their own businesses.</p> <p>In January 2025, ASEAN-ACT presented to a diverse group of BlueScope employees from our NS BlueScope business on human trafficking and forced labour. The presentation also included a reminder to our employees of our policies and commitments to human rights and responsible sourcing.</p>

Our Structure

BlueScope is one of the leading manufacturers in painted and coated steel products for building and construction, employing ~16,500 people at over 160 sites in 15 countries. The Group manufactures and markets 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.

We directly employ people across manufacturing, processing, distribution, sales channels and functional teams. Our operations range from small product storage sites to our core steelmaking facilities in Australia, New Zealand, and North America. Headquartered in Melbourne, Australia, BlueScope Steel Limited is listed on the Australian Securities Exchange. The Melbourne Corporate office employs around 175 people. BlueScope has a number of owned and controlled entities, structured into four business segments.

Australia

We are Australia's largest steel manufacturer, employing around 7,100 people at approximately 100 sites. The operations are a mix of large manufacturing plants, rollforming facilities and distribution centres, producing and selling quality branded products primarily for the Australian building and construction industry.

North America

We operate five businesses across North America, employing around 4,700 people at North Star BlueScope Steel, BlueScope Recycling and Materials (BRM), Buildings North America, BlueScope Coated Products and NS BlueScope North America. North Star is a low-cost regional supplier of hot rolled coil, based in Ohio, serving automotive, construction and manufacturing end-use industries. North Star is highly efficient, operates at industry leading utilisation rates and is strategically located near its customers and in one of the largest scrap regions of North America. BRM is a full-service, ferrous scrap metal recycler with three processing facilities in the region where North Star operates. Buildings North America, BlueScope Coated Products and NS BlueScope North America collectively focus on the large non-residential construction industry, supplying quality engineered buildings systems and high-quality metal coated and painted steel building products. NS BlueScope North America is a joint venture with Nippon Steel Corporation (NSC), with operations on the West Coast of North America. BlueScope holds a controlling interest and therefore consolidates the business.

Asia

We have an extensive footprint across Asia, employing around 3,050 people across the region. Our operations in Thailand, Indonesia, Vietnam, Malaysia, India and China all primarily serve their domestic building and construction industries in each of these countries. BlueScope operates in partnership with NSC across Southeast Asia and with Tata Steel in India. Both are joint ventures, with BlueScope controlling and therefore consolidating the South East Asian joint venture with NSC, and jointly controlling and therefore equity accounting the joint venture with Tata Steel.

New Zealand & Pacific Islands

Our New Zealand Steel business, in Glenbrook, is the only steel producer in New Zealand, with operations also including the Waikato North Head iron sands mine, the Pacific Steel long products business and the Pacific Islands businesses. In the region, we employ around 1,600 people, and produce a range of flat and long steel products, primarily for domestic use.

Our Workforce

~16,500

Total employees

25%

Total women in BlueScope

46%

Women in Executive Leadership team

50%

Women on Board of Directors

How We Do Things at BlueScope

Our global supply chain

BlueScope is a significant purchaser of goods and services in the countries in which we operate, with a total procurement spend of approximately \$13 billion in FY2025. Across all our businesses we continue to focus on domestic supply chains that support local jobs and economic development.

Our Approach

Our procurement and supplier management processes are primarily managed by procurement teams in each business unit or country of operation, with the exception of some strategic categories managed at a Group level.

BlueScope is committed to a sustainable supply chain that is free from labour abuse, including modern slavery. Our approach to responsible sourcing is governed by Group-wide standards and expectations. The Head of Group Procurement is responsible for strategic oversight and development of the Group's responsible sourcing program. Business unit procurement teams are responsible for identification and management of responsible sourcing risks, and for the engagement, assessment and collaboration processes with suppliers to mitigate these risks.

Our businesses are required to assess their suppliers based on importance to our business and sustainability risk factors (including modern slavery). We use industry and country risk data as well as knowledge from our local teams to gain an understanding of ESG risk, with a heavy focus on human rights and modern slavery indicators. We make use of digital tools to help us do this at scale, covering over 6000 suppliers across BlueScope and more than 90 percent of spend in each business unit. We recognise that there may be greater risk in the lower levels of our supply chain and have, in some specific cases, mapped lower tier suppliers and risks.

