DECISION USEFUL DIAGNOSIS 037 — FY2026

BlueScope Steel Limited (ASX: BSL)

Remained not decision-useful for retail investors and the public, because every target covers Scope 1 and 2, 46% of the footprint, and Scope 3 has none

REPORTING PERIOD	REVIEW DATE	PROTOCOL	SECTOR
FY2026	3 September 2026	Climate Disclosure Review Rules v15.23	Manufacturing

8 / 15 overall score · sum of the five audience ratings, for ranking



This review tests BlueScope's publicly available climate disclosure against CRI's Climate Disclosure Review Rules, which use the CRI Net Zero Standard as the reference for a credible claim together with AASB S2 Climate-related Disclosures. It reflects the information available at the review date, states what the evidence supports, what it does not, and what would resolve each open point, and says "cannot verify", not "no issue", where evidence is missing. It is general information, not legal, financial or investment advice, and not an audit or an assurance engagement. It does not allege illegality, misconduct, greenwashing or dishonesty. Organisations may contact CRI at robc@noco2.com.au to identify an error, provide relevant public information or request review of updated disclosures. See Important information at the end of this report.

Decision-usefulness at a glance

Company	Carbon / supply-chain accounting	Institutional investors	Consumer / retail investors	Consumers & public	Regulators
BlueScope Steel Limited (ASX: BSL)	2	2	1	1	2

How to read this report

HOW TO READ THE RATINGS

Each audience gets its own rating.

The same disclosure can be reliable for one reader and misleading for another, so we rate decision-usefulness **separately for each audience** on the three-point scale below. There is no single pass/fail verdict — decision-usefulness is a judgement about each audience, not the report as a whole.

1 **Not decision-useful**
Cannot be relied on in its current form for this reader's decision.

2 **Mostly decision useful**
Usable, with one material limitation the reader must work around.

3 **Decision-useful**
Can be relied on. A deliberately high bar.

The bar below adds the five audience ratings into an **overall score out of 15**. It is used only to rank reports against one another — it carries **no band and no verdict label**. Its colour simply reflects the mix of the five ratings: the more red, the more audiences the disclosure falls short for.



8 / 15
overall score · for ranking only

This review assesses whether the company's climate disclosure is *decision-useful*: whether a reader can actually rely on it for the decision they are making. Because a disclosure that is sound for one reader can mislead another, we score decision-usefulness **separately for each of the main audiences** that rely on climate disclosure. The audiences, and what each needs from the disclosure, are the same across all our reviews:

AUDIENCE	WHAT THEY RELY ON THE DISCLOSURE FOR
Carbon / supply-chain emissions accounting	Lifting the company's emissions figures into their own inventory. They need complete category coverage (nothing material excluded), a single reconcilable footprint, and a disclosed, transparent method. Whether a figure is estimated or supplier-specific is a maturity question, not a fault; the fault is exclusion.
Institutional investors	Pricing climate risk (physical and transition) including target credibility and whether targets are being met with real reductions, the completeness of financed / portfolio exposure, and flow-through exposure inherited from investees or counterparties whose own emissions may be growing. They can usually reconstruct detail, so they are judged on whether the true position is derivable.
Consumer / retail investors	Understanding the company's climate position and target progress without expert reconstruction. They need the headline claims to match the evidence, the material sources to be targeted, and caveats to be easy to find.
Consumers & public	Knowing whether the company's public claims are true: that it is genuinely acting rather than greenwashing, and not fuelling climate change while presenting otherwise. Headline claims matter most to this audience, which is least able to read past a buried caveat.
Regulators	Whether the disclosure is compliant, consistent across sources and audiences (does the company say one thing to one audience and something else to another), and useful across the board.

The **overall score** is simply the sum of the five audience ratings, out of 15. It has **no band and no pass/fail label**; we use it only to rank reports against one another; its colour bar reflects the mix of the five ratings (the more red, the more audiences the disclosure falls short for). §2.1 gives each audience's rating and the reason behind it; §1 covers scope and basis, §2.2–2.3 the evidence dashboard, §3 what the disclosure means for a reader (what's counted, financed-emissions detail, real-vs-accounting movement, trajectory), §4 the findings, §5 disclosure-risk, §6 how to fix it and §7 the conclusion; the working annexes show the rule-level derivation.

Two conventions apply throughout. A certification (including the Australian Government's Climate Active program) is treated as a claim to be tested, not as a strength in itself. Detailed disclosure and candour about a company's own gaps are the baseline expected of a credible discloser, not a credit.

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1. Scope & basis

1.1 What we reviewed

DOCUMENT	REVIEWED?	IF MISSING, EFFECT ON THIS REVIEW
FY2026 Annual Report (year ended 30 June 2026), including Section 07 Sustainability Report (Climate-related Disclosures) prepared under AASB S2, the Directors' declaration for that report, the independent auditor's review report, Section 02 Sustainability Overview, the Directors' Report, the Remuneration Report and the audited financial statements	Yes	
FY2026 Sustainability Data Supplement, including the metrics and data tables, the fifteen-category Scope 3 inventory, the product sustainability credentials and the metric definitions	Yes	
FY2026 Sustainability Metrics and Data Tables (spreadsheet)	Yes	
FY2026 Full Year Financial Results Supplementary Materials	Yes	

DOCUMENT	REVIEWED?	IF MISSING, EFFECT ON THIS REVIEW
A standalone FY2026 Sustainability Report	Not applicable: not published as a separate document	BlueScope states that the FY2026 reporting suite comprises the Annual Report, the results release, presentation and supplementary materials, the Sustainability Data Supplement, the Tax Contribution Report and a Modern Slavery Statement due late 2026. Sustainability content sits inside the Annual Report, so nothing is missing
Climate Action Report, second edition, September 2024	Yes: retrieved from bluescope.com	The FY2026 suite directs the reader to this document for the site-specific decarbonisation pathways, the non-steelmaking pathway detail and the Scope 3 long-term work program
A Climate Action Report covering FY2025 or FY2026	Not published	BlueScope's climate action page, checked 3 September 2026, lists only the 2021 first edition and the 2024 second edition. The company's standalone climate strategy document therefore predates the reviewed period by two years
FY2026 Corporate Governance Statement	Not provided	Board and committee oversight is described in the Annual Report's governance chapter and in the climate report; committee charter detail is not tested
FY2026 Modern Slavery Statement, FY2026 Tax Contribution Report	Excluded: not relevant to this review	
Emission factor register, global warming potential statement, Safeguard Mechanism baseline and surrender records	Not provided: not published in the reviewed suite	The factor publications are named by jurisdiction, but the conversion basis and BlueScope's facility baselines and unit surrenders cannot be tested
National Greenhouse and Energy Reporting register, FY2025-26	Not published: not yet released at the review date	The most recent published register covers FY2024-25, so the regulator-facing reconciliation in §5.3 sits on the prior year

1.2 Standards the company is held to or references

STANDARD / FRAMEWORK	REFERENCED BY COMPANY?	HOW STRONGLY	SECTOR MODULE(S) APPLIED
Corporations Act / Ch 2M	Yes	Binding: the Sustainability Report is prepared under Division 1 of Part 2M.3 and carries a Directors' declaration under section 296A(6) stating compliance with AASB S2 and the section 296D climate statement disclosures	Directors' Report, operating review and the statutory climate statement all tested
AASB S2	Yes	In accordance with: FY2026 is BlueScope's first mandatory year. "This report has been prepared in accordance with AASB S2 Climate-related Disclosures (AASB S2) issued by the Australian Accounting Standards Board (AASB), and in accordance with the Corporations Act 2001"	Applied in full, with the first-year transition reliefs recognised
ASIC RG 280	No	Not referenced: not named in the FY2026 suite	Not applicable
GHG Protocol (Corporate / Scope 2 / Scope 3)	Yes	In accordance with: "The Group measures its Scope 1 and 2 GHG emissions globally in accordance with the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004), except for the Group's Australian operations"; equity share and the Scope 2 location-based method are both named	Applied in full
PCAF (financed emissions)	No: not referenced	Not applicable: not a financial institution	Not applicable
SBTi	No: not referenced; no science-based, Paris-aligned or 1.5°C label is applied to any target	Not applicable	Not applicable
Climate Active / other carbon-neutral framework	No: not referenced; no carbon-neutral claim is made	Not applicable	Not applicable

STANDARD / FRAMEWORK	REFERENCED BY COMPANY?	HOW STRONGLY	SECTOR MODULE(S) APPLIED
Certificates (GreenPower / LGC / ACCU / REC)	Yes: emission unit permits ($86.0 million), Australian carbon credit units ($38.5 million) and energy certificates ($1.5 million) are held on the balance sheet. Emission-Free Energy Certificates covering North Star's whole electricity consumption are described in the climate report	Mentioned: balance-sheet holdings are for compliance surrender; the Emission-Free Energy Certificates are described but do not enter any reported figure	Tested for claim use under the contractual-instrument rules
AASB S2025-1 Amendments to Greenhouse Gas Emissions Disclosures	Yes: early adopted	In accordance with: "allowing Australian GHG emissions reporting to align with the National Greenhouse and Energy Reporting (NGER) methodology rather than the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004)"	Jurisdictional relief tested for disclosure of effect
ASSA 5000 / ASSA 5010 (sustainability assurance)	Yes	Binding: Ernst & Young issued an unmodified limited-assurance conclusion over the phase-in subject matter	Assurance scope tested against the claims it is used to support
Other (company-referenced)	Yes: Global Reporting Initiative Standards, SASB Iron and Steel Producers standard, UN Sustainable Development Goals, IPCC AR6 Shared Socioeconomic Pathways, IEA Net Zero Emissions by 2050, the Australian Safeguard Mechanism, the New Zealand Emissions Trading Scheme	With reference to: the Global Reporting Initiative claim is "with reference to", the loosest form	Not applicable

1.3 Review basis & limitations

This is a standard review of BlueScope's FY2026 climate disclosure, scoped to documents covering the year ended 30 June 2026 and earlier. FY2026 is BlueScope's first mandatory reporting year, and the climate content now sits inside the Annual Report as a statutory Sustainability Report with a Directors' declaration and an independent limited-assurance conclusion.

Four limitations bound the conclusions. BlueScope has adopted the AASB S2 first-year reliefs to omit comparatives and Scope 3 from the statutory report, so the assured statutory layer covers one year of Scope 1 and Scope 2 only and the value chain sits in the voluntary layer. Scope 2 is reported on the location-based method alone, so the effect of the contractual electricity arrangements covering North Star's entire consumption cannot be measured. The Scope 3 total moved 6.4 per cent on three causes the disclosure names and does not size, so the movement cannot be attributed. And no site-level emissions or intensity figures are published for FY2026, so the share of the reported intensity improvement attributable to individual sites cannot be verified from the reviewed suite.

2. Verdict

2.1 Decision-usefulness by audience

2

Carbon / supply-chain emissions accounting

2 met · 2 partial · 0 not met

The figures are lift-ready and they reconcile: all fifteen Scope 3 categories are itemised with three years of data, the categories sum exactly to the stated total in each year, the 1 per cent materiality threshold is published, and the method statement now names the consolidation approach, the jurisdictional relief and the emission factor publication used in each region. Two things still limit it. No market-based Scope 2 basis is published even though certificates cover the whole electricity consumption of the largest single site, and Scope 3, 54 per cent of the footprint, sits outside the assurance scope with no split of Scope 1 or Scope 2 by site, country or gas.

§3.1, §4.2, §4.3

2 **Institutional investors**
1 met · 4 partial · 1 not met

The reporting is materially better than the position it reports. Nine years of absolute and intensity data are now published in the annual suite, the physical and transition risks carry quantified financial effects, and the audited accounts price the Safeguard Mechanism exposure. What the reporting shows is a plateau: Scope 1 and 2 have been flat at about 10.2 million tonnes for three years and 4 per cent below 2018, steelmaking emissions rose slightly in FY2026, and the 16 per cent intensity improvement is mostly the arithmetic of higher output at the lowest-intensity site. The 2030 steelmaking target sits 8 percentage points below the company's own projection from projects already committed, and the company states it will not be revised.

§3.3, §3.4, §4, §5

1 **Consumer / retail investors**
2 met · 1 partial · 1 not met

The headline is handled well: the 16 per cent figure, its driver, the absolute nine-year series and the plain statement that performance is ahead of the 2030 target all appear on one page. The problem is what is committed to. Every target and the 2050 goal cover Scope 1 and Scope 2, which is 46 per cent of the footprint on the company's own numbers. The other 54 per cent, value chain emissions, has no target, no baseline and no target year, and the disclosure never says so.

§3.1, §3.4, §4.2

1 **Consumers & public**
2 met · 0 partial · 1 not met

Every claim states its own boundary and no carbon-neutral, renewable-electricity or science-based label is used anywhere, so the usual routes to an untrue public claim are not taken. The composite still misleads. A reader is shown a 16 per cent improvement described as ahead of target, a 2050 net zero goal and a commissioning electric arc furnace, and takes from it that BlueScope's emissions are coming down. Scope 1 and 2 have not moved in three years, the majority of the footprint carries no commitment, and this year's fall in reported value chain emissions is an emission-factor and boundary movement the disclosure does not attribute.

§3.3, §4.2

2 **Regulators**
0 met · 1 partial · 1 not met

The first mandatory year has been delivered on its face: a statutory climate statement under AASB S2, a Directors' declaration, an unmodified limited-assurance conclusion over the phase-in subject matter, and the

transition reliefs taken as the standard permits. Two things sit against it. A physical-risk exposure metric in the statutory statement is stated as a share of Group total assets when the percentage is a share of property, plant and equipment, which overstates it by about a factor of two against the balance sheet in the same document. And Scope 2 is reported on one basis where the standard the company cites requires two.

§5.3, §4.2, Annex J

What the company should fix first: set a Scope 3 target with a baseline, a target year and stated category coverage, and replace the 2030 steelmaking target with one calibrated to the company's own below-1.3 projection, so that every published measure constrains something the company has not already achieved.

2.2 Scorecard

Headline claim ↔ evidence match	●●●●○	Disclosure quality	8 / 15
Inventory completeness (Scope 1/2/3)	●●●●○	Financed-emissions completeness (if FI)	*N/A*
Target credibility	●○○○○	Real reduction vs accounting movement	●○○○○
Offset / certificate / renewable integrity	●●●○○	Assurance coverage vs claim	●●●○○
Standards / compliance confidence	●●●○○	Comparability (like-for-like only)	●●●○○
Reader accessibility	●●●○○	Evidence limitations	●●●○○

DIMENSION	RATING	JUSTIFICATION
Headline claim ↔ evidence match	4/5	The 16 per cent reduction, the 12 per cent and 30 per cent targets and the 2050 goal are each accurate and each carry a stated boundary, and the suite now says plainly that performance is ahead of the 2030 steelmaking target. No carbon-neutral, renewable-electricity or science-based label is used.
Disclosure quality	8 / 15 overall	A fifteen-category Scope 3 table with three years of data, a nine-year absolute and intensity series in the annual suite, a published materiality threshold, named factor publications by region, a quantified estimate share and a statutory basis of preparation.
Inventory completeness (Scope 1/2/3)	4/5	Complete by category and it reconciles. The market-based Scope 2 basis is absent and Scope 1 and Scope 2 carry no split by site, country, gas or source.
Financed-emissions completeness (if FI)	N/A	Not a financial institution.
Target credibility	1/5	The 2030 steelmaking target was passed two years ago, sits 4 percentage points below the FY2026 outturn and 8 below the company's own projection from committed projects, and the company states it will not be revised. The 2050 goal is contingent on five external enablers, retains an offsets option with no residual cap, and its cost is expressly excluded from the audited cash flows. Value chain emissions, the majority of the footprint, are untargeted.

DIMENSION	RATING	JUSTIFICATION
Real reduction vs accounting movement	1/5	Steelmaking emissions rose 10,000 tCO_2e in FY2026 while the intensity metric improved, because output rose 126,000 tonnes. Across FY2018 to FY2026, about four-fifths of the 15.9 per cent intensity improvement is the denominator. The 6.4 per cent fall in Scope 3 is attributed to three causes and none is sized.
Offset / certificate / renewable integrity	3/5	No offsets were used or surrendered in FY2026 and no offset-backed claim is made. Certificates covering the whole electricity consumption of the largest site are described but not reflected in any reported figure, and no market-based basis is published, so their effect cannot be seen either way.
Assurance coverage vs claim	3/5	Limited assurance over governance, the strategy risks and opportunities, and Scope 1 and location-based Scope 2 under the statutory phase-in, plus steelmaking intensity in the voluntary layer. Scope 3, 54 per cent of the footprint, the targets and the vulnerability metrics are outside the scope.
Standards / compliance confidence	3/5	The first mandatory year is delivered with a Directors' declaration and an unmodified conclusion. Against that, one basis is reported where the cited standard requires two, the global warming potential version is not stated, and one statutory metric is stated against the wrong denominator.
Comparability (like-for-like only)	3/5	Nine years of Scope 1, Scope 2 and intensity data are now published in the annual suite. Two changes are disclosed without their effect: the early adoption of the NGER methodology for Australian operations, and the mid-year exclusion of the divested joint venture without restated comparatives.
Reader accessibility	3/5	The absolute series, the intensity series, the whole-footprint split and the target position now sit on adjacent pages of the Annual Report. Four elements still direct the reader to a document published in September 2024.
Evidence limitations	3/5	Market-based Scope 2, the site-level series, the attribution of the Scope 3 movement, the effect of the methodology change and cumulative decarbonisation spend are all unavailable.

2.3 Standards & compliance snapshot

AREA	RATING	BASIS
Corporations Act / Ch 2M	Appears broadly compliant: minor limitations	A statutory Sustainability Report on pages 174 to 195, a Directors' declaration under section 296A(6) covering AASB S2 compliance and the section 296D disclosures, and an unmodified auditor's review conclusion.
AASB S2	Appears broadly compliant: minor limitations	First mandatory year. Governance, strategy, risk management and metrics and targets are all addressed, with quantified current and anticipated financial effects for each risk and opportunity. The first-year reliefs for comparatives and Scope 3 are permitted by the standard and are disclosed. The limitation is the vulnerability metric stated against Group total assets when the percentage is of property, plant and equipment.
ASIC RG 280	Appears broadly compliant: minor limitations	Forward-looking climate statements carry the reasonable-grounds framing and the scenario assumptions are published. Sustainability records supporting the target and vulnerability metrics were not tested.
GHG Protocol / Scope 2 / Scope 3	Potential compliance concern	Scope 2 is reported on the location-based method only. The Scope 2 Guidance requires dual reporting where an entity holds contractual instruments, and BlueScope states that Emission-Free Energy Certificates cover North Star's entire electricity consumption and are not reflected in reported Scope 2. The global warming potential version is not stated.
PCAF / financed emissions	Not applicable for the period	Not a financial institution; Category 15 is nil under the equity-share boundary.
Carbon-neutral / net-zero framework	No apparent issue	No carbon-neutral certification is held or claimed. The 2050 goal is self-declared and states its Scope 1 and Scope 2 boundary wherever it is set out.
Certificates / credits	No apparent issue	Emission unit permits, Australian carbon credit units and energy certificates are held for compliance surrender, carried at cost and disclosed in the financial statements. None supports a public emissions claim, and no offsets were used or surrendered in FY2026.
Other company-referenced framework	Appears broadly compliant: minor limitations	The Global Reporting Initiative claim is "with reference to", the loosest form, and a content index is published with stated partial omissions. SASB metric alignment is marked per metric.

3. What this means for a reader

3.1 What is counted / not counted

Reporting basis: equity share, global, year ended 30 June 2026, superseded by the National Greenhouse and Energy Reporting methodology for Australian operations under the jurisdictional relief BlueScope has adopted, with Scope 2 on the location-based method. BlueScope publishes rounded figures in $ktCO_2e$; the figures below are the published values expressed in tonnes. Total counted footprint: **22,150,000 tCO_2e** (Scope 1 and 2 location-based 10,200,000; Scope 3 11,950,000). Scope 3 is **54%** of it, as BlueScope states. Steelmaking accounts for 9,420,000 tCO_2e, 92% of Scope 1 and 2; non-steelmaking for the remaining 780,000 tCO_2e. Data for the Tata BlueScope joint venture, sold on 31 December 2025, is excluded from the second half of FY2026.

Emissions composition

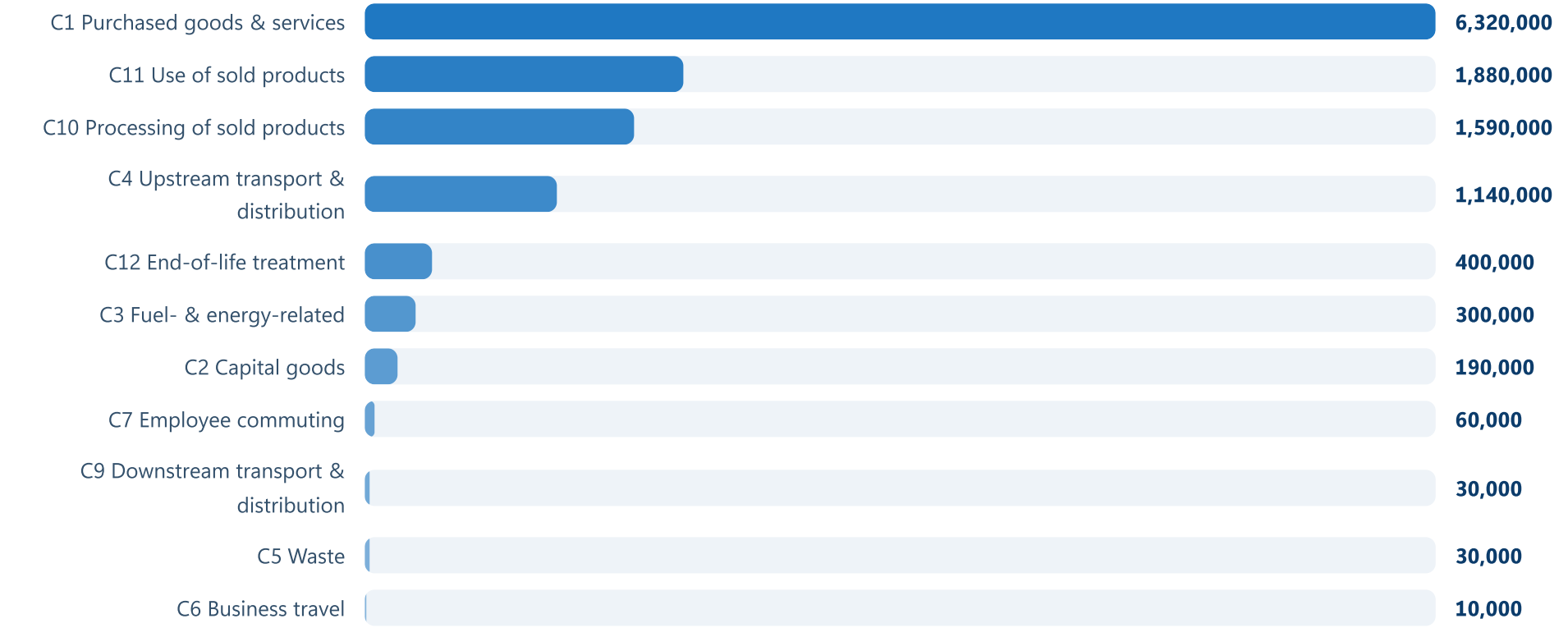
Values as reported (tCO_2e). Bars are independent magnitudes, not a stack.

