Supplier Code of Conduct



This Code of Conduct sets out BlueScope's minimum standards for suppliers. We expect our suppliers to meet the expectations in this Code and to pass on these expectations to their own suppliers so that they are communicated through the supply chain.

Our Purpose

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

At BlueScope, we have a responsibility to one another, to our families, customers, shareholders, and the broader community, to build a sustainable business that contributes to protecting our future.

We recognise that 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.

Our Bond and Our Code of Conduct

At BlueScope we are guided by "Our Bond", a written expression of our values and principles that also reflects the importance of our customers, suppliers, our people, our shareholders, and the communities in which we operate. Our Bond, together with Our Code of Conduct (How We Work), guides our actions and decisions and supports us in choosing to do what is right.

Our Responsible Sourcing Framework

BlueScope is committed to sustainable sourcing practices, seeking products and services that are produced responsibly and create long-term environmental, social, and economic value for all stakeholders. We partner with businesses who share our values.

Our Responsible Sourcing Policy sets out our commitment to sustainable sourcing practices; and our Responsible Sourcing Framework details our approach to engaging our supply chain partners and the principles that we embrace and expect our suppliers to commit to. Our aim is to ensure that sustainability principles are embedded within our sourcing processes, including supplier selection, performance monitoring and ongoing cooperation.

Our Responsible Sourcing Policy is available on the BlueScope corporate website and our Responsible Sourcing Framework can be found in Appendix 1 of this Code.



Application of the Supplier Code of Conduct

This Code is applicable to all BlueScope suppliers and contractors, including their subcontractors. This Code applies to all workers¹, including, but not limited to, casual or temporary workers, workers of all genders and ages, and to both local and foreign migrant workers.

Suppliers are always required to comply with the applicable laws. If there are instances where laws are less stringent than this Code, suppliers are to uphold the expectations in this Code as part of BlueScope's business commitment to responsible sourcing.

Our Expectations of Suppliers

We will communicate our principles and expectations to suppliers and periodically review supplier alignment with our approach to responsible sourcing. We require our existing and new suppliers to:

 Demonstrate that the way in which they operate aligns with BlueScope's expectations, and to commit to the detailed guidance in this Supplier Code of Conduct.

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¹ Throughout this document 'worker/s' refers to any worker that provides services to a company regardless of whether they are employed directly or through a contractor or a subcontractor.





- Monitor and review their compliance with this Supplier Code of Conduct and to communicate to BlueScope any issues or challenges in their operations and supply chain.
- Comply with BlueScope processes that seek to assess compliance with this Supplier Code of Conduct. This includes responding to requests for information and may include site visits, online assessments, third party audits and corrective action plans.

When assessing the effectiveness of a supplier's approach to managing the risks addressed by this Code, we consider a supplier's size, country risk (inherent risk given their operating context), business activities and the nature of our relationship with them. Our expectation is that suppliers have adequate processes in place to manage the risks that are relevant to their business and supply chain.

Although we do not tolerate 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 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 until, and unless, there is any repetition. Ongoing noncompliance with our principles and expectations as communicated by us to a supplier may lead BlueScope to terminate the business relationship.

Should there be any questions regarding the Code of Conduct, suppliers are encouraged to contact their BlueScope Procurement representative.

Supplier Code of Conduct Development

Our Supplier Code of Conduct has been developed by internal subject matter resources and is supported by research and benchmarking against international governing frameworks, industry best practices, global assessment programs, and our peers and supply chain partners.

The Code is based on the following 5 guiding pillars:

- A. Business Ethics
- B. Labour and Human Rights
- C. Health and Safety
- D. Environment
- E. Community

The following guidance, standards and initiatives have been considered and incorporated into the development of this Code:

- Ethical Trading Initiative's (ETI) Base Code
- United Nations Global Compact's (UNGC) 10 guiding principles
- United Nations Universal Declaration of Human Rights' (UDHR) principles
- Responsible Business Alliance (RBA)'s Code of Conduct
- ResponsibleSteelTM International Standard
- United Nations Sustainable Development Goals (SDGs)
- International Labour Organisation (ILO) Standards

The following BlueScope documents guide and support this Code of Conduct:

- Our Purpose & Our Bond
- Code of Conduct, How We Work
- Statement on Human Rights
- Our Health, Safety, Environment and Community (HSEC) Policy
- BlueScope Responsible Sourcing Policy
- BlueScope Responsible Sourcing Framework

The most up to date versions of these documents can be found on the <u>BlueScope corporate website</u>.