We prioritise high potential risk suppliers for meaningful engagement and assessment activities, with a strong emphasis on building understanding, alignment and implementation of improvement opportunities. Assessment processes include EcoVadis ratings (or other equivalent independent assessment) and onsite audits.

We expect existing and potential new suppliers to demonstrate that the way they operate aligns with BlueScope's expectations, and to adhere to BlueScope's Supplier Code of Conduct. However, it is important to note that we do not walk away from suppliers facing genuine difficulties in achieving compliance. Our aim is to ensure that any such difficulties are addressed, and practices implemented to prevent similar issues from happening again. Ongoing non-compliance with our expectations may lead BlueScope to seek alternate supply.

Our in-bound supply chain can be grouped into three main categories

1. Raw and production materials used in the goods that we manufacture

- BlueScope operates three steel making facilities: In Australia, New Zealand and North America. The primary raw materials used at these facilities are coal, iron ore, limestone and scrap steel. Most of the raw materials that we buy are sourced directly from the mining companies that extract them, with only a small percentage being purchased through reputable traders. This ensures we have clear visibility of the source of our extractive raw materials and the responsible sourcing risks related to them.
- Production materials are used to produce the finished steel products, such as COLORBOND® steel, ZINCALUME® steel and TRUECORE® steel, and include coating metals, polymer coatings and process chemicals. For the majority of these products we have had long-term partnerships with our suppliers and a deep understanding of their human rights and responsible sourcing practices.
- Most of our raw and production materials are purchased through multi-year contractual agreements which include anti-bribery and corruption (ABC) and modern slavery clauses.

2. External steel feed and downstream accessories

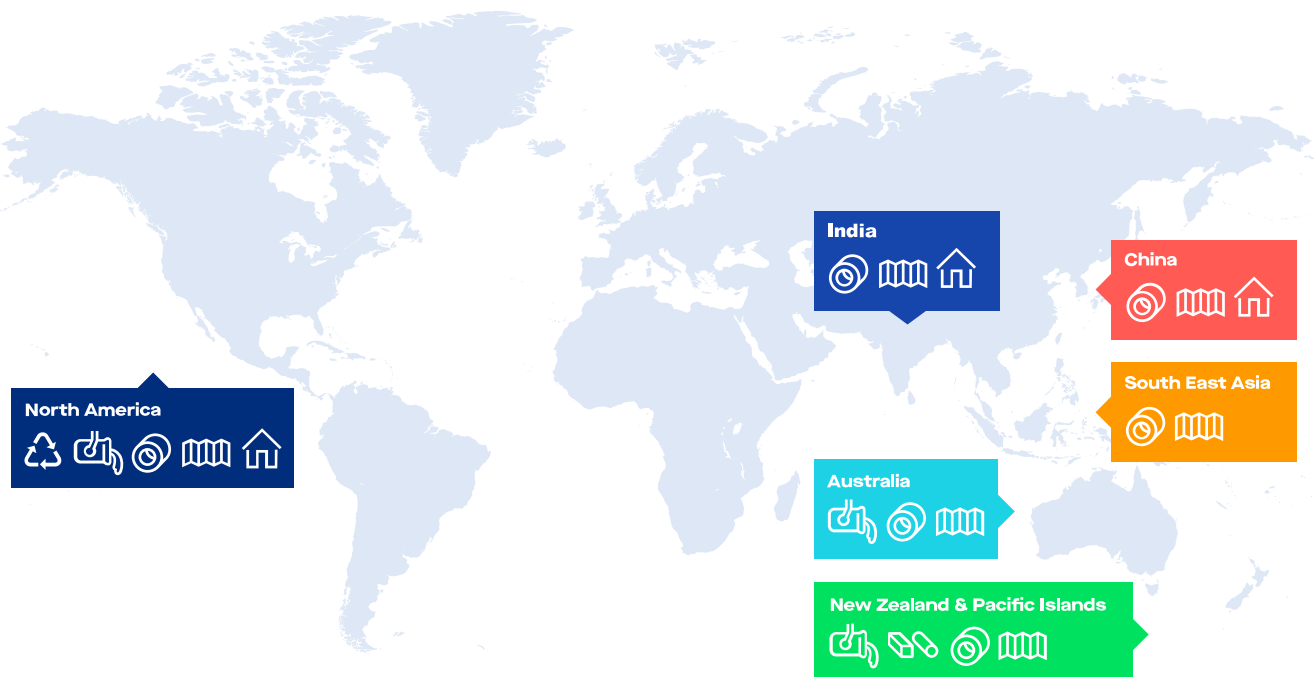
- Our business units that do not manufacture steel, purchase steel for use in the goods and services that they offer to market. As with our raw and production materials suppliers, we have had long-term partnerships with the majority of our external steel feed suppliers.
- Downstream accessories and other trading goods are finished goods purchased for sale in our downstream and buildings businesses. These products are purchased through a variety of contracts and purchase orders, which include our ABC and modern slavery clauses.