Source: FY2026 Sustainability Data Supplement page 11; FY2026 Annual Report folios 30 and 192. Equity share, global, year ended 30 June 2026, as published in $ktCO_2e$. Scope 2 is location-based; no market-based basis is published for FY2026



Scope 3 by category (largest first)

Source: FY2026 Sustainability Data Supplement, breakdown of Scope 3 GHG emissions by category, pages 17 to 19. Categories 8, 13 and 14 are marked not applicable and Category 15 is nil, so they do not appear



What is counted

Every scope and Scope 3 category, coloured by inclusion status. Values as reported.

Source: FY2026 Sustainability Data Supplement page 11 and pages 17 to 19, year ended 30 June 2026

Scope 1: combustion / fugitive / process
8,490,000
REPORTED

Scope 2: electricity (location-based)
1,710,000
REPORTED

Scope 2: electricity (market-based)
NOT DISCLOSED

Scope 3 C1 Purchased goods & services
6,320,000
REPORTED

Scope 3 C2 Capital goods
190,000
REPORTED

Scope 3 C3 Fuel- & energy-related
300,000
REPORTED

Scope 3 C4 Upstream transport & distribution
1,140,000
REPORTED

Scope 3 C5 Waste
30,000
REPORTED

Scope 3 C6 Business travel
10,000
REPORTED

Scope 3 C7 Employee commuting
60,000
REPORTED

Scope 3 C8 Upstream leased assets
NOT RELEVANT

Scope 3 C9 Downstream transport & distribution
30,000
REPORTED

Scope 3 C10 Processing of sold products
1,590,000
REPORTED

Scope 3 C11 Use of sold products
1,880,000
REPORTED

Scope 3 C12 End-of-life of sold products
400,000
REPORTED

Scope 3 C13 Downstream leased assets
NOT RELEVANT

Scope 3 C14 Franchises
NOT RELEVANT

Scope 3 C15 Investments
0
REPORTED

Reported / counted · Not counted (excluded or unquantified) · Not relevant or not applicable

SCOPE / CATEGORY	STATUS	QUANTIFIED (tCO_2E)	MATERIAL?	NOTE
Scope 1: combustion / fugitive / process	Reported	8,490,000	Yes	Covers the six Kyoto Protocol gases. The statutory table splits this into the consolidated accounting group, 8,480,000, and other investees, 10,000. No split by site, country, gas or source is published.
Scope 2: electricity (location-based)	Reported	1,710,000	Yes	Up from 1,700,000 in FY2025. The primary source is purchased electricity, calculated from supplier invoices using jurisdictional factors.

SCOPE / CATEGORY	STATUS	QUANTIFIED (tCO_2E)	MATERIAL?	NOTE
Scope 2: electricity (market-based)	Not disclosed	Not disclosed	Yes	Not published for FY2026 on any boundary. BlueScope states that a power purchase agreement with a local nuclear provider has covered North Star's entire electricity consumption since 2020, independently verified through Emission-Free Energy Certificates, and that "as the Group reports Scope 2 GHG emissions under the location-based method, these EFECs are not reflected in reported Scope 2 emissions". The two Scope 2 rows measure the same electricity and are not additive; only the location-based row enters the Scope 1 and 2 total.
Scope 3 C1 Purchased goods & services	Reported	6,320,000	Yes	53% of Scope 3 and 29% of the whole footprint. Iron ore, pig iron, hot briquetted iron, purchased steel, scrap steel, coal, paint, resins and chemicals. Down from 7,260,000; supplier-specific factor coverage increased during the year.
Scope 3 C2 Capital goods	Reported	190,000	Yes	Capital spend on the Port Kembla blast furnace reline and the Glenbrook electric arc furnace installation.
Scope 3 C3 Fuel- & energy-related	Reported	300,000	Yes	
Scope 3 C4 Upstream transport & distribution	Reported	1,140,000	Yes	Road, rail and sea freight of raw materials. Up from 860,000; BlueScope states the underlying transport emission factors were updated in FY2026.
Scope 3 C5 Waste	Reported	30,000	No	Below the published 1% materiality threshold.
Scope 3 C6 Business travel	Reported	10,000	No	Below the 1% threshold.
Scope 3 C7 Employee commuting	Reported	60,000	No	Below the 1% threshold.
Scope 3 C8 Upstream leased assets	Not relevant	Not applicable	Not applicable	Marked not applicable. The basis is not stated; the implication is that leased operations sit inside Scope 1 and Scope 2.
Scope 3 C9 Downstream transport & distribution	Reported	30,000	No	Below the 1% threshold.
Scope 3 C10 Processing of sold products	Reported	1,590,000	Yes	Processing of co-products sold to customers (slag, benzene, toluene and xylene, coal tar, ammonium sulphate, calcined dolomite and limestone, vanadium, melter slag, iron sand, mill scale, electric arc furnace slag and dust), plus bending and cutting of all steel despatches.
Scope 3 C11 Use of sold products	Reported	1,880,000	Yes	16% of Scope 3. Stated to include emissions from coke sales from Port Kembla Steelworks.
Scope 3 C12 End-of-life of sold products	Reported	400,000	Yes	Unchanged across three years.
Scope 3 C13 Downstream leased assets	Not relevant	Not applicable	Not applicable	Marked not applicable; basis not stated.
Scope 3 C14 Franchises	Not relevant	Not applicable	Not applicable	Marked not applicable; basis not stated.
Scope 3 C15 Investments	Reported	0	No	Nil, consistent with the equity-share approach, under which a share of an investee's emissions sits inside Scope 1 and Scope 2 rather than in this category. The statutory table quantifies the other-investee share of Scope 1 and 2 at 10,000 tCO_2e.

3.2 Financed-emissions detail (financial institutions)

N/A, not a financial institution.

3.3 Real reduction vs accounting movement

Steelmaking emissions intensity, FY2018 to FY2026 (-15.9%)

Decomposition of the reported reduction into its drivers.

Source: Review analysis of the FY2026 Sustainability Data Supplement pages 8, 11 and 12 (raw steel production, steelmaking Scope 1 and 2, steelmaking intensity). FY2018 production is derived from the published FY2018 steelmaking emissions and intensity



Higher output at the lowest-intensity site (12.5 pp) Lower absolute steelmaking emissions (3.4 pp)

Of the 15.9 percentage-point reduction reported, about 3.4 pp is own action beyond business-as-usual; the rest is external / accounting movement.

REPORTED CHANGE	DRIVER	REAL-WORLD REDUCTION?
Steelmaking emissions intensity down 2.1% in FY2026 (1.41 to 1.38 tCO_2e per tonne of raw steel)	Activity: the denominator. Raw steel production rose 1.9% to 6,814,000 tonnes while steelmaking Scope 1 and 2 emissions rose from 9,410,000 to 9,420,000 tCO_2e.	**No**: steelmaking emissions were higher in FY2026 than in FY2025. The whole of the single-year improvement in the metric is the extra tonnes in the denominator.
Steelmaking emissions intensity down 15.9% since FY2018 (1.64 to 1.38)	Activity: output growth concentrated at the lowest-intensity site. Applying FY2026 production to FY2018 emissions gives 1.44, so about 12.5 of the 15.9 percentage points come from producing more steel and about 3.4 from producing lower absolute emissions. BlueScope attributes the result to "operational and efficiency improvements at Port Kembla, together with North Star's continued growth following its EAF expansion", and its investor materials lead with the North Star expansion.	**Partly**: about one-fifth of the improvement is lower absolute emissions; the rest is the arithmetic of higher output. Neither share is disclosed, and no site-level intensity figures are published for FY2026.
Scope 1 down 0.1% in FY2026 (8,500,000 to 8,490,000 tCO_2e)	**Mixed**: named contributions are operational improvements at Port Kembla, lower steel production volumes at Glenbrook and the first full year of the upgraded Western Port paint line oven, which BlueScope states has cut site Scope 1 emissions by more than 20,000 tCO_2e since completion. Emissions from the divested Tata BlueScope joint venture are excluded from the second half of the year.	**Partly**: the named projects are identified and two are sized, but the split between abatement, lower output at Glenbrook and the mid-year disposal is not disclosed.
Scope 2 (location-based) up 0.6% in FY2026 (1,700,000 to 1,710,000 tCO_2e)	**Cannot** verify: not decomposed. BlueScope names grid decarbonisation as a driver of the non-steelmaking intensity result and reports a 14% fall in site Scope 2 at Map Ta Phut, Thailand, from switching to a private power provider.	**Increase**: the location-based figure rose. The site-level reductions named are smaller than the group movement.
Combined Scope 1 and 2 flat at 10,200,000 tCO_2e	**Mixed**: reported combined because the targets and the 2050 goal are framed on it. The decomposition above shows Scope 1 falling marginally and Scope 2 rising marginally, with Scope 1 at 83% of the total.	**No**: the combined figure is unchanged for a second year and 4.5% below FY2018, against production up about 14% over the same period.
Scope 3 down 6.4% in FY2026 (12,770,000 to 11,950,000 tCO_2e)	**Method** or factor: Category 1 fell 940,000 tCO_2e and Category 4 rose 280,000. BlueScope names three causes and sizes none: increased coverage of supplier-specific emission factors, updated transport emission factors, and the exclusion of the divested joint venture from the second half of the year. Prior-year comparatives are not restated.	Cannot verify: two of the three named causes are method or boundary changes, and no supply-chain abatement is named or quantified.
Contractual electricity at North Star	**Certificates**: a power purchase agreement with a local nuclear provider has covered North Star's entire electricity consumption since 2020, evidenced by Emission-Free Energy Certificates verified by the market operator. A new supply agreement continuing the certificate retirement was executed in FY2026.	Cannot verify: not measurable. BlueScope reports Scope 2 on the location-based method only, so the certificates do not enter the reported figure and no market-based position is published. This works against BlueScope's reported position rather than for it.

REPORTED CHANGE	DRIVER	REAL-WORLD REDUCTION?
North Star debottlenecking to 3.3 million tonnes a year	Activity: BlueScope states the program will deliver "efficiency gains and further reducing BlueScope's total steelmaking emissions intensity per tonne, although it is anticipated that BlueScope's absolute emissions will increase due to the higher volume of steel produced".	**No**: this is the company's own statement that the mechanism driving the intensity metric raises the absolute total.
Non-steelmaking intensity down 13% since FY2018 (0.25 to 0.22 tCO_2e per despatched tonne)	**Mixed**: named projects: the Western Port paint line oven, a direct fire furnace pre-heater at Kapar in Malaysia cutting furnace gas use 20% and saving about 1,200 tCO_2 a year, the Map Ta Phut power switch and an induction heating upgrade at Suzhou. BlueScope also names grid decarbonisation and, in the remuneration scorecard, reduced despatch volumes relative to the baseline year.	**Partly**: these are identified, sized engineering projects, together of the order of tens of thousands of tonnes a year against a 10,200,000 tCO_2e footprint, and the company discloses that volume and grid movement also contributed.

3.4 Trajectory over time

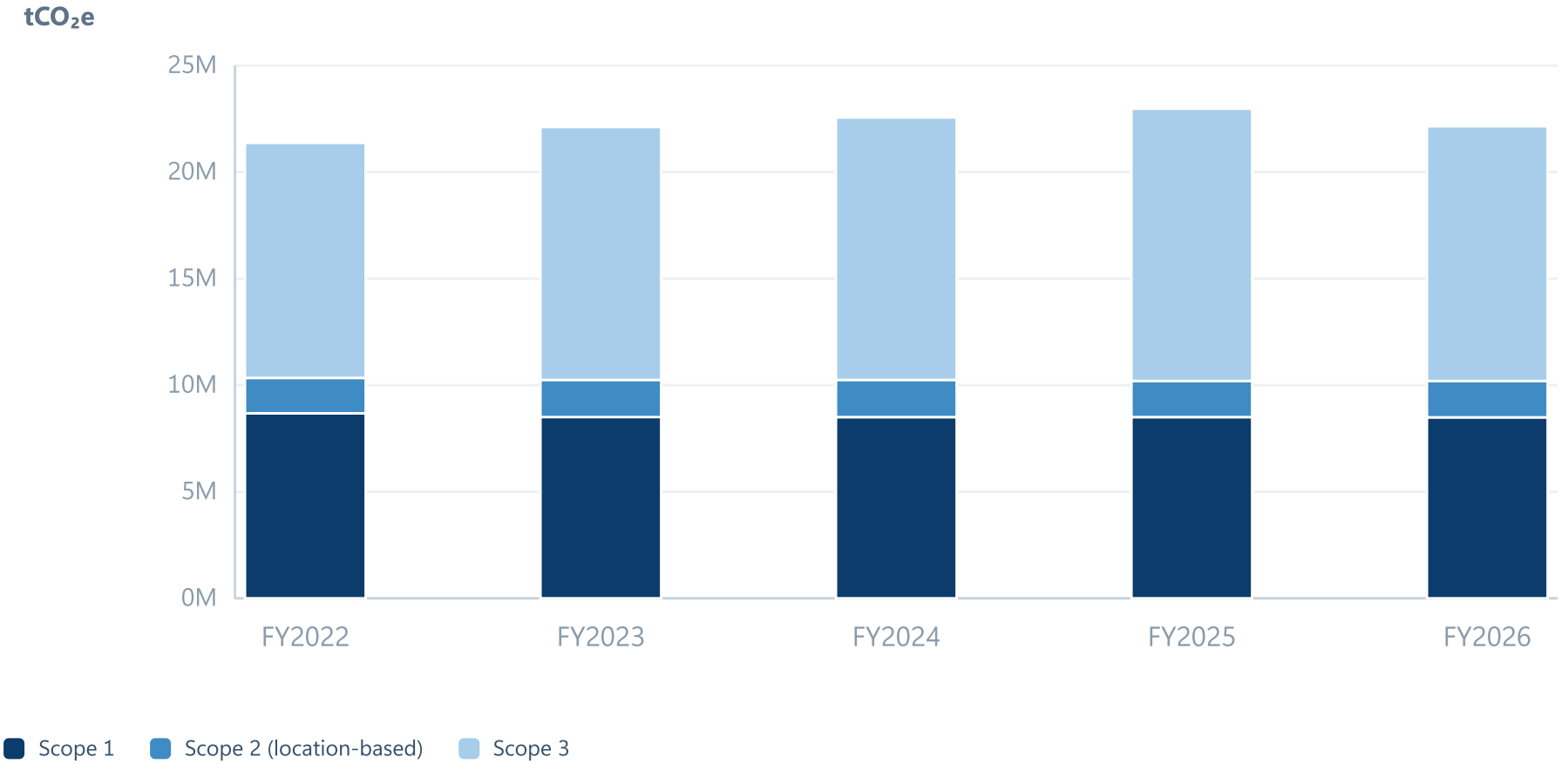
Across nine years the absolute direction of travel is flat. Scope 1 and 2 fell 4.5% between FY2018 and FY2026 while raw steel production rose about 14%, and the combined figure has now been 10,200,000 tCO_2e for two consecutive years. FY2026 sits above the FY2020 low of 10,090,000 tCO_2e. The improvement BlueScope reports is in intensity, and §3.3 shows what drove it. Reported Scope 3 rose 15.8% between FY2022 and FY2025 and then fell 6.4% in FY2026, so the total footprint is 22,150,000 tCO_2e against 21,370,000 in FY2022, up 3.6% over four years despite this year's fall. Two features of the FY2026 suite change what a reader can see, both for the better: the full FY2018 to FY2026 series for Scope 1, Scope 2 and both intensity metrics is now published in the annual report rather than in a separate document, and the physical-risk and scenario analysis that previously sat outside the annual suite is now inside it. Two things are new and unresolved: the divested joint venture is excluded from the second half of FY2026 without restated comparatives, and the Australian operations moved from the GHG Protocol to the National Greenhouse and Energy Reporting methodology during the year with no statement of the effect. There is still no absolute emissions target of any kind against which to read the series.

Metrics over time

Trajectory over time

Reported operational emissions by scope, stacked, in tCO_2e per reporting year.

Source: FY2026 Sustainability Data Supplement page 11 (Scope 1, location-based Scope 2 and Scope 3 totals). Equity share, global, superseded by the NGER methodology for Australian operations. Scope 1 and Scope 2 are also published for FY2018 to FY2021 in the FY2026 Annual Report folio 32; Scope 3 is not published before FY2022, so the chart begins at FY2022



METRIC	FY2018	FY2022	FY2023	FY2024	FY2025	FY2026	MOVEMENT	DRIVER	NOTE
Scope 1 ($ktCO_2e$)	8,820	8,680	8,510	8,500	8,500	8,490	Down: 3.7% over nine years; flat over three	**Cannot** verify: not decomposed at group level	FY2019 8,590; FY2020 8,380; FY2021 8,800, as printed in the FY2026 Annual Report; the FY2025 suite and the September 2024 Climate Action Report printed FY2020 8,420 and FY2021 8,840, and the change is not flagged or explained (Annex K.2). FY2019 and FY2020, absent from the prior year's tables, are restored in FY2026
Scope 2 location-based ($ktCO_2e$)	1,860	1,660	1,740	1,750	1,700	1,710	Down: 8.1% over nine years, not monotonic, up in FY2026	**Grid** factor: grid emission factors named as a driver of the non-steelmaking result	FY2019 1,810; FY2020 1,710; FY2021 1,740. No market-based basis in any year
Scope 2 market-based ($ktCO_2e$)	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not applicable	Never published, although certificates have covered North Star's whole consumption since 2020
Scope 3 total ($ktCO_2e$)	Not disclosed	11,030	11,860	12,310	12,770	11,950	Up: net 8.3% over five years; up 15.8% to FY2025, then down 6.4% in FY2026	**Mixed**: method and boundary both moved in FY2026: supplier-specific factors, updated transport factors and a mid-year disposal, none of them sized	The FY2026 series begins FY2022. No target of any kind
Emissions intensity (steelmaking, tCO_2e per tonne of raw steel)	1.64	1.58	1.51	1.44	1.41	1.38	Down: 15.9%, past the FY2030 target level of 1.44 in FY2024	Activity: about four-fifths denominator growth	FY2019 1.64; FY2020 1.63; FY2021 1.61. BlueScope projects below 1.3 by 2030 from projects already committed
Renewable electricity (% of consumption)	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not applicable	No renewable-electricity claim is made. The North Star supply is described as emission-free, sourced from nuclear generation
Certificates and offsets retired ($ktCO_2e$)	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not disclosed	0	New: nil stated for FY2026	Not applicable	No offsets were used or surrendered in FY2026. Carbon units are disclosed by carrying value in the financial statements ($126.0 million at 30 June 2026, from $143.6 million) and are held for compliance surrender
Scope 1 and 2 combined ($ktCO_2e$)	10,680	10,340	10,250	10,250	10,200	10,200	Down: 4.5% over nine years; unchanged over two	**Mixed**: marginal, against production up about 14%	FY2020 10,090, the low; FY2026 is 1.1% above it
Steelmaking Scope 1 and 2 ($ktCO_2e$)	9,780	9,500	9,370	9,410	9,410	9,420	Down: 3.7% over nine years; up 0.1% in FY2026	Activity: output-driven; the metric that improved is the ratio, not the total	92% of the group total
Non-steelmaking emissions intensity (tCO_2e per despatched tonne)	0.25	0.24	0.22	0.23	0.22	0.22	Down: 13% over nine years against a 30% target for 2030	**Mixed**: named engineering projects, grid decarbonisation and despatch volume	FY2021 0.24. Not re-baselined for the mid-year disposal; BlueScope states the divested facilities do not materially affect the base year

Targets and claims over time

TARGET OR CLAIM	AS FIRST STATED (PERIOD)	AS STATED FOR FY2026	CHANGE	EXPLAINED?	NOTE
12% steelmaking emissions intensity reduction, FY2018 to FY2030	12% steelmaking intensity reduction, FY2018 to FY2030, three steelmaking sites (2021)	Unchanged; with the non-steelmaking target, stated to cover about 99% of Scope 1 and 2; "the 2030 steelmaking target will not be revised"	Achieved: passed in FY2024 and exceeded by 4 percentage points in FY2026; not revised	Yes: attributed to "operational and efficiency improvements at Port Kembla, together with North Star's continued growth following its EAF expansion"	The FY2026 short-term incentive threshold of 14.1% and target of 16.0% both sit above the 12% public target

TARGET OR CLAIM	AS FIRST STATED (PERIOD)	AS STATED FOR FY2026	CHANGE	EXPLAINED?	NOTE
30% non-steelmaking emissions intensity reduction, FY2018 to FY2030	30% non-steelmaking intensity reduction, FY2018 to FY2030, midstream sites (2021)	Unchanged; 13% achieved	Unchanged	Not applicable	Still requires real further reduction, 13% achieved against 30%
Net zero Scope 1 and 2 by 2050	Net zero Scope 1 and 2 by 2050, adopted August 2021	Net zero Scope 1 and 2 by 2050; restated unchanged in the September 2024 report, in FY2025 and in FY2026	Unchanged: contingent on five external enablers throughout	Not applicable	The offsets option is retained, with no residual cap and no volume estimate. Covers 46% of the FY2026 footprint

Safeguard Mechanism position. Not disclosed for earlier years. Trade-exposed baseline-adjusted status held FY2024 to FY2026, reducing the decline rate from 4.9% to 1% a year. For the FY2025 compliance year, 289,294 Safeguard Mechanism Credits were issued for Port Kembla and 1,138 for Western Port; Port Kembla is expected to be below its baseline again for FY2026. Below baseline and generating credits; the concessional decline rate is disclosed. Western Port is no longer covered, its Scope 1 emissions having fallen below the threshold.

4. Findings

4.1 What stands up (genuine / qualified positives)

▲ F–1

BlueScope makes no carbon-neutral, renewable-electricity, offset-backed or science-based claim, and where it does make a claim it states the boundary in the claim itself: the goal is presented as "NET ZERO Scope 1 and 2 GHG Emissions by 2050", the 12 per cent target as applying to the three named steelmaking sites, and the 30 per cent target to named midstream sites. No offsets were used or surrendered in FY2026 and performance against the 2030 targets is reported on a gross basis.

WHY IT MATTERS

Most of the ways a climate disclosure misleads a reader are unavailable here, because the claims are self-limiting on their face. A reader who takes the words at face value is not misled about what they cover.

QUALIFICATION (IF ANY)

The boundaries are accurate; whether they are the right boundaries is a separate matter, taken up at F-4 and F-5.

▲ F–2

The Glenbrook electric arc furnace has produced steel. Cold commissioning began in the second half of FY2026 and hot commissioning followed in July 2026, at a site whose intensity had not moved since FY2013. BlueScope states the furnace enables a reduction of up to one million tonnes a year, about 55 per cent, in the facility's Scope 1 and 2 emissions, co-funded by the New Zealand Government, and it has launched a lower-emissions product range produced on it.

WHY IT MATTERS

This is abatement with a physical mechanism, a counterparty, a cost and now a commissioning date rather than a study. On the company's own figures it is the largest single emissions reduction available to BlueScope this decade, and it has moved from under construction to producing metal.

QUALIFICATION (IF ANY)

The stated reduction is subject to securing additional renewable power purchase agreements and recycling more domestic scrap in New Zealand, which BlueScope discloses. The benefit falls outside the reviewed year's results.

▲

F–3

Every climate risk and opportunity carries a quantified or explicitly bounded financial effect, and the assumptions behind them are the same ones used in the audited accounts. The Safeguard Mechanism liability is put at up to $60 million a year by 2035 unmitigated; a one per cent displacement of domestic sales into export markets at about $9 million a year, with up to five per cent modelled under the 1.5°C scenario; physical hazards at average annualised losses of up to $20 million by 2100 under the high-temperature scenario; and renewable-energy-related demand at up to $50 million of annual earnings uplift. The impairment note states that a 20 per cent increase in Safeguard compliance cost in each year of a 30-year forecast would reduce the Australian Steel Products recoverable amount by $77 million, and that the cash flows "do not include the operating and capital expenditure that may be required to achieve the Group's 2050 net zero emissions goal".