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Code of Conduct Detailed GuidanceA. Business Ethics

Suppliers must have a robust governance framework in place supported by appropriate management systems. They must also maintain a high standard of integrity and transparency in all business interactions and comply with applicable laws wherever they operate. BlueScope does not tolerate bribery, corruption and unlawful practices and encourages reporting of any observed or suspected misconduct.

A1. Transparency

Suppliers maintain accurate, transparent records of business operations, permits and licenses. In relation to business integrity and ethics, social and labour conditions, health and safety in their operations, and environmental impacts, suppliers must operate in a transparent manner and be open to third-party assessments.

A2. Anti-Bribery and Corruption, and Sanctions

Suppliers must comply with all local and international laws and regulations of the countries in which they, and the BlueScope business that they supply goods and services to, operate. Suppliers must not commit, or become involved in, bribery or corruption of any form. Suppliers must set clear expectations on standards of business conduct, conflicts of interest and anti-bribery and corruption and provide training to workers to ensure awareness and promote compliance. Suppliers should have a mechanism for parties to report, and processes to investigate, any complaints relating to bribery or corruption.

A3. Management Systems

BlueScope believes that measuring, disclosing and being accountable for organisational performance can be a catalyst for driving sustainable business practices and improvement over time. Suppliers must have a quality management system (QMS) or processes to support and maintain governance, compliance requirements and to drive continuous improvements.

The management systems should include:

- Management team or senior manager accountability
- A statement on responsible sourcing commitments and practices
- A statement relating to workplace code of conduct and business practices
- Training, monitoring and evaluation of management processes.

A4. Knowledge of Material Impacts

BlueScope recognises that understanding the nature and extent of an organisation's key impacts is critical to managing and minimising those impacts. BlueScope encourages its suppliers to identify and effectively manage their material sustainability issues, including their impacts on people, the environment, communities, and their own supply chains.

A5. Information Security Controls

Suppliers must comply with all applicable privacy legislation and must have controls in place against the improper use, loss, unauthorised access to, use and disposal of BlueScope or third-party information (including personal identifiable information), assets, and property, including intellectual property.

Suppliers must report any potential data breaches relating to operations, intellectual property, and our information (including our employee information) to BlueScope promptly and collaborate with us on any potential investigations and remediations.

A6. Responsible Sourcing of Minerals

Suppliers of materials, or products, containing minerals must have processes to reasonably assure that the minerals (including, but not limited to, tantalum, tin, tungsten, gold, cobalt and mica) in the products they manufacture do not directly or indirectly finance or benefit groups that are perpetrators of serious human rights abuses. Suppliers must exercise due diligence on the source and Chain of Custody² of these minerals and make their due diligence measures available to BlueScope upon request.

A7. Provision of Security Services

Where security services are provided, either to BlueScope or a supplier's own business, then service providers shall adhere to the Voluntary Principles on Security and Human Rights or to the relevant local security laws should they be internationally recognised.

A8. Industry Sustainability Certification

BlueScope is committed to the ResponsibleSteel™ International Standard, the steel industry's first global multistakeholder site certification and product certification standard. The Standard requires BlueScope to commit to increasingly source from raw material suppliers that commit to responsible sourcing, disclose their sourcing locations, and demonstrate Chain of Custody.

All other suppliers are encouraged to participate in relevant, and robust, industry certification schemes to drive

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² Chain of Custody – Means a documented process that tracks the extraction, processing, and movement of materials through the layers of their supply chain.



robust Environmental, Social and Governance (ESG) standards.

B. Labour and Human Rights

Suppliers must support and respect the protection of internationally proclaimed human rights and ensure that they are not complicit in human rights abuses. BlueScope does not tolerate forced and compulsory labour and the worst forms of child labour³.

B1. Hiring, Disciplinary, and Termination Practices

Suppliers must have processes in place to ensure that hiring practices, employment contracts and termination practices are ethical and comply with applicable laws and regulations at a minimum.

Disciplinary actions regarding employment terms must be clearly defined and communicated to workers in a language that they understand. Suppliers who work with third-party labour hiring agents are expected to conduct their own due diligence to ensure that hiring and recruitment practices are ethical and that no recruitment fees and/or travel costs are paid by any workers.

B2. Young Workers and Child Labour

There must be no use, by the supplier or any of their contractors or sub-contractors, of child labour under the applicable legal minimum age or under the age of 15, whichever is higher. Where young workers (older than 15 but under the age of 18) are present, suppliers must comply with applicable regulations relating to adequate protection of young workers and their pursuit of educational development.