3. All other goods and services







- BlueScope procures a diverse range of other goods and services including labour, freight and logistics, packaging, technology, utilities, etc. These goods and services are purchased through a variety of contracts and purchase orders, which include our ABC and modern slavery clauses.

Due to the geographic spread of our business, with business units and operations across many countries, our responsible sourcing program is overseen at a corporate level, and supplier engagement and collaboration are managed at a business unit level.

Our global operations



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

Country data - for our operations and major sourcing countries

Country	BlueScope operations	Top six sourcing countries (spend %)	Top six sourcing countries - major supply categories	Country human-rights risk rating ¹
Australia	●	38%	Raw materials, Services, Logistics	7.5 ● Low risk
USA	●	35%	Raw materials, Steel, Production materials	6.5 ● Low risk
Japan		4%	Steel	7.1 ● Low risk
China	●	4%	Steel, Trading Goods, Production materials	4.3 ● High risk
New Zealand	●	4%	Raw Materials, Services, Freight	7.8 ● Low risk
South Korea		2%	Steel, Production materials, Raw materials	6.6 ● Low risk
Indonesia	●			4.7 ● Medium risk
Malaysia	●			5.1 ● Medium risk
Thailand	●			4.5 ● High risk
Vietnam	●			3.7 ● High risk

1. Source: EcoVadis country human rights risk rating (January 2025)

Governance and policies

Governance

- Our commitment to sustainable governance is led from our Executive Leadership Team (ELT), with clear accountabilities for oversight and implementation of our sustainability commitments, including those related 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 ELT 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 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 for BlueScope. We understand that this is an iterative process that allows for learning and insights to be incorporated into a sustainable governance model.
- The People and Payroll Governance Framework provides a formal structure for first and second line reviews of payroll compliance and working hours. This framework is managed by the Head of Social Impact & Inclusion and reports to the Remuneration and Organisation Committee bi-annually.
- A 'learn from each other' collaborative approach is used to identify and manage 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.

Risk management framework

BlueScope is committed to an integrated approach to managing current and emerging risks, including our modern slavery risks. We aim to have a proactive risk culture, supporting 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 business unit 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 is monitored periodically, and consolidated metrics reported to the Risk and Sustainability Committee of the Board.

Our Group Risk Appetite statements set out the fundamental principles that govern the way we will execute our strategy and the level of risk we are willing to take.

Risks associated with human rights, including modern slavery are reviewed annually. Human rights, including modern slavery, are included as a specific component in the Group Risk Appetite statement, under Ethics and Compliance. 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.



Policies

Our Policies communicate BlueScope's expectations and guide employees to make good decisions that are consistent with Our Bond, business strategies and objectives. Our Policies and other Guiding Documents are designed to be clear, concise and accessible. The policies listed below are the core policies that communicate our human rights and modern slavery expectations and are publicly available on our corporate website and internal communication channels.

