SSA – Credit 3.3 Procurement OH&S Assessment

BLUESCOPE RESPONSE AS SUPPLIER

September 2023

General information

This document has been developed by BlueScope in response to Credit 3.3 Procurement OH&S Assessment of the Steel Sustainability Australia Program.

Definitions

- **Biological Hazards**

  Any organic substance that presents a threat to the health of people or other living organisms. Biological hazards can include viruses, biological toxins, fungi, or bio-active substances etc.

- **Chemical Hazards**

  Any non-biological substance that can cause harm to life or health. Chemical hazards can be solid, liquid, or gas, and can cause harm to anyone directly exposed, usually through inhalation, ingestion, or direct contact to the skin.

- **Health Hazards**

  A health hazard is a biological, chemical, or physical factor that can have either short or long-term negative impacts on human health. This could include contaminated drinking water, exposure to toxic or carcinogenic toxins, exposure to dust or mould, exposure to viruses or contagious diseases etc.

- **Physical Hazards**

  A hazard that can cause physical harm with contact. This could include working in conditions that are too hot or too cold, vibration and noise hazards, working with explosive or flammable materials, trip hazards etc.

Health, Safety, Environment and Community (HSEC) Policy

BlueScope has a long and proud history of health and safety management. Our solid foundations have built employee trust through visible leadership and workforce engagement. We recognise that spending time interacting with our employees is critical, as is improving the capability of our leaders. This approach, supported by integrated HSE management systems and defined risk control practices, has helped significantly reduce our instances of serious injury and near misses.

BlueScope has a comprehensive company-wide Occupational Health and Safety Management System in place. Its purpose is to ensure the health and safety of our employees, customers, contractors, visitors and the public.

We are enhancing our safety, health, and wellbeing through developing our employees, encouraging participation and collaboration, building on our risk-based management foundations and focusing on continuously strengthening our controls.

A copy of BlueScope HSEC Policy dated July 2022 is provided below. To ensure access to the latest version, please visit: HSEC Policy - BlueScope Corporate.

Global Policy

Our Health, Safety, Environment & Community (HSEC) Policy

At BlueScope our care and commitment to Health, Safety, Environment and Community is integral to the way we do business and starts with each one of us.

To support Our Purpose, Our Bond and align with our 'How We Work' Code of Conduct we are committed to:

Health, Safety & Environment

- Fostering an inclusive workplace culture that values and invites a diversity of people and perspectives, and which extends to our customers, contractors, suppliers, and communities
- Providing safe and healthy working conditions to enhance wellbeing and prevent work related injuries, ill health, harm to the environment and our communities
- Applying practical, effective controls to eliminate hazards and reduce risks associated with our workplaces, products and services
- Striving for our goal of no serious injuries or ill-health
- The efficient use of resources, preventing pollution, and reducing the negative environmental impact of our operations, products and services.

Community

- Respecting the values and cultural heritage of our communities
- Being a valued corporate citizen, actively engaged in inclusive partnerships with our communities to provide employment, social and economic benefits

Our Actions

To meet our HSEC commitments we will:

- Foster an environment of care and support for our health and wellbeing
- Be visible leaders across our teams, actively consulting with and seeking participation from our employees and internal and external stakeholders
- Clearly define, articulate and meet our HSEC responsibilities and accountabilities
- Align HSEC activities with business strategies and risk profiles whilst setting, monitoring and reporting on associated objectives and targets
- Provide appropriate HSEC information and training, develop our capability and decision-making abilities whilst fostering an environment of learning
- Continually improve our HSEC performance and supporting management systems, taking into account HSEC risks and opportunities and applying governance programs to assure the effectiveness of risk control measures
- Comply with legal and other business requirements

We value inclusion and encourage our People to share their ideas and feedback. We are committed to fostering a culture of speaking up when something isn't right.