B3. Forced Labour

No forced, compulsory or involuntary, bonded or indentured labour, forced or compulsory prison labour (as defined in the <u>ILO CO29 Forced Labour Convention</u>), slavery or trafficked workers are to be used. This also includes the transportation, recruitment, and transferring of persons by means of threat, force, coercion, or fraud for labour services.

Some common indicators of forced labour are:

- Penalties
- Unfree/bonded labour
- Work and life under duress
- · Withholding of identification papers or passport
- · Impossibility of leaving employment

B4. Harassment and Abuse

Suppliers must ensure that no harsh or inhumane punishment or abuse, such as sexual, physical, verbal abuse, corporal punishment, or mental coercion occurs in

the workplace. Suppliers must provide training to all workers, including supervisors and managers, relating to maintaining a workplace free from harassment and abuse.

B5. Discrimination

Suppliers must commit to a workplace free of unlawful discrimination based on factors such as age, gender, sexual orientation, ethnicity, religion, disability, pregnancy, political affiliation or membership of an employee association or union. Workers must be provided with equal opportunity for employment.

B6. Freedom of Association

Suppliers must respect the right of workers to freedom of association and voluntary collective bargaining in accordance with local laws.

B7. Grievance Mechanisms

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

Suppliers should share the details of the <u>BlueScope Speak Up mechanism</u> to all workers directly related to the <u>BlueScope supplier</u> relationship. Where suppliers are still in the process of implementing their own confidential grievance mechanism, they should share the details of the <u>BlueScope Speak Up mechanism</u> with all workers involved in the production of goods or services that are supplied to <u>BlueScope</u>.

See "Remedy and Grievance Mechanisms" section for more guidance on Grievance Mechanisms.

B8. Wages and Benefits

Suppliers must pay legal minimum wage (including overtime premiums and mandated benefits) for all workers, or the wages and benefits agreed within an applicable agreement or employment contract (whichever higher).

B9. Working Hours

Suppliers must have processes to ensure that workers work no more than the maximum working hours, including overtime, according to applicable laws and industry standards. Where no applicable local laws exist the supplier must meet the requirements of the <u>ILO Hours of Work (Industry) Convention (No. 1) of 1919</u>. Workers must have a weekly rest period of at least 24 consecutive hours every 7 days.

C. Health and Safety

Suppliers must uphold the wellbeing, health, and safety of all workers in the work environment and take appropriate

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³ As defined in the International Labour Organization's (ILO) Convention No. 182.



measures to ensure that workers are provided with adequate protection against occupational injury and illnesses.

Suppliers should work collaboratively with supply chain partners to understand each other's needs regarding health, safety, and wellbeing and to implement sustainable, effective, and practical controls to eliminate hazards and reduce risks associated with workplaces, products, and services. This includes understanding how each supply chain partner's processes, operations and products may have an impact on the wellbeing, health, and safety of each other (including customers) and members of the public.

All suppliers working at, or visiting, BlueScope sites are expected to follow our Health, Safety, Environment and Community (HSEC) procedures.

C1. Occupational Health and Safety (OH&S) Management

Suppliers must have adequate systems and processes in place to effectively manage OH&S risks and opportunities. Senior management must have overarching accountability for OH&S. Responsibilities must be clearly defined OH&S and standards must be in place and should include:

- Consultation arrangements, including all workers, and where they exist, workers' representatives, having the opportunity to raise health and safety opportunities or concerns and have them addressed through a consultative process.
- Processes to effectively identify hazards and manage health and safety risks as far as reasonably practicable, utilising the hierarchy of control⁴. This should include management of the risks associated with interactions between supply chain parties and members of the public (for example: all parties in the supply chain adequately packing product to allow for safe transportation).
- Processes for responding (recording, investigating, and taking action) to all incidents (including near misses, and all injuries and illnesses).
- Return to work processes that ensure injured workers receive the care and treatment necessary to support recovery and get back to work.

C2. Industrial Hygiene

Suppliers must have appropriate measures in place to ensure that the work environment is clean, safe, and hygienic. Industrial Hygiene risk is to be managed as far as reasonably practicable, taking into account the hierarchy of control. The supplier will provide well-maintained, fit-for-purpose personal protective equipment (PPE). Workers must not be charged for PPE.