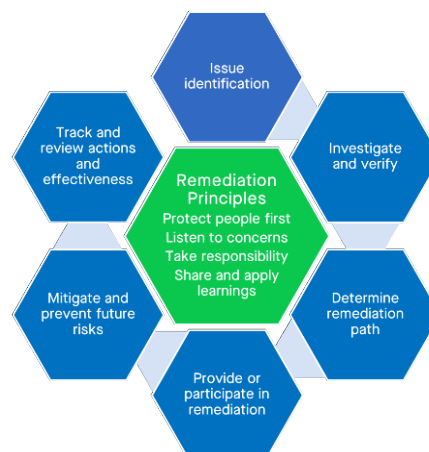
Policy	How this supports our modern slavery governance
Our Bond	Our Bond outlines the guiding principles for strengthening our business. It identifies our key stakeholders; guides how we work together and conduct ourselves. It sets the foundation for our culture and outlines the expectation for our people to be proactive and considerate in looking out for the best interests of others.
Our Code of Conduct, How We Work	Our Code of Conduct sets out what we expect of every single employee as we all strive to live Our Purpose and Our Bond. It sets out commitments in relation to human rights, including modern slavery, as detailed under our Human Rights Policy. We expect employees, contractors, consultants and anyone we do business with to adhere to this Code of Conduct.
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.
Speak Up Policy	This policy contains information on how to raise a grievance, and emphasises the protection of those who do. The Speak Up channel was established under this policy and serves as our primary global grievance mechanism. It is accessible to all stakeholders, including workers in the supply chain, and allows for anonymous reporting. This channel can be used to raise concerns about modern slavery.
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 our products and services to market. This includes, our expectation regarding labour conditions such as: child labour, forced labour, harassment and abuse, freedom of association, wages and benefits and working hours.
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 building a workplace where all individuals are safeguarded; because everyone deserves to feel secure and valued.
Responsible Sourcing Policy	This policy outlines our commitment to embed and promote ethical and responsible sourcing across BlueScope and our supply chain. Our approach to responsible sourcing aligns with the best practices outlined in the UDHR's principles, the UNGC's Ten Principles and the United Nations Sustainable Development Goals. Together with the Responsible Sourcing Framework, Supplier Code of Conduct and responsible sourcing standards and procedures, it sets out our internal commitments and expectations of our suppliers.

Procedures

Our approach to addressing modern slavery



Our remediation procedure and principles



We listen and act on all grievances

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

BlueScope's global Speak Up channel is an externally managed service available 24 hours a day, 7 days a week and can be accessed in various ways including 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. During FY2025, 269 reports were received across the various channels (excluding business misconduct); this includes **205** people related grievances and **64** reports relating to labour rights and modern slavery (further details on modern slavery grievances are outlined below).

SpeakUp

Grievance channel	Number of reports in FY2025	Nature of grievances from contract workers
Global Speak Up channel (confidential)	6	Labour rights issues such as employment contract and wage accuracy for contract workers and employees
Malaysia - social dialogue	23	Working hours, wage accuracy, leave entitlements, living conditions
Indonesia - proactive self-audit	6	Wages and benefits, working hours and under-age workers (for third-party)
Indonesia - social dialogue	4	Labour rights including wages and benefits
Vietnam - social dialogue	5	Wage accuracy and leave entitlement
Thailand - feedback grievance box	20	Wages and benefits
TOTAL	64	

Remediation in practice

BlueScope has an established and effective incident response process which includes an outline of roles and responsibilities, first response protocols and preparing a fit for purpose action plan. This process guides us through a modern slavery incident when required. Senior leaders are trained in this group-wide process, with annual role playing and refresher training at business unit management teams.

The Social Impact Steering Committee is responsible for establishing an appropriate incident management plan for all significant matters relating to modern slavery or human rights and

will escalate to the Managing Director and CEO and the Chief People Officer if a protocol is enacted. Our remediation procedure (as outlined on page 12) highlights four key principles to guide our decision making; protect people first, listen to concerns, take responsibility and share and apply learnings. We expect this process to continually evolve as we learn through our experience.