Our Purpose Our Bond SpeakUp

Overview of BlueScopes OH&S Management approach

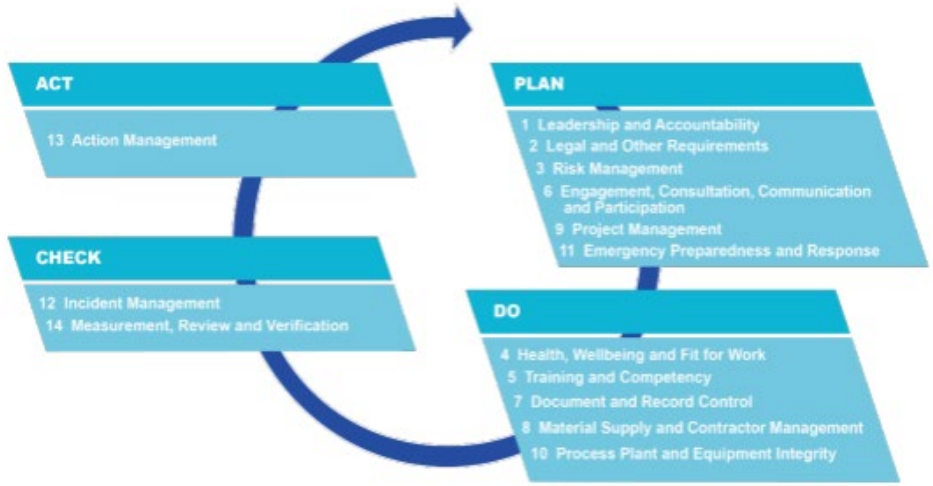
BlueScope owns and operates a range of steel and building solutions businesses around the world in different cultural and regulatory environments. Our HSE Standards are designed to apply across this global footprint and enable a consistent approach to Health, Safety and Environment (HSE).

The objectives of the HSE Standards are to:

- Support BlueScope's Purpose and Bond, Code of Conduct (How We Work), Health, Safety, Environment and Community (HSEC) Policy, Safety Beliefs and Environment Principles;
- Set expectations for progressive development and implementation of HSE policies, processes and procedures;
- Drive continual improvement.

The HSE Standards cover the steps that enable management of HSE performance, are aligned with international HSE standards and can be arranged within the Plan-Do-Check-Act framework. Strategy and plans (ISO14001 and ISO45001).

BlueScope HSE Standard	ISO14001: 2015 Clauses Environmental Management Systems	ISO45001:2018 Clauses Health and Safety Management Systems
HSE Standards Sections 1 – 6	4	4
1. Leadership and Accountability	5.1, 5.2, 5.3,6.2,7.1	5.1, 5.2, 5.3,6.2,7.1
2. Legal and Other Requirements	6.1.3	6.1.3
3. Risk Management	6.1, 8.1	6.1, 8.1
4. Health, Wellbeing and Fit for Work	Various	Various
5. Training and Competency	7.2	7.2
6. Engagement, Consultation, Communication and Participation	5.4, 7.3, 7.4	5.4, 7.3, 7.4
7. Document and Record Control	7.5	7.5
8. Material, Supply and Contractor Management	8.1.4	8.1.4
9. Project Management	8.1	8.1
10. Process, Plant and Equipment Integrity	8.1	8.1
11. Emergency Preparedness and Response	8.2	8.2
12. Incident Management	10	10
13. Action Management	10	10
14. Measurement, Review and Verification	9	9



BlueScope Business in Australia utilise an inhouse solution called MARS for the recording of processes related to Safety, Environment and Quality. These include Incidents, Audits, Risk Management and Complaints. A variety of other software applications are also used for recording Training, Document Control, Performance Management, Recruitment, Management of Change, Health Records, Legal Monitoring and other system requirements.