WHY IT MATTERS

An investor can see what the transition costs on the company's own modelling, in dollars, on the same assumptions the auditors saw, and can see plainly that the destination itself is unpriced. Quantified climate effects tied back to impairment assumptions are what makes a climate statement usable for pricing rather than reading.

QUALIFICATION (IF ANY)

The summary line for the customer-preference risk reads "not quantifiable" while the same box supplies the unit rate and the modelled displacement, so a reader who stops at the summary gets less than the disclosure offers.

4.2 What does not stand up (negatives)

▼ F–4

54% of BlueScope's footprint has no target, and the disclosure never says so. Scope 3 was 11,950,000 tCO_2e in FY2026 against 10,200,000 tCO_2e of Scope 1 and 2, and BlueScope states the Scope 3 share itself: "BlueScope's FY2026 Scope 3 GHG emissions represent 54 per cent of the Company's overall emissions profile". Every target and the 2050 net zero goal cover Scope 1 and Scope 2 only. BlueScope states its 2030 targets together cover "around 99 per cent of BlueScope's Scope 1 and 2 GHG emissions", which is about 46 per cent of the whole. Value chain emissions have no target, no baseline and no target year, and the long-term work program for them is described in a document published in September 2024.

WHY IT MATTERS TO A READER

The majority of the emissions BlueScope reports on are outside everything it has committed to. A reader who takes "net zero by 2050" as a statement about BlueScope's emissions is reading it about twice as widely as it is meant, and nothing in the suite tells them that the 54 per cent they have just been shown carries no commitment.

WHAT WOULD FIX IT

A Scope 3 target with a baseline, a target year and stated category coverage, starting with Category 1, which alone is 29 per cent of the whole footprint; and a line wherever the coverage figure appears stating what share of the total footprint the targets reach.

▼ F–5

The 2030 steelmaking target is four percentage points behind the current result, eight behind the company's own projection, and will not be revised. The target is a 12 per cent intensity reduction from the FY2018 baseline of 1.64, giving a target level of 1.44 tCO_2e per tonne of raw steel. FY2024 came in at 1.44, FY2025 at 1.41 and FY2026 at 1.38. BlueScope states its own forward estimate: with the Glenbrook furnace and the North Star debottlenecking and "no other changes from FY2026", steelmaking intensity is "estimated to be below 1.3 tCO_2e per tonne by 2030", at least a 20 per cent reduction. Its FY2026 short-term incentive scorecard set a threshold of 14.1 per cent, a target of 16.0 per cent and a stretch of 17.0 per cent, so the annual bonus gate is already harder than the public 2030 commitment. And the company states: "At this stage, the 2030 steelmaking target will not be revised."

WHY IT MATTERS TO A READER

The published target requires no further reduction of any kind, and permits intensity to rise about 4 per cent from the FY2026 position and still be met in 2030. A reader who sees a 2030 target line drawn to the right of the current result is looking at a commitment the company has already passed, expects to beat by two-thirds, and has decided to leave where it is.

WHAT WOULD FIX IT

Replace the 2030 steelmaking target with one calibrated to the below-1.3 projection, and state the coverage, baseline and mechanism of the replacement alongside the absolute emissions it implies.

▼ F–6

The intensity improvement is mostly output growth, and this year it is entirely output growth. Steelmaking Scope 1 and 2 emissions rose from 9,410,000 to 9,420,000 tCO_2e in FY2026 while raw steel production rose 1.9 per cent to 6,814,000 tonnes, so the whole 2.1 per cent fall in the metric is the denominator. Over the longer period, applying FY2026 production to FY2018 emissions gives 1.44, so about 12.5 of the 15.9 percentage points of improvement since FY2018 come from producing more steel and about 3.4 from producing lower emissions. BlueScope names the driver, "North Star's continued growth following its EAF expansion", and its investor materials lead with it, but no site-level intensity or emissions figures are published for FY2026 and the shares are not disclosed.

WHY IT MATTERS TO A READER

A reader is shown a falling line and told the company is ahead of target. What the line records is that BlueScope grew where its emissions per tonne were already lowest, and that in the reviewed year its steelmaking emissions went up rather than down. The mechanism matters because it is finite: it stops working once the mix stops shifting, and the debottlenecking that continues it also raises the absolute total, which BlueScope states.

WHAT WOULD FIX IT

Publish the site-level emissions and intensity series in the annual suite, and decompose the group movement into production volume, site mix, grid emission factors and site abatement.

▼ F–7

The 6.4 per cent fall in reported value chain emissions is attributed to three causes and none of them is sized. Scope 3 fell from 12,770,000 to 11,950,000 tCO_2e, entirely on Category 1, which fell 940,000 tCO_2e, partly offset by Category 4, which rose 280,000 on updated transport emission factors. BlueScope names increased supplier-specific factor coverage, the updated transport factors and the exclusion of the divested Tata BlueScope joint venture from the second half of the year. Prior-year comparatives are not restated for the disposal, and the narrative describes the position as "total Scope 3 GHG emissions and their largest contributors have remained largely consistent". No supply-chain abatement is named or quantified anywhere in the suite.

WHY IT MATTERS TO A READER

Two of the three named causes are changes to how the number is calculated or what it covers, not changes in the emissions themselves. A reader cannot tell whether BlueScope's value chain emissions fell, and the largest single line in the whole footprint moved 13 per cent without an explanation a reader can weigh.

WHAT WOULD FIX IT

Size each of the three causes, restate the comparatives on a consistent boundary, and state separately what part of the movement is supply-chain change.

▼ F–8

Scope 2 is reported on the location-based method only, and the certificates that would change it cover an entire site. BlueScope states that "North Star is powered by GHG emissions-free electricity via a power purchase agreement with a local nuclear power provider, independently verified through the supply of Emission-Free Energy Certificates (EFECs) equivalent to North Star's electricity consumption", that the agreement has been in place since 2020 and covers the site's entire consumption, and that "as the Group reports Scope 2 GHG emissions under the location-based method, these EFECs are not reflected in reported Scope 2 emissions". No market-based figure is published for the group or the site, and no Scope 2 split by site exists from which one could be derived.

WHY IT MATTERS TO A READER

The GHG Protocol requires both bases where an entity holds contractual instruments, and the gap between them is usually the finding. Here the single-basis reporting works against BlueScope's reported position, because its market-based footprint would be lower. A reader can see neither the contractual position nor its size, and a customer running its own value-chain accounting cannot take BlueScope's best number from BlueScope's own reporting.

WHAT WOULD FIX IT

Report both bases for the group, with the certificate and contract volumes behind the market-based figure, and publish Scope 2 by site or region.

▼ F–9

A vulnerability metric in the statutory climate statement is stated against the wrong denominator. The report states that "approximately $8,060M of PPE at 30 June 2026 was assessed as vulnerable to physical climate-related risks, representing over 99 per cent of Group total assets", and that a deeper assessment of the three steelmaking sites "identified approximately $4,660M of PPE as vulnerable to physical climate-related risks (Risk 3), representing 58 per cent of the Group's total assets". Total assets in the same Annual Report are $16,398.9 million, so the two figures are 49 per cent and 28 per cent of total assets. The percentages given are shares of the assessed property, plant and equipment base: $8,060 million is 99.7 per cent of property, plant and equipment plus right-of-use assets, and $4,660 million is 58 per cent of $8,060 million.

WHY IT MATTERS TO A READER

This is one of the few AASB S2 metrics that ties the climate statement to the balance sheet, and it is the metric a reader uses to size physical exposure against the company. As printed it says that essentially the whole of BlueScope's balance sheet is exposed to physical climate risk, where the assessed exposure is about half of it. The dollar figures are correct and the error runs against the company, but the reader who takes the percentage rather than the dollars is misinformed.

WHAT WOULD FIX IT

Restate both percentages against the denominator they were computed on, naming it as property, plant and equipment, and give the total-assets share separately.

▼ F-10

The project the disclosure most often names as a source of abatement is excluded from the figure that measures abatement spending. The Western Port paint line oven upgrade is cited in the Sustainability Overview, the Data Supplement and the Climate-related Targets section as a key FY2026 emissions-reduction project, and BlueScope states that Scope 1 emissions at the site "have declined by more than 20,000 tCO_2-e since completion of the project". The same report states that the $139 million of FY2026 decarbonisation investment "does not include capital investments with indirect decarbonisation benefits, where the primary driver relates to cost, capability or operational improvements, such as the North Star expansion, Western Port oven upgrades and various energy savings projects".

WHY IT MATTERS TO A READER

A reader cannot tell what the company counts as decarbonisation spending. The same project is presented as delivering emissions reductions in one part of the report and as an operational investment with only indirect decarbonisation benefits in another, and no cumulative figure is published against the FY2021 commitment of up to $150 million over five years, a period that ended in FY2026.

WHAT WOULD FIX IT

Use one definition of decarbonisation investment across the suite, and publish the cumulative spend against the five-year commitment and against the $300 million to $400 million estimate to 2030.

▼ F-11

The 2050 net zero goal keeps an unquantified offsets option with no residual-emissions cap. BlueScope states that it "retains the option to use carbon offsets to meet its 2050 net zero goal where direct abatement is not technically or commercially feasible", that "there is a high degree of uncertainty associated with the magnitude of carbon offsets that may need to be used to achieve this goal, thus BlueScope has not disclosed an associated gross target", and that the goal depends on five enablers "which are largely beyond BlueScope's direct control". The cost of achieving it is expressly excluded from the audited cash flows. The Board receives an annual update on whether there is "a reasonable basis on which to view this goal as achievable in the stated timeframe".

WHY IT MATTERS TO A READER

A net zero goal with no cap on how much may be offset, no residual-emissions figure, no gross target, no cost in the accounts and five external preconditions is a statement of direction rather than a commitment a reader can hold the company to. It is also the only commitment covering the period after 2030, because the two targets expire then.

WHAT WOULD FIX IT

Cap the residual share the goal permits to be offset, state the expected residual volume, publish an interim absolute milestone between 2030 and 2050, and price the pathway in the accounts as the 2030 targets already are.

▼ F–12

The reporting suite still directs the reader to a document published two years before the reviewed period. The Annual Report states that "site-specific pathways are set out in BlueScope's second Climate Action Report" and refers the reader there for the non-steelmaking decarbonisation pathway; the Sustainability Overview refers there for the indicative decarbonisation pathways for each steelmaking operation and for the Scope 3 long-term work program; and the Data Supplement refers there for the five enablers. BlueScope's climate action page, checked 3 September 2026, lists the September 2024 second edition as the current version. The physical climate risk assessment relied on throughout the FY2026 statement was itself "conducted in 2024".

WHY IT MATTERS TO A READER

Four substantive parts of BlueScope's climate position, including the site pathways that the whole decarbonisation story rests on and the work program for the 54 per cent of the footprint with no target, are available only in a document that predates the reported year by two years. In a mandatory reporting year, the statutory statement is the document a reader is entitled to rely on.

WHAT WOULD FIX IT

Carry the site pathways, the site-level series and the Scope 3 work program into the annual report, refresh the physical risk assessment, and either update or retire the standalone Climate Action Report.

▼ F–13

Two disclosed changes to the basis of the figures carry no statement of effect. BlueScope early adopted AASB S2025-1, moving Australian operations from the GHG Protocol to the National Greenhouse and Energy Reporting methodology, and states in the same section that "there were no material changes in the measurement approach, inputs and assumptions during the reporting period", without giving the effect of the change or a comparison on the prior basis. Separately, data for the divested Tata BlueScope joint venture is excluded from the second half of FY2026 across Scope 1, Scope 2 and Scope 3, and comparatives are not restated; the disclosure states only that the divested facilities do not materially affect the midstream intensity base year.

WHY IT MATTERS TO A READER

Two of the nine years in the published series were produced on a different basis from the rest, and the reader is told that the change happened without being told what it did. Where a series is the only evidence of direction of travel, an unquantified change in how it is measured limits what the series can be used for.

WHAT WOULD FIX IT

State the effect of the methodology change on reported Scope 1 and 2, and restate the emissions comparatives for the disposal or publish the excluded amount.

4.3 What cannot be verified

?

F–14

How much of the reduction in Scope 1 and 2 since FY2018 is BlueScope's own abatement

WHY IT IS OPEN

The disclosure names production mix, grid emission factors, site efficiencies and lower Glenbrook volumes as drivers but sizes none of them at group level; the named projects total of the order of tens of thousands of tonnes against a 480,000 tCO_2e nine-year reduction

WHAT WOULD RESOLVE IT

A decomposition of the movement into volume, mix, grid factor, method and abatement

?

F–15

The split of the 820,000 tCO_2e fall in Scope 3 between supplier-specific factor coverage, the transport factor update and the mid-year disposal

WHY IT IS OPEN

Three causes named, none sized, and comparatives not restated

WHAT WOULD RESOLVE IT

The amount attributable to each cause, with comparatives on a consistent boundary

?

F–16

BlueScope's market-based Scope 2 position

WHY IT IS OPEN

Not published for FY2026 at group or site level, and no Scope 2 split by site exists from which it could be derived

WHAT WOULD RESOLVE IT

A group market-based figure with the underlying certificate and contract volumes

?

F–17

The effect on reported Scope 1 and 2 of moving Australian operations to the National Greenhouse and Energy Reporting methodology

WHY IT IS OPEN

The change is disclosed as an early adoption; no effect is quantified and no comparison on the previous basis is given

WHAT WOULD RESOLVE IT

The reported figures on both bases for the reviewed year

?

F-18

Site-level emissions and intensity for FY2026

WHY IT IS OPEN

Not published in the FY2026 suite; the last published site series ends at FY2024 and sits in the September 2024 report

WHAT WOULD RESOLVE IT

The site-level series for the three steelmaking sites in the annual suite

?

F-19

The basis on which Categories 8, 13 and 14 are not applicable

WHY IT IS OPEN

Each is marked "Not applicable" with no reason given, for a group operating in more than ten countries

WHAT WOULD RESOLVE IT

A one-line basis for each, as is given for the categories marked immaterial

?

F-20

The global warming potential version applied

WHY IT IS OPEN

Not stated anywhere in the suite; the six Kyoto Protocol gases are named and the factor publications are named by jurisdiction, so the basis is implied but not disclosed

WHAT WOULD RESOLVE IT

A methodology note naming the assessment report used

?

F-21

Cumulative spend against the FY2021 commitment of up to $150 million over five years

WHY IT IS OPEN

Only the FY2026 figure of $139 million is published, and the five-year period ended in FY2026

WHAT WOULD RESOLVE IT

The cumulative figure against the commitment and against the $300 million to $400 million estimate to 2030

?

F-22

BlueScope's Safeguard Mechanism baseline and surrender position for FY2026

WHY IT IS OPEN

The credits issued for the FY2025 compliance year are disclosed and Port Kembla is stated to be expected below its FY2026 baseline, but the baselines themselves, covered emissions and any surrender are not

WHAT WOULD RESOLVE IT

The Port Kembla and Western Port baselines and covered emissions for FY2026

5. Disclosure risk exposure

5.1 Risk read

BlueScope's exposure sits in the gap between what its targets say and what they require, not in the accuracy of what it publishes. The figures are sound, the claims are boundary-labelled, the first mandatory statement is delivered with a Directors' declaration and an unmodified assurance conclusion, and the financial effects are quantified on the same assumptions the auditors saw. What carries risk is a climate statement organised around a 2030 target the company passed two years ago, has decided not to move, and expects to beat by two-thirds, published in a year when absolute emissions did not fall and the company states they will rise as output grows. The second driver is the absence of any target over the 54 per cent of the footprint the same statement quantifies. Two narrower items are new: a vulnerability metric stated against Group total assets when the percentage is of property, plant and equipment, and a change in measurement methodology disclosed without its effect. Both now sit inside an audited annual report under a mandatory standard, which raises the consequence of each without changing its nature.

5.2 Risk by lens

Risk exposure by lens

Relative exposure across disclosure-risk lenses; see the table for what drives each and what would reduce it.

Source: Review analysis of the FY2026 Annual Report, Sustainability Report (Climate-related Disclosures), folios 182 to 191

Legal (misleading-conduct / disclosure / director-duty)	Low to moderate	High confidence
Regulatory (ASIC / ACCC / Clean Energy Regulator / AASB S2)	Moderate	High confidence
Technology (dependence on unproven abatement)	High	High confidence
Physical (physical-risk disclosure consistency)	Low to moderate	High confidence
Other: commercial and market	Moderate	Medium confidence

LENS	EXPOSURE	CONFIDENCE	WHAT DRIVES IT	WHAT WOULD REDUCE IT
Legal (misleading-conduct / disclosure / director-duty)	Low to moderate	High	Individual claims are accurate and carry their own boundaries, and the suite now states plainly that performance is ahead of the 2030 target rather than approaching it. The residual is a Directors' declaration over a statement containing a vulnerability percentage that does not reconcile to the balance sheet in the same document, and a 2050 goal whose cost is excluded from the cash flows and whose offset reliance is uncapped.	Correct the vulnerability denominator, and state the residual-emissions assumption behind the 2050 goal.
Regulatory (ASIC / ACCC / Clean Energy Regulator / AASB S2)	Moderate	High	The first mandatory statement is compliant on its face, and the transition reliefs are permitted and disclosed. Three items remain live against standards the company cites: one Scope 2 basis where the GHG Protocol requires two on operations holding contractual instruments, no global warming potential version, and a measurement methodology change without a statement of effect. Separately, Port Kembla's concessional decline rate expires after FY2026 and the disclosure states the position beyond it is uncertain.	Report both Scope 2 bases, state the conversion basis, quantify the methodology change, and disclose the Safeguard baseline position.
Technology (dependence on unproven abatement)	High	High	The 2050 goal is contingent on five external enablers BlueScope does not control, including commercial-scale ironmaking technology and competitively priced green hydrogen. The largest ironmaking project, NeoSmelt, remains at feasibility with a final investment decision expected in mid FY2027 and a 30,000 to 40,000 tonne pilot after that. Port Kembla, the largest single source, has no committed technology change this decade, and the company's own 2030 projection assumes no changes beyond Glenbrook and North Star.	Publish the abatement each named project is expected to deliver, with dates, against the Scope 1 and 2 total, and state what happens at Port Kembla between 2030 and 2050.
Physical (physical-risk disclosure consistency)	Low to moderate	High	The assessment covers 71 sites against six hazards under two Shared Socioeconomic Pathways across three time horizons, and quantifies average annualised losses at up to $20 million by 2100. Two limitations: the assessment was conducted in 2024 and has not been refreshed for the reviewed year, and the exposure share is stated against the wrong denominator, so the headline reads as though the whole balance sheet is exposed. The supply chain mapping carries no financial impacts.	Refresh the assessment, correct the denominator, and extend the financial quantification to the supply chain analysis.
Other: commercial and market	Moderate	Medium	BlueScope quantifies this itself: about $9 million of earnings for every one per cent of domestic sales displaced into export markets, with up to five per cent modelled under the 1.5°C scenario. Environmental Product Declarations are registered across the COLORBOND, XLERPLATE and related ranges in several countries and a lower-emissions product brand has launched in New Zealand, but the corporate inventory publishes no per-tonne figure by site or route, and the market-based position at the lowest-emissions site is not reported. Customers running their own value-chain accounting cannot take BlueScope's best position from BlueScope's own reporting.	Publish site and route-level intensity annually and report both Scope 2 bases.

5.3 Consistency across audiences

CLAIM / METRIC	TO THE REGULATOR	TO INVESTORS / PUBLIC	CONSISTENT AFTER NORMALISING BOUNDARY?
Scope 1 and location-based Scope 2, Australian operations	6,223,931 tCO_2e Scope 1 and 786,481 tCO_2e Scope 2 reported to the National Greenhouse and Energy Reporting register for FY2024-25, on an operational-control, Australia-only basis	8,500,000 tCO_2e Scope 1 and 1,700,000 tCO_2e Scope 2 globally for FY2025, on an equity-share basis	Yes: on the evidence available. The Australian figure is 73% of the global Scope 1, which is consistent with Port Kembla being the group's only blast furnace and with New Zealand, North America and Asia making up the balance. The FY2025-26 register was not published at the review date, so FY2026 cannot be tested. No reconciliation is published, so the residual is not tested
Physical-risk asset exposure	Audited balance sheet: total assets $16,398.9 million, property, plant and equipment $7,610.1 million plus right-of-use assets $470.3 million	Statutory climate statement: $8,060 million of property, plant and equipment vulnerable, "representing over 99 per cent of Group total assets", and $4,660 million "representing 58 per cent of the Group's total assets"	No: both percentages are shares of the assessed property, plant and equipment base. Against total assets in the same report they are 49 per cent and 28 per cent
What counts as decarbonisation investment	Not reported to a regulator in this form	The Western Port paint line oven is named as a key emissions-reduction project delivering more than 20,000 tCO_2e, and is expressly excluded from the $139 million decarbonisation investment figure as an investment with indirect decarbonisation benefits	No: the same project is inside the abatement narrative and outside the abatement spending figure, and no cumulative spend is published
Consolidation approach	Statutory climate statement: equity share globally, "unless superseded by the jurisdictional relief adopted for Australian operations under the NGER scheme"	Data Supplement: "environmental data is reported utilising an equity share approach", without the Australian qualification	Partly: the statutory statement is the fuller one; the Data Supplement's description is incomplete for Australian operations. The reported figures are the same in both

CLAIM / METRIC	TO THE REGULATOR	TO INVESTORS / PUBLIC	CONSISTENT AFTER NORMALISING BOUNDARY?
The 16% steelmaking intensity result against the 2030 target	Annual Report, lodged with ASX: "This performance is ahead of the 12 per cent emissions intensity target for 2030"	Sustainability Overview, Data Supplement and results presentation: the same words and the same figure	Yes: one characterisation across the suite, and the remuneration scorecard's 15.7 per cent is the same result on unrounded inputs
Target coverage	Statutory climate statement: the 2030 targets "cover around 99 per cent of BlueScope's Scope 1 and 2 GHG emissions"	Results presentation: steelmaking target 92 per cent and non-steelmaking target 8 per cent of Group Scope 1 and 2	Yes: after normalising. The difference is downstream activities, which the non-steelmaking target excludes by its own definition