The table below provides a summary of remediation efforts implemented within our operations and supply chain for contract workers.

Key topics	Key audit findings in FY2025	Summary of remediation steps
Working hours	Some suppliers did not accurately match hours worked with wages paid, causing discrepancies in contractor compensation.	Ensure workers are reimbursed for unpaid work. Review contracts to ensure no fixed rates (if overtime applies), and establish clear roles and responsibilities within sites for checking compliance.
Wages and benefits	Workers incurred deductions from their pay that were not authorised (or part of our contract with vendors). Annual leave entitlements not communicated effectively to some contract workers.	Ensure personal protective equipment (PPE) costs are not borne by contract workers and reimburse any such expenses, and reconcile annual leave entitlements with suppliers. Commence ongoing education with workers in ASEAN region on their rights and ensure all contractors have a copy of their employment contract.
Recruitment fees	Supplier audit revealed that migrant workers had previously paid recruitment fees to a third-party.	Audit identified that the supplier had previously reimbursed recruitment fees and workers confirmed no ongoing deductions were being made.
Working conditions	Contract workers not being provided with adequate PPE for the task (by suppliers). Accessibility of rest areas for all workers not meeting the needs of everyone.	Provided uniforms to all workers, including rain coats. Improved rest areas in some locations.

Modern slavery risks in operations and supply chain

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

Potential risks in our operations

During FY2025, the Social Impact Steering Committee completed its annual internal assessment of risk topics (including modern slavery). The process mapped the severity to the affected party for each human right, against the risk exposure for our industry and potential impact to BlueScope businesses. Our findings did not materially change from the prior assessment in FY2024, and therefore, our current priority areas remain unchanged. We have, however, outlined more specific aspects of these focus areas as priorities.

Outlined in Table 1, there are specific categories or practices within the Group's operations that we consider carry a heightened risk of modern slavery. In addition, BlueScope has identified the following key priorities for operations (and our supply chain), and we are working on actions to ensure ongoing continuous improvement, with particular regard to more vulnerable populations, such as migrant workers:

Hours of work – reasonable monitoring and limitation of working hours

Wages and benefits – accurate and timely payment (including paid holidays)

Forced labour – all forms of forced labour (with a focus on foreign contract workers)

Grievance mechanisms – accessibility of mechanisms for employees, labour hire and contractors

Harassment and abuse – prevention and response to harassment in the workplace.

We are working to ensure that new and existing controls are in place to monitor and evaluate BlueScope's ongoing exposure. Detailed actions are outlined on [page 5](#).

We acknowledge that, without proper controls, we may be **directly linked** to or **contribute** to modern slavery through the use of exploited labour at our sites through our third-party contractor workforce.

BlueScope has non-operated JVs (as described on page 15) and investments where (without proper controls) we may be **directly linked** to modern slavery through the use of exploited labour. We continue to engage with all JV partners on modern slavery risk management.

Leadership awareness and understanding are key to a successful ongoing process for identifying and managing modern slavery risks and we are continuing to build internal capability regarding modern slavery due diligence.

Potential risks in our supply chain

BlueScope has a complex supply chain with 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 there may be higher risks of modern slavery in the lower tiers of our supply chain, where we have less visibility and influence.

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 these.

Table 1 - Description and approach for the potential high-risk categories.

High risk category	Operational or Supply Chain	Description of potential exposure and approach	Risk factors ¹
On-site contracted services and labour hire	Operational	BlueScope utilizes services such as security, cleaning and catering, as well as labour hire in our operations. In high risk geographies, these services have a high risk of labour rights non-compliances and modern slavery. BlueScope's Supplier Code of Conduct applies to all contractors, including subcontractors, and details our expectations relating to labour and human rights. Targeted on-site audits 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 High risk geographies Vulnerable populations
Raw and recycled materials	Supply Chain	Supply chains of raw and recycled materials are complex and, in some 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 geographies
Shipping and logistics	Supply Chain	Medium to high risk of labour exploitation and modern slavery in shipping and logistics. These suppliers are prioritised for assessment. Every vessel chartered directly by BlueScope continues to be governed by our Charter Party Agreement. We engage with RightShip ² to support our vessel selection process helping to drive industry standards beyond compliance.	<ul style="list-style-type: none"> Vulnerable populations High-risk business model

1. Risk factors originally drawn from the Modern Slavery Risks, Rights & Responsibilities guide (commissioned by the Australian Council of Superannuation Investors – ACISI) and reviewed and updated based on research and publications such as the Global Slavery Index 2023.