OHS certification

BlueScope is currently not certified, though the BlueScope HSE Standards are aligned to ISO 14001 and ISO 45001. BlueScope sites are audited against the HSE Standards via the internal governance program. BlueScope holds Self Insurance Licences in New South Wales, Victoria and South Australia and undergoes audits by the regulator as per each states licensing requirements. BlueScope Manufacturing at Port Kembla and more recently Western Port facilities have also participated in the Responsible Steel Certification Program. Certificates of currency are available on request.

Identification and management of risk to BlueScope's personnel

BlueScope HSE Risk Management Standard

The purpose of the BSL HSE Risk Management Standard is to set the requirements and mechanisms for implementing the BlueScope Risk Management Standard within a Health, Safety and Environmental (HSE) context. It guides how we continually identify, assess, treat and monitor/review HSE risks and seek opportunities to improve.

All BlueScope businesses are required to eliminate or reduce HSE risks so far as is reasonably practicable. The term "So Far As Is Reasonably Practicable" or "SFAIRP" is a common term used in external literature with regards to risk. To achieve these requirements, individuals have certain responsibilities for HSE risk management.

HSE Risk Management Requirements

1. For risks where BlueScope Codes of Practice exist, risk controls are defined.
2. Risk registers exist at the appropriate levels with a manageable number of material HSE risks.
3. Risk controls are defined in risk registers and are derived from BlueScope HSE Codes of Practice or Procedures where they exist.
4. Risk controls are monitored/audited to verify they are in place and effective.
5. Incident investigations identify the effectiveness of risk controls and drive corrective action.
6. Risk reviews take place for registered risks on a defined frequency and drive risk reduction.
7. Risk reviews consider effectiveness of controls based on risk control monitoring and incident data.
8. Risk reviews create the evidence to demonstrate that risk is reduced SFAIRP.
9. Information from risk reviews features in HSE Management Review and HSE Planning to drive continuous improvement and demonstrate due diligence.

To support meeting these requirements, a range of BlueScope Codes of Practice are available which define the HSE risk controls that must be in place and working effectively to manage top ranked HSE risks. This is further supported by a range materials and resources for other HSE risks including a HSE risk convention list for the population of risk registers.

The table below details identifies our top risks - physical, chemical, and biological risks to workers and the high level risk management practices to control each risk.

Type of Risk	Risk Identification	How the risk is managed
Physical /Chemical	Process Safety	BSL Code of Practice – Process safety and technical guidelines Major Accident Controls Inspection Test and Monitoring Standard Operating Procedures Critical Procedures Training
Physical	Mobile Equipment	BSL Code of Practice – Mobile Equipment and technical guidelines Standard Operating Procedures Critical Procedures Training
Physical	Traffic Management	BSL Code of Practice – Traffic Management and technical guidelines Traffic Management Plans Standard Operating Procedures Training
Physical	Falls	BSL Code of Practice – Falls and technical guidelines Safe System of Work (Permit) Job Safety Environment Analysis Standard Operating Procedures Training
Physical / Electrical	Live Equipment	BSL Code of Practice – Live Equipment and subsequent technical guidelines Safe Access – Guarding Isolation – Full Energy Isolations Safe System of Work (Permit) Job Safety Environment Analysis Standard Operating Procedures Critical Procedures Training
Physical	Product Storage and Handling	BSL Code of Practice – Product Storage and Handling and subsequent technical guidelines Standard Procedures Inspection Test and Monitoring Training
Physical	Chain of Responsibility including Load Restraint	BSL Code of Practice – Product Transport and Handling and subsequent technical guidelines Load Restraint System Load Restraint Auditing COR and Load Restraint Training