C3. Health and Safety Training

Suppliers must provide training to all workers (including contractors) on health and safety considerations relating to the work they are undertaking so that they are competent for their role. This includes training on hazards which may affect other parties in the supply chain or members of the public. This includes understanding the hazards and how the risks are being controlled. Examples include (but are not limited to) working at heights, working with machinery, securing material on vehicles, working around mobile equipment, working with hazardous chemicals, fatigue management and the correct usage of PPE.

C4. Fire Safety Controls and Emergency Preparedness

Suppliers must establish, implement, and maintain processes needed to prepare for and respond to potential emergency situations.

Suppliers must maintain fire safety protocols and equipment according to legal requirements and regularly conduct evacuation training and drills to implement fire safety responses and emergency egress.

C5. Sanitation, Food and Accommodations

Workers (including contractors and sub-contractors) must have access to clean drinking water and access to sanitary food preparation, storage, and eating facilities. Suppliers must have safe, appropriate, and suitable toilet facilities for the number of, and gender breakdown of, workers.

Where accommodation is provided for workers, the accommodation is clean, safe (gender-specific where applicable) and hygienic.

C6. Health and Safety Communication

Suppliers should provide relevant health and safety information to workers in a language/s that can be understood by all workers. Safety signs and cautions are placed appropriately throughout the site where required.

D. Environment

Suppliers must implement controls and initiatives to minimise the environmental impacts of their operations, promote greater environmental responsibility, and actively seek technologies and remedies that improve environmental performance.

D1. Environment management processes

Suppliers must have adequate processes to support and maintain environmental compliance, including all valid permits and licences related to environmental impacts.

D2. Waste management

Suppliers must monitor waste produced onsite and take measures to minimise waste. Where hazardous

controls from the highest level of protection and reliability through to the lowest and least reliable protection.

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⁴ The hierarchy of control is a system for controlling risks in the workplace. It is a step-by-step approach to eliminating or reducing risks and it ranks risk



substances are produced, suppliers must dispose of hazardous waste safely, responsibly, and according to legal requirements.

D3. Emission to Air, Land and Water

Where applicable, suppliers must ensure that they emit to air, land, and water according to legal requirements and have relevant permits for these emissions. This also includes amenity and community disturbance impacts such as odour and noise.

D4. GHG emissions and Energy

Suppliers should report and monitor greenhouse gas (GHG) emissions resulting from its operations, in alignment with globally acceptable standards and frameworks.

- Where suppliers are liable under an emission limiting regulatory scheme (e.g. carbon pricing regulations, regional emission trading schemes) in its regions of operation, ensure that the relevant regulatory requirements are adhered to.
- If operating an energy intensive process, suppliers should take measures to track energy consumption and actively seek cost-effective measures to reduce energy consumption, and where possible, increase the use of low emission or renewable energy.
- Suppliers are requested to share the GHG emissions associated with the raw and processed materials (extraction, processing, production, and transport) and other applicable products and services provided to BlueScope.

D5. Water

Suppliers are encouraged to preserve community water sources. If operating a water intensive process, suppliers must evaluate and report on the impacts and potential risks of their water use on the local environment and communities, including:

- Monitoring water sources and taking measures to reduce the usage of freshwater.
- Monitoring the quality of water that is discharged and ensuring that this is done according to legal requirements.

Suppliers operating in regions with High or Very High baseline water stress (as defined by the World Resources Institute's (WRI) Water Risk Atlas tool, <u>Aqueduct</u>) or local water restriction mandates, should have controls in place to support their water efficiency.

D6. Hazardous Materials and Chemical Management

Suppliers are encouraged to undertake programs to reduce the use and inclusion of hazardous materials⁵ in the goods that they produce. For materials used to manufacture BlueScope products, declarations on hazardous materials, substances of concern and other problematic ingredients are required. We encourage suppliers to work with us to reduce the use of hazardous and problematic ingredients.

Suppliers must monitor the inventory and use of chemicals (hazardous and/or flammable substances). Where such chemicals are used, suppliers must exercise chemical safety measures and provide regular training to all workers and supervisory staff on safe handling, storage and usage of chemicals, chemical spill protocols, and appropriate disposal of chemicals. Appropriate safety signage must be prominently displayed in all areas where chemicals are used and stored.

D7. Circular Economy

Suppliers of goods should take steps to embed resource efficiency and circular economy principles within their manufacturing processes and ensure that, as far as possible, products can be reused, repaired and/or recycled at the end of their life.