2. RightShip is a leading Environmental, Social and Governance (ESG) focused digital maritime platform, providing expertise in global safety, sustainability and social responsibility practices.

Effectiveness of our Actions

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

BlueScope is committed to maintaining effective systems to identify and proactively manage modern slavery risks in accordance with Our Bond and our regulatory obligations.

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. Where harm is identified, our first aim is to ensure these are remediated and that practices are put in place to prevent recurrence. We will continue to work with suppliers that demonstrate their commitment to this goal. We understand that raising awareness, building knowledge and increasing capacity are key to addressing the risk of modern slavery. We recognise the need to continue building capabilities of our employees to identify the risks of modern slavery and the actions required to respond effectively.

The following goals have been used to measure the effectiveness of outcomes in FY2025

We will continue to challenge our effectiveness and ensure our metrics are relevant and fit for purpose for our business. We have assessed our effectiveness against the following aspirational goals and the details of this review is outlined on [page 5](#).

- **Empower** our people to identify modern slavery risks
- **Integrate** human rights practices into our existing processes
- **Prioritise** our focus on high-risk areas for maximum impact
- **Engage** third parties to build capability and alignment to BlueScope values.

In addition, BlueScope continues to monitor a number of indicators as measures of effectiveness, such as; the number of suppliers assessed for ESG risk and improvement in risk and maturity scores, training records for relevant policies, codes and frameworks and the internal audit program and findings.

Consultation and approval

As outlined under **Our structure (page 8)**, BlueScope is comprised of a number of owned and controlled entities in **15 countries**.

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 the Social Impact Steering Committee, Social Impact & Inclusion, Sustainability, Procurement, Risk, Legal, and 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 ELT (which includes representatives of all reporting entities), and the BlueScope Board after consultation with the Board Risk and 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. The following table outlines our consultation approach.

Category	Wholly owned	Joint Venture / controlled	Joint Venture / not operated
Description	BlueScope owns 100% of the entity and has control	BlueScope owns less than 100% of the entity but has control	BlueScope owns less than 100% of the entity and either does not control, or jointly controls
Consultation	Regular engagement with Executive Leadership team (and business leaders) and annual briefing on Modern Slavery Statement	Regular engagement with Country business leaders and annual briefing on Modern Slavery Statement	Engagement and sharing of experiences. Annual briefing of Modern Slavery Statement
Due diligence	Ongoing due diligence through the Social Impact Steering Committee	Ongoing due diligence via the Social Impact Steering Committee	Request annual due diligence review and report
Tracking	Monthly tracking of actions via the Social Impact Steering Committee	Monthly tracking of actions via the Social Impact Steering Committee	Responsible sourcing teams engage with JV, and support board members with evaluation of changes in sourcing approach.

If you have any questions about this statement, please contact sustainability@bluescope.com

If you have concerns about, or reasonable basis to suspect, any form of modern slavery within BlueScope's operations or its supply chain, please contact us via one of BlueScope's Speak Up channels below. BlueScope treats all concerns raised seriously and in strict confidence. All Speak Up reports may be made anonymously.

BlueScope's Externally Managed Speak Up Hotline

Phone: 1800 052 122 (Toll Free)

Web: www.bluescopespeakup.deloitte.com.au

Email: bluescopespeakup@deloitte.com.au

Post: BlueScope Speak Up Hotline

Reply Paid 12628

A'Beckett St Melbourne

VIC 8006 AUSTRALIA

Speak Up directly to BlueScope

ethics@bluescope.com



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