Physical	Overhead Cranes and Lifting Equipment	BSL Code of Practice – Overhead Cranes and subsequent technical guidelines Standard Operating Procedures Critical Procedures Training
Physical	Manual Tasks	BSL Code of Practice – manual Tasks and subsequent technical guidelines Standard Operating Procedures Training
Biological	Biological Hazard	Occupational Hygiene and Health Monitoring Standard Operating Procedures Personal Protective Equipment
Physical	Electrical Hazard	Compliance to Technical Standards Electrical Licensing Isolation – Full Energy Isolations Safe System of Work (Permit) Job Safety Environment Analysis Standard Operating Procedures
Chemical	Chemical Hazard	Chemical management System Safety Data Sheets Standard Operating Procedures Job Safety Environment Analysis Personal protective equipment
Physical	Noise (& vibration)	Hearing Testing Noise Monitoring Standard Operating Procedures Job Safety Environment Analysis Personal protective equipment
Psychosocial	Psychosocial Hazards	BSL HSE Standard 4 Health, Wellbeing and Fit For Work (inc Psychosocial Hazards) Front Line Leader Training – Leading Health and Wellbeing in the Workplace Work Design, Job Demands Health Assessments Return to Work Program Health and Wellbeing Promotion Speak Up (phoneline) Employee Assistance Program
Physical	Rail Safety	National Rail Safety Criteria Compliance Rail Load Restraint Guidelines Standard Operating Procedures Rail Isolation Standards Rail Safety Training

Additional information: Supporting risk control processes

Consultation and Communication - Sites have documented arrangements for consultation and communication of health and safety information and matters. Sites conduct meetings to talk about safety, such as pre-start meetings, safety meetings and/or toolbox talks.

Change Management - Sites follow management of change process for temporary and permanent changes in the workplace. The MoC system describes the types of changes that require the process to be followed, assign roles, responsibilities and competencies for change management and detail how to initiate, assess, approve, implement, and check the effectiveness of changes in the workplace.

Contractor management - Sites follow a contractor management process as defined by the BlueScope Code of Practice for Contractor Management. The process includes Roles and Responsibilities, Contractor Selection, Mobilisation and Monitoring, and Contractor Review.

Training and Competency - The system for training in Australia Steel Products (ASP) is described in the ASP Training Framework and associated documents and is implemented through the use of Training Needs Analysis (TNA) form/ activity and Training Material. Employees, contractors and visitors must all undergo an induction that is appropriate for the risks they will encounter and the level of supervision that will be present. Records of health and safety training and competency assessments are maintained.

Emergency Preparedness and Response - All sites have an emergency response plan that considers, and risk assesses potential emergency scenarios. The processes for emergency management within BlueScope ASP are based upon AS 3745 Planning for Emergencies in Facilities, HIPAP No.1 - Industry Emergency Planning Guidelines and the Safe Work Australia Managing the Work Environment and Facilities Code of Practice. The plan includes preparation, response, and recovery phases, as well as incident/emergency/crisis escalation criteria. Emergency roles and responsibilities are outlined in the plan.

Incident Management - BlueScope has a global HSE Incident Management Standard to ensure incidents are identified, reported, investigated, corrective & preventive actions are identified, and outcomes are communicated. The Standard covers Relationship between incident and risk management, Process (overview) for incident management, Notification/ Communication requirements, Roles and responsibilities, Training qualifications for investigations, and Definitions.

Management System Audits - Internal Auditing of the SEQ System for compliance to the 14 HSE Standards and alignment to corporate procedures, policies and codes of practice. The Governance Program is designed to verify compliance and maturity of business level systems, procedures and practices for Health, Safety, Environment and Quality alignment to external standards and to manage compliance to legal and other requirements. The HSE Governance Program is supported by separate internal audit programs, within each certified part of the business, for the management system requirements of ISO9001, ISO14001, factory production control certifications and ISO17025.

External auditing of the ASP management systems to determine compliance with the requirements of ISO9001 and ISO14001 is conducted by ANAB accredited providers. Factory production control, Responsible Steel and ISO17025 external auditing is conducted by auditors approved by the relevant organisation.

Supporting Documentation: Additional specific documentation to supports the above claims may be made available upon request.

References

- BlueScope Health, Safety, Environment and Community (HSEC) Policy
- BlueScope Sustainability Reporting Suite