

BHP

Modern Slavery Statement 2026

Bringing people and resources together to build a better world

BHP Group Limited
ABN 49 004 028 077

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Cover photo
Olympic Dam, Australia

About this Statement

This is BHP Group Limited's Joint Modern Slavery Statement (Australia), Slavery and Human Trafficking Statement (United Kingdom) and BHP Canada Inc.'s Forced Labour and Child Labour Report (Canada) for 1 July 2025 to 30 June 2026 (**Statement**). It is made under section 14(1) of the Australian Modern Slavery Act 2018 (Cth) (**Australian Act**), section 11(2)(a) of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 (**Canadian Act**) and section 54(1) of the UK Modern Slavery Act 2015 (**UK Act**).

This Statement is structured to address reporting criteria under the Australian, Canadian and UK Acts. See Appendix 3 for details of where each reporting criterion is addressed in this Statement. Reporting entities are identified in Appendix 2.

This Statement was approved by the Board of BHP Group Limited on 18 August 2026 under section 54(6)(a) of the UK Act, as the 'higher entity' under section 14(2)(d)(ii) of the Australian Act, and by the Board of BHP Canada Inc. on 4 August 2026 in respect of BHP Canada Inc. as its 'governing body' under section 11(4)(a) of the Canadian Act.

Definition of modern slavery

We adopt the Australian Act's definition of 'modern slavery', which includes trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour. We consider this definition suitable to align with the intended interpretation of slavery and human trafficking in the UK Act and forced labour under the Canadian Act.

The Canadian Act's definition of 'child labour' captures a wider range of practices than the worst forms of child labour. In practice, the third-party risk data that informs the BHP Group's supplier due diligence system captures broader forms of child labour and BHP Canada Inc.'s recruitment process involves checks to ensure candidates and apprentices are at least 18 years old. On-site contractors at the Jansen potash project in Canada are contractually required to adhere to all site safety procedures and *BHP's Minimum requirements for suppliers*, which contain requirements relating to child labour, forced or compulsory labour, human trafficking and other labour issues. The Jansen potash project site procedures do not allow anyone under 18 years old to work or be present on site without BHP's express approval.

Information base

This Statement covers BHP functions, major projects and wholly owned and/or operated assets, including BHP-operated joint ventures ('operated assets' or 'operations').[1] We use the term 'business' to describe those functions, major projects and operated assets, as well as other activities undertaken by the Group.

On 2 April 2026, we completed the divestment of the remaining former OZ Minerals Brazil operations, projects and exploration tenements located in Brazil acquired through the OZ Minerals acquisition completed on 2 May 2023 (**OZ Minerals Brazil assets**). Data in relation to those assets is included only where stated and only up to the date of completed divestment. Where data for OZ Minerals Brazil is reported in this Statement, it is reported in accordance with OZ Minerals Brazil's operating standards. Unless otherwise stated, the operational and supply chain data and content presented in this Statement does not otherwise include any of the OZ Minerals Brazil assets.

BHP holds interests in joint venture assets that are not operated by BHP (referred to in this Statement as 'non-operated joint ventures' or 'non-operated assets'). Non-operated assets are not included in the BHP Group and therefore data for non-operated assets is not presented in this Statement, unless otherwise stated. This Statement does describe our general approach to risks and engagement for our interests in non-operated assets and other investments, including in relation to modern slavery.[2]

BHP was the sole donor to the BHP Foundation in FY2026. The BHP Foundation is a separate charitable entity headquartered in the United States with its own management and operations. Where BHP Foundation data is reported in this Statement, it is supplied to BHP and reported in accordance with BHP Foundation's operating standards.

Assurance and verification

In addition to our internal verification processes, we have sought independent limited assurance over this Statement by our external auditors (see Appendix 4).

1. Operated assets are our assets (including those under exploration, projects in development or execution phases, sites and operations that are closed or in the closure phase) that are wholly owned and operated by BHP or that are owned as a BHP-operated joint venture. References in this Statement to a 'joint venture' are used for convenience to collectively describe assets that are not wholly owned by BHP. Such references are not intended to characterise the legal relationship between the owners of the asset.
2. For more information on our non-operated assets and investments, see the BHP Annual Report 2026, Operating and Financial Review 4 (Our assets).

Copper **Iron ore** **Coal** **Potash**

Our Purpose

Bringing people and resources together to build a better world.

Acknowledgement

We acknowledge the Indigenous peoples of the lands and waters where we operate. We respect those who have cared for, lived on, and continue to steward these lands and waters into the future. We acknowledge the historical and ongoing impacts of slavery, forced labour and other forms of exploitation on Indigenous peoples globally. We recognise their strength, resilience and enduring contributions to our business, our communities, and our shared future.

To view our Annual Reporting Suite visit **bhp.com**

- Annual Report 2026
- Economic Contribution Report 2026
- Modern Slavery Statement 2026
- ESG Standards and Databook 2026

Key progress this year

Reviewing working conditions and advancing our pilot 'impact project' with a major supplier in higher-risk jurisdictions

We partnered with one of our major suppliers to better understand potential modern slavery and human rights risks in higher-risk locations for modern slavery. Together, we reviewed working conditions for subcontracted security and housekeeping services in BHP corporate offices in India, Malaysia and the Philippines, with an emphasis on worker voice.

We did not identify evidence of modern slavery within the scope of this engagement. We did identify opportunities to strengthen working practices to better align with international standards, including International Labour Organization (**ILO**) standards.

We will pilot our 'impact project' with this supplier at these BHP offices, including trialling Issara Institute's worker grievance platform to enhance worker voice and access to remedy (**Impact Project**).[3]

For more information see page 9

Strengthening workforce due diligence to assess control effectiveness

We established a three-year improvement plan to strengthen and embed human rights due diligence across BHP, informed by our FY2025 maturity assessment against the International Council on Mining and Metals (**ICMM**) Human Rights Due Diligence Guidance Maturity Matrix.

As a key step, we conducted an enterprise-wide Human Rights Saliency Assessment (**Saliency Assessment**) during FY2026 to identify and prioritise the most severe risks to people across our growth, operated asset and commercial portfolios. We also commenced a workforce human rights diagnostic.

Together, these initiatives inform our future program to address modern slavery and human rights risks more broadly in our operations and supply chains.

For more information see page 13

Improving our understanding of 'living wage' in our supply chains

We are working to understand how the concept of living wage applies in parts of our supply chain and are engaging with relevant suppliers on this issue, as informed by Sedex Members Ethical Trade Audits (**SMETA**) and collaboration with a major supplier.

Living wage was identified as an emerging trend through our supplier ethical trade audits and remains an evolving and complex human rights concept.

In FY2026, our supplier ethical trade audit program spanned 19 sites across nine countries. We also did not receive any new complaints or reports of potential modern slavery practices through our reporting channels during FY2026 that required further investigation.

For more information see pages 15–16



"In FY2026, we took important steps to strengthen our foundations in assessing and addressing modern slavery risk in increasingly complex supply chain and operating environments.

We continued work on the fundamentals, such as bolstering our approach to human rights due diligence. We also partnered with suppliers to better understand workers' experiences, including in higher-risk jurisdictions. This work provides valuable insight into where risk may arise and where to focus our attention.

While we have made progress, we recognise there is more to do. As our understanding of modern slavery risk continues to evolve, we will build on the insights gained and focus our efforts where they can have the greatest impact."

Brandon Craig

Brandon Craig
Director and Chief Executive Officer

For and on behalf of BHP Group Limited
18 August 2026

3. For more information on our pilot impact project under the Responsible Supply Chains pillar of our social value scorecard, see the BHP Annual Report 2026, Operating and Financial Review 9.3 (2030 goals and social value scorecard).

1 Our structure, business and supply chains

BHP is a global natural resources company.

We explore, extract and process metals and minerals, including copper, iron ore and steelmaking coal. We also produce uranium and gold as by-products of our copper production. And we are building a significant potash business.[4]

Our portfolio of world-class assets is structured to address the demand from major global shifts occurring today, including digitalisation, decarbonisation and population growth.

1.1 Structure

BHP Group Limited (ABN 49 004 028 077) is the parent company of the BHP Group and registered at 171 Collins Street, Melbourne, Victoria 3000, Australia. BHP Group Limited ultimately owns or controls the other reporting entities listed in Appendix 2.

BHP Group Limited is incorporated in Australia. It has a primary listing on the Australian Securities Exchange, an international secondary listing on the London Stock Exchange, a secondary listing on the Johannesburg Stock Exchange and an American Depositary Receipt program listed on the New York Stock Exchange. The BHP Group is led by BHP Group Limited's Board of Directors and management team.

1.2 Business

Our business locations are displayed in Figure 2. In FY2026, we operated our business under three main divisions:

- Minerals Australia, comprising our iron ore assets in Western Australia and coal assets in Queensland and New South Wales[5]
- Copper South Australia, comprising our copper assets in South Australia
- Minerals Americas, comprising our copper assets in Chile and potash project in Canada

Consistent with our strategy to grow in attractive commodities, in FY2026 our Jansen Stage 1 potash project was 84 per cent complete by the end of FY2026, with first production on track for mid-CY2027. Our Jansen Stage 2 project was 16 per cent complete by the end of FY2026.

We also progressed global programs focusing on early-stage exploration opportunities in Australia, Argentina, Botswana, Canada, Chile, Norway, Peru, Serbia and the United States.