We encourage suppliers to work with us and with suppliers across their supply chain to innovate to increase percentages of recycled input materials, reduce wastage (such as in packaging and obsolete parts) and ensure that resources used in products are not lost to landfill.

D8. Natural Environment, Biodiversity and Cultural Heritage

Suppliers are encouraged to conduct business in a way that protects the natural environment, biodiversity, and cultural heritage. Examples of considerations include, but are not limited to:

- Implementing controls to reduce the impact on the local environment, biodiversity and cultural heritage of new projects and developments.
- Focusing on initiatives that improve the natural environment and promote biodiversity for existing operations such as planting wildlife corridors or rehabilitation waterways.
- Consider environmental, biodiversity and cultural heritage impacts across your supply chain when sourcing goods and services.

E. Community

BlueScope recognises the benefit to communities through our engagement with Indigenous organisations, social enterprises, the disadvantaged and other community-based groups. BlueScope encourages its suppliers to do likewise and manage their operations to contribute to the communities in which they operate.

E1. Local and Inclusive Employment

Suppliers should have programs in place to maximise local and inclusive employment including the employment of Indigenous peoples and people with disabilities.

the environment. This could be because of the material by itself or interaction with other materials.

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⁵ A hazardous material is any item or agent (biological, chemical, radiological, and/or physical) that could cause harm to humans, animals, or



E2. Local and Inclusive Procurement

Suppliers should have programs in place to maximise local and inclusive procurement throughout their operations.

E3. Minimise Negative Impacts

Suppliers must seek to avoid, mitigate, and remediate any potential negative impacts and risks arising from its activities.

Remedy and Grievance Mechanisms

BlueScope recognises the importance of grievance mechanisms to responsible business practices. The United Nations Guiding Principles on Business and Human Rights (UNGP) define grievance mechanisms as any routine process through which grievances concerning business-related human rights abuse can be raised and remedied.

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).

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 principles detailed below.

The UNGP has established effectiveness criteria for operational-level grievance mechanisms below:

- 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 basing on principles of non-discrimination, equity, accountability, empowerment, and participation.
- Source of continuous learning Drawing on relevant measures to identify lessons for improving the mechanism and preventing future grievances and harms

Examples of internal grievance mechanisms:	Examples of external grievance mechanisms:
Suggestion boxes	Ethics Line
Open door policy / open	Facilitated dialogues
dialogue	Audits with worker
Meetings between workers	interviews
and management	Worker surveys
Worker surveys	Phone / app / web-based
Phone / app / web-based	helplines
helplines	

Speak Up/Conduct Hotline

BlueScope provides a hotline service managed by a third party for employees, suppliers, contractors/sub-contractors and concerned members of the public as a mechanism to confidentially raise misconduct concerns.

As well as being a confidential reporting line, reporters can also choose to lodge their Speak Up reports anonymously.

If you have identified conduct that may not be in compliance with the requirements detailed in this Code or if you have identified breaches against the Code or suspect any other misconduct related to BlueScope, please:

- contact your BlueScope Procurement representative;
- email a confidential report through to BlueScope's Ethics & Compliance team at Head Office in Australia: ethics@bluescope.com; or
- report it through the BlueScope Speak Up mechanism using one of the methods outlined here.

For any questions relating to this Supplier Code of Conduct, please contact your BlueScope Procurement representative.

At BlueScope we are committed to fostering a culture of speaking up when something isn't right and protecting those that do.



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Appendix 1: Responsible Sourcing Framework



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Appendix 2: References

- BlueScope's Speak Up Hotline: https://australia.deloitte-halo.com/whistleblower/website/BlueScope
- Ethical Trading Initiative's (ETI) Base Code: https://www.ethicaltrade.org/eti-base-code
- International Labour Organization Standards: https://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/working-time/lang--en/index.htm
- ResponsibleSteelTM International Standard: https://www.responsiblesteel.org/
- Responsible Business Alliance Code of Conduct: http://www.responsiblebusiness.org/code-of-conduct/
- United Nations Global Compact's (UNGC) 10 guiding principles: https://www.unglobalcompact.org/what-is-gc/mission/principles
- United Nations Universal Declaration of Human Rights' (UDHR) principles: http://www.un.org/en/universal-declaration-human-rights/
- United Nations Guiding Principles on Business and Human Rights: https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf
- Voluntary Principles on Security and Human Rights: https://www.voluntaryprinciples.org/
- World Resources Institute: https://www.wri.org/



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