6. How to fix it

6.1 NoCO2 Standard alignment

REQUIREMENT AREA	DOCUMENT / CLAUSE	CURRENT POSITION	GAP	ACTION
Organisational boundary	NoCO2 Net Zero Standard 4.4 Organisational Boundary; 5.1.7 Boundary Description	Equity share globally, superseded by NGER jurisdictional relief for Australian operations; NS BlueScope Coated Products named; other investees quantified at 10 $ktCO_2e$	The entity list and the percentages applied are not published, and the emissions removed by the mid-year disposal are not stated	Publish the entity list with percentages and the disposal amount
Emission categories and materiality	4.5.3 GHG Emission Categories; 4.5.4 Quantification	All fifteen categories addressed with a published 1 per cent threshold, three years of data and exact reconciliation to the total	Categories 8, 13 and 14 are marked not applicable without a stated basis	A one-line basis for each not-applicable category
Market versus location-based electricity	4.5.5 Methodology, market versus location-based electricity; 5.1.13 Contractual Instruments for Purchased Energy	Location-based only. Certificates covering North Star's entire consumption are described and expressly excluded from the reported figure	No market-based basis at group or site level, and no Scope 2 split from which one could be derived	Report both bases with certificate and contract volumes; publish Scope 2 by site or region
Influence-based inventory	4.5.6 Influence Based Inventory Categories; Annex B Net Zero Attribution of GHG Protocol Categories	The advocacy and enabler work occupies a substantial part of the climate content as narrative, and the lower-embodied-carbon product range is presented qualitatively	Neither is a disclosed inventory category, so neither can be tracked or tested	Constitute the enabler advocacy and the avoided-emissions position as an influence-based category
Data quality and supplier-specific factors	4.6 Data Quality; 4.6.2 improvement; 4.6.4 Supplier-Specific Emission Factor assessment; 5.1.14 Scope 3 improvement plan	Supplier-specific factor coverage is stated to have increased and moved Category 1 by 940 $ktCO_2e$; the coverage percentage is not published	Without a published coverage ranking, a factor change cannot be separated from an emissions change	Publish the coverage percentage and a dated improvement plan
Reduction obligations and trajectory	4.7 Reduction Obligations; 4.7.4 Accelerated Reduction Timeline; 4.7.5 Net Zero Status Requirements; 4.9.2 Metrics and Targets with base-year consistency	Two 2030 intensity targets, one passed by 4 percentage points and stated not to be revised, and a 2050 net zero goal with no interim milestone and no absolute cap	No absolute obligation, no milestone between 2030 and 2050, and two disclosed basis changes with no restated comparison	Replace the steelmaking target with a trajectory calibrated to the below-1.3 projection, add an absolute obligation and an interim milestone, and carry both basis changes under the base-year consistency requirement
Required interventions	4.7.1 Required Interventions Schedule	The Glenbrook furnace, the North Star debottlenecking, the Port Kembla efficiency program and four midstream projects are interventions in substance, and three of the midstream projects are sized	They are not scheduled with dates and expected abatement against the 10,200 $ktCO_2e$ total, and the capital figure excludes several of them	Schedule each intervention with a date and an expected abatement, and reconcile the schedule to the capital-deployment figure
Clean alternative assessment	4.7.2 Clean Alternative Assessment	The Australian DRI options study and the NeoSmelt pilot are clean-alternative evaluations in substance, with indicative reduction ranges published for the natural-gas and hydrogen routes	The assessment output is not published: options considered, emissions each would deliver, and the basis for treating natural-gas DRI as the transition route	Publish the assessment output alongside the pathway

REQUIREMENT AREA	DOCUMENT / CLAUSE	CURRENT POSITION	GAP	ACTION
Carbon credits and residual emissions	4.8.1 Abatement Principles; 4.8.2 CDR Criteria; 4.8.3 Permanence Risk Mitigation; 5.1.12 Carbon Credit Reporting	No offsets used or surrendered in FY2026, gross reporting of target progress, and five published procurement principles including transparent disclosure of retirements	No residual-emissions cap, no volume estimate, and an express decision not to disclose a gross target for the 2050 goal	Cap the residual share, state the expected residual volume, and apply the CDR criteria to the credit types contemplated
Public claims and disclosure	4.9.1 Use of Claims and Statements; 4.9.1.2 Net Zero Claims; 4.9.1.5 Partial Application; 4.9.4 Public Reporting and Disclosure	Every claim states its boundary where it is made, and the whole-footprint split and the 54 per cent Scope 3 share are published on the same page as the goal	The Scope 1 and 2 boundary is stated but its consequence, that 54 per cent carries no commitment, is nowhere stated	Declare the goal as a partial application, so the untargeted share is a matter of record wherever the goal appears
Conformance and assurance	6.1 Assurance Requirements; 6.2 Conformance Requirements; 5.1.15 Non-Conformance Disclosure	Limited assurance over governance, strategy risks and opportunities and Scope 1 and 2 under the statutory phase-in, plus steelmaking intensity in the voluntary layer	Scope 3, the target metrics, the vulnerability metrics and the capital-deployment figure are unassured, and both figure defects sit in that unassured half	Extend assurance ahead of the phase-in, starting with the metrics carrying quantified statements

7. Conclusion & next steps

BlueScope's first mandatory climate statement is a substantially better document than the position it reports. The statutory report carries governance, scenario analysis, a physical risk assessment, a full method statement and quantified financial effects for every risk and opportunity, tied to the assumptions in the audited accounts. Nine years of absolute and intensity data now sit in the annual report. The claims are boundary-labelled, no offsets were used, and the electric arc furnace at Glenbrook has produced its first steel. What the improved reporting shows more clearly than before is a plateau. Scope 1 and Scope 2 have been 10,200,000 tCO_2e for two years running and 4 per cent below 2018 across nine. Steelmaking emissions rose in the reviewed year while the intensity metric improved, because output rose faster. The reported fall in value chain emissions is attributed to an emission-factor change, a transport factor change and a mid-year disposal, and none of the three is sized.

The first fix is the target architecture, because it is what the whole statement is arranged around and it is the one thing the reporting improvements have not touched. Value chain emissions, 54 per cent of the footprint on BlueScope's own figure, have no target. Scope 1 and 2 have no absolute cap and no milestone between 2030 and 2050. The 2030 steelmaking target sits four percentage points behind the current result and eight behind BlueScope's own projection from projects already committed, its annual bonus threshold is set harder than it, and the company states it will not be revised. Replacing it with a target calibrated to the below-1.3 projection, and setting a Scope 3 target with a baseline, a target year and stated category coverage, would give a reader a measure that says something about the future.

The second is attribution. Three separate movements this year, the intensity improvement, the Scope 1 result and the Scope 3 fall, are each driven by a mix of output, method and boundary that the disclosure names and does not size. Publishing the site-level series, decomposing the group movement, and stating what the methodology change and the disposal each removed would let a reader see what BlueScope actually abated.

The third is smaller and quick: report both Scope 2 bases, state the global warming potential version, correct the vulnerability percentages against the denominator they were computed on, publish cumulative decarbonisation spend against the five-year commitment that has now ended, and bring the site pathways and the Scope 3 work program out of a 2024 document and into the statement a reader is entitled to rely on.

Important information

This diagnosis is general information, published to support transparency, accountability and public debate on corporate climate disclosure. It sets out CRI's assessment of the publicly available climate disclosures of the organisation named above, for the reporting period stated, based on third-party information available at the review date. The assessment is made against CRI's Climate Disclosure Review

Rules (version stated above), which use the CRI Net Zero Standard as the reference for a credible claim together with AASB S2 Climate-related Disclosures, and it gives reasons for each finding.

It assesses the disclosure, not the organisation's underlying climate performance or intent, and it does not allege illegality, misconduct, greenwashing or dishonesty. It is not tailored advice, nor legal, financial or investment advice, and it is not an audit, an assurance engagement or a certification. CRI does not accept liability for any error or omission in this analysis, or for any loss arising from use of or reliance on it.

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Organisations may contact CRI at robc@noco2.com.au to identify an error, provide relevant public information or request review of updated disclosures. Where a correction affects a finding, the diagnosis is updated and the change is noted. Further information about the review method is at noco2.com.au.

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--- ANNEXES (INTERNAL WORKING LAYER) ---

These annexes are the detailed working layer behind the findings in the body: the evidence base, rule application and traceability. Much of it is review working, retained for transparency and of interest to both the internal review team and external readers who want to see how each finding was reached.

Annex A: Documents reviewed & completeness (A-01A)

DOCUMENT	STATUS	CRITICALITY	NOTES
BlueScope Steel Limited Annual Report FY2026 (year ended 30 June 2026)	Reviewed	Critical	Primary audited source under A-01B. Carries Section 07 Sustainability Report (Climate-related Disclosures) on folios 174 to 195, the Directors' declaration for that report, the EY review report, Section 02 Sustainability Overview, the Remuneration Report STI scorecard, and the carrying-value note with the Safeguard Mechanism assumptions and sensitivity
BlueScope Sustainability Data Supplement FY2026	Reviewed	Critical	Metrics and data tables, the fifteen-category Scope 3 inventory with FY2024 to FY2026, the product sustainability credentials, the SASB and GRI indices, and the metric definitions and glossary
BlueScope FY2026 Sustainability Metrics and Data Tables (.xlsx)	Reviewed	Material	Machine-readable form of the metrics tables
BlueScope FY2026 Full Year Financial Results Supplementary Materials	Reviewed	Material	Climate Action slide with the nine-year intensity series and the target coverage split; capital expenditure detail on the New Zealand electric arc furnace
A standalone FY2026 Sustainability Report	Confirmed not published as a separate document	Not applicable	The FY2026 reporting suite listed by BlueScope comprises the Annual Report, the results release, presentation and supplementary materials, the Sustainability Data Supplement, the Tax Contribution Report and a Modern Slavery Statement due late 2026. Sustainability content sits inside the Annual Report; nothing is missing from the corpus
BlueScope Climate Action Report, second edition, September 2024	Reviewed	Critical	In scope (covers FY2024 and earlier). Carries the site-level intensity series FY2013 to FY2024, the site decarbonisation pathways, the Scope 3 long-term work program and the North Star market-based illustration. Still cross-referenced four times by the FY2026 suite
A Climate Action Report covering FY2025 or FY2026	Confirmed not published	Critical if it existed	Channel check: bluescope.com climate action page, retrieved 3 September 2026, lists only the 2021 first edition and the 2024 second edition. Finding about the entity's disclosure architecture (F-12), not a review limitation
BlueScope Corporate Governance Statement FY2026	Not reviewed, document not provided	Useful but optional	Board and committee structure, including the 1 February 2026 restructure, is described in the climate report and the governance chapter. Charter-level detail untested; no dependent finding is drawn
BlueScope Modern Slavery Statement FY2026, Tax Contribution Report FY2026	Not reviewed	Not relevant	Outside the climate scope. The Modern Slavery Statement is stated to be due late 2026
Emission factor register; global warming potential statement	Not published in the reviewed suite	Material	The factor publications are named by jurisdiction (NGER Measurement Determination 2008 Compilation 20, US EPA 2025, NZ Ministry for the Environment 2026, eGRID, IEA). The conversion basis is routed to F-20. No implication drawn that the information does not exist internally
Safeguard Mechanism baseline, covered emissions and unit surrender position for FY2026	Not published	Material	Routed to F-22. Credits issued for the FY2025 compliance year are disclosed. Clean Energy Regulator publishes Safeguard data separately; not relied on here
NGER register FY2024-25 (published data as at 27 February 2026)	Reviewed	Material	Statutory Scope 1 and location-based Scope 2 anchor. Covers FY2025, so the reconciliation in Annex J.2 sits on the prior period; the FY2025-26 register was not published at the review date

DOCUMENT	STATUS	CRITICALITY	NOTES
Prior-period BlueScope suite: FY2025 Annual Report, FY2025 Sustainability Report, FY2025 Sustainability Data Supplement and Metrics Tables	Reviewed as context	Material	In scope (earlier period). Used for the year-over-year series in §3.4 and Annex K, not as authority for the FY2026 rating (SEC-SF-11, A-01B)

No document covering a period later than FY2026 was reviewed, and none exists in the corpus.

Annex B: Evidence table (AI-02)

EVIDENCE ID	SOURCE (DOC · PAGE/TABLE)	WHAT IT SHOWS	LINKED CLAIM / FINDING	RULE IDS	STATUS
EV-01	Data Supplement p.11; Metrics Tables, Action on climate and environment	Scope 1 8,490; Scope 2 location-based 1,710; total Scope 1 and 2 10,200; steelmaking Scope 1 and 2 9,420; Scope 3 11,950 $ktCO_2e$ for FY2026, with FY2018 and FY2022 to FY2025 comparatives	§3.1, §3.3, §3.4, F-6	G-06, G-07, GHG-STD-00	Reconciled
EV-02	Data Supplement pp.17–19	Fifteen-category Scope 3 inventory, FY2024 to FY2026, with a stated 1% materiality threshold; categories sum exactly to 11,950, 12,770 and 12,310 $ktCO_2e$ respectively. Category 1 6,320; Category 4 1,140 with "the underlying transport emission factors were updated in FY2026"; Categories 8, 13 and 14 marked not applicable; Category 15 nil	A1, §3.1, F-7	S3-01, S3-25, S3-26, OUT-STK-13	Reconciled
EV-03	Annual Report folio 192, Measurement of Scope 1 and 2 GHG emissions	"The Group measures its Scope 1 and 2 GHG emissions globally in accordance with the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004), except for the Group's Australian operations that are within the scope of the Australian National Greenhouse and Energy Reporting (NGER) scheme, where jurisdictional relief has been adopted"; "The Group uses the equity share approach globally to define organisational boundaries, unless superseded by the jurisdictional relief"; NS BlueScope Coated Products named as a consolidated 50/50 joint venture with Nippon Steel; "Scope 2 emissions are calculated using the location-based method"; factor publications named by jurisdiction; estimates "accounting for less than one per cent"; "There were no material changes in the measurement approach, inputs and assumptions during the reporting period"	A3, F-8, F-13, F-17, F-20	G-04, G-05, G-10, S2-28, GHG-STD-08	Reconciled, with the effect of the methodology change recorded as cannot-verify
EV-04	Annual Report folio 175, Basis of preparation	"BlueScope has adopted the transitional relief provided under AASB S2 to exclude comparative information and Scope 3 Greenhouse Gas (GHG) emissions from its first year of annual reporting. Relevant Scope 3 information is provided separately in the Sustainability Overview and Sustainability Data Supplement … on a voluntary basis"; "The Company early adopted AASB S2025-1 Amendments to Greenhouse Gas Emissions Disclosures"	G1, F-13, §1.3	S2-01, S2-46, S2-47, L-01	Reconciled. Reliefs are permitted and disclosed; not a fault
EV-05	Annual Report folio 192, Climate-related Metrics table	Scope 1 8,490 (consolidated accounting group 8,480; other investees 10); Scope 2 location-based 1,710 (consolidated 1,710; other investees 10); total Scope 1 and 2 10,200 (consolidated 10,190; other investees 10). "Numbers are rounded to the nearest 10 $ktCO_2$-e. Totals may not align due to rounding"	A2, §3.1	G-06, G-07, S2-26, S2-28	Reconciled
EV-06	Annual Report folios 192–193, Contractual Instruments	"North Star is powered by GHG emissions-free electricity via a power purchase agreement with a local nuclear power provider, independently verified through the supply of Emission-Free Energy Certificates (EFECs) equivalent to North Star's electricity consumption. This power purchase agreement has been in place since 2020 and covers North Star's entire electricity consumption. As the Group reports Scope 2 GHG emissions under the location-based method, these EFECs are not reflected in reported Scope 2 emissions"; other energy contracts "do not convey energy attributes"	F-8, C-06, F-16	S2-28, E-01, E-05, E-24, G-07	Departure recorded
EV-07	Annual Report folio 31 footnote 3	"Involves all of North Star's electricity consumption being matched with Emission Free Electricity Certificates (EFECs) which refer to electricity generated without producing CO2 emissions. These certificates are independently verified by the electricity market operator PJM Environmental Information Services"	F-8, P1	E-01, E-24, OUT-TB-02	Reconciled

EVIDENCE ID	SOURCE (DOC · PAGE/TABLE)	WHAT IT SHOWS	LINKED CLAIM / FINDING	RULE IDS	STATUS
EV-08	Data Supplement p.12; Annual Report folio 32; Results Supplementary Materials p.21	Steelmaking intensity FY2018 1.64, FY2019 1.64, FY2020 1.63, FY2021 1.61, FY2022 1.58, FY2023 1.51, FY2024 1.44, FY2025 1.41, FY2026 1.38, against an FY2030 target of 1.44. "In FY2026, BlueScope achieved a 16 per cent reduction in steelmaking emissions intensity against its FY2018 baseline. This performance is ahead of the 12 per cent emissions intensity target for 2030. This was primarily driven by operational and efficiency improvements at Port Kembla, together with North Star's continued growth following its EAF expansion, while maintaining a lower emissions intensity."	F-5, F-6, C-04	T-14, T-BASE-01, A-19, G-BAU	Reconciled. One characterisation across the suite
EV-09	Annual Report folio 32, Looking ahead to 2030	"Upon finalisation of commissioning the EAF at Glenbrook in CY2026, together with the debottlenecking at North Star, BlueScope's steelmaking GHG emissions intensity is estimated to be below 1.3 tC02-e per tonne by 2030. This would represent at least a 20 per cent reduction ... on the FY2018 baseline." Footnote: "based on the existing operational footprint as at 30 June 2026, assuming an approximate 850,000 tCO2-e reduction in GHG emissions at Glenbrook Steelworks and an increase in production to 3.3 Mt per annum at North Star at FY2026 emissions intensity. This estimate incorporates no other changes from FY2026"	F-5	T-14, T-06, A-19	Reconciled
EV-10	Annual Report folio 195, Setting, Reviewing and Monitoring Progress Against Targets	"At this stage, the 2030 steelmaking target will not be revised. As the Company better understands the timing of regional iron and steelmaking transformation and its enablers, the appropriate timing and composition of BlueScope's potential future emission reduction targets will be considered."	F-5	T-14, S2-41, A-18, A-21	Recorded
EV-11	Annual Report folio 70, Executive KMP STI scorecard	"Reduction in Group steelmaking Scope 1 & 2 GHG emissions intensity from 2018 baseline", weighting 5.0%, threshold 14.1%, target 16.0%, stretch 17.0%, outcome 4.6%; "Achieved 15.7% reduction. The change from FY2025 was largely driven by a relative increase in the contribution of raw steel tonnes produced from North Star and operational efficiency improvement at Port Kembla." Non-steelmaking measure: threshold 13.0%, target 16.0%, stretch 20.0%, "reduced by approximately 13.3% since FY2018, largely impacted by reduced despatch volumes relative to the baseline year"	F-5, F-6, D7-1	GOV-01, A-11, A-19, G-BAU	Reconciled. The bonus gate is set above the public 2030 target
EV-12	Annual Report folio 194, Table 2 and Overview of BlueScope's Emission Reduction Commitments	"Together, the 2030 targets cover around 99 per cent of BlueScope's Scope 1 and 2 GHG emissions"; steelmaking target scope "Steelmaking activities only (PKSW, Glenbrook and North Star)", intensity, gross GHG emissions, base year 2018, target year 2030; non-steelmaking target scope midstream activities excluding downstream; 2050 net zero goal scope "All global operations", type net GHG emissions, absolute	F-4, C-08, T-COV-02	T-COV-02, T-14, OUT-TB-21	Bounded on its face; the bound is the finding
EV-13	Annual Report folio 30 and folio 32	Total GHG emissions 22,150 $ktCO_2$-e, split Scope 1 8,490, Scope 2 1,710, Scope 3 11,950; "BlueScope's FY2026 Scope 3 GHG emissions represent 54 per cent of the Company's overall emissions profile"; footnote "Scope 2 GHG emissions are reported using the location-based method"	F-4, §3.1	G-06, G-07, S3-01, T-COV-02	Reconciled
EV-14	Annual Report folio 32, nine-year Scope 1 and 2 chart	Scope 1 FY2018–FY2026: 8,820 / 8,590 / 8,380 / 8,800 / 8,680 / 8,510 / 8,500 / 8,500 / 8,490. Scope 2 FY2018–FY2026: 1,860 / 1,810 / 1,710 / 1,740 / 1,660 / 1,740 / 1,750 / 1,700 / 1,710	§3.4, F-6	YOY-01, YOY-02, SEC-SF-11	Reconciled. FY2019 and FY2020, absent from the prior year's tables, are restored
EV-15	Annual Report folio 31	North Star debottlenecking: "delivering efficiency gains and further reducing BlueScope's total steelmaking emissions intensity per tonne, although it is anticipated that BlueScope's absolute emissions will increase due to the higher volume of steel produced"; Glenbrook EAF "an up to one million tonnes per annum, or approximately 55 per cent reduction, in the facility's Scope 1 and 2 GHG emissions ... This has enabled the launch of PACIFIC DCRB®, a locally made, lower-emissions steel brand"; hot commissioning July 2026	F-2, F-6, C-11	T-06, A-19, S2-38	Reconciled
EV-16	Annual Report folio 195, Use of Carbon Credits	"No carbon offsets have been used or surrendered in FY2026 in pursuit of BlueScope's 2050 net zero goal or 2030 targets"; the Company "retains the option to use carbon offsets to meet its 2050 net zero goal"; "a specific estimate of the carbon offset volume required is not disclosed"; five procurement principles; "Any future use of carbon offsets will be verified by appropriate recognised third-party schemes"	F-1, F-11, C-09	G-11, E-08, E-13, E-19, T-05	Recorded
EV-17	Annual Report folio 194 footnote 2	"Due to the uncertainty associated with the development and progression of these enablers, there is a high degree of uncertainty associated with the magnitude of carbon offsets that may need to be used to achieve this goal, thus BlueScope has not disclosed an associated gross target associated with its 2050 net zero goal"	F-11	T-05, G-11, S2-38	Recorded
EV-18	Annual Report folios 197–200, Independent auditor's review report (EY, ASSA 5000 / ASSA 5010)	Selective Sustainability Information: Governance (AASB S2 para 6 and Appendix D), Strategy risks and opportunities (9(a), 10(a), 10(b)), Scope 1 and 2 emissions (29(a)(i)(1)–(2), 29(a)(ii)–(v)). Subject Matter: GHG emissions intensity for steelmaking activities and TRIFR. Unmodified limited-assurance conclusions on both	A4, G1, §2.2	GOV-10, A-11, OUT-STK-13	Reconciled. Scope 3 and the target and vulnerability metrics are outside the scope

EVIDENCE ID	SOURCE (DOC · PAGE/TABLE)	WHAT IT SHOWS	LINKED CLAIM / FINDING	RULE IDS	STATUS
EV-19	Annual Report folio 193, Other Metrics	"Approximately $1,522M of FY2026 revenue was associated with business activities vulnerable to climate-related transition risks, representing nine per cent of Group consolidated revenue. Approximately $15,466M of FY2026 revenue was associated with business activities aligned with climate-related opportunities, representing 93 per cent"; "approximately $8,060M of PPE at 30 June 2026 was assessed as vulnerable to physical climate-related risks, representing over 99 per cent of Group total assets, based on the assets included in the assessment"; "approximately $4,660M of PPE as vulnerable to physical climate-related risks (Risk 3), representing 58 per cent of the Group's total assets"	F-9, G2, §5.3	S2-31, DR-02, A-01B	Divergence recorded
EV-20	Annual Report folio 102, consolidated balance sheet	Total assets $16,398.9M; property, plant and equipment $7,610.1M; right-of-use assets $470.3M; external sales revenue $16,605.9M (folio 100)	F-9, §5.3	A-01B, DR-02	Reconciled. Provides the denominators EV-19 is tested against
EV-21	Annual Report folio 193, Capital Deployment	"In FY2021, BlueScope committed to invest up to $150M over five years in projects supporting the 2030 targets and longer-term decarbonisation ambitions with total estimated spend of approximately $300–$400M to 2030. Investment under this program in FY2026 was $139M, primarily comprising the New Zealand Steel EAF, emissions-reduction enhancements to the No. 6 Blast Furnace reline and Project NeoSmelt. This investment does not include capital investments with indirect decarbonisation benefits … such as the North Star expansion, Western Port oven upgrades and various energy savings projects." Footnote: "Net of grants received for New Zealand's EAF"	F-10, F-21	T-06, DR-02, S2-33	Divergence recorded
EV-22	Annual Report folio 31	"Following the installation of a more efficient paint line oven at Western Port Works, Scope 1 emissions at the site have declined by more than 20,000 tCO2-e since completion of the project"; Kapar direct fire furnace pre-heater "reducing natural gas consumption of the furnace by 20 per cent and saving approximately 1,200 tCO2 per year"; Map Ta Phut "a 14 per cent reduction in Scope 2 emissions at the site"; Suzhou induction heating upgrade	§3.3, F-10, P3	A-19, G-BAU, T-06	Reconciled
EV-23	Annual Report folios 183–184, Risk 2	"the estimated annual SGM liability by 2035 could be up to $60M … an unmitigated exposure that assumes ACCU/SMC prices reach the government stipulated cap by 2035"; "Anticipated financial effect: Short term - not material. Medium term - up to $60M per annum decrease in EBIT"	F-3, §5.2	S2-33, S2-35, DR-04	Reconciled
EV-24	Annual Report folio 182, Risk 1	"for every one per cent of annual domestic sales displaced to export markets, based on the mid-cycle spread between domestic and export margins, earnings may decline by approximately $9M per annum"; "up to five per cent of domestic volumes could be redirected to export markets" under the 1.5°C scenario; "Anticipated financial effect: Medium and long term - not quantifiable"	F-3, §5.2	S2-33, S2-35, OUT-TB-03	Reconciled, with the summary-line point recorded
EV-25	Annual Report folio 185, Risk 3	Physical risk: 71 sites, six hazards, three time horizons (2030, 2050, 2100), two SSP scenarios; "BlueScope could be exposed to average annualised losses of up to $20M by 2100 if unmitigated"; "Based on the physical climate risk assessment conducted in 2024"; supply chain mapping "did not include financial impacts"	I1, §5.2, F-12	N-01, N-04, S2-19, S2-22	Reconciled
EV-26	Annual Report folios 194–195, Safeguard Mechanism	PKSW subject to the SGM; TEBA status FY2024 to FY2026 reducing the decline rate from 4.9% to 1% a year; "both PKSW and Western Port facilities operated below FY2025 baselines, resulting in the issuance of 289,294 and 1,138 SMCs respectively for the FY2025 compliance year"; PKSW "expected to operate below its SGM baseline for the FY2026 compliance period"; Western Port "no longer covered by the SGM"	F-22, §5.2, §3.4	DR-04, L-09	Recorded
EV-27	Annual Report folio 127, note 14.6	"an increase in the cost to comply with the SGM by 20% in each year of the 30-year cash flow forecast for impairment testing, without any mitigating strategies, would reduce the recoverable amount of ASP by $77M"	F-3	S2-33, GOV-05, DR-03	Reconciled
EV-28	Annual Report folio 125, note 14 key assumptions	Cash flows "include estimates of the operating and capital expenditure required to achieve the Group's 2030 GHG emission intensity reduction targets" but "do not include the operating and capital expenditure that may be required to achieve the Group's 2050 net zero emissions goal, as the nature, timing and cost of the transition remain uncertain"; climate assumptions stated to be "consistent with those disclosed in that report"	F-3, F-11	S2-33, S2-35, A-01B	Reconciled
EV-29	Annual Report folio 118, note 8 Operating intangible assets	Emission unit permits $86.0M (FY2025 $117.6M); Australian carbon credit units $38.5M (FY2025 $23.2M); energy certificates $1.5M (FY2025 $2.8M); total $126.0M (FY2025 $143.6M), carried at cost and held for surrender	§3.4, F-1	E-13, DR-02	Reconciled
EV-30	Annual Report folio 178, Climate-related Remuneration	"Under the FY2026 STI, 10 per cent of the MD&CEO's STI scorecard and 10 per cent of each Executive KMP's STI scorecard were allocated to climate-related objectives"; the three measures and their 5 per cent weightings	D7-1	GOV-01, A-11	Reconciled

EVIDENCE ID	SOURCE (DOC · PAGE/TABLE)	WHAT IT SHOWS	LINKED CLAIM / FINDING	RULE IDS	STATUS
EV-31	Annual Report folios 176–179	Governance: Board plus four standing committees after the 1 February 2026 restructure; the Safety and Sustainability Committee reviews targets and enabler status at least annually; the Audit, Risk and Technology Committee oversees statutory sustainability disclosure governance; from FY2027 the CFO assumes responsibility for climate disclosure	D7-2, §2.3	GOV-01, GOV-02, S2-06	Reconciled
EV-32	Annual Report folios 188–191	Four climate scenarios (Accelerated Leap ~1.5°C, Coordinated Climb ~2.0°C, Fragmented Lanes, Unchanged Paths) built on IPCC AR6 SSPs and the IEA Net Zero Emissions by 2050 pathway; per-site implications and responses; assumptions on carbon policy, macroeconomics, energy mix and technology; time horizon to 2100; midstream operations "not separately modelled due to their small emissions footprint"	I1, §5.2	S2-19, S2-22, N-04	Reconciled
EV-33	Data Supplement p.11 and comments column	Net energy consumption 110 PJ; energy intensity for steelmaking 14.8 GJ/t; "Updates have been made to correct a previous overstatement in FY2024 of net energy consumption data (from 116PJ to 109PJ) and energy intensity for steelmaking activities (from 16.1GJ/t to 15.2GJ/t)"	§3.4, A3	G-10, T-BASE-01, YOY-04	Restatement disclosed with before and after values
EV-34	Data Supplement p.11 footnote 2; Annual Report folio 195 footnote 1	"The sale of BlueScope's 50 per cent interest in the Tata BlueScope Joint Venture was completed 31 December 2025. Accordingly, data for the divested facilities is excluded from 2H FY2026"; "BlueScope's midstream GHG emissions intensity target has not been re-baselined as the divested facilities do not have a material impact on the GHG emissions intensity in the base year"	F-13, F-15, §3.4	G-10, T-BASE-01, YOY-04	Recorded; comparatives not restated
EV-35	Data Supplement p.8	Raw steel production 000 tonnes: FY2022 5,978; FY2023 6,173; FY2024 6,526; FY2025 6,688; FY2026 6,814. "BlueScope total raw steel production increased on the prior year, led by higher output at North Star and more modest increases at Port Kembla Steelworks and New Zealand Steel"	F-6, §3.3	A-19, G-BAU	Reconciled
EV-36	Data Supplement pp.20–22, product sustainability credentials	Environmental Product Declarations registered with EPD Australasia and the International EPD System across the COLORBOND and XLERPLATE ranges in Australia and Vietnam, plus Thai, Malaysian, Indonesian and Chinese product schemes and a Digital Product Passport for two COLORBOND gauges	A4, §5.2	S3-EST, SEC-MIN, A-16	Reconciled
EV-37	NGER register FY2024-25 (data as at 27 February 2026)	BLUESCOPE STEEL LIMITED, ABN 16 000 011 058: Scope 1 6,223,931 tCO_2e; Scope 2 (location-based) 786,481 tCO_2e; net energy 73,728,065 GJ	Annex J.2	A-01C, DR-02	Reconciled after boundary normalisation, against FY2025
EV-38	bluescope.com climate action page, retrieved 3 September 2026	Lists the first Climate Action Report (2021) and the second Climate Action Report (2024). No third edition and no climate document published after August 2026	F-12, Annex A	A-01A, E-21	Channel check recorded
EV-39	Annual Report folio 196, Directors' declaration (Sustainability Report)	The Directors' opinion that reasonable steps were taken to ensure the substantive provisions of the Sustainability Report on pages 174 to 195 comply with AASB S2 and contain the section 296D climate statement disclosures; resolution under section 296A(6) as modified by section 1707C(2), 17 August 2026	G1, §2.3	L-01, S2-01, GOV-05	Reconciled

Annex C: Claim register (AI-18 / OUT-TB-15)

CLAIM ID	WORDING / PARAPHRASE	CLAIM OBJECT	CLAIM SOURCE & BASIS (OUT-TB-15)	DOC & LOCATION	STRENGTH	AUDIENCE	EVIDENCE REQ/FOUND/MISSING	TRIGGERED SCANS	RULE IDS	STATUS
C-01	"NET ZERO Scope 1 and 2 GHG Emissions by 2050 · All global operations (steelmaking and non-steelmaking)"	Operational Scope 1 and Scope 2 only, 10,200 $ktCO_2e$ of a 22,150 $ktCO_2e$ footprint	Self-declared. No third-party framework, no validation, no certification	Annual Report folio 30; folio 194 Table 2; Data Supplement p.32	Goal, expressly dependent on five enablers "largely beyond BlueScope's direct control"	All	Boundary found and stated in the claim; residual-emissions figure missing; offset cap missing; gross target expressly not disclosed; costing excluded from the audited cash flows	Net zero: target boundary, transition plan, gross vs net, residual, offsets, assurance, prior claims	OUT-TB-15, T-05, G-11, E-08, S2-33	Boundary accurate; architecture is the finding (F-4, F-11)

CLAIM ID	WORDING / PARAPHRASE	CLAIM OBJECT	CLAIM SOURCE & BASIS (OUT-TB-15)	DOC & LOCATION	STRENGTH	AUDIENCE	EVIDENCE REQ/FOUND/MISSING	TRIGGERED SCANS	RULE IDS	STATUS
C-02	"12 per cent emissions intensity reduction by 2030", steelmaking activities only at Port Kembla, Glenbrook and North Star, gross GHG emissions, base year 2018	Combined Scope 1 and 2 intensity per tonne of raw steel across three sites	Self-declared. Explicitly "not derived using a sectoral decarbonisation approach"	Annual Report folio 194 Table 2; Data Supplement p.32	Target	Investors, public	Baseline found (1.64); target level found (1.44); FY2026 actual found (1.38). Target exceeded by 4 percentage points and stated not to be revised	Target achievement: boundary, baseline, current year, progress calc, method changes, restatements, remuneration links	T-14, T-BASE-01, T-COV-02, A-19, S2-41	Accurate and passed (F-5)
C-03	"30 per cent emissions intensity reduction by 2030", midstream activities including cold rolled, metal coating and painting lines and long products, excluding downstream	Scope 1 and 2 intensity per despatched tonne, midstream only	Self-declared	Annual Report folio 194 Table 2; Data Supplement p.32	Target	Investors	Baseline 0.25; target 0.18; FY2026 actual 0.22, a 13% reduction after eight years	Target achievement; boundary change (divested joint venture excluded from 2H FY2026 without re-baselining)	T-14, T-BASE-01, G-10	Live, requires substantial further reduction
C-04	"In FY2026, BlueScope achieved a 16 per cent reduction in steelmaking emissions intensity against its FY2018 baseline. This performance is ahead of the 12 per cent emissions intensity target for 2030."	Combined three-site steelmaking intensity	Self-declared; the metric is within the voluntary limited assurance scope, the characterisation is not	Annual Report folios 30 and 32; Data Supplement p.12; Results Supplementary Materials p.21	Performance statement	All	Figure verified (9,420 / 6,814 = 1.382). Driver named in every place the result is reported; not sized, and no site-level series for FY2026	Reduction claim: BAU counterfactual, mix, grid vs own action; cross-source consistency	A-19, G-BAU, DR-02	Literally true and consistently characterised; mechanism unsized (F-6)
C-05	"Total Scope 1 and 2 GHG emissions have remained stable over recent years, including FY2025, with FY2026 emissions 4 per cent lower than 2018 levels on an absolute basis."	Absolute Scope 1 and 2	Self-declared	Annual Report folio 32; Data Supplement p.11	Performance statement	All	Verified: 10,200 against 10,680, a 4.5% fall. FY2026 sits 1.1% above the FY2020 low of 10,090, which the nine-year chart shows but the narrative does not name	Multi-period series; real vs accounting	A-19, YOY-01, YOY-02	Accurate and candid
C-06	"Scope 2 emissions are calculated using the location-based method"; "As the Group reports Scope 2 GHG emissions under the location-based method, these EFECs are not reflected in reported Scope 2 emissions"	Method statement for all Scope 2	Self-declared method under the GHG Protocol, with NGER jurisdictional relief for Australia	Annual Report folios 192–193; Data Supplement p.32	Method disclosure	Carbon accountants, regulators	Market-based basis missing at group and site level; no Scope 2 split by site from which one could be derived	Scope 2: location vs market, consumption, certificates, ownership, retirement, residual mix	S2-28, E-01, E-24, G-07	Departure from dual reporting (F-8)
C-07	"North Star is powered by GHG emissions-free electricity via a power purchase agreement with a local nuclear power provider"	Electricity supply at one site	Third-party verified certificates (PJM Environmental Information Services); self-declared characterisation	Annual Report folio 192; folio 31 footnote 3	Site-level supply claim	Investors, public, customers	Mechanism disclosed in the same paragraph: a power purchase agreement plus Emission-Free Energy Certificates equivalent to consumption. Certificate volumes and vintages not published	100% renewable / market-based Scope 2 trigger: enablement versus use, ownership, retirement, timing, wording	E-01, E-05, E-24, OUT-TB-02, OUT-TB-21	Bounded on its face and mechanism-disclosed. No renewable label is used; the generation is nuclear and is described as emission-free, which is accurate

CLAIM ID	WORDING / PARAPHRASE	CLAIM OBJECT	CLAIM SOURCE & BASIS (OUT-TB-15)	DOC & LOCATION	STRENGTH	AUDIENCE	EVIDENCE REQ/FOUND/MISSING	TRIGGERED SCANS	RULE IDS	STATUS
C-08	"Together, the 2030 targets cover around 99 per cent of BlueScope's Scope 1 and 2 GHG emissions"	Target coverage of Scope 1 and 2 only	Self-declared	Annual Report folio 194	Coverage claim	Investors	Numerator and denominator both Scope 1 and 2; the denominator is 46% of the whole footprint the same suite publishes	Coverage claim: numerator, denominator, excluded categories	T-COV-02, OUT-TB-21	Bounded on its face; the bound is the finding (F-4)
C-09	"BlueScope retains the option to use carbon offsets to meet its 2050 net zero goal where direct abatement is not technically or commercially feasible ... a specific estimate of the carbon offset volume required is not disclosed"	Offset use within the net zero goal	Self-declared; no framework, no volume, no cap, five stated procurement principles	Annual Report folio 195	Qualifier on C-01	Investors, public	No residual figure, no cap, no gross target. No offsets used or surrendered in FY2026	Offsets: gross emissions, residual, retirement, quality, permanence	G-11, E-08, E-13, E-19	Unquantified option (F-11)
C-10	"This report has been prepared in accordance with AASB S2 Climate-related Disclosures (AASB S2) issued by the Australian Accounting Standards Board (AASB), and in accordance with the Corporations Act 2001"	Statutory compliance for the reviewed year	Self-declared, supported by a Directors' declaration and an unmodified limited-assurance conclusion over the phase-in subject matter	Annual Report folios 175, 196, 197	Compliance statement	Regulators	Governance, strategy, risk management and metrics and targets all addressed; transition reliefs disclosed; assurance obtained. Against it: one Scope 2 basis, no global warming potential version, one vulnerability metric against the wrong denominator	AASB S2 applicability and completeness	L-01, S2-01, S2-46, S2-47, GOV-05	Compliant on its face with the limitations at F-8 and F-9
C-11	"PACIFIC DCRB®, a locally made, lower-emissions steel brand produced using EAF technology, which supports customers in reducing their supply chain emissions"	Product-level embodied carbon at Glenbrook	Self-declared, tied to a named mechanism (electric arc furnace replacing the prior route)	Annual Report folio 31; folio 182	Comparative product claim	Customers, public	The mechanism is evidenced (the furnace has produced steel and is stated to cut site Scope 1 and 2 by about 55%). No per-tonne embodied-carbon figure for the product is published in the reviewed suite	Product claim: basis, boundary, quantification, verification	OUT-TB-02, OUT-TB-15, S3-EST	Literally true within its boundary; unquantified in the suite (F-18)
C-12	"approximately $8,060M of PPE at 30 June 2026 was assessed as vulnerable to physical climate-related risks, representing over 99 per cent of Group total assets"	Physical-risk exposure as a share of the balance sheet	Self-declared statutory metric, outside the assurance scope	Annual Report folio 193	AASB S2 metric	Investors, regulators	Total assets $16,398.9M in the same report; the dollar figure is 49% of total assets and 99.7% of property, plant and equipment plus right-of-use assets	Cross-source consistency; figure integrity	S2-31, DR-02, A-01B	Divergence recorded (F-9)
C-13	"Approximately $15,466M of FY2026 revenue was associated with business activities aligned with climate-related opportunities, representing 93 per cent of Group consolidated revenue"	Revenue alignment to climate opportunities	Self-declared statutory metric, outside the assurance scope	Annual Report folio 193	AASB S2 metric	Investors, regulators	Recomputes exactly against external sales revenue of $16,605.9M. The basis is stated in the same paragraph: total external sales from steelmaking and building product activities across five segments, which is substantially the whole business	Reasonable-reader impression; coverage claim	S2-31, OUT-TB-02, OUT-TB-21	Accurate and basis-disclosed; the impression point is recorded at D8-2

Annex D: Detailed findings, two-track (A-03)

D.1 Applicability gate & AASB S2 readiness (Sections 04–05)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D1-1	FY2026 is BlueScope's first mandatory AASB S2 year. It has published a statutory Sustainability Report (Climate-related Disclosures) on folios 174 to 195, prepared in accordance with AASB S2 and the Corporations Act, with a Directors' declaration under section 296A(6) and an unmodified EY limited-assurance conclusion over the ASSA 5010 phase-in subject matter (EV-04, EV-18, EV-39)	Appears broadly compliant. All four AASB S2 content areas are addressed; the declaration and assurance are in place	Baseline expected of a Group 1 entity in its first mandatory year, so not credited (A-16). The report is materially more complete than the prior period's voluntary equivalent, which is the year-over-year observation at Annex K and not a positive	Appears broadly compliant, minor limitations · High	The statutory layer is now the primary source for governance, strategy, risk and Scope 1 and 2	Nothing on the gate itself
D1-2	BlueScope has adopted both first-year transition reliefs: comparatives omitted and Scope 3 omitted from the statutory report, with Scope 3 provided voluntarily in the Sustainability Overview and Data Supplement on the historical GHG Protocol basis (EV-04)	Permitted by AASB S2 and disclosed. No finding. The relief is a fairness control: an entity is not marked down for taking a relief the standard grants	Decision-usefulness consequence recorded without fault: the assured statutory layer covers one year of Scope 1 and Scope 2, and the 54 per cent of the footprint in Scope 3 sits in the voluntary layer on a different measurement basis. The Scope 3 disclosure itself is complete and is treated as such at D4-1	No apparent issue · High	The statutory and voluntary layers are measured on different bases in the same suite	Nothing required; the reliefs lapse of their own accord
D1-3	The Company early adopted AASB S2025-1, moving Australian operations from the GHG Protocol to the NGER methodology, and states in the same section that "there were no material changes in the measurement approach, inputs and assumptions during the reporting period", without quantifying the effect or giving a comparison on the prior basis (EV-03, EV-04)	No minimum-compliance breach; early adoption is permitted and disclosed	Decision-usefulness concern. Two of the nine years in the published series were produced on a different basis from the rest and the reader is not told what the change did. Where a series is the only evidence of direction of travel, an unquantified change in how it is measured limits what the series supports	Decision-usefulness concern · High	Comparability across the nine-year series is not testable	State the reported Scope 1 and 2 on both bases for the reviewed year
D1-4	Four substantive elements of the climate position (the site-specific decarbonisation pathways, the non-steelmaking pathway detail, the Scope 3 long-term work program and the site-level intensity history) remain available only in the September 2024 Climate Action Report, to which the FY2026 suite defers. The physical risk assessment relied on throughout was "conducted in 2024". Channel check on 3 September 2026 confirms no later edition exists (EV-25, EV-38)	Below the standard AASB S2 sets for a self-contained climate statement, though not a breach of any specific paragraph	Decision-usefulness concern. In a mandatory year the statutory statement is the document a reader is entitled to rely on, and the site pathways that the whole decarbonisation narrative rests on are not in it	Decision-usefulness concern · High	The statement is not self-contained on the mechanism of its own strategy	Carry the pathways, the site series and the Scope 3 work program into the statutory statement; refresh the physical risk assessment

D.2 GHG inventory foundation & Scope 1 (Sections 06–07)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D2-1	The method statement names the consolidation approach (equity share, superseded by NGER jurisdictional relief for Australian operations), the Scope 2 method, the six Kyoto Protocol gases, the emission factor publication used in each jurisdiction, the higher-order methods applied, and quantifies estimates at under one per cent of reported Scope 1 and 2 (EV-03)	No apparent issue on the elements disclosed	Baseline expected of a discloser; not credited. The residual gaps are the global warming potential version (F-20) and the absence of any Scope 1 or Scope 2 split by site, country, gas or source	Minor limitation · High	The method can be reproduced at group level but not disaggregated	State the conversion basis and publish Scope 1 and 2 by site or region

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D2-2	Scope 1 fell 0.1% to 8,490 $ktCO_2e$ and Scope 2 location-based rose 0.6% to 1,710 $ktCO_2e$, so the combined figure is unchanged at 10,200 $ktCO_2e$ for a second year. The two scopes moved in opposite directions and the combined figure conceals it (EV-01, EV-14)	No minimum-compliance issue	Decision-usefulness concern. BlueScope frames its targets and its 2050 goal on the combined figure, and the combined figure is the one that appears in the narrative. The decomposition is available from the published tables but is not drawn anywhere	Decision-usefulness concern · High	A reader following the combined line sees stability where one scope fell and the other rose	Report the two scopes separately wherever the combined figure is used, and name the driver of each
D2-3	The equity-share residual is now quantified. The statutory table separates the consolidated accounting group from other investees at 10 $ktCO_2e$ for Scope 1, Scope 2 and the total, and NS BlueScope Coated Products is named as a consolidated 50/50 joint venture with Nippon Steel (EV-03, EV-05)	No apparent issue	The entity list and the equity percentages applied are still not published, but the unlisted residual is bounded at about 0.1% of Scope 1 and 2, so a material exclusion through the boundary can be ruled out	Minor limitation · High	Completeness on the boundary is confirmable	Publish the entity list with the percentages applied
D2-4	Data for the divested Tata BlueScope joint venture is excluded from the second half of FY2026 across Scope 1, Scope 2 and Scope 3. Comparatives are not restated. BlueScope states only that the divested facilities do not materially affect the midstream intensity base year (EV-34)	No minimum-compliance breach; the disposal is disclosed and dated	Decision-usefulness concern. The GHG Protocol expects a base-year recalculation assessment on a structural change; the statement given addresses the intensity base year and not the absolute series or Scope 3, and the amount removed is not published	Decision-usefulness concern · Medium	Part of the FY2025 to FY2026 movement in three scopes is a boundary change of unstated size	Publish the emissions removed by the disposal, or restate the comparatives
D2-5	A restatement is disclosed with before and after values: FY2024 net energy consumption corrected from 116 PJ to 109 PJ and steelmaking energy intensity from 16.1 to 15.2 GJ per tonne (EV-33)	No apparent issue	Baseline expected of a discloser; not credited. It is the form the emissions restatements at D2-4 and D1-3 do not take	No apparent issue · High	Energy comparability is restored	None

D.3 Scope 2 & renewable electricity (Section 08)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D3-1	Scope 2 is reported on the location-based method only. BlueScope states that a power purchase agreement with a local nuclear provider has covered North Star's entire electricity consumption since 2020, verified through Emission-Free Energy Certificates, and that these are not reflected in reported Scope 2. No market-based figure is published at group or site level, and no Scope 2 split by site exists from which one could be derived (EV-06, EV-07)	Potential compliance concern against the GHG Protocol Scope 2 Guidance, which requires dual reporting where an entity holds contractual instruments. The instruments exist and are described. For Australian operations the NGER jurisdictional relief displaces the requirement; North Star is in the United States, where it does not	Decision-usefulness concern. The reader can see neither the contractual position nor its size. The direction of the effect runs against BlueScope: its market-based position would be lower than the figure it reports	Potential compliance concern · High	The company reports a higher Scope 2 than its contracts support and gives the reader no way to see either figure	Report both bases with the certificate and contract volumes, and publish Scope 2 by site or region
D3-2	The claim "North Star is powered by GHG emissions-free electricity" is made in the statutory statement; the Sustainability Overview footnote describes the same arrangement as "all of North Star's electricity consumption being matched with Emission Free Electricity Certificates" (EV-06, EV-07)	No apparent issue. The mechanism is disclosed in the same paragraph as the claim, the generation source is named, and the verifier is named	The two formulations differ in strength, "powered by" against "matched with", but both appear beside the mechanism and neither is presented as a renewable-electricity claim. Nuclear generation described as emission-free is accurate	Minor limitation · High	A reader is not misled about the mechanism	Use one formulation, and state the certificate volume
D3-3	No renewable-electricity percentage is published for any period, and no renewable claim is made anywhere in the suite (EV-03, EV-06)	No apparent issue	The absence of a claim removes a class of risk. Not credited: not making a claim is not above baseline. Named renewable projects at Southeast Asian sites and the Map Ta Phut supply switch are described qualitatively, with one site-level percentage	No apparent issue · High	None	Publish the renewable share of consumption if the projects are to be relied on

D.4 Scope 3 & value chain (Section 09)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D4-1	All fifteen GHG Protocol categories are addressed with FY2024 to FY2026 figures, a published 1 per cent materiality threshold, a relevance marking per category, and categories that sum exactly to the stated total in each of the three years (EV-02)	No apparent issue on completeness	Baseline expected of a discloser; not credited. Estimation basis is not scored. The set is confirmable, which is what the completeness criterion requires	No apparent issue · High	A carbon accountant can see what is in and what is out	None on completeness
D4-2	Scope 3 is 11,950 $ktCO_2e$, 54 per cent of the footprint, and carries no target, no baseline and no target year. Every target and the 2050 goal cover Scope 1 and Scope 2. The stated target coverage of "around 99 per cent" is a share of Scope 1 and 2, about 46 per cent of the whole (EV-12, EV-13)	No minimum-compliance breach; AASB S2 does not require a Scope 3 target	Decision-usefulness concern, escalating to a claim-quality concern where the 2050 goal is read as a statement about BlueScope's emissions. The suite states the 54 per cent share and never states that it is untargeted	Decision-usefulness concern · High	The majority of the footprint sits outside every commitment	A Scope 3 target with a baseline, a target year and stated category coverage
D4-3	Scope 3 fell 6.4 per cent, entirely on Category 1 (down 940 $ktCO_2e$), partly offset by Category 4 (up 280 $ktCO_2e$ on updated transport emission factors). Three causes are named and none is sized: supplier-specific factor coverage, the transport factor update and the mid-year disposal. No supply-chain abatement is named or quantified (EV-02, EV-34)	No minimum-compliance breach	Decision-usefulness concern. Two of the three named causes are method or boundary changes. The largest single line in the footprint moved 13 per cent with no explanation a reader can weigh, and the narrative describes the position as "largely consistent"	Decision-usefulness concern · High	The direction of travel in the majority of the footprint cannot be established for the reviewed year	Size each cause and state separately what part of the movement is supply-chain change
D4-4	Categories 8, 13 and 14 are marked "Not applicable" with no basis stated, for a group operating in more than ten countries. Category 15 is nil (EV-02)	Minor limitation. A basis is given for the categories marked immaterial but not for those marked not applicable	The nil Category 15 is coherent under equity-share consolidation, where a share of an investee's emissions sits inside Scope 1 and 2. The three not-applicable markings are not explained	Minor limitation · Medium	Three category exclusions rest on an unstated basis	A one-line basis for each, as is given for the immaterial categories
D4-5	Scope 3 is outside the assurance scope in both the statutory and the voluntary layers (EV-18)	Consistent with the ASSA 5010 phase-in and with the Scope 3 transition relief; no compliance finding	Decision-usefulness limitation for a party lifting the figure. 54 per cent of the footprint carries no assurance. Recorded as a limitation, not as a completeness failure, because the category set is complete and reconciles	Minor limitation · High	A downstream accountant lifting Scope 3 relies on an unassured figure	Extend assurance to Scope 3 ahead of the phase-in

D.5 Offsets, credits & net claims (Section 10)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D5-1	No carbon offsets were used or surrendered in FY2026 in pursuit of the 2050 goal or the 2030 targets, and performance against the 2030 targets is reported on a gross basis (EV-16)	No apparent issue	Baseline expected; not credited. It removes the class of risk that attaches to offset-backed progress claims	No apparent issue · High	Reported progress is gross	None
D5-2	The 2050 goal retains an offsets option with no residual cap, no volume estimate and expressly no gross target: "there is a high degree of uncertainty associated with the magnitude of carbon offsets that may need to be used to achieve this goal, thus BlueScope has not disclosed an associated gross target" (EV-16, EV-17)	No minimum-compliance breach for a self-declared goal	Decision-usefulness concern. A net zero goal with no cap on offset reliance, no residual figure, no gross target and five external preconditions is a direction rather than a commitment that can be tested. It is also the only commitment covering the period after 2030	Decision-usefulness concern · High	The goal cannot be held to a number	Cap the residual share, state the expected residual volume, and set an interim absolute milestone
D5-3	A carbon-offset governance framework is published: five procurement principles covering cost-effectiveness, traceability and additionality, country alignment, community co-benefit and transparent disclosure of retirements, with future use to be "verified by appropriate recognised third-party schemes" (EV-16)	No apparent issue	Governance without a quantity. The principles are sound and there is nothing to apply them to; they do not substitute for the residual cap at D5-2	Minor limitation · High	Quality is governed, quantity is not	Pair the principles with a residual volume

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D5-4	Carbon-related intangibles fell to $126.0 million (emission unit permits $86.0M, Australian carbon credit units $38.5M, energy certificates $1.5M), with Australian carbon credit unit holdings rising from $23.2M to $38.5M. Port Kembla and Western Port were issued 289,294 and 1,138 Safeguard Mechanism Credits for the FY2025 compliance year (EV-26, EV-29)	No apparent issue. Units are held for compliance surrender, carried at cost, and disclosed in the financial statements	None of these units supports a public emissions claim. The credit issuance reflects operating below a baseline whose decline rate is reduced from 4.9 to 1 per cent a year by trade-exposed status, which BlueScope discloses	No apparent issue · High	The compliance position is credit-positive under a concessional baseline	Disclose the baselines and covered emissions alongside the credits

D.6 Targets & transition (Section 11)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D6-1	The 2030 steelmaking target level of 1.44 tCO_2e per tonne was reached in FY2024, passed in FY2025 at 1.41 and passed again in FY2026 at 1.38. BlueScope's own projection from committed projects is below 1.3 by 2030, at least a 20 per cent reduction against a 12 per cent target, assuming "no other changes from FY2026". The Company states "the 2030 steelmaking target will not be revised" (EV-08, EV-09, EV-10)	No minimum-compliance breach. A company may keep a target it has passed	Decision-usefulness concern of the highest order for the target criterion. The published target requires no further reduction and permits intensity to rise about 4 per cent from the FY2026 position and still be met. The decision not to revise is stated, which is candid and does not cure it	Decision-usefulness concern · High	The principal forward commitment constrains nothing	Replace the target with one calibrated to the below-1.3 projection, with the absolute emissions it implies
D6-2	The FY2026 short-term incentive scorecard sets the steelmaking intensity measure at a threshold of 14.1 per cent, a target of 16.0 per cent and a stretch of 17.0 per cent cumulative reduction from FY2018, all above the 12 per cent 2030 public target. The FY2026 outcome was 15.7 per cent, paying 4.6 of the 5.0 per cent weighting (EV-11)	No minimum-compliance issue	The threshold now sits above the prior year's outturn, which is the design the measure requires. That the annual bonus gate is harder than the ten-year public commitment is the clearest internal evidence that the 2030 target no longer binds	Decision-usefulness concern · High	Pay is set against a harder standard than the market is	Align the public target with the internal gate
D6-3	The 2030 non-steelmaking target of a 30 per cent intensity reduction stands at 13 per cent after eight years, against a target level of 0.18 from a baseline of 0.25. It requires substantial further reduction (EV-08, EV-12)	No minimum-compliance issue	A qualified positive at most. It is an intensity target and does not cap absolute emissions; the co-located absolute position is that non-steelmaking Scope 1 and 2 is about 780 $ktCO_2e$, 8 per cent of the total, and the drivers named include despatch volume and grid decarbonisation as well as engineering projects	Minor limitation · High	The smaller of the two targets is the one still doing work	State the absolute non-steelmaking series beside the intensity metric
D6-4	The 2050 net zero goal is contingent on five enablers "largely beyond BlueScope's direct control", is reviewed annually by the Board for whether there remains "a reasonable basis on which to view this goal as achievable in the stated timeframe", and its cost is excluded from the audited cash flows (EV-17, EV-28)	No minimum-compliance breach; the contingency is disclosed	Decision-usefulness concern. The disclosed contingency is candid and is not a fault in itself, but combined with no interim absolute milestone, no residual cap and no costing, the goal supports no reader inference about the trajectory between 2030 and 2050	Decision-usefulness concern · High	Nothing measurable applies after 2030	An interim absolute milestone and a priced pathway
D6-5	Named abatement with mechanism, cost and date: the Glenbrook electric arc furnace (hot commissioning July 2026, up to one million tonnes a year and about 55 per cent of site Scope 1 and 2, co-funded by the New Zealand Government); Project NeoSmelt (feasibility, final investment decision expected mid FY2027, 30,000 to 40,000 tonne pilot); the Western Port paint line oven (more than 20,000 tCO_2e since completion); the Kapar pre-heater (about 1,200 tCO_2e a year); the Map Ta Phut supply switch (14 per cent of site Scope 2); the Suzhou induction heating upgrade (EV-15, EV-22)	No apparent issue	Genuine positive. The largest item has moved from under construction to producing metal, and the smaller items are identified and mostly sized. The named projects do not aggregate to a stated pathway against the 10,200 $ktCO_2e$ total	Positive, above baseline · High	Abatement is physical and dated rather than announced	Aggregate the named projects against the footprint with dates

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D6-6	The FY2021 commitment of up to $150 million over five years reached its end in FY2026. FY2026 investment under the program was $139 million net of New Zealand grants, and no cumulative figure is published. The figure expressly excludes the North Star expansion, the Western Port oven upgrades and energy savings projects as investments with only indirect decarbonisation benefits, while the Western Port oven is named elsewhere in the same suite as a key emissions-reduction project (EV-21, EV-22)	No minimum-compliance issue	Decision-usefulness concern. A reader cannot tell whether the five-year commitment was delivered, and the same project is inside the abatement narrative and outside the abatement spending figure	Decision-usefulness concern · High	Decarbonisation spending is not measurable against the commitment	Publish cumulative spend and use one definition across the suite
D6-7	The target architecture as a whole covers Scope 1 and 2 only, expires in 2030 for the two live targets, contains no absolute cap, and leaves the 54 per cent of the footprint in Scope 3 untargeted (EV-12, EV-13)	No minimum-compliance breach	Decision-usefulness concern. This is the single structural finding the review returns to at F-4, F-5 and F-11; it is stated once here and referenced elsewhere	Decision-usefulness concern · High	No published measure constrains where the emissions are travelling	Scope 3 target, absolute cap, interim milestone

D.7 Governance, remuneration & assurance (Section 12)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D7-1	Ten per cent of the MD and CEO's and each Executive KMP's short-term incentive scorecard is allocated to climate objectives, split 5 per cent on steelmaking intensity, 5 per cent on non-steelmaking intensity or a business unit climate objective. Both measures are intensity metrics (EV-11, EV-30)	No apparent issue. The measures, weightings, threshold, target, stretch and outcome are all published	Decision-usefulness concern. Pay is geared to the two ratios and to nothing absolute, on metrics BlueScope's own scorecard commentary attributes in part to production mix and, for the non-steelmaking measure, to despatch volume. The thresholds are set above the prior-year outturns, which is the correct design	Minor limitation · High	The incentive rewards the measure that improves when output grows	Add an absolute emissions gate to the climate component
D7-2	Board oversight is set out with four standing committees following the 1 February 2026 restructure, with the Safety and Sustainability Committee reviewing targets, pathway and enabler status at least annually, the Audit, Risk and Technology Committee overseeing statutory sustainability disclosure governance, and responsibility for climate disclosure moving to the CFO from FY2027 (EV-31)	No apparent issue	Baseline expected of a Group 1 entity; not credited. Governance is within the assured subject matter	No apparent issue · High	Oversight is documented and assured	None
D7-3	Assurance covers governance, the strategy risks and opportunities, and Scope 1 and location-based Scope 2 under the statutory phase-in, plus steelmaking intensity and TRIFR in the voluntary layer. Risk management, the targets, the vulnerability metrics, the capital deployment figure and Scope 3 are outside it (EV-18)	Consistent with the legislated phase-in; no compliance finding	The scope is set by the timeline rather than chosen, so neither its breadth nor its limits are credited or faulted. The consequence is that the metrics carrying the errors at F-9 and the figures at F-10 are unassured	Minor limitation · High	The unassured half of the statement is where both figure defects sit	Extend assurance ahead of the phase-in
D7-4	The audited financial statements price the live carbon cost on the same assumptions as the climate report: a 30-year forecast including Safeguard compliance cost, a $77 million sensitivity on the Australian Steel Products recoverable amount to a 20 per cent rise in that cost, and an express statement that 2050 net zero costs are excluded (EV-27, EV-28)	No apparent issue. Chapter 2M expectations on financial effects are met and exceeded	Genuine positive. An investor can price the live cost and see that the destination is unpriced. The cross-reference between the impairment assumptions and the climate report closes the separation that would otherwise leave the figures in one document and the narrative in another	Positive, above baseline · High	The transition cost is visible in the accounts	None

D.8 Sector module & new-module findings (Section 13)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D8-1	Mining and heavy industry module. Steelmaking Scope 1 and 2 rose from 9,410 to 9,420 ktCO_2e while raw steel production rose 1.9 per cent to 6,814 kt, so the entire 2.1 per cent fall in the intensity metric is the denominator. Over FY2018 to FY2026, applying FY2026 production to FY2018 emissions gives 1.44, so about 12.5 of the 15.9 percentage points of improvement are output growth and about 3.4 are lower absolute emissions. No FY2026 site-level series is published (EV-01, EV-08, EV-35)	No minimum-compliance issue	Decision-usefulness concern. The driver is named in every place the result is reported, which is a change in the disclosure, but it is not sized and the site series that would show its scale is not published for the reviewed year	Decision-usefulness concern · High	The headline performance measure improves when output rises at the lowest-intensity site	Publish the site series and decompose volume, mix, grid and abatement
D8-2	AASB S2 vulnerability and alignment metrics. $1,522 million of revenue (9 per cent) is stated as vulnerable to transition risk and $15,466 million (93 per cent) as aligned with climate opportunities, the latter being total external sales from steelmaking and building products across five segments. Both percentages recompute exactly against external sales revenue (EV-19, EV-20)	No apparent issue. The metric is required and the basis is stated in the same paragraph	Minor limitation. Classifying substantially the whole revenue base as aligned with climate opportunities, in a year when the same table identifies the emissions intensity of that same revenue as the transition risk, gives a reader a stronger impression of alignment than the underlying basis supports. The basis is disclosed, so the reader can test it	Minor limitation · Medium	A reader taking the 93 per cent at face value reads it as transition alignment	State the opportunity-alignment basis in the metric line rather than only in the surrounding text
D8-3	Physical-risk exposure metrics are stated against the wrong denominator: $8,060 million of property, plant and equipment "representing over 99 per cent of Group total assets" and $4,660 million "representing 58 per cent of the Group's total assets", where total assets in the same report are $16,398.9 million (49 per cent and 28 per cent). Both percentages are shares of the assessed property, plant and equipment base (EV-19, EV-20)	Potential compliance concern. A quantified AASB S2 metric in a statutory statement covered by a Directors' declaration does not reconcile to the audited balance sheet in the same document	Decision-usefulness concern. The dollar figures are correct and the error runs against the company, so it is an accuracy defect rather than a favourable overstatement. A reader taking the percentage rather than the dollars is materially misinformed about the share of the balance sheet exposed	Potential compliance concern · High	The metric that ties the climate statement to the balance sheet does not tie to it	Restate both percentages against the denominator they were computed on
D8-4	Product-level disclosure. Environmental Product Declarations are registered with EPD Australasia and the International EPD System across the COLORBOND and XLERPLATE ranges, with further national product schemes in Thailand, Malaysia, Indonesia, Vietnam and China and a Digital Product Passport for two COLORBOND gauges. The lower-emissions PACIFIC DCRB brand launched on the Glenbrook furnace carries no published per-tonne figure in the reviewed suite (EV-36, C-11)	No apparent issue	Baseline for a steelmaker selling into embodied-carbon-sensitive markets; not credited. The gap is that the corporate inventory publishes no per-tonne figure by site or route, so a customer cannot connect the product declarations to the corporate footprint	Minor limitation · High	Customers running value-chain accounting cannot take BlueScope's best position from its corporate reporting	Publish site and route-level intensity, and the DCRB per-tonne figure
D8-5	Financial institution module: not applicable. Category 15 is nil under the equity-share boundary and no material investment book exists	Not applicable	Not applicable	Not applicable · High	None	None

D.9 Nature & physical risk (Section 14)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D9-1	The physical climate risk assessment covers 71 sites (three steelmaking plus 68 selected midstream and downstream sites by insured value) against six hazards, over 2030, 2050 and 2100, under SSP1-2.6 and SSP5-8.5 aligned to IPCC AR6, with a high-level supply chain analysis for the three steelmaking sites. Average annualised losses are quantified at up to $20 million by 2100 under the high-temperature scenario if unmitigated (EV-25, EV-32)	No apparent issue. Coverage, hazards, scenarios, horizons and a financial effect are all disclosed	Assessed for relevance to the business model and methodology transparency only, not for modelling quality. Coverage is relevant: coastal integrated steelworks with water-intensive processes. The financial quantification is what the criterion asks for	No apparent issue · High	Physical exposure is sized	None on the assessment itself

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D9-2	The assessment was "conducted in 2024" and has not been refreshed for the reviewed year, and the supply chain mapping carries no financial impacts. The site-level results are not published (EV-25)	Minor limitation	Decision-usefulness limitation. The conclusion is carried forward from a two-year-old assessment into a statutory statement, and the reader cannot see which of the 71 sites drive the exposure	Minor limitation · High	The physical-risk conclusion rests on work older than the reported period	Refresh the assessment, publish site-level results and extend the quantification to the supply chain
D9-3	Nature and biodiversity are addressed through water, air quality, materials efficiency and land stewardship disclosures with published metrics, including a return of fresh and recycled water metrics to historical averages after a third-party supply issue was resolved, and thirty low-severity environmental non-compliances (Data Supplement pp.13–14)	No apparent issue for a climate review	Outside the climate scope; recorded for completeness. No nature-related target or dependency assessment is published	Not applicable · Medium	None for this review	A nature dependency assessment if the entity moves to nature-related reporting

Annex E: Cross-rule escalation chains (AI-06 / AI-23)

BASE ISSUE	CHAINS TO	RULE + EVIDENCE IDS	ESCALATED SEVERITY
Steelmaking Scope 1 and 2 rose 10 ktCO_2e while the intensity metric fell 2.1% on 1.9% production growth (D8-1, EV-01, EV-35)	The 16% performance claim (C-04); the 2030 target progress claim (C-02); the executive incentive outcome (D7-1)	A-19, G-BAU chained to T-14, A-17, GOV-01, A-11; EV-08, EV-11, EV-35	Decision-usefulness concern, held. The claim is literally true and the driver is now named in every place the result is reported, so no claim-quality escalation is available; the escalation runs to target credibility and to the incentive gate, both of which rest on the ratio
No Scope 3 target over 54% of the footprint (D4-2)	The 2050 net zero goal's reader impression (C-01); the target coverage claim (C-08); the retail and public audience scores	T-COV-02 and T-14 chained to A-17, OUT-TB-02; EV-12, EV-13, EV-02	Escalated. A goal covering 46% of the footprint, in a statement that publishes the 54% share on the same page and never states that share is untargeted, sets the ceiling for the audiences least able to reconstruct the boundary
The 2030 steelmaking target is passed, is 8 points behind the company's own projection, and will not be revised (D6-1, D6-2)	Target credibility for institutional investors (I2); the target architecture (D6-7); the incentive design (D7-1)	T-14 and S2-41 chained to OUT-TB-02, GOV-01, A-21; EV-08, EV-09, EV-10, EV-11	Decision-usefulness concern, held. The target is accurately stated, the position against it is stated plainly, and the decision not to revise is disclosed. A-21 applies to the disclosed intention to consider future targets: it is neither a fault nor a credit, and it does not cure the present target
Market-based Scope 2 absent while certificates cover an entire site's consumption (D3-1)	Method transparency for carbon accountants (A3); standards compliance for regulators (G1); the product position for customers (D8-4)	S2-28 and E-01 chained to OUT-STK-06, L-05; EV-06, EV-07	Potential compliance concern, held at that level. The departure is from the GHG Protocol, which BlueScope cites; the jurisdictional relief covers Australian operations but not North Star
A statutory vulnerability metric stated against Group total assets where the percentage is of property, plant and equipment (D8-3, EV-19, EV-20)	Cross-source consistency for regulators (G2); physical-risk exposure for institutional investors (I1); the Directors' declaration	DR-02 and A-01B chained to S2-31, GOV-05; EV-19, EV-20, EV-39	Escalated to the regulator row. The divergence is between a statutory climate metric and the audited balance sheet in the same document. Not escalated to a claim-quality finding: the error overstates the company's own exposure and the dollar figures are correct
The Scope 3 movement is driven by two method or boundary changes and one unnamed residual (D4-3, D2-4)	Real-versus-accounting attribution (I3); comparability of the multi-period series (D1-3); the composite impression (P2)	A-19, G-BAU and G-10 chained to YOY-04, OUT-TB-02; EV-02, EV-34	Decision-usefulness concern, held, with the magnitude recorded as cannot-verify. The causes are named, which prevents escalation to a claim-quality finding, and none is sized, which prevents the reader from resolving it
Four elements of the climate position available only in a September 2024 document, and a 2024 physical-risk assessment (D1-4, D9-2)	Reconstructability for institutional investors (I6); the site series (D8-1); the Scope 3 work program (D4-2)	OUT-TB-03 chained to SEC-SF-11, YOY-05, N-04; EV-25, EV-38	Decision-usefulness concern, held. The document is public and expressly cross-referenced, so the burden is effort rather than absence. The consequence is higher in a mandatory year than in a voluntary one
The Western Port oven is inside the abatement narrative and outside the abatement spending figure (D6-6, EV-21, EV-22)	Cross-source consistency for regulators (G2); the credibility of the capital-deployment disclosure	DR-02 chained to T-06, S2-33; EV-21, EV-22	Not separately escalated. Recorded as a divergence supporting the G2 defeat rather than driving it

Annex F: NoCO2 Net Zero Required Interventions, CAAM & Prohibited Activities screen (OUT-05)

SCREEN	OUTPUT	BASIS
Required Interventions Schedule	Applicable	Integrated blast furnace and basic oxygen furnace ironmaking at Port Kembla and the direct reduction and electric smelting furnace route at Glenbrook are prescribed-intervention candidates: coal-based reduction, coke ovens and on-site electricity generation. The Glenbrook electric arc furnace (hot commissioning July 2026), the North Star debottlenecking, the Port Kembla efficiency program and the midstream oven, pre-heater and induction heating replacements are already interventions in substance. They are not scheduled with dates and expected abatement against the 10,200 $ktCO_2e$ footprint, and the FY2026 capital figure of $139 million excludes several of the projects the same suite names as delivering reductions
Clean Alternative Assessment	Potentially applicable; evidence required	The Australian Direct Reduced Iron options study (Project IronFlame) and the NeoSmelt direct reduced iron and electric smelting furnace pilot, with a final investment decision expected mid FY2027 and a 30,000 to 40,000 tonne pilot, are clean-alternative evaluations in substance. What is not published is the assessment output: the options considered, the emissions each would deliver, and the basis on which natural-gas direct reduced iron is treated as the transition route ahead of green hydrogen. BlueScope publishes indicative reduction ranges for the routes (about 60 per cent for natural-gas direct reduced iron and more than 85 per cent for hydrogen-based) without dates or volumes
Prohibited Activities Schedule	Not apparently applicable	No activity in the reviewed suite falls within a prohibited category. Coal is purchased as a metallurgical reductant and an energy input to steelmaking, not produced or sold as a fuel; coke is sold as a co-product and its downstream combustion is counted in Category 11

Annex G: Rule-application table

RULE FAMILY	APPLIED?	RESULT
Applicability gate (L / S2-01..06)	Yes	FY2026 is BlueScope's first mandatory year as a Group 1 entity with a 30 June balance date. A statutory Sustainability Report, a Directors' declaration and an unmodified limited-assurance conclusion are all in place (D1-1). Both first-year transition reliefs are taken as permitted and disclosed (D1-2)
GHG inventory foundation (G / GHG-STD)	Yes	Method statement now names the consolidation approach, the jurisdictional relief and the factor publication per region, and quantifies the estimate share (D2-1). The equity-share residual is bounded at 10 $ktCO_2e$ (D2-3). Outstanding: the global warming potential version (F-20), the unquantified effect of the NGER methodology change (D1-3), and the mid-year disposal without restated comparatives (D2-4). An energy restatement is disclosed with before and after values (D2-5)
Scope 1 (G-06 / S2-26)	Yes	8,490 $ktCO_2e$, 83% of Scope 1 and 2, down 0.1% on the year and 3.7% over nine years on production up about 14%. Decomposed against Scope 2 rather than reported as a lump (D2-2). No split by site, country, gas or source
Scope 2 & renewables (E / S2-28)	Yes	Location-based only, while certificates cover the entire electricity consumption of the largest single site and are expressly excluded from the reported figure (D3-1). The site-level claim is mechanism-disclosed and accurate (D3-2). No renewable-electricity claim of any kind (D3-3). Location-based Scope 2 rose 0.6% on the year
Scope 3 (S3 / S3A / G-15)	Yes	All fifteen categories addressed with three years of data, published materiality threshold, categories sum exactly to the total in each year (D4-1). No target over 54% of the footprint (D4-2); the 6.4% fall is attributed to three causes and none sized (D4-3); three categories marked not applicable without a basis (D4-4); unassured (D4-5). Estimation basis not scored (S3-EST)
Offsets / net claims (E-08..22 / G-11)	Yes	No offsets used or surrendered and gross reporting of target progress (D5-1). An uncapped offsets option on the 2050 goal with no residual figure and an express decision not to publish a gross target (D5-2). A published offset governance framework with nothing yet to apply it to (D5-3). Compliance units disclosed in the audited accounts, supporting no public claim (D5-4)
Targets & transition (T / S2-14/15/40)	Yes	The 2030 steelmaking target passed, 8 points behind the company's own projection, and stated not to be revised (D6-1); the annual incentive gate set harder than the public target (D6-2); the non-steelmaking target 17 points short after eight years produced 13 (D6-3); the 2050 goal contingent, uncapped and excluded from the audited cash flows (D6-4); one large project moved from construction to first steel (D6-5); the five-year capital commitment closed without a cumulative figure (D6-6); no absolute cap and no target over the majority of the footprint (D6-7)
Governance / remuneration / assurance (GOV / A-11)	Yes	Ten per cent of the short-term incentive on two intensity measures with thresholds above the prior-year outturns and nothing absolute (D7-1); committee oversight documented and within the assured subject matter, baseline, not credited (D7-2); assurance scope set by the legislated phase-in, neither credited nor faulted (D7-3); the impairment note prices the live carbon cost on the same assumptions as the climate report (D7-4)

RULE FAMILY	APPLIED?	RESULT
Sector (SEC-*)	Yes	Mining and heavy industry. The entire single-year intensity improvement is the denominator and no FY2026 site series is published (D8-1); the revenue-alignment metric covers substantially the whole business (D8-2); the physical-risk exposure metric is stated against the wrong denominator (D8-3); product declarations supply the downstream route without a per-tonne corporate figure (D8-4)
SEC-FI-TGT-04	No	Not a financial institution
SEC-FI-05A	No	Not a financial institution
SEC-SF / SEC-INV-LT	Partly	SEC-SF-11 applied to the multi-period series: prior-period reports are context, not current disclosure, and the FY2026 rating is derived from the FY2026 suite. SEC-INV-LT not applicable; Category 15 is nil under equity share
G-20 (boundary reach / which-scope test)	Yes	Run on the divested joint venture and on the "other investees" line. Post-disposal emissions of the Tata BlueScope facilities are out of boundary rather than excluded from within it, so no quantification is required of them; what is required, and absent, is the amount removed from the reviewed period (D2-4). Equity-share investee emissions sit inside Scope 1 and 2, which is why Category 15 is nil
OUT-TB-21 (bounded completeness words)	Yes	Run on "covers North Star's entire electricity consumption" and on "Together, the 2030 targets cover around 99 per cent". Both are bounded on their face and state coverage of a named quantity. The first is evidenced; the second is accurate against a Scope 1 and 2 denominator, and the finding is the denominator, not the word (D4-2, D3-1)
A-21 (disclosed intention to improve)	Yes	Run on "the appropriate timing and composition of BlueScope's potential future emission reduction targets will be considered" and on the Scope 3 improvement narrative. Neither is credited and neither is treated as evidence that the present treatment is wrong. The present targets are deficient on independent grounds, so the intention bears on the recommendation only (D6-1, D4-3)
NOCO2-MAP-01/02	Yes	Ten clause mappings recorded in §6.1
Nature / physical risk (N)	Yes	Physical risk relevant to the business model, assessed across 71 sites and six hazards, and financially quantified (D9-1); the assessment dates from 2024 and its site-level results are unpublished (D9-2); no nature dependency screen (D9-3)
Disclosure risk (DR-01..07 / A-01C)	Yes	NGER reconciled after boundary normalisation against FY2025 (Annex J.2); one arithmetic divergence and two definitional divergences recorded inside the suite (Annex J.1); five risk lenses plus one other in §5.2
Year-over-year (YOY-01..08)	Yes	Nine-year headline series across four report types. The methodology change, the mid-year disposal, the restored FY2019 and FY2020 years, the energy restatement and the target status are all recorded in Annex K

Annex H: Evidence requests / cannot-verify items (AI-21 / A-05)

ID	ITEM	PACK / REQUEST	STATUS
K-01	Market-based Scope 2 for the group and for North Star, with certificate volumes, vintages and retirement evidence	Renewable electricity evidence pack	Requested. F-16
K-02	Group-level decomposition of the Scope 1 and 2 movement into production volume, site mix, grid emission factor, method change and site abatement, FY2018 to FY2026	Target progress evidence pack	Requested. F-14
K-03	Site-level Scope 1, Scope 2 and intensity for Port Kembla, Glenbrook and North Star for FY2025 and FY2026	Target progress evidence pack	Requested. F-18
K-04	The amount attributable to each of the three named causes of the Scope 3 movement, and comparatives restated on a consistent boundary	Scope 3 evidence pack	Requested. F-15
K-05	Reported Scope 1 and 2 for FY2026 on both the GHG Protocol and the NGER basis for Australian operations	Scope 3 and inventory method pack	Requested. F-17
K-06	The stated basis on which Scope 3 Categories 8, 13 and 14 are not applicable	Scope 3 evidence pack	Requested. F-19

ID	ITEM	PACK / REQUEST	STATUS
K-07	The global warming potential version applied and the assessment report it derives from	Inventory method pack	Requested. F-20
K-08	Cumulative spend under the FY2021 commitment of up to $150 million over five years, on one definition of decarbonisation investment	Transition plan evidence pack	Requested. F-21
K-09	Port Kembla and Western Port Safeguard Mechanism baselines, covered emissions and any unit surrender for FY2026	Target progress evidence pack	Requested. F-22
K-10	The per-tonne embodied carbon figure for the PACIFIC DCRB range and the site or route intensity behind it	Renewable electricity and product evidence pack	Requested. Supports D8-4 and C-11

No evidence request is treated as an assumed failure. Each is recorded as an open item and is reflected in the cannot-verify list at §4.3.

Annex I: Evidence-chain & triggered-scan log (AI-10)

TRIGGER DETECTED	SCANS RUN	SECTIONS LOADED	OUTCOME
Net zero claim ("NET ZERO Scope 1 and 2 GHG Emissions by 2050")	Target boundary, transition plan, Scope 1/2/3, gross versus net, residual emissions, offsets, removals, assurance scope, prior claims, reader-burden caveats	10, 11, 03	Boundary accurate and stated; no residual cap, no gross target, no interim milestone. F-4, F-11
Target achievement claim ("ahead of the 12 per cent emissions intensity target")	Boundary, baseline, current year, progress calculation, gross versus net, offsets, Scope 3 coverage, method changes, mergers and disposals, restatements, assurance, remuneration links	11	Target passed and stated not to be revised; the incentive gate is harder than the public target. F-5, D6-1, D6-2
Market-based Scope 2 / contractual instruments (Emission-Free Energy Certificates at North Star)	Location versus market-based, consumption, certificate evidence, ownership, retirement, timing, residual mix, sold certificates, wording	08	One basis published where two are required; the claim itself is mechanism-disclosed. F-8, D3-1, D3-2
Scope 3 disclosed with a material movement	Category coverage, business-model-obvious categories, exclusions, data quality, spend versus supplier-specific, target boundary, consistency	09	Complete and reconciling; the movement is unattributable. D4-1, D4-3, F-7
Assurance statement	Subject matter, level, assured metrics, exclusions, qualifications, Scope 3 completeness, whether nearby claims imply broader assurance	12	Scope set by the legislated phase-in; both figure defects sit in the unassured half. D7-3
Climate-linked remuneration	Metric boundary, gross versus net, Scope 3 inclusion, offsets, target progress, assurance, controls	12	Two intensity measures, thresholds above the prior-year outturns, nothing absolute. D7-1, D6-2
Transition plan / low-carbon opportunity	Actions, capital, dependencies, milestones, Scope 3 coverage, scenario analysis, financial effects, delivery risk	11	Projects physical and dated; capital definition inconsistent; no aggregation to the footprint. D6-5, D6-6
Methodology / boundary / base-year change (AASB S2025-1 early adoption; mid-year disposal; FY2024 energy restatement)	Time-series comparability, baseline recalculation, target progress, real versus accounting movement, disposals, peer comparability	06, 11	Energy restatement disclosed with values; the two emissions-basis changes are disclosed without effect. D1-3, D2-4, D2-5
Coverage percentage claim ("around 99 per cent")	Numerator, denominator, excluded categories	11, 09	Denominator is Scope 1 and 2, about 46 per cent of the footprint. F-4, C-08
Externally dependent target (five enablers)	Target year versus dependency pathway, disclosed bridge, fallback actions	11	Enablers now listed in the statutory statement; no dated bridge. D6-4, I5

TRIGGER DETECTED	SCANS RUN	SECTIONS LOADED	OUTCOME
Any reduction or target-progress claim: business-as-usual counterfactual	Scope 2 grid factor versus consumption versus instruments; production volume and mix; Scope 3 factor change versus supplier decarbonisation	06, 03	The single-year intensity improvement is entirely the denominator; the Scope 3 fall is method and boundary. D8-1, D4-3, F-6
Any combined Scope 1+2 figure	Decompose into Scope 1 and Scope 2, and Scope 2 into location and market-based	06, 07, 08	Decomposed: Scope 1 down 0.1 per cent, Scope 2 up 0.6 per cent, combined flat. Market-based unavailable. D2-2, D3-1
Australian entity with metrics in more than one place	NGER register lookup; cross-source consistency matrix; boundary normalisation before flagging	16, 01	NGER reconciles for FY2025; three intra-suite divergences recorded, one arithmetic. Annex J
More than one reporting period and report type	Multi-period series across every year and report type up to the reviewed one; trajectory, restatements, dropped and added disclosures, target weakening, cross-report-type divergence, certification continuity	17, 06, 11	Nine-year series built; FY2019 and FY2020 restored by the company; two basis changes unquantified. §3.4, Annex K
Source contracted, operated or controlled by another party (divested joint venture; equity-share investees)	G-20 which-scope test before any exclusion or cannot-verify finding	06, 09	Post-disposal emissions are out of boundary rather than excluded; investee emissions sit inside Scope 1 and 2, so Category 15 is nil. D2-4, I4
Completeness word beside a named quantity ("entire electricity consumption"; "around 99 per cent")	OUT-TB-21 bounded-completeness test before testing the claim	02	Both bounded on their face; the first is evidenced, the second's denominator is the finding. D3-1, D4-2
Disclosed intention to review or improve (future target composition; Scope 3 improvement)	A-21: neither fault nor credit; test whether the present treatment is independently deficient	03, 17	Present targets deficient on independent grounds; the intention bears on the recommendation only. Annex L
Sector: mining and heavy industry	Process emissions, site mix, product declarations, safeguard exposure, physical exposure of fixed assets	13, 14	Applied at D8-1 to D8-4 and D9-1 to D9-3

Annex J: Cross-source consistency matrix, NGER reconciliation & disclosure-risk register (DR-01..DR-07 / A-01C / OUT-TB-18)

O.1 Cross-source consistency matrix (DR-02)

CLAIM / METRIC	ANNUAL REPORT (AUDITED)	STATUTORY CLIMATE STATEMENT	DATA SUPPLEMENT	INVESTOR MATERIALS	DIVERGENCE AFTER NORMALISATION
Scope 1, Scope 2 location-based, total	8,490 / 1,710 / 10,200 $ktCO_2e$ (folios 30, 32)	8,490 / 1,710 / 10,200 $ktCO_2e$, split consolidated group and other investees (folio 192)	8,490 / 1,710 / 10,200 $ktCO_2e$ (p.11)	Not restated	None
Scope 3 total	11,950 $ktCO_2e$ (folio 30)	Omitted under the first-year relief; reader directed to the voluntary layer (folio 175)	11,950 $ktCO_2e$ with fifteen categories (pp.11, 17–19)	Not restated	None. The omission is a disclosed relief
Steelmaking intensity result against the 2030 target	"a 16 per cent reduction … ahead of the 12 per cent emissions intensity target for 2030" (folio 32)	Same words (folio 194)	Same words (p.12)	"Achieved 16% reduction since FY2018", "-16%" against the 1.44 target line (p.21)	None. One characterisation across four documents

CLAIM / METRIC	ANNUAL REPORT (AUDITED)	STATUTORY CLIMATE STATEMENT	DATA SUPPLEMENT	INVESTOR MATERIALS	DIVERGENCE AFTER NORMALISATION
Drivers of the intensity result	"operational and efficiency improvements at Port Kembla, together with North Star's continued growth following its EAF expansion" (folio 32)	Same (folio 194)	Same (p.12)	"Driven by North Star expansion ramp-up and operating and process improvements at Port Kembla" (p.21); remuneration commentary: "a relative increase in the contribution of raw steel tonnes produced from North Star and operational efficiency improvement at Port Kembla" (folio 70)	None. The mix driver is named in every place the result is reported, including the remuneration section. Only the order differs
Physical-risk asset exposure	Total assets $16,398.9M; property, plant and equipment $7,610.1M plus right-of-use $470.3M (folio 102)	"$8,060M of PPE ... over 99 per cent of Group total assets"; "$4,660M of PPE ... 58 per cent of the Group's total assets" (folio 193)	Not carried	Not carried	**Yes. The two shares are 49 per cent and 28 per cent of total assets. Both percentages are of the assessed property, plant and equipment base. Arithmetic divergence against the audited balance sheet in the same document**
Decarbonisation investment	Not separately stated	"$139M ... does not include capital investments with indirect decarbonisation benefits ... such as the North Star expansion, Western Port oven upgrades" (folio 193)	Not carried	"Climate related investments" line in the capital table (p.15)	**Yes. The Western Port oven is named at folio 31 as delivering more than 20,000 tCO_2e and is excluded from the investment figure at folio 193. No cumulative figure against the five-year commitment**
Consolidation approach	Not separately stated	Equity share globally "unless superseded by the jurisdictional relief adopted for Australian operations under the NGER scheme" (folio 192)	"environmental data is reported utilising an equity share approach" (p.3)	"GHG emissions data reported on an equity accounted basis" (p.21)	**Yes, definitional. The statutory statement is the fuller one; the other two omit the Australian qualification. The reported figures are identical in all three**
Target coverage	"around 99 per cent of BlueScope's Scope 1 and 2 GHG emissions" (folio 194)	Same	Not carried	Steelmaking target "92% of Group-wide Scope 1 and 2 emissions"; non-steelmaking target "8%" (p.21)	None after normalisation. The difference is downstream activities, which the non-steelmaking target excludes by its own definition
Carbon cost exposure	Note 14.6: a 20 per cent rise in Safeguard compliance cost across a 30-year forecast reduces the ASP recoverable amount by $77M; note 8: $126.0M of carbon-related intangibles (folios 118, 127)	Risk 2: up to $60M a year by 2035 unmitigated; assumptions stated to be consistent with the impairment model (folios 183, 125)	Not carried	Not carried	None. The two are on stated common assumptions and the impairment note cross-references the climate report
Absolute emissions outlook	Not separately stated	Not separately stated	Not carried	Not carried in the deck	None. The statement that "BlueScope's absolute emissions will increase due to the higher volume of steel produced" appears at folio 31 and is not contradicted anywhere

O.2 NGER reconciliation (A-01C)

ITEM	REGULATOR-FACING	DISCLOSURE	NORMALISATION	RESULT
Scope 1	6,223,931 tCO_2e, FY2024-25 register, data as at 27 February 2026	8,500,000 tCO_2e globally for FY2025	NGER is operational control, Australian facilities only. The disclosure is equity share, global	The Australian figure is 73 per cent of the global Scope 1, consistent with Port Kembla being the group's only blast furnace and with New Zealand, North America and Asia making up the balance. No divergence identified
Scope 2 (location-based)	786,481 tCO_2e, same register	1,700,000 tCO_2e globally for FY2025	Same normalisation	The Australian figure is 46 per cent of the global location-based Scope 2, consistent with North Star being the largest single electricity consumer and sitting outside Australia. No divergence identified
Net energy	73,728,065 GJ, same register	110 PJ globally for FY2026, 109 PJ for FY2025	Same normalisation	The Australian figure is about 68 per cent of the global FY2025 net energy. Consistent. No divergence identified
Reviewed period	Not available	FY2026	The FY2025-26 register had not been published at the review date	The FY2026 figures cannot be reconciled to the register. Recorded as a timing limitation, not a finding

No reconciliation is published by BlueScope, so the residual between the Australian and global figures is not tested. Under A-05 the untested residual is recorded rather than asserted either way. From FY2026 the Australian operations are measured on the NGER methodology under the jurisdictional relief, which should narrow the reconciling items in future periods; the effect is not stated (F-17).

O.3 Disclosure-risk register (DR-01..DR-07)

#	RISK	LENS	EXPOSURE	CONFIDENCE	DRIVER	MITIGATION
O-1	A quantified AASB S2 metric in a statement covered by a Directors' declaration does not reconcile to the audited balance sheet in the same document	Legal, regulatory	Moderate	High	The vulnerability percentages are shares of the assessed property, plant and equipment base and are labelled as shares of Group total assets. The metric is outside the assured subject matter	Restate both percentages against the denominator used, and give the total-assets share separately
O-2	One Scope 2 basis is reported where the standard the company cites requires two, on operations holding contractual instruments outside the Australian jurisdictional relief	Regulatory	Moderate	High	Certificates cover North Star's entire consumption and are expressly excluded from the reported figure; no site-level Scope 2 exists from which a market-based position could be derived	Report both bases with certificate and contract volumes
O-3	The principal forward commitment has been passed and the company has stated it will not be revised	Legal, regulatory	Low to moderate	High	The 2030 steelmaking target level of 1.44 was reached in FY2024 and stands 4 percentage points behind the FY2026 result and 8 behind the company's own projection. The position is stated plainly, which is the main protection	Replace the target with one calibrated to the projection
O-4	The majority of the footprint carries no commitment, and the disclosure quantifies the share without stating that it is untargeted	Legal, commercial	Moderate	High	Scope 3 is 54 per cent of a 22,150 $ktCO_2e$ footprint and has no target, baseline or target year. The 2050 goal is boundary-labelled, which is what keeps this out of a claim-quality finding	A Scope 3 target, and a line stating the untargeted share wherever the coverage figure appears
O-5	Two disclosed changes to the basis of the emissions figures carry no statement of effect	Regulatory, technical	Moderate	High	The move of Australian operations to the NGER methodology, and the mid-year exclusion of the divested joint venture without restated comparatives	State the reviewed year on both bases and publish the emissions removed by the disposal
O-6	The statement is not self-contained on the mechanism of its own strategy	Regulatory	Moderate	High	The site pathways, the site-level intensity history and the Scope 3 work program are available only in a September 2024 document; the physical-risk assessment dates from 2024	Carry the material into the statutory statement and refresh the assessment

#	RISK	LENS	EXPOSURE	CONFIDENCE	DRIVER	MITIGATION
O-7	Dependence on abatement that does not yet exist at commercial scale	Technology	High	High	The 2050 goal rests on five enablers largely outside the company's control. Port Kembla, the largest single source, has no committed technology change this decade, and the company's own 2030 projection assumes no changes beyond Glenbrook and North Star	Publish the abatement each project is expected to deliver, with dates, and state the position at Port Kembla between 2030 and 2050
O-8	The Safeguard concession expires after FY2026 with no quantified step change disclosed	Regulatory	Moderate	Medium	Trade-exposed baseline-adjusted status reduces the decline rate from 4.9 to 1 per cent a year for FY2024 to FY2026 inclusive; beyond it the disclosure states the position "remain[s] uncertain and dependent on achieving TEBA status and transition of baselines from site-specific to industry averages"	Disclose the baseline path and the modelled liability on each of the stated assumptions
O-9	Customers cannot take the company's best emissions position from its own reporting	Commercial	Moderate	Medium	No per-tonne figure by site or route in the corporate inventory, no market-based basis, and no published figure for the lower-emissions product range	Publish site and route-level intensity and both Scope 2 bases

Annex K: Longitudinal series & cross-period tracking register (YOY-01..08 / OUT-TB-19)

P.1 Longitudinal series

All figures as published, ktCO_2e unless stated. Sources: FY2026 Annual Report folio 32 (nine-year Scope 1 and 2 and intensity charts), FY2026 Data Supplement pages 8, 11 and 12, FY2026 Results Supplementary Materials page 21, and the prior-period FY2025 suite for cross-checking. Scope 3 is not published before FY2022 in the current suite.

METRIC	FY2018	FY2019	FY2020	FY2021	FY2022	FY2023	FY2024	FY2025	FY2026
Scope 1	8,820	8,590	8,380	8,800	8,680	8,510	8,500	8,500	8,490
Scope 2 (location-based)	1,860	1,810	1,710	1,740	1,660	1,740	1,750	1,700	1,710
Scope 1 and 2 combined	10,680	10,400	10,090	10,540	10,340	10,250	10,250	10,200	10,200
Steelmaking Scope 1 and 2	9,780	—	—	—	9,500	9,370	9,410	9,410	9,420
Scope 3	—	—	—	—	11,030	11,860	12,310	12,770	11,950
Total footprint	—	—	—	—	21,370	22,110	22,560	22,970	22,150
Steelmaking intensity (tCO_2e/t raw steel)	1.64	1.64	1.63	1.61	1.58	1.51	1.44	1.41	1.38
Non-steelmaking intensity (tCO_2e/t despatched)	0.25	—	—	0.24	0.24	0.22	0.23	0.22	0.22
Raw steel production (kt)	~5,963 (derived)	—	—	—	5,978	6,173	6,526	6,688	6,814
Net energy consumption (PJ)	111	—	—	—	109	108	109	110	110
Energy intensity, steelmaking (GJ/t)	17.0	—	—	—	16.6	15.9	15.2	15.0	14.8
Recovered and recycled scrap share	—	—	—	—	46%	48%	50%	52%	55%
Carbon-related intangibles ($M)	—	—	—	—	—	—	302.9	143.6	126.0

FY2018 raw steel production is derived from the published FY2018 steelmaking emissions of 9,780 ktCO₂e and intensity of 1.64 tCO₂e per tonne; it is not published directly. Dashes mark years the reviewed suite does not publish, not years with no data.

P.2 Cross-period tracking register

#	OBSERVATION	PERIODS	RULE CHAIN	ASSESSMENT
P-01	Scope 1 and 2 combined has been unchanged at 10,200 ktCO₂e for two consecutive years and is 4.5 per cent below FY2018 across nine, while raw steel production rose about 14 per cent. FY2026 sits 1.1 per cent above the FY2020 low of 10,090	FY2018 to FY2026	YOY-01, YOY-02, A-19, G-BAU	Three periods available, so a trend observation is supported. The direction of travel in absolute terms is flat
P-02	Scope 1 and Scope 2 moved in opposite directions in FY2026: Scope 1 down 0.1 per cent, Scope 2 up 0.6 per cent	FY2025 to FY2026	G-06, G-07, YOY-02	Two periods, so a change observation is supported. The combined figure conceals it
P-03	Steelmaking Scope 1 and 2 rose 10 ktCO₂e while the intensity metric fell 2.1 per cent, on production up 1.9 per cent	FY2025 to FY2026	A-19, G-BAU, T-14	Change observation. The entire single-year improvement in the reported metric is the denominator
P-04	FY2019 and FY2020, absent from the prior period's published tables, are restored to the nine-year charts in the annual report	FY2025 to FY2026	SEC-SF-11, YOY-06	An added disclosure. Not credited (A-16); recorded because it changes what the series shows, including the FY2020 low the earlier tables omitted
P-05	Scope 3 rose 15.8 per cent from FY2022 to FY2025 and fell 6.4 per cent in FY2026, entirely on Category 1, partly offset by Category 4 rising on updated transport emission factors	FY2022 to FY2026	YOY-03, G-10, A-19	Trend then reversal. The reversal is attributed to three causes and none is sized, so it is recorded as unattributable rather than as abatement
P-06	The Australian operations moved from the GHG Protocol to the NGER methodology under early adoption of AASB S2025-1, with no statement of effect, while the same section states there were no material changes in measurement approach	FY2025 to FY2026	G-10, GHG-STD-08, YOY-04	A method change disclosed without its effect. Normalisation is not possible, so the magnitude is cannot-verify
P-07	The 50 per cent interest in Tata BlueScope was sold on 31 December 2025 and the divested facilities are excluded from the second half of FY2026 across all three scopes; comparatives are not restated and the amount removed is not published	FY2025 to FY2026	G-10, T-BASE-01, YOY-04	A boundary change disclosed without quantification. The midstream intensity target is stated not to have been re-baselined because the base year is not materially affected; nothing is said about the absolute series or Scope 3
P-08	FY2024 net energy consumption was restated from 116 to 109 PJ and steelmaking energy intensity from 16.1 to 15.2 GJ per tonne, with before and after values published	FY2024 to FY2026	G-10, YOY-04	A restatement disclosed in the form the two emissions-basis changes are not. Not credited; recorded as the contrast
P-09	The 2030 steelmaking target level of 1.44 was reached in FY2024, passed in FY2025 at 1.41 and passed again in FY2026 at 1.38, and the company has now stated it will not be revised	FY2024 to FY2026	T-14, S2-41, A-18, A-21	Three periods past the target. The statement that it will not be revised is new in FY2026 and is the first express decision on the point
P-10	The short-term incentive threshold on steelmaking intensity rose from 11.0 per cent in the prior period to 14.1 per cent in FY2026, with target 16.0 and stretch 17.0, all above the 12 per cent public 2030 target	FY2025 to FY2026	GOV-01, A-11, T-14	Change observation. The gate now sits above the prior-year outturn, which is the design the measure requires, and above the public commitment
P-11	The climate content moved from a standalone Sustainability Report into a statutory Sustainability Report inside the Annual Report, with a Directors' declaration and an unmodified limited-assurance conclusion, and the scenario analysis, physical-risk assessment, CRRO table, method statement and target definitions moved with it	FY2025 to FY2026	L-01, S2-01, SEC-SF-11	The first mandatory year. Baseline for a Group 1 entity; not credited. Recorded because it changes what a reader can obtain from one document
P-12	Four elements remain available only in the September 2024 Climate Action Report, down from six in the prior period: the site pathways, the non-steelmaking pathway detail, the site-level intensity history and the Scope 3 work program. No third edition has been published	September 2024 to September 2026	SEC-SF-11, YOY-05, OUT-TB-03	A narrowing, not a closure. The site-level series that explains the headline performance measure is the element that matters most and it still ends at FY2024
P-13	Assurance widened from Scope 1, location-based Scope 2 and steelmaking intensity to also cover governance and the strategy risks and opportunities, under the statutory phase-in	FY2025 to FY2026	GOV-10, A-11	Set by the legislated timeline rather than chosen. Neither credited nor faulted; Scope 3 remains outside

#	OBSERVATION	PERIODS	RULE CHAIN	ASSESSMENT
P-14	Carbon-related intangibles fell from $302.9M to $143.6M to $126.0M, while Australian carbon credit unit holdings rose from $14.1M to $23.2M to $38.5M	FY2024 to FY2026	E-13, DR-02	Three periods, so a trend observation is supported. Units are held for compliance surrender; no offsets were used or surrendered in FY2026
P-15	The certification and claim chain is unchanged across all periods: no carbon-neutral certification, no renewable-electricity claim, no science-based or Paris-aligned label, and a 2050 net zero goal covering Scope 1 and 2 that has been stated in the same terms since August 2021	2021 to FY2026	E-25, A-18, OUT-TB-15	Continuity, which earns no credit (A-16). No claim has been withdrawn or weakened, and none has been broadened
P-16	Scope 1 for FY2020 and FY2021 is 8,380 and 8,800 $ktCO_2e$ in the FY2026 Annual Report's nine-year chart (folio 32), against 8,420 and 8,840 as published in the September 2024 Climate Action Report (p.12) and the FY2025 Metrics Tables and Data Supplement (p.13). Scope 2 for both years is unchanged (1,710 and 1,740), so the combined figure moves 40 $ktCO_2e$ lower in each year. No footnote, restatement note or GRI 2-4 entry in the FY2026 suite explains it, and the FY2026 Metrics Tables carry FY2018 and FY2022 onward only. FY2022 to FY2025 are unchanged, so the NGER methodology change (P-06), which applies to FY2026, does not account for it	FY2020 to FY2021, as published in FY2025 and FY2026	YOY-04, G-10, A-05	A restatement of two historical years in the later document, not flagged. Each review carries the figures of its own documents. Small (about 0.5 per cent of Scope 1) and outside the FY2018 base year and the reviewed year, so it moves no target or progress figure; cause cannot verify

Prepared under the Climate Disclosure Review Rules v15.23 (controlled AI-assisted review). The body (§1–§7) states the verdict and may be issued on its own; the annexes are the working layer. General information only: not legal, financial or investment advice, an audit, an assurance opinion, or a NoCO2 certification or conformance determination. © Carbon Reduction Institute Pty Ltd, ABN 26 122 969 233.

Annex L: How each score was reached

Each audience score is built from a fixed set of load-bearing criteria, marked before the score is set. "Partial" means the criterion is satisfied only with reader effort that this audience can reasonably spend, not a soft failure. The count matters as well as the score: a score can reach its floor on two failed criteria, so two reports sharing a score may sit some distance apart on the detail below.

#	AUDIENCE	CRITERION	VERDICT	WHY
A1	Carbon accounting	No material category excluded	Pass	**OUT-STK-13 does not fire.** Trigger (i) fails: every upstream category is itemised individually with its own figure and nothing sits in an unquantified "other". Trigger (iii) fails: the disclosure is by GHG Protocol category, not by business segment. Trigger (ii) is literally met, the Scope 3 total being outside the assurance scope, but **the rule's own rebuttal test is satisfied**: BlueScope publishes a full fifteen-category breakdown with three years of data, a stated 1% materiality threshold, a relevance marking per category, and categories that sum exactly to the stated total in FY2024, FY2025 and FY2026. The equity-share residual, open in the prior period, is now quantified at 10 $ktCO_2e$, so a material exclusion through the boundary is ruled out. The mid-year disposal removes emissions from the boundary rather than excluding them from within it
A2	Carbon accounting	Single reconcilable footprint	Pass	No competing emissions totals anywhere in the suite. Scope 1 plus Scope 2 equals the stated total in every published year; the Scope 3 categories sum exactly to the Scope 3 total in each of three years; steelmaking 9,420 plus non-steelmaking 780 equals 10,200 and matches the stated 92 / 8 split; the stated 22,150 total and the 54% Scope 3 share both recompute; and the statutory table's consolidated and other-investee lines reconcile within the disclosed rounding to the nearest 10 $ktCO_2e$. The 16% and 12% derived percentages both recompute from the published figures. The vulnerability-metric divergence at D8-3 concerns an asset metric, not the footprint, and is counted at G2
A3	Carbon accounting	Method, boundary and version transparency	partial (workable)	**Action:** a carbon accountant reads the Measurement of Scope 1 and 2 GHG Emissions section, which names the consolidation approach (equity share, with NGER jurisdictional relief for Australian operations), the Scope 2 method, the six Kyoto Protocol gases, the emission factor publication for each region (NGER Measurement Determination 2008 Compilation 20 with Methods 1 and 2, US EPA 2025, New Zealand Ministry for the Environment 2026, eGRID, the IEA factor database), the higher-order methods applied and the estimate share of under one per cent, and reads the Contractual Instruments paragraph, which states that certificates cover North Star's entire consumption and are not in the reported figure. **Data:** Annual Report folios 192 to 193, plus the Data Supplement restatement note giving before and after values. The reader can therefore reproduce the boundary and the basis and knows exactly which instruments sit outside it. What keeps this a partial rather than a pass: no market-based basis is published and no Scope 2 split by site exists from which one could be derived, the global warming potential version is not stated (it is implied by the named factor publications but not disclosed), and the effect of moving Australian operations to the NGER methodology is not quantified
A4	Carbon accounting	Granularity and assurance sufficient to lift	partial (workable)	**Action:** a downstream accountant seeking a supplier-specific factor for BlueScope steel uses the third-party verified Environmental Product Declarations registered with EPD Australasia and the International EPD System across the COLORBOND and XLERPLATE ranges, listed by product and country in the Data Supplement; an accountant lifting the corporate footprint uses the assured Scope 1 and location-based Scope 2 totals, which now sit inside a statutory statement covered by a Directors' declaration. **Data:** the product credentials table on Data Supplement pages 20 to 22 and the assurance report's criteria table on Annual Report folio 197. What is missing and keeps this a partial: Scope 3, 54% of the footprint, is unassured, and neither Scope 1 nor Scope 2 carries a split by site, country, gas or source in the FY2026 suite

#	AUDIENCE	CRITERION	VERDICT	WHY
I1	Institutional investors	Physical risk relevant and transparent (N-04)	partial (workable)	**Action:** the investor reads the physical-risk assessment now printed in the statutory statement, and takes the dollar exposures ($8,060M of property, plant and equipment assessed, $4,660M at the three steelmaking sites) against total assets of $16,398.9M in the balance sheet of the same report, which is the correct denominator, rather than the percentages printed beside them. **Data:** Annual Report folios 185, 191 and 193, and the consolidated balance sheet on folio 102. Coverage is relevant to the business model: 71 sites, six named hazards, three time horizons, two IPCC AR6 pathways, coastal integrated steelworks with water-intensive processes, and an average annualised loss quantified at up to $20M by 2100. Assessed for relevance and methodology transparency only, not for modelling quality. What keeps this short of a pass: the printed percentages do not reconcile to the balance sheet, the assessment dates from 2024, the site-level results are not published, and the supply chain mapping carries no financial impacts
I2	Institutional investors	Transition risk: derivable target headroom	partial (workable)	**Action:** the reader reads the FY2026 actual of 1.38 against the FY2030 target level of 1.44 printed on the same chart, and the non-steelmaking actual of 0.22 against 0.18, and computes the headroom directly; the same page prints the company's own 2030 estimate of below 1.3 and the assumptions behind it. **Data:** the intensity charts on Annual Report folio 32 and the target column in the Data Supplement metrics table, both of which print baseline, actual and target. The headroom is fully visible, and what it reveals is negative headroom on the steelmaking target of about 4 per cent. The consequence, a target requiring no further reduction, is a target-credibility matter counted at D6-1 and not counted twice here. What keeps this short of a pass is the absence of any absolute cap on Scope 1 and 2 in a period in which the company states absolute emissions will rise
I3	Institutional investors	Target achievement: real reductions, honest progress	Not met	The targets are being met and not with real reductions. Steelmaking Scope 1 and 2 rose from 9,410 to 9,420 $ktCO_2e$ while the intensity metric fell 2.1 per cent, because raw steel production rose 1.9 per cent to 6,814 kt, so the whole of the single-year improvement is the denominator. Over FY2018 to FY2026, applying FY2026 production to FY2018 emissions gives 1.44, so about 12.5 of the 15.9 percentage points come from output growth and about 3.4 from lower absolute emissions. Group Scope 1 and 2 is unchanged at 10,200 $ktCO_2e$ for a second year and sits above the FY2020 low of 10,090. The progress-statement limb is materially better than the achievement limb: the driver is now named in the Sustainability Overview, the statutory statement, the Data Supplement and the remuneration commentary, and the investor deck leads with it. It is not sized anywhere, and no FY2026 site-level series is published. The Scope 3 movement compounds the attribution problem: a 6.4 per cent fall driven by an emission-factor change, a transport-factor change and a mid-year disposal, none of them sized
I4	Institutional investors	Portfolio / financed-emissions completeness	Pass	Not a financial institution and no material investment book. Category 15 is reported as nil, which is the coherent treatment under equity-share consolidation, where a share of an investee's Scope 1 and 2 sits inside Scope 1 and 2 rather than in this category, and the statutory table now quantifies that investee share at 10 $ktCO_2e$. Nothing is excluded on this criterion
I5	Institutional investors	Flow-through / look-through exposure	partial (workable)	**Action:** the investor reads the five enablers, now printed in the statutory statement rather than only in a separate document, which are the company's own statement of what it does not control, together with the Category 1 composition, and sizes the exposure as the 6,320 $ktCO_2e$ of purchased iron, steel, ore, coal, paint and chemicals whose decarbonisation belongs to suppliers. **Data:** Figure 2 on Annual Report folio 180 and the Category 1 line and description on Data Supplement page 17. BlueScope also quantifies two flow-through items itself: about $9M of earnings per one per cent of domestic sales displaced by customer preference, with up to five per cent modelled under the 1.5°C scenario, and the statement that the debottlenecking will raise absolute emissions. Missing: any supplier target coverage, any Scope 3 target, and any dated bridge for the enablers
I6	Institutional investors	Reconstructability by a sophisticated reader	partial (workable)	**Action:** the investor works from the FY2026 Annual Report alone for the nine-year absolute and intensity series, the scenario analysis, the physical-risk assessment, the risk and opportunity table with financial effects, the method statement, the target definitions and the enablers, and opens the September 2024 Climate Action Report, which the suite names and which is public, only for the site pathways, the site-level intensity history and the Scope 3 work program. **Data:** the two documents together, with the annual report now carrying the majority. What keeps this a partial rather than a pass is that the site-level series that explains the headline performance measure is obtainable only from a document two years older than the reported period and ends at FY2024, and that two changes to the basis of the figures are disclosed without their effect
R1	Retail investors	Headline matches evidence without cross-document work	Pass	The reader of the Sustainability Overview meets, on two facing pages, the 16 per cent figure, the sentence naming its drivers, the plain statement that "this performance is ahead of the 12 per cent emissions intensity target for 2030", the nine-year absolute Scope 1 and 2 chart, the whole-footprint pie showing 22,150 $ktCO_2e$ split three ways, the statement that Scope 3 is 54 per cent of the profile, and the statement that absolute emissions will increase as North Star grows. The headline is literally accurate, the correction to the target chart's geometry is stated in words beside it, and the absolute position is co-located with the intensity position. No cross-document work is required to see any of it
R2	Retail investors	Targets cover material sources; achievement honest	Not met	The coverage limb fails outright. Every target and the 2050 goal cover Scope 1 and Scope 2, which is 46 per cent of the 22,150 $ktCO_2e$ footprint the same page publishes; Scope 3, the remaining 54 per cent, has no target, no baseline and no target year, and the suite nowhere says so. The stated coverage figure of "around 99 per cent" is a share of Scope 1 and 2. The achievement limb compounds it: the 2030 steelmaking target level of 1.44 was reached in FY2024 and is now exceeded by 4 percentage points, the company's own projection from committed projects is at least 20 per cent against a 12 per cent target, and the company states the target will not be revised. A retail reader is shown a target line drawn ahead of the current result and told performance is ahead of it, without being told the target will stay where it is
R3	Retail investors	Material risks legible	Pass	The climate risk and opportunity table sets out three risks and two opportunities in plain language, each with a description, drivers, time horizons, business-model impacts, a current financial effect, an anticipated financial effect and a management response. The Safeguard Mechanism, its decline rates and Port Kembla's concession are explained in ordinary terms, and the credits issued are stated. A retail reader can see what BlueScope says could go wrong and what it says it is worth
R4	Retail investors	Caveats findable, understandable, fairly presented	partial (workable)	**Action:** the reader who reads the target page reads its caveats on the same page, because the five enablers are printed beneath the 2050 goal, the target boundaries are printed inside the target statements, and the footnote to the 2030 projection sets out exactly what it assumes and excludes. **Data:** Annual Report folios 30, 32 and 194 and their footnotes. The material caveats are co-located rather than buried, and the Use of Carbon Credits section states plainly that no offsets were used. What holds it short of a pass: the offsets option carries no scale and the goal expressly has no gross target, and the summary line on the customer-preference risk reads "not quantifiable" while the same box supplies the unit rate and the modelled displacement

#	AUDIENCE	CRITERION	VERDICT	WHY
P1	Consumers & public	Claims literally true within their implied boundary	Pass	Every headline claim states its own boundary where it is made. The goal is presented as "NET ZERO Scope 1 and 2 GHG Emissions by 2050", the 12 per cent target as applying to three named steelmaking sites, the 30 per cent target to named midstream sites, and the 16 per cent result as a steelmaking intensity reduction against a stated baseline. No carbon-neutral claim, no renewable-electricity claim, no offset-backed claim and no science-based or Paris-aligned label appears anywhere, and the suite states expressly that the 2030 target "was not derived using a sectoral decarbonisation approach". The site electricity claim names its mechanism, its generation source and its verifier in the same paragraph. The vulnerability-metric error is a statement about the company's own exposure that overstates it, not a favourable public claim, and is counted at G2
P2	Consumers & public	No greenwashing or misleading composite impression	Not met	The statements hold and the composite they build does not. A member of the public reading the climate content meets a 16 per cent improvement described as ahead of target, a 2050 net zero goal covering all global operations, an electric arc furnace producing its first steel, a decarbonisation pathway and $139M of investment, and takes from it that BlueScope's emissions are coming down. Scope 1 and 2 have not moved in two years and are 4 per cent below 2018 across nine, steelmaking emissions rose in the reviewed year, the improvement shown is about four-fifths the arithmetic of producing more steel where the intensity was already lowest, and this year's fall in reported value chain emissions is an emission-factor and boundary movement the disclosure names and does not size. The 54 per cent of the footprint the same page quantifies carries no commitment of any kind and the suite never says so. Nothing in the chapter is untrue, several parts of it are candid, and none of it conveys that position
P3	Consumers & public	Genuine climate action evidenced	Pass	The action is physical, funded, dated and now operating. The Glenbrook electric arc furnace reached hot commissioning and first hot metal in July 2026, co-funded by the New Zealand Government, at a site whose intensity had not moved since FY2013, and is stated to enable up to one million tonnes a year, about 55 per cent of the site's Scope 1 and 2. NeoSmelt has a final investment decision expected mid FY2027 and a 30,000 to 40,000 tonne pilot behind it. Four midstream projects are installed and three are sized: the Western Port paint line oven at more than 20,000 tCO_2e since completion, the Kapar pre-heater at about 1,200 tCO_2e a year, and the Map Ta Phut supply switch at 14 per cent of that site's Scope 2. Port Kembla's efficiency program is described mechanically
G1	Regulators	Standards compliance / readiness	partial (workable)	**Action:** the regulator reads the basis of preparation, which names the standard, the Corporations Act provisions, the reliefs taken and the early adoption, and reads the assurance report's criteria table, which states exactly which AASB S2 paragraphs were reviewed. **Data:** Annual Report folios 175, 196 and 197. The first mandatory statement is delivered with a Directors' declaration under section 296A(6) and an unmodified limited-assurance conclusion, and the transition reliefs are permitted and disclosed, so no compliance finding arises from them. The gaps that keep this short of a pass are live against standards the company cites: one Scope 2 basis where the GHG Protocol requires two on operations holding contractual instruments and outside the Australian jurisdictional relief, no global warming potential version, and a disclosed methodology change with no statement of effect
G2	Regulators	Cross-source / audience consistency	Not met	One divergence survives normalisation on arithmetic and two on definition, all inside BlueScope's own suite. **First**, the statutory climate statement states that $8,060M of property, plant and equipment assessed as vulnerable to physical climate risk represents "over 99 per cent of Group total assets" and that $4,660M represents "58 per cent of the Group's total assets", where total assets in the same Annual Report are $16,398.9M, so the two shares are 49 per cent and 28 per cent; both percentages are of the assessed property, plant and equipment base. This is a quantified AASB S2 metric inside a statement covered by a Directors' declaration, and it does not reconcile to the audited balance sheet a hundred folios earlier. **Second**, the Western Port paint line oven is named in three places as a key emissions-reduction project delivering more than 20,000 tCO_2e and is expressly excluded from the $139M decarbonisation investment figure as an investment with only indirect decarbonisation benefits. **Third**, the Data Supplement describes the consolidation approach as equity share without the Australian jurisdictional qualification the statutory statement carries. The two divergences that stood in the prior period, the "in line with" against "above" characterisation of the target position and the grid driver named only in the remuneration section, are both resolved: the suite now uses one characterisation and names the drivers consistently. The NGER reconciliation raises nothing after boundary normalisation