BHP's principal operations are complemented by the following relevant activities:

- **Non-operated joint venture assets**: Comprising Vicuña in Argentina and Chile (50 per cent ownership, copper), Antamina in Peru (33.75 per cent ownership, copper), Resolution Copper in the United States (45 per cent ownership, copper), and Samarco in Brazil (50 per cent ownership, iron ore).
- **Social investment**:[6] In FY2026, BHP continued as the sole donor of the BHP Foundation, a separate charitable entity established in 2013 and headquartered in the United States, with its own management and operations. Since its inception, the Foundation has distributed US$500 million to partners predominantly in Australia, Canada, Chile and the United States.
- **Financial investments**: BHP Ventures is our dedicated venture capital unit and invests in companies developing game-changing technologies with the potential to make BHP's global operations safer, more productive and more sustainable. BHP Xplor is our global accelerator program that provides grants to support innovative, early-stage mineral exploration companies.

For more information on the **BHP Foundation**, see: bhp-foundation.org

For more information on **BHP Ventures** and **BHP Xplor**, see: bhp.com/about/our-businesses

BHP Canada Inc. (BN 867880486) is ultimately owned by BHP Group Limited. It owns the Jansen potash project, the closed Island Copper mine site,[7] and a Canadian company with branches engaged in copper exploration outside of Canada. It also holds a non-operating minority interest in a Canadian mineral exploration company, an interest in a non-profit Canadian company engaged in carbon capture and storage knowledge activities, and an interest in a Canadian company with reclamation activities in Canada and subsidiaries with mining activities outside of Canada.

In FY2026, BHP Canada Inc.'s primary business activities related to developing the Jansen potash project in Saskatchewan. The project is under construction and not 'producing goods' within the meaning of the Canadian Act. BHP Canada Inc. imports goods into Canada as inputs into its primary activities (not for distribution or on-sale) and freight services for the delivery of goods to the project.

In FY2026, BHP Canada Inc. had 695 direct employees and the Jansen potash project had a workforce of over 3,000 contractors (engaged through third-party contractors and not directly employed by BHP Canada Inc.).[8]

Our business model

Exploration and acquisition

We seek to add high-quality interests through our exploration activities and early-stage entry and acquisition options.

Development and mining

We strive to achieve the industry's best performance in safety, operational excellence, project management and allocation of capital.

Process and logistics

We process and refine ore and seek to safely manage waste. Our objective is to efficiently and sustainably transport our products to customers.

Sales, marketing and procurement

We maximise value through our centralised marketing and procurement organisations, commercial expertise, understanding of markets and customer and supplier relationships.

Closure and rehabilitation

We consider closure and rehabilitation throughout the asset lifecycle to help minimise our impact and optimise post-closure value for all stakeholders and partners.

4. For more information on our strategy, commodities and growth outlook, see the BHP Annual Report 2026, Operating and Financial Review 2 (Why BHP) and 3 (Strong growth outlook).
5. Western Australia Nickel (our Nickel West operations and West Musgrave project) transitioned into temporary suspension in FY2025. We intend to review the decision to temporarily suspend Western Australia Nickel by February 2027.
6. For more information on our social investment, see the BHP Economic Contribution Report 2026 (Social value).
7. The Island Copper mine site is located in British Columbia (Canada) and in long-term care and maintenance.
8. Contractor data is collected from internal organisation systems and averaged for a 10-month period, July 2025 to April 2026.



Our people

Our people are the foundation of our business. BHP has over **84,000** employees and contractors globally, primarily in Australia and the Americas.[9]

464
Apprentices and trainees trained by FutureFit Academy,[10] with 210 commencing 490 graduating

47.8%
Employees covered by collective bargaining agreements

52.2%
Employees on non-collective agreements

41.5%
Female employee representation

No. of employees and contractors

Global total

~44,000	Australia
~31,000	Chile
~4,000	Canada
~5,500	Rest of World

Employees by contract type

95.0%	Full-time
3.4%	Part-time
1.1%	Fixed-term full-time
0.1%	Fixed-term part-time
0.4%	Casual

9. Based on a 'point-in-time' snapshot of employees as at 30 June 2026 including employees on extended absence. Contractor data is collected from internal organisation systems and averaged for a 10-month period, July 2025 to April 2026. Figures reported do not include employees and contractors of OZ Minerals Brazil assets.
10. Based on the number of apprentices and trainees in-training at the Academy, averaged over the 12 month period July 2025 to June 2026.

1 Our structure, business and supply chains continued

1.3 Supply chains

In FY2026, our payments to suppliers totalled US$26 billion, across over 8,900 suppliers located in 65 countries.[11] The majority of our spend continued to be in the countries where we have operated assets.

Our sourcing functions

Our Commercial function leads the purchase of goods and services across BHP to support the activities of our operated assets and global functions. Within Commercial, our Procurement team has primary responsibility for sourcing, while our Sales and Marketing team sources key trade-related inputs (such as fuels, minerals and metals), and our Maritime team procures freight and manages shipping logistics.

Our supplier arrangements

We partner with our suppliers to work towards our purpose of bringing people and resources together to build a better world.[12]

The form of our supplier relationships varies depending on the nature, term, financial value of the engagement and counterparty size. For example, we may use a long-form contract with standard or bespoke terms and conditions, a short-form contract, or a purchase order. Where practicable, we seek to use BHP's standard contractual terms and conditions, which include modern slavery clauses, or seek to negotiate the inclusion of an appropriate modern slavery clause.

Our supply chains

We describe our supply chains in this Statement with reference to our direct (tier one) supplier spend. We combine supplier spend with the supplier's location (country of incorporation) and the type of goods and services we procure, to illustrate the scope of BHP's supply chains on a global level.

We acknowledge that our supply chain extends beyond our direct suppliers. While our visibility and ability to engage indirect suppliers (beyond tier one) remains limited, we continue to take steps to improve our understanding of our deeper supply chain (see section 2.2 for more details).

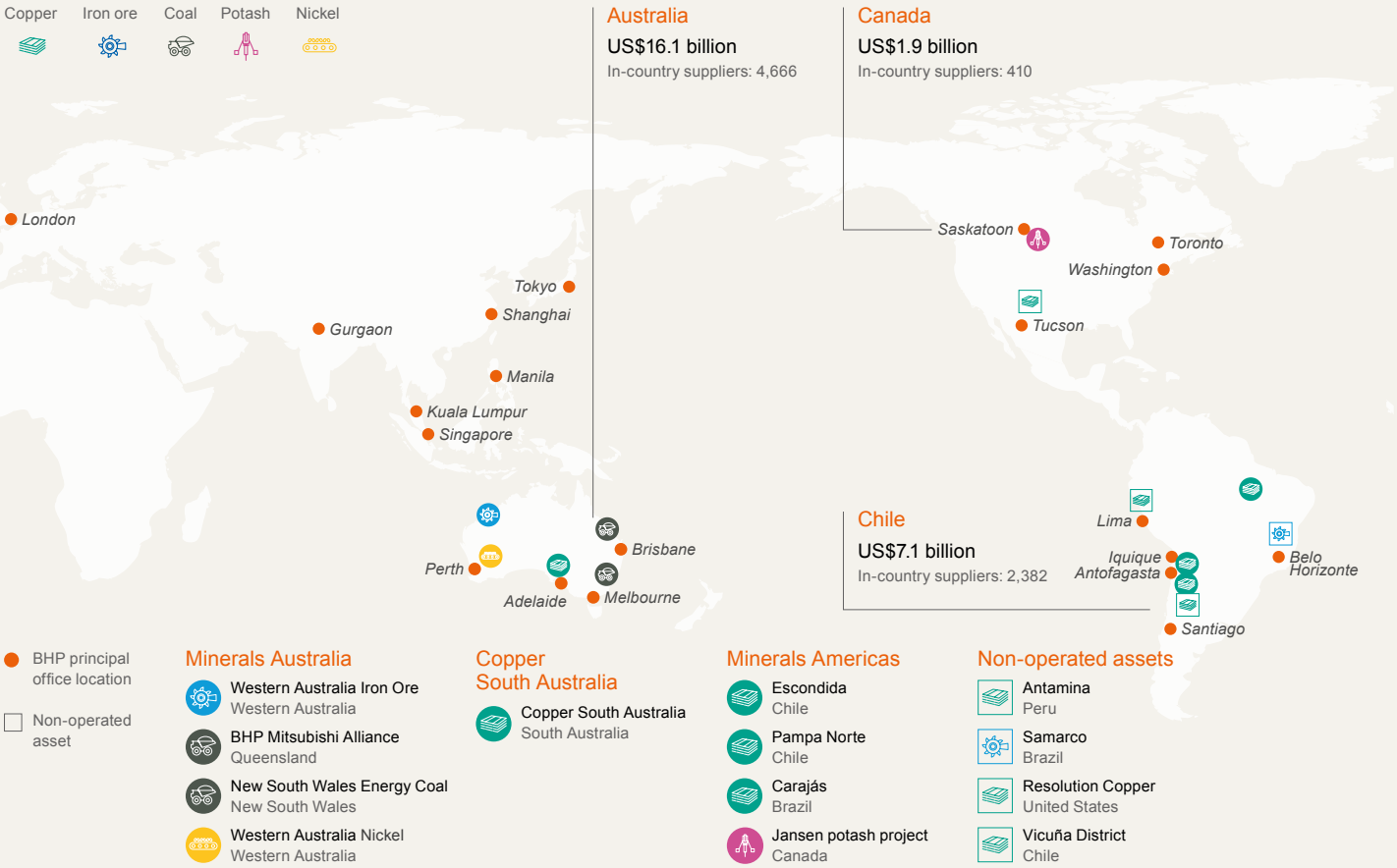
Figure 1 displays our total global supplier spend by country, across our operated assets and functions in FY2026. We highlight the top 10 countries, which span the Asia-Pacific, Europe and the Americas. The supplier spend displayed in Figure 1 consolidates the supplier spend categories used in our FY2025 Statement (non-traded goods and services and trade-related inputs) for enhanced clarity and to provide a more complete view of our global supply chains.

Figure 1: Global supplier spend by country[13]



- 55.14% Australia
- 23.76% Chile
- 6.54% Canada
- 5.15% Singapore
- 1.75% Hong Kong SAR
- 1.12% Japan
- 1.03% United States
- 0.98% China
- 0.81% Germany
- 0.70% United Kingdom
- 3.02% Other

Figure 2: In-country suppliers in countries with BHP operated assets[14]



11. Includes payments to suppliers for operating costs on an accruals basis and payments to suppliers for capital expenditure on a cash basis. For more information on our payments to suppliers, see the BHP Economic Contribution Report 2026 (Our contribution).
12. For more information on BHP's corporate purpose, see: bhp.com/about
13. Based on payments to direct (tier one) suppliers, supplier country of incorporation and invoice posting date. Exclusive of GST/VAT. In our FY2025 Statement, Figure 1 identified total spend on non-traded goods and services and Figure 3 identified the top countries (by total proportion of overall spend) for purchases of trade-related inputs. We have changed the way we present this data in FY2026 for enhanced clarity and to provide a more holistic description of our supply chains.
14. Values relate to spend with in-country suppliers only. See methodology description in footnote 15. This map displays direct (tier one) in-country supplier spend in the countries where we operate assets. This map does not reflect global supplier spend (see Figure 1 for these details).

As displayed in Figure 2, our in-country supplier spend totalled US$25.1 billion with around 7,400 suppliers in the countries where we operate assets (Australia, Canada and Chile).[15] Around 84 per cent of our global supplier spend was with these in-country suppliers.

BHP supports strong local supply chains and the economic empowerment of Indigenous peoples by engaging local and Indigenous businesses in the countries where we operate, either directly or through our Local Buying Programs in Australia and Chile.[16]

For more information on our **Local Buying Programs**, see bhp.com/suppliers/become-a-supplier

Figure 3 displays our top 10 categories of goods and services procured in FY2026 (by total proportion of overall spend) with key sourcing countries for each category (i.e. countries where our suppliers are incorporated).[17] These categories represent approximately 85 per cent of our total global spend on goods and services.

In FY2026, BHP Canada Inc.'s top sourcing countries for goods and services (by supplier country of incorporation) were Canada, the United States, Australia, the United Arab Emirates, Singapore, India and China. Its top five categories of goods and services spend in FY2026 were engineering and construction, operational support services, major equipment purchases, freight and logistics, and indirect services. Our Maritime team also purchased freight, port and maritime services from suppliers incorporated in Singapore, France and Germany on behalf of BHP Canada Inc. to support delivery of goods to the Jansen potash project.

Figure 3: Top 10 categories of global goods and services spend

Category[18]	Description	Key sourcing countries[19]
1 Engineering and construction	Engineering services and construction, projects or otherwise, including EPC (engineer, procure and construct) and EPCM (engineer, procure, construct and manage) contractors	Australia, Canada, Chile, United States, China, Germany, Singapore, United Kingdom, Japan, India
2 Freight and logistics	All inbound and outbound freight of goods and warehouse and storage, including marine and port freight services	Singapore, Hong Kong, Australia, Japan, Germany, China, British Virgin Islands, Malta, Chile, United Kingdom
3 Bulk materials	Goods that are procured by weight or volume, typically batch produced by suppliers (for example, diesel and explosive materials)	Australia, Chile, Canada, United States, Japan, United Arab Emirates, Switzerland, Peru, China, Singapore
4 Maintenance, repair and operations (**MRO**)	Goods that are procured and changed out on a recurring basis for MRO at our production sites	Australia, Chile, Canada, China, United States, Hong Kong SAR, United Kingdom, Singapore, Germany, Israel
5 Operational support services	All production-related labour and lease/hire services	Australia, Chile, Canada, United States
6 Professional services	Provision of services and resources of a technical or professional nature, excluding engineering services	Australia, Chile, United States, United Kingdom, Canada, Brazil, Singapore, Netherlands, Peru, India
7 Maintenance services	All services that cover maintenance, inspection, repair and testing of equipment and infrastructure	Australia, Chile, Canada, United States, China, Germany
8 Major equipment purchase	Purchase of all major equipment, infrastructure and large components	Australia, Chile, Canada, United States
9 Utilities	Electricity, gas, water and renewable utilities	Chile, Australia, Canada, United States
10 Indirect services	Supporting services not directly related to maintenance, production or operations, excluding professional labour services (for example, facilities management)	Australia, Chile, Canada, Singapore, United States, United Kingdom, Philippines, Malaysia, Brazil, China

15. Values relate to spend with in-country suppliers only. In-country supplier refers to suppliers incorporated in the same country as the BHP entity purchasing its goods or services. Based on payments to direct (tier one) suppliers, supplier country of incorporation and invoice posting date. Exclusive of GST/VAT.
16. Local supply chains refer to our business relationships with 'local suppliers', being suppliers headquartered in the local regions where we operate, as well as Traditional Owner and Indigenous suppliers for local assets.
17. Based on categories of goods and services procured from direct (tier one) suppliers, supplier country of incorporation and invoice posting date. The data in Figure 3 consolidates the supplier spend categories in our previous Statement (non-traded goods and services and trade-related inputs) for enhanced clarity and to provide a more holistic description of our supply chains.
18. Category refers to product and service classifications aligned to level 1 (i.e. broader) classifications under the United Nations Standard Products and Services Code (**UNSPSC**), which is an open, global, multi-sector classification standard.
19. Listed in descending order of spend. Based on supplier country of incorporation and invoice posting date. We identify up to the top 10 sourcing countries for where our direct supplier spend exceeded US$1 million for at least one classification aligned to a level 2 (i.e. narrower) UNSPSC category.

2 Assessing our modern slavery risks

This section describes the risks of modern slavery practices in our business and supply chains.

In this Statement, we describe modern slavery risks using Verisk Maplecroft country and industry scoring, unless stated otherwise.[20]

These risk ratings reflect various process and outcome-based factors, such as the adequacy of domestic regulation and law enforcement, corruption levels and the extent and severity of reported modern slavery violations.

For information on our modern slavery risk assessment methodology for suppliers, see page 14

2.1 In our business

In FY2026, we had operated assets in Australia, Canada, and Chile[21] and corporate offices in 13 countries (see Figure 2 for our locations).

Operated assets and projects

Verisk Maplecroft identifies inherent modern slavery risks in the global mining sector due to factors including the sector's corruption susceptibility, potential health and safety risks, and the presence of vulnerable groups and low-skilled or unskilled workers.

We consider that the risk of causing or contributing to modern slavery practices at our operated assets is lower, since they are located in low (Australia) or medium (Canada and Chile) risk countries for modern slavery.

We nevertheless acknowledge that we have the potential to both positively and adversely impact broader labour-related human rights of our workforce. This includes supporting the right to decent work and conditions, the right to freedom from sexual harassment and bullying in the workplace, supporting the practice of cultural and religious beliefs, including for our Indigenous employees and contractors, and respecting the right to form trade unions.

Our enterprise-wide Saliency Assessment seeks to identify the areas of most salient human rights risks for our workforce and support the development of a risk-based response. For more information, see page 13.

Alongside controls to comply with applicable local employment and employee relations laws,[22] we manage labour and workforce-related risks through targeted controls, including:

- mandatory screening and background checks to ensure employees meet the legal minimum working age in their country of employment and have appropriate rights to work
- our Risk Framework, which identifies material risks at a Group-level relating to employee attraction, retention and capability development. We apply controls to mitigate these risks, including controls to ensure employees receive appropriate remuneration
- our *Minimum requirements for suppliers* (which contain requirements relating to child labour, forced or compulsory labour, human trafficking and other labour issues) are incorporated into the standard services contract and purchase order that we typically seek to use to engage labour-hire agencies and service contractors
- we conduct modern slavery risk assessments for all new suppliers of labour hire or service contractors via BHP's third-party risk assessment tool (3PR) at onboarding and continue to annually monitor suppliers assessed as higher risk

In our previous two Statements, we described illegal mining practices at some former OZ Minerals Brazil exploration tenements in Brazil and that artisanal and small-scale mining is higher risk for modern slavery practices, such as child labour.[23] These assets have now been divested. In FY2026, other than in relation to those former OZ Minerals Brazil tenements, we had no reported or identified artisanal and small-scale mining on or adjacent to any of our operated assets.

Exploration and growth

Most of our FY2026 growth activities were in countries rated low or medium for modern slavery risk.[24] We also held interests in some jurisdictions rated higher risk (Botswana, Ecuador, Peru and Tanzania)[25] (see page 13 for our approach to managing modern slavery risks in our growth activities).

Corporate offices

Some of our corporate offices are located in countries attracting higher modern slavery risk ratings, such as Brazil, China, India, Malaysia, Peru and the Philippines. Our other corporate office locations attract low (Australia) or medium risk scores (Canada, Chile, Japan, Singapore, the United Kingdom and the United States).

In practice, our office activities (including legal, accounting, communications, human resources, risk management, administrative support and economic functions performed by trained professionals on individual employment agreements or contracting arrangements) present a lower risk of causing or contributing to modern slavery practices than our operated assets. However, our offices do have supply chain touchpoints with higher-risk industries, such as cleaning and information technology services (see pages 14–17 and Case Study 1 for how we address modern slavery risks in our supply chain, including targeted steps in FY2026 to review BHP corporate offices located in certain higher-risk jurisdictions for modern slavery).

Non-operated assets

Non-operated assets operate under separate management. We recognise that Brazil (for Samarco) and Peru (for Antamina) attract higher modern slavery risk scores due to the frequency of reported modern slavery across sectors, risks associated with the mining industry, and weaker legal enforcement against modern slavery practices in Brazil.[26] Within the limits of the relevant joint venture agreements and governance frameworks, our teams responsible for monitoring our interests in non-operated joint venture assets seek to, when appropriate, engage with operator companies in relation to their approach to respecting human rights.

The BHP Foundation

Given its mission to contribute to addressing some of the root causes of sustainability challenges relevant to the resources industry, the BHP Foundation is sometimes exposed to countries that carry higher modern slavery risks through the projects it funds.[27]

In FY2026, the Foundation's investments had a particular focus on Australia, Chile and Canada (where BHP's operated assets are located), and the United States (where it is registered). During the reporting period, some of the Foundation's partners operated in or extended their work into countries that attract higher-risk scores for modern slavery, such as Colombia, Ecuador, Ghana, Guyana, India, Indonesia, Liberia, Mexico, Mongolia, Nicaragua, Nigeria, Peru, the Philippines, Senegal, Sierra Leone, South Africa, Tanzania, Ukraine and Zambia.

BHP Ventures and BHP Xplor

All the companies in which BHP Ventures has invested are headquartered in low- or medium-risk jurisdictions for modern slavery practices (Australia, Argentina, Canada, Singapore, the United Kingdom and the United States). However, investee companies may in some instances be exposed to countries rated higher risk for modern slavery through their operations or supply chains.

Some companies selected as participants in our FY2026 cohort of the BHP Xplor Program undertake exploration in countries that attract high modern slavery risk scores, including Guyana, Indonesia and South Africa.

20. Verisk Maplecroft is a data subscription service that uses geospatial datasets, predictive models and third-party information to assess risk exposure.
21. Excludes BHP-operated legacy assets transitioning to closure and located in North America.
22. For more information on applicable local employment and employee relations laws, see the BHP Annual Report 2026, Operating and Financial Review 9.4 (People).
23. US Department of Labor, 2024 List of Goods Produced by Child Labor or Forced Labor (2024), available at: dol.gov/agencies/ilab/reports/child-labor/list-of-goods. BHP uses the ICMM definition of artisanal and small-scale mining as mining activities that are 'labour-intensive and capital-, mechanisation- and technology-poor'. See the ICMM website for more information.
24. Australia, Norway and Sweden are rated low risk for modern slavery. Argentina, Canada, Chile, Serbia and the United States are rated medium risk.
25. We exited our 17 per cent interest in Kabanga Nickel Limited (the majority owner of the Kabanga nickel project in Tanzania) in July 2025, with contingent payments linked to project development milestones due to BHP. BHP's divestment arrangements provided for an independent verification of the project's resettlement action plan being developed and implemented in material alignment with the International Finance Corporation's Performance Standard 5 objectives.
26. Verisk Maplecroft rates Brazil (Samarco) and Peru (Antamina) as higher risk and Argentina, Chile (Vicuña) and the United States (Resolution Copper) as medium risk for modern slavery.
27. For more information on BHP's approach to and definition of sustainability, see the BHP Annual Report 2026, Operating and Financial Review 9.1 (Our sustainability approach) and 10.4 (Glossary; Other terms). For more information on the BHP Foundation's mission, see: bhp-foundation.org

2.2 In our supply chains

Our most significant modern slavery-related risks arise in our supply chains, where BHP could be 'directly linked' to modern slavery practices through the goods and services we purchase.[28] Supply chain is therefore a prioritised human rights theme in our Human Rights Policy Statement.

In FY2026, approximately 86.8 per cent of our suppliers were rated as low risk, 4.7 per cent as medium risk and 8.5 per cent as higher risk for modern slavery.[29] The main sources of supply chain risks are purchases from higher-risk countries and industries.

Regarding types of modern slavery practices, our risk exposure potentially includes forced labour and practices that the ILO recognises as indicators of forced labour.[30] These ILO indicators include abuse of vulnerability, deception, restriction of movement, isolation, violence, intimidation and threats, retention of identity documents, withholding wages, debt bondage, abusive working and living conditions, and excessive overtime.[31]

Given the scale, complexity and dynamic nature of our supply chains, we prioritise routine risk identification, due diligence and monitoring at the tier one (direct) supplier level, including those suppliers' manufacturing or outsourcing in other countries.

This approach reflects the critical role of tier one suppliers in shaping downstream visibility and risk, and the practical limitations in consistently identifying, engaging and influencing suppliers beyond tier one.

We recognise that modern slavery risk extends across our broader supply chain (i.e. indirect suppliers beyond tier one). However, effective due diligence beyond tier one requires a strong understanding of our tier one supplier base, which we continue to build.

Country risks

Over 95 per cent of BHP's global supplier spend in FY2026 was with suppliers incorporated in countries rated low or medium risk for modern slavery.[32]

A supplier's country of incorporation may not be the same as their manufacturing or outsourcing location. Since January 2024, we have required new suppliers to indicate the countries or regions where the products or services they provide to BHP are manufactured, assembled or performed (either by the supplier or a third-party).

In FY2026, our direct suppliers most commonly identified manufacturing and outsourcing locations in Australia, Chile, China, Canada, Germany, India, Italy, United Kingdom and United States.[33] Data collected to date indicates that our purchases relating to MRO and technology represented our highest potential exposure to modern slavery risk, based on their manufacturing or outsourcing location.[34]

We also acknowledge the presence of higher-risk countries (such as China and Peru) in our Sales and Marketing chemicals supply chains, which are sometimes purchased from commodity traders who act as intermediaries between buyers and chemicals producers.

Industry risks

Our risk identification process also considers industry risk. For example, in our maritime-related supply chains, the shipping industry is considered higher risk for modern slavery (particularly forced labour) due to industry-wide factors, such as reliance on vulnerable workers, including migrant workers.

Figure 4 displays our higher-risk categories of goods and services purchased across various industries in FY2026. It highlights the categories of goods and services we purchased in FY2026 where both the industry and one or more sourcing countries attract higher risk scores for modern slavery.[35]

According to Verisk Maplecroft, higher risks of modern slavery associated with the categories listed in Figure 4 are linked to one or more of the following factors in the relevant industry:

- corruption susceptibility
- potential exposure to health and safety risks in the industry's activities
- workers with lower skill levels
- reliance on workers from vulnerable groups

Case Study 1: Engaging with a major supplier to review working conditions and participate in piloting our Impact Project

In FY2026 we engaged collaboratively with one of our major suppliers to conduct a review of working conditions with a focus on identifying, assessing and mitigating modern slavery and forced labour risks at select BHP global offices (**Review**).

The Review was limited to support services performed by local vendors at BHP global business services, and sales and marketing offices in India, Malaysia and the Philippines. These services were selected due to their higher vulnerability to labour exploitation, including risks related to recruitment practices (noting the prevalence of migrant workers in these jurisdictions), labour law compliance, freedom of movement and access to grievance mechanisms.

The Review found no evidence of modern slavery or forced labour at sites within the scope of the Review, and workers were generally satisfied with their working conditions. While this outcome is reassuring, we identified opportunities to continue to enhance and strengthen working practices to better align with international standards, including ILO standards, particularly around workers' awareness of grievance mechanisms, salary payment practices and leave practices.

We are working with our supplier to monitor implementation of these uplifts which are expected by early FY2027. This will include piloting some of Issara Institute's grievance mechanisms to enhance worker voice at the relevant BHP global offices, as part of our Impact Project.

"Global events during FY2026 reinforced the value of resilient supply chains and trusted supplier partnerships. By working closely with suppliers and deepening our understanding of modern slavery risks, we continued to support both security of supply and respect for human rights."

Ragnar Udd
Chief Commercial Officer

28. 'Directly linked' means connected through the activities of another entity through our business relationships and aligns to the meaning provided under the UNGPs.
29. Percentages rounded to the nearest single decimal. For important information on the methodology and approach for assessing supplier risk, see page 14.
30. Forced or compulsory labour is defined as "all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered [themself] voluntarily" (Article 2(1), ILO Forced Labour Convention 1930 (No.29)).
31. For more information, see *ILO Indicators of Forced Labour (2025 revised edition)*, International Labour Organization.
32. In FY2026, our spend with suppliers exceeded US$1 million in countries rated as low risk (Australia, Belgium, Denmark, Finland, France, Germany, Ireland, Luxembourg, Netherlands, Norway and Sweden), medium risk (Austria, Bermuda, British Virgin Islands, Canada, Cayman Islands, Chile, Cyprus, Japan, Malta, Marshall Islands, Mauritius, New Zealand, Singapore, Slovakia, South Korea, Switzerland, Taiwan, United Kingdom, United States) and higher risk (Brazil, China, Hong Kong SAR, India, Israel, Liberia, Malaysia, Panama, Peru, Philippines, South Africa, United Arab Emirates) for modern slavery.
33. Based on direct suppliers that we purchased from in FY2026 and data collected since January 2024.
34. Based on vendor frequency, overall volume of spend and countries rated as higher risk for modern slavery by Verisk Maplecroft.
35. To illustrate a snapshot of higher-risk industries within our global direct supplier spend, we mapped the level 2 (i.e. narrower) UNSPSC categories recorded in BHP's spend management system to the relevant Verisk Maplecroft industries. Verisk Maplecroft scores the relevant industries as higher risk globally.

2 Assessing our modern slavery risks continued

Figure 4: Higher-risk categories of procured goods and services[36]

Category[37]		Sub-category[38]		Higher-risk sourcing countries[39]
1	Freight and logistics	– Port and maritime services – Containers and storage	– Air freight	Hong Kong SAR, China, Liberia, Panama, United Arab Emirates, India, Philippines, Peru, South Africa, Brazil, Malaysia
2	Bulk materials	– Construction materials – Sulphuric acid	– Chemicals and additives	United Arab Emirates, Peru, China, Hong Kong SAR, Philippines
3	Engineering and construction	– Engineering consulting – Industrial plant construction services	– Civil works	China, India, South Africa, Israel, Malaysia, Philippines, United Arab Emirates, Hong Kong SAR, Jamaica, Indonesia, Peru
4	Indirect services	– Facilities management – Vehicle lease	– Asset disposals and sales	Philippines, Malaysia, China, India, Peru, Brazil, South Africa
5	MRO	– Drive and transportation systems	– Electrical MRO – Heat transfer	China, Israel, South Africa, Hong Kong SAR, Malaysia
6	Tyres, wheels and rims	– Earth moving tyres		China
7	Maintenance services	– Trade maintenance services – Specialist equipment maintenance services	– Maintenance and repair contract (MARC) – Lab services	China, Malaysia, South Africa, Ecuador
8	Exploration and land services	– Mining exploration services		Peru, Ghana, Brazil
9	Mining drilling	– Mining drilling services	– Mining exploration drilling	China, Peru
10	Operational support services	– Earthmoving service – Operational support equipment hire	– Mining production services	Peru, China, Philippines, Brazil
11	Non-production consumables	– Other non-production consumables – Office consumables	– Food and beverage – Personal protective equipment	India, Malaysia, Peru, China, Philippines
12	Utilities	– Utilities other	– Electric utilities	China, Peru, Brazil, India, Malaysia
13	Technology	– End-user computing	– Automation and control systems	India, Hong Kong SAR, South Africa, China, Peru
14	Travel and accommodation	– Accommodation	– Travel facilitation	Philippines, Brazil, Malaysia

Beyond tier one

Our direct suppliers have greater oversight and influence over their own direct suppliers. Our *Minimum requirements for suppliers* require that our suppliers consider their own direct suppliers' compliance with applicable human rights standards and where they source their materials and inputs.[40]

We continue to supplement our routine risk identification activity with targeted deep dives on higher-risk industries for modern slavery. This involves enhanced review, engagement and analysis beyond tier one. For example, international researchers describe elevated forced and child labour risks associated with certain renewable energy technologies, including photovoltaic solar panels, wind turbines and lithium-ion batteries.

In FY2026, we periodically reviewed modern slavery risks in our extended renewable energy supply chain. We engaged select partners involved in renewable energy-related purchases for some of our operated assets (including power purchase agreements). This review process generally included communicating expectations on supply chain transparency, understanding our partners' policies and processes, incorporating ethical sourcing and transparency criteria into the tender and bid evaluation process for renewable energy projects, undertaking enhanced due diligence and including tailored modern slavery clauses where appropriate.

In FY2026, we also collaborated with one of our major suppliers, to review the working conditions of certain subcontractors. See Case Study 1 for more details.

36. In our FY2025 Statement, Table 2 displayed higher-risk categories of non-traded goods and services only. In this Statement, Figure 4 consolidates the supplier spend categories in our previous Statement (non-traded goods and services and trade-related inputs) to provide a more complete global view of our supply chain. Based on categories of goods and services procured from direct (tier one) suppliers and invoice posting date. Categories and countries are listed in descending order of spend. Excludes minerals and metals externally supplied, for which details are available in BHP's Responsible Minerals Program Report 2026 for suppliers under our Responsible Minerals Program (available at bhp.com/RMPR2026).
37. Refers to product and service classifications aligned to level 1 (i.e. broader) classifications under the UNSPSC.
38. Refers to product and service classifications aligned to level 2 (i.e. narrower) classifications under the UNSPSC.
39. Based on supplier country of incorporation and relevant Verisk Maplecroft country risk scores.
40. For more information on our *Minimum requirements for suppliers*, see page 12. Due to the long-term nature of some of BHP Canada Inc.'s contracts with suppliers, the latest version of the *Minimum requirements for suppliers* may not be the version incorporated into the contract. However, prior versions have all included core prohibitions on forced and child labour and the site procedures, which form part of the contact, prohibit anyone under 18 years of age to work on site or be present on site without BHP's express approval.

3 Our actions to address modern slavery risks

This section describes how we address modern slavery risks in our business and supply chains, including through governance, policies, standards and processes.

BHP operates and is managed as an integrated group with enterprise-wide policies, systems and processes overseen by the BHP Group Limited Board, which are required to be applied consistently across the Group and all operated assets.

Our Human Rights Policy Statement identifies 'labour conditions' and 'supply chains' as prioritised human rights themes for our business. We also commit to operating in a manner consistent with the United Nations Guiding Principles on Business and Human Rights (**UNGPs**) and taking steps to operate in a manner consistent with the ILO's Declaration on Fundamental Principles and Rights at Work.

The UNGPs inform our risk identification and control measures in our supply chains and our operations, through our Group-level human rights risk identification and evaluation process. Relevant teams are guided by the UNGPs when raising awareness of modern slavery and supporting the business and our suppliers with human rights subject-matter expertise.



3.1 Governance and responsibilities

BHP uses a 'three-lines model' to define the role of teams across the organisation in managing risk, including for modern slavery risk.

Figure 5: Overview of our three-lines risk management model

First line

Anyone who makes decisions, deploys resources or contributes to an outcome is responsible for identifying and managing the associated risks. Provided by our frontline staff, operational management and people in functional roles.

Second line

Responsible for providing expertise, support, monitoring and challenge on risk-related matters, including by defining minimum standards and providing internal assurance. Includes our Compliance, Human Rights and Social Performance, Legal and Ethics, and Risk teams.

Third line

Our Internal Audit team is responsible for independent and objective assurance over the control environment (governance, risk management and internal controls) to the Board and Executive Leadership Team. Assurance may also be provided by external providers.

The BHP Group Limited Board oversees BHP's risk management systems and internal controls, supported by the Board's Risk and Audit Committee and Sustainability Committee.

Below Board level, responsibilities to address modern slavery risk sits across different parts of the organisation:

- **Ethics, Compliance and Human Rights (ECHR) sub-function** – Led by the Chief Ethics, Compliance and Human Rights Officer (**CECHRO**), who reports to BHP's Chief Legal, Governance and External Affairs Officer. The CECHRO maintains a dotted reporting line to the Risk and Audit Committee for certain risks.
- **Human Rights and Social Performance team** – Established in FY2026 and sits in the abovementioned ECHR sub-function. It consolidates the second line Ethical Supply Chain and Transparency (**ESCT**), Global Policy and Assurance – Human Rights, Community, and Indigenous Peoples teams. It defines minimum standards and provides internal assurance in relation to human rights and social performance across our growth, operated asset and commercial portfolios. It is the primary BHP team dedicated to modern slavery mitigation, investigation and reporting.
- **Compliance Due Diligence team** – Established in FY2026 and sits in the Compliance team. This team conducts due diligence for medium and high risk third parties (including suppliers).
- **Governance and Social Value Procurement team** – Sits in the Commercial function and manages modern slavery risks that may arise in our inbound supply chain.
- **Global Business Services Master Data team** – Sits in the Commercial function and is responsible for onboarding new third parties (including suppliers) following completion of due diligence.
- **Maritime and Supply Chain Excellence team** – Sits in the Commercial function and is responsible for the procurement of international freight services. This team manages modern slavery risks that may arise in our maritime supply chain through our vessel vetting process. This includes assessing vessel operators against established labour, safety and seafarer welfare standards, and engaging with owners and operators to address identified risks.
- **Marketing Sustainability team** – Sits in the Commercial function and is accountable for BHP's Responsible Minerals Program, including strategy, implementation, governance and reporting. The team is responsible for developing and promoting responsible minerals and metals supply chains for certain trade-related inputs. This team provides subject-matter expertise on the Organisation for Economic Co-operation and Development (**OECD**) risk-based due diligence framework. The ESCT team provides second line oversight, including modern slavery expertise, advice and monitoring for the Responsible Minerals Program for higher-risk minerals and metals transactions.

3 Our actions to address modern slavery risks continued

3.2 Values, policies and standards

Our Values set the tone for our culture, a unique part of our competitive advantage. They guide our decision-making, reinforce our culture and ensure our people deliver on our purpose. We seek to apply Our Values in our actions to address modern slavery.

Our Values

Do what's right

A sustainable future starts with safety and integrity, building trust with those around us.

Seek better ways

Listening to learn and inspiring challenge is how we drive progress.

Make a difference

The accountability to act, create value and have impact is on each of us, every day.

Responsible production and sourcing standards

Our 2030 Responsible Supply Chains goal under our social value framework is to create sustainable, ethical and transparent supply chains together with our partners.[41] To help meet this aspirational goal, we have set a metric for producing BHP operated assets to be assessed with external verification against a set of credible responsible production and sourcing standards. In FY2026, we continued to implement and be assured against these standards.

For more information, refer to our **Value Chain Sustainability** page at bhp.com/sustainability/value-chain-sustainability, our **Social Value** page at bhp.com/about/operating-ethically/social-value, and the **BHP Responsible Minerals Program Report 2026** at bhp.com/RMPR2026



The following documents provide minimum standards and guidance for our people, including on human rights and modern slavery:

Our ***Code of Conduct (Our Code)*** sets out BHP's conduct expectations for all employees and contractors. It outlines how respecting human rights is critical to sustainably operating our business. *Our Code* also provides guidance on speaking up and channels for reporting concerns.

Our Code is available at bhp.com/about/our-code

Our **Human Rights Policy Statement** provides detail on our human rights commitments, approach and prioritised human rights themes, which include labour conditions, supply chain, host communities and Indigenous peoples.

Our **Human Rights Policy Statement** is available at bhp.com/humanrightspolicystatement

Our **Responsible Minerals Policy** outlines our commitment and approach to the responsible sourcing and production of minerals and metals in our supply chains. It includes our expectations that minerals and metals third-party suppliers implement due diligence over their own supply chains to identify and mitigate the risks described in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (**OECD Guidance**) and is also guided by the OECD Handbook on Environmental Due Diligence (**OECD Handbook**)

Our **Responsible Minerals Policy is** available at bhp.com/sustainability/value-chain-sustainability

Our ***Supply Global Standard*** outlines our requirement for all new suppliers to accept BHP's *Minimum requirements for suppliers*.

Our ***Minimum requirements for suppliers*** outline procedural and substantive requirements for suppliers, including in relation to supplier due diligence, child labour, forced labour, human trafficking and grievance mechanisms for our suppliers of non-traded goods and services. All of BHP's standard contract templates for non-traded goods and services contain a clause requiring adherence to the *Minimum requirements for suppliers*.

Our ***Minimum requirements for suppliers*** is available at bhp.com/suppliers/become-a-supplier

Our ***Contractor Management Global Standard*** requires our assets to verify that contractors and sub-contractors working at our sites comply with our *Minimum requirements for suppliers*.

Our ***Business Conduct Global Standard*** sets out processes to support *Our Code* and BHP's legal and ethical obligations. It directs employees and contractors to contact our Compliance team if they suspect a supplier is violating human rights (including in relation to its own workforce).

Our **Entering a High-Risk Country Global Procedure** outlines the procedure and approval requirements BHP follows before operating or establishing a legal or physical presence in higher-risk countries, and post-approval operating requirements.

Our ***Community and Indigenous Peoples Global Standard*** sets minimum requirements for due diligence when engaging with communities and Indigenous peoples. It requires all of our activities and investment decisions that support our operations to integrate host community, Indigenous peoples and human rights due diligence to identify and manage impacts and opportunities when applying BHP's minimum requirements for risk management.

Our ***Community and Indigenous Peoples Global Standard*** is available at bhp.com/about/corporate-governance

41. For more information on BHP's approach to and definition of sustainability and our 2030 social value scorecard, see the BHP Annual Report 2026, Operating and Financial Review 9.1 (Our sustainability approach) and 10.4 (Glossary; Other terms).

3.3 Due diligence and risk management

A. In our business activities

In FY2026, we progressed initiatives to strengthen our human rights due diligence and risk management approach:

- **New Human Rights and Social Performance team** – We formed this new team, which strengthened human rights governance by bringing human rights policy, due diligence, internal assurance and effectiveness evaluation into a more coordinated operating model. It also clarifies accountability for assessing and addressing human rights risks, including modern slavery. The integrated model strengthens engagement between teams responsible for due diligence design, operational implementation and assurance, which provides more consistent human rights support across operated assets, growth activities and business relationships.
- **Three-year improvement plan** – Following the FY2025 assessment of our human rights approach against the ICMM Human Rights Due Diligence Maturity Matrix, we established a three-year improvement plan to strengthen and further embed human rights due diligence across the business. Priority focus areas include enhancing human rights governance and cross-functional collaboration, enhanced risk tracking and disclosure.
- **Saliency Assessment** – As a key step in our three-year improvement plan, we advanced an enterprise-wide Saliency Assessment to identify and prioritise the most severe human rights risks across our operated assets, growth activities and commercial portfolios. The assessment has been guided by the UNGPs, and by assessing and prioritising risks to people based on severity (scale, scope and remediability) and indicative likelihood. The methodology combined desktop review, internal stakeholder engagement and validation processes. Upon completion, the outputs will be integrated into our internal standards, due diligence processes and control frameworks, and will inform the ongoing strengthening of our approach to managing modern slavery and broader human rights risks.
- **Human rights risk assessment methodology for operated assets** – We implemented a globally consistent risk assessment methodology across our operated assets to strengthen our understanding of human rights risks related to communities and Indigenous peoples. It shifted focus from site-level issue tracking to enterprise-level human rights risk themes, informing our Saliency Assessment. We are using outputs to develop standardised, auditable controls aligned to international standards, embedding human rights into risk and control frameworks and marking a shift from risk identification to systematic control design.
- **ESCT Framework review** – We reviewed and updated our ESCT Framework to strengthen clarity and internal assurance over our processes for identifying and mitigating modern slavery risks in our supply chain.
- **Modern slavery clause review** – We reviewed and updated modern slavery clauses across all standard supply contracts. Updates followed a standard contract suite review in FY2025 and were implemented across relevant templates in FY2026.

Growth activities

Our portfolio growth activities include transactions, exploration and new country entry activities, which can present heightened modern slavery risks particularly in early-stage projects, non-operated arrangements and higher-risk jurisdictions.

Before establishing operations or a legal or physical presence in higher-risk countries, we assess material human rights risks under our Entering a High-Risk Country Global Procedure.

In FY2026, we reviewed our internal procedures and human rights due diligence tools, with external specialist support, to ensure continued alignment with international standards and evolving expectations around managing modern slavery risk. Through this process we developed a Human Rights Due Diligence Framework for Growth, which identifies, assesses and manages risks to people across the full lifecycle of growth activities. These tools address operational and supply chain modern slavery risks and broader human rights risks. Due diligence measures are applied on a risk-based and proportionate basis, considering operatorship, transaction type, jurisdiction, identified risk severity and BHP's level of influence.

When investing in exploration projects operated by a third-party for any period, we seek to engage with the operating company to set expectations, share knowledge and good practice guidance in the management of non-technical risks, including modern slavery and broader human rights risks. Where heightened risks are found, we identify appropriate mitigation measures, governance mechanisms and ongoing oversight to support responsible conduct over time.

Case Study 2: Strengthening human trafficking risk controls at Jansen

Our Jansen potash project (pictured on page 12) assessed human trafficking risk as part of a security assessment in FY2026. While human trafficking was not identified as a credible scenario and no incidents have been identified to date, the presence of a large contractor workforce was recognised as a contributing risk factor.

To mitigate this risk, the site requires all individuals to present valid national or provincial identification during onboarding to verify identity and confirm eligibility for site access. This measure helps prevent access by individuals on disallowed lists or those who do not meet site requirements. Additionally, all contractors are required to complete BHP's Business Code of Conduct training as a pre-requisite to site access.

BHP's Code of Conduct training helps workers understand, apply and uphold BHP's values and business conduct standards, and empowers them to speak up and report conduct that may breach *Our Charter, Our Code*, internal requirements or the law, including concerns related to human trafficking.

As an additional control, human trafficking awareness training was arranged with the Royal Canadian Mounted Police (**RCMP**) Human Trafficking and Counter Exploitation Unit. This training was delivered in July 2026 to Jansen security personnel, paramedics, emergency response teams and camp management.

Case Study 3: Assessing human rights and labour commitments across our workforce

In Q3 FY2026, we commenced a workforce human rights diagnostic (**Diagnostic**) which aims to strengthen visibility of how our human rights and labour rights commitments are applied across our workforce, including employees and contractors. 'Modern slavery, forced labour and child labour' and 'grievance mechanisms' constitute key workforce rights pillars under review in this Diagnostic. The Diagnostic seeks to assess our relevant policies, processes, controls and risk management practices, including our grievance and remedy mechanisms, and aims to support improvement to and ongoing alignment with BHP's risk governance frameworks. Our work on the Diagnostic remains ongoing and insights are expected to inform our future priorities for assessing and addressing modern slavery and labour-related human rights risks across our workforce.

"During FY2026, we advanced key initiatives to better understand and address increasingly complex modern slavery risks across our activities and business relationships.

This work has strengthened our approach to identifying, assessing and managing risks to people, consistent with our commitment to respect human rights.

While we have made progress, we recognise that effective human rights due diligence is an ongoing process requiring continued engagement, learning and action."

Caroline Cox
Chief Legal, Governance and External Affairs Officer

3 Our actions to address modern slavery risks continued

B. In our non-operated assets, the BHP Foundation, BHP Ventures and BHP Xplor

Non-operated assets

Non-operated assets are independently managed and operated under their own governance frameworks, consistent with each joint venture agreement. Our teams overseeing our investments in non-operated joint venture assets use appropriate governance frameworks to, when suitable, share our expectations, engage with operator companies for our joint ventures in relation to human rights and modern slavery risks, and seek to influence the adoption of industry best practices and alignment with relevant international standards. These engagements are typically via shareholder governance bodies or other contractual mechanisms.

The BHP Foundation

The BHP Foundation continued to apply BHP's 3PR tool, which includes automated modern slavery risk assessments at supplier onboarding. A small number of BHP Foundation suppliers received one-off payments for services in FY2026 and were not onboarded via 3PR. These suppliers provided low-risk services, such as coaching services.

The BHP Foundation continued its due diligence process for new charitable investments. This process considers prospective grantees' exposure to human rights risks, including modern slavery, and the maturity of controls to manage these risks. New grantees had to declare known human rights violations (including modern slavery) during onboarding, and grant agreements required grantees to undertake ongoing identification, management and any remediation required in relation to human rights risks, including modern slavery.

The BHP Foundation's minimum requirements set expectations in relation to freedom of association, wages, penalties and working hours and prohibit the use of modern slavery in connection with projects funded by the Foundation, or when using Foundation grant funds. All service agreements paid for by the BHP Foundation incorporated these minimum requirements in FY2026. The minimum requirements also require grantees to provide a grievance mechanism for workers engaged on the project (whether by the grantee, a sub-grantee or a contractor) to raise complaints about that project. The BHP Foundation continued to maintain a publicly accessible grievance mechanism to report concerns in relation to its projects.



BHP Ventures and BHP Xplor

During the reporting period, we conducted risk-based due diligence for all companies shortlisted to enter the 2026 BHP Xplor program prior to selection. This due diligence considered human rights risks (including modern slavery risks) relevant to the company, country and project.

BHP Ventures also conducted tailored compliance and legal due diligence on proposed financial investments, which considered supply chain and ethical sourcing practices prior to investment where applicable.

C. In our supply chains

Under the Responsible Supply Chains pillar of our social value framework, we have an aspirational 2030 goal to create sustainable, ethical and transparent supply chains together with our partners.[42]

Overview of our supplier due diligence approach

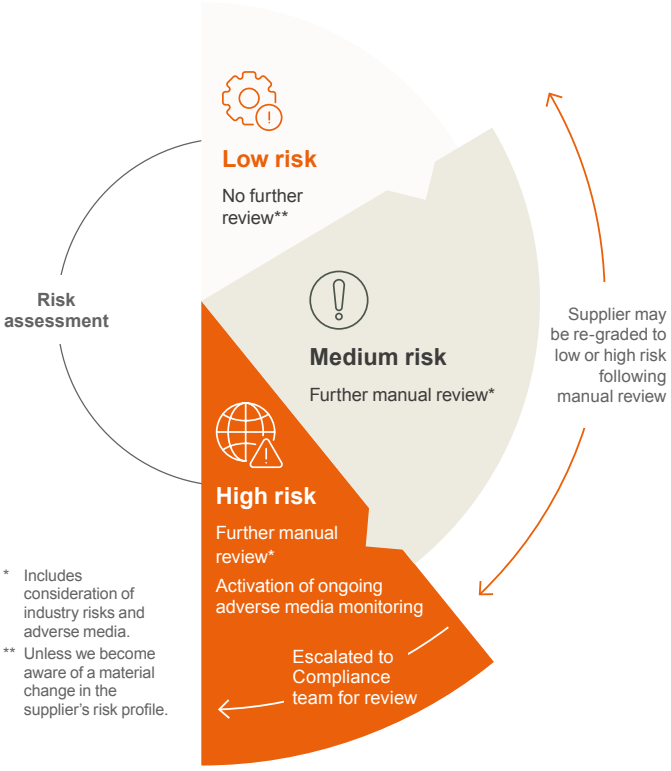
We take a risk-based approach to managing modern slavery risks in our supply chains, prioritising areas of highest risk informed by various risk datapoints.

All new suppliers undergo automated modern slavery risk assessments in 3PR at onboarding. As displayed in Figure 6, suppliers receive an initial risk rating of low, medium or high based on Verisk Maplecroft scoring for country of incorporation and/or country of manufacture or services, and business-user and supplier-provided information.

We use two of Verisk Maplecroft's risk indices in our supplier due diligence – the Modern Slavery Index and the Child Labour Index. Where there is a difference in country scores between the two indices, we adopt the higher risk score.

In our FY2025 Statement, we reported delays in some supplier onboarding and modern slavery due diligence due to suppliers providing incomplete information, some internal delays, and certain initial screening shortfalls requiring further review. We have resolved these issues, cleared the backlog of due diligence and established a dedicated Compliance Due Diligence team for medium- and high-risk third parties, including suppliers.

Figure 6: Summary of our supplier due diligence approach



42. For more information on BHP's approach to and definition of sustainability and our 2030 social value scorecard, see the BHP Annual Report 2026, Operating and Financial Review 9.1 (Our sustainability approach) and 10.4 (Glossary; Other terms).

Ethical Supply Chain and Transparency Framework

Our ESCT team (within our Human Rights and Social Performance team) maintains the ESCT Framework. Updated in FY2026, the ESCT Framework sets minimum requirements and defines a multi-layered internal assurance system to manage modern slavery risk in our inbound supply chain. Figure 7 summarises key controls from that system and key FY2026 improvement activities.

Figure 7: Summary of ESCT Framework controls

Control category	Description	Example FY2026 improvement activity
Baseline controls	To define expectations and enforceable standards across the inbound supply chain. Includes, for example, supplier due diligence (3PR), modern slavery contract clauses and ESCT team review of high-risk or non-standard contracts.	Purchase request risk screening controls embedded into purchasing workflows, supporting early identification of higher-risk procurement and alignment with BHP's obligations and commitments.
Risk screening and prioritisation	To support identification and prioritisation of higher-risk supply chains. Includes, for example, risk-based methodologies (including country risk factors), higher-risk procurement reviews and targeted category deep dives.	Saliency Assessment to identify and prioritise the most severe risks, and provide structured risk intelligence to enhance future screening, risk prioritisation and decision-making.
Targeted verification	To provide focused, on-site validation in higher-risk circumstances. Includes, for example, SMETA audits and review of supplier-provided audit materials.	Targeted reviews of supplier conditions (see Case Studies 1 and 4), including supplier self-assessment questionnaires, interviews and site validation, providing direct worker insights and supporting remediation of labour risks.
Continuous monitoring and detection	To complement periodic verification activities. Includes, for example, supplier reporting channels, investigation processes and reviewing community complaints.	Monitoring of ESCT controls through Compliance, Systems and Monitoring team verification, annual review for the framework owner and routine oversight of supplier due diligence activities.
Internal engagement, capability-building and governance	To support internal awareness, capability uplift and integration within our internal governance ecosystem. Includes, for example, subject matter expert advice on key risks, cross-functional and Board-level reporting.	Dedicated Compliance Due Diligence team established, which builds capacity to perform supplier risk assessments.
External engagement and capability-building	To support remediation and longer-term capability uplift. Includes, for example, supplier engagement through corrective actions, training and collaboration.	Supplier-facing capability activities, including for Local Buying Program participants, Jansen potash vendors and supplier engagement through corrective actions.

Supplier ethical trade audit program

The ESCT team collaborates with our Procurement team to engage suppliers for ethical trade audits and works with our suppliers to ensure audit findings are addressed. Suppliers are selected to participate in these audits based on multiple considerations, including the supplier's 3PR risk rating, geographic location and relationship factors, including contractual obligations. The ESCT team monitors audit plans and corrective action plans, as required.

In FY2026, our supplier ethical trade audit program covered 19 suppliers, across 19 sites in nine countries. Figure 8 displays the country and number of sites, and categories of procured goods or services. It also summarises our key audit findings according to the type of procured goods or service, based on the thematic codes of the SMETA four-pillar audit methodology. It includes information from where we arranged supplier ethical trade audits directly (16 audits) or accepted supplier-provided audit materials (three audits).[43]

Where suppliers use alternative methodologies for supplier-provided audit or assessment materials, we review those methodologies to ensure they cover substantially equivalent topics.[44] We also review findings and engage with suppliers to confirm corrective actions are completed in line with our approach to BHP-initiated supplier audits.

The number of supplier ethical trade audits in FY2026 continued to reflect our risk-based approach, with resources prioritised towards monitoring corrective action plan closures for audits conducted in the prior reporting period. We also refined our criteria for accepting alternative audit methodologies for supplier-provided audit or assessment materials.

Living wage was a common theme identified through the SMETA audits conducted in FY2026 as requiring further action by some suppliers. The SMETA methodology requires auditors to assess whether wages paid meet applicable legal minimums and, where credible benchmarks exist, to consider gaps between wages paid and estimates of a living wage. In FY2027, we intend to use these insights to further consider the concept of living wage within our supply chain due diligence, including through engagement with suppliers, collaboration with industry initiatives and ongoing work to better understand how living wage considerations can be reflected in our standards, expectations and approach over time.

Our FY2025 Statement reported on potential forced labour indicators identified in a hotel vendor's outsourced cleaning contractors in Malaysia. These indicators were identified via a SMETA audit arranged by BHP. During FY2026, we engaged with the hotel vendor to encourage remediation. Despite repeated engagement by BHP and our corporate travel manager provider, the hotel vendor did not address the findings. We therefore removed the hotel from our approved vendor list as a last resort.

Five suppliers audited under our supplier ethical trade audit program in FY2026 supplied goods or services to BHP Canada Inc. Audited sites were located in Canada, Mexico and India, and suppliers provided the following goods or services: IT services, mining services, non-production consumables and rail goods and services.

Case Study 4: Bridgestone's Off-the-Road Tire Plant in Aiken County

In Q1 FY2026, we conducted a SMETA audit of Bridgestone's Off-the-Road Tire Plant in Aiken County, South Carolina, United States. This site was identified as the most appropriate site based on the goods supplied to BHP. The audit considered whether Bridgestone had a sound management system across the four pillars of the SMETA methodology, including human rights and labour standards, while also identifying any opportunities for Bridgestone to improve through a Corrective Action Plan.

The engagement with Bridgestone throughout the audit process demonstrated both parties' aims to support collective efforts to promote transparency and respect for human rights in global supply chains.

Rob Seibert (President, Off the Road: USA and Canada) made the following comment about the SMETA process: "*As part of the Bridgestone Group's commitment to respecting human rights and our ongoing efforts to build trust with our customers, we welcomed BHP's selection of our Aiken plant for the SMETA audit.*"

43. We accepted supplier-provided audit materials for audits conducted within the previous 12 months.
44. In FY2026, agreed methodologies for supplier-provided audit and assessment materials that we accepted included the SMETA (2 suppliers) and Lloyds Register Quality Assurance (1 supplier) methodologies.

3 Our actions to address modern slavery risks continued

Figure 8: Summary of findings from our supplier ethical trade audit program[45]

Category of goods or services[46]	Number of audits by country and category of goods or service								
	Australia	Brazil	Canada	Chile	China	India	Mexico	Philippines	United States
Bulk materials				●					
Conveyor belting and parts		●							
IT services						●			
Major equipment purchase				●					
MRO					●			●	●
Maintenance services	●				●				
Mining services			●						
Non-production consumables			● ●		●				●
Professional services	● ●			●					
Rail goods and services							●		
Tyres, wheels and rims									●
Key audit findings for suppliers to take corrective action (by theme)[55]	**Key audit findings (by theme and country)**								
Business integrity controls[47]	●	●	●	●					
Child labour prevention controls[48]	●	●	●	●					
Ensuring a living wage[49]	●	●	●	●	●				●
Ensuring reasonable working hours[50]		●	●	●	●		●	●	●
Environmental management systems[51]		●	●						
Human rights policy[52]			●	●		●			
Responsible recruitment[53]	●		●		●			●	
Workplace health and safety controls[54]	●	●	●	●	●	●		●	●

45. Country references in Figure 8 are based on the country of audited site location.
46. Refers to product and service classifications aligned to level 1 (i.e. broader) classifications under the UNSPSC.
47. Findings under this category could include, for example, no/inadequate anti-bribery and corruption policy, whistleblowing procedure is not communicated to all workers, or no whistleblower protection policy in place.
48. Findings under this category could include, for example, no child labour remediation policy, or this policy does not align with ILO guidance, or age verification records are not consistently maintained.
49. Findings under this category could include, for example, no living wage gap analysis being performed, incomplete wage improvement plans (with living wage as the goal), or delayed payment of social insurance and other legally mandated contributions to relevant authorities.
50. Findings under this category could include, for example, isolated incidents of workers not taking off one day in seven, systemic excessive overtime hours, or rest breaks not properly documented in time records.
51. Findings under this category could include, for example, lack of a detailed environmental policy, missing licence for a controlled chemical substance, or waste not appropriately segregated.
52. Findings under this category could include, for example, no written human rights policy, or a human rights policy that is not trained to employees.
53. Findings under this category could include, for example, insufficient due diligence on recruitment fees paid by workers, labour providers used not holding the required licence, or no plans/initiation to reimburse recruitment fees paid by workers.
54. Findings under this category could include, for example, isolated incidents of missing health and safety training records, electrical safety issues, or improper marking and lighting of emergency exits.
55. Thematic categories are adapted from the SMETA four-pillar audit methodology finding categories. Findings are based on the materials reviewed and/or personnel interviewed by auditors.

Maritime

BHP chartered vessels completed 1,535 voyages in FY2026. The safety and welfare of seafarers on these vessels are important considerations in BHP's vessel chartering decisions.

We select operators based on factors including their maritime operational and safety performance. We continued to engage RightShip in FY2026 to vet and inspect dry bulk vessels for compliance with seafarers' rights and welfare protections prior to these vessels entering our supply chain. RightShip assesses dry bulk vessels against its global vessel vetting criteria and BHP's bespoke vessel vetting criteria to manage risks associated with terminals, commercial contracts and nature of the loaded cargo.

Through this process, BHP seeks to ensure that all chartered vessels comply with the ILO Maritime Labour Convention (2006), which sets minimum standards for seafarers' living and working conditions, including fundamental rights and principles relating to forced or compulsory labour and child labour.

BHP also works with organisations such as Mission to Seafarers, to better understand seafarers' challenges and support its work, as a Founding Gold Sponsor of the annual Seafarer Awards. Recognising that shore leave is critical to seafarer welfare, BHP has contributed to building a new Port Hedland Seafarers Centre, which started in May 2026 and is expected to be completed in FY2027. Additionally, through collaboration with port and service partners, BHP supported initiatives to improve seafarers' access to reliable internet connectivity during the port call at Port Hedland, helping to reduce isolation and support wellbeing for crew visiting the port.

Case Study 5: Responding to labour exploitation risks in our maritime supply chain

In FY2026, our Maritime team responded to labour exploitation risks relating to a vessel owner.

The Australian Maritime Safety Authority (**AMSA**) banned a vessel from Australian ports or waters, following a Port State Control inspection in the Port of Newcastle. AMSA inspectors found that, among other things, the vessel's crew had been unlawfully underpaid and that separate payroll records were being maintained for the vessel's crew and for regulators.

In response, our Maritime team placed the vessel owner on its continuous improvement list and has temporarily suspended all of its vessels from entering BHP's supply chain. Although the AMSA ban applied to one vessel, our Maritime team assessed the AMSA findings to be indicators of potential systemic risk and declined nominations of other vessels from the same owner.

This suspension remains until the vessel owner demonstrates that the wage underpayment issues have been resolved across its fleet and management systems. Our Maritime team continues to engage with the vessel owner to monitor progress and support future improvements.

Responsible Minerals Program

In line with our Responsible Minerals Policy, we undertake due diligence for minerals and metals sourced from third-parties through our Responsible Minerals Program. The program is aligned with the OECD Guidance[56] and guided by the OECD Handbook.

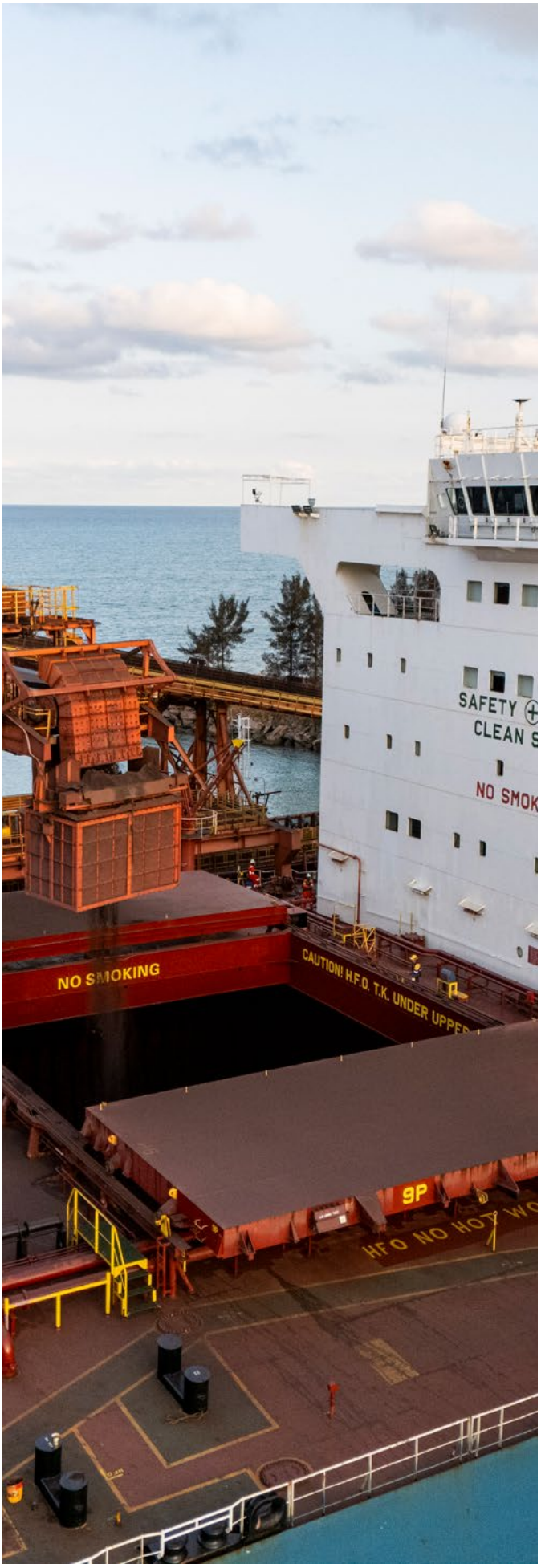
The Responsible Minerals Program is applicable to suppliers selling minerals and/or metals directly into our operated assets that will physically form part of our products or selling minerals and/or metals to BHP that BHP intends to market to a third-party. The Responsible Minerals Program does not apply to minerals and/or metals supplied from non-operated joint ventures.

In FY2026, due diligence was conducted across all suppliers of minerals and metals that fall within our Responsible Minerals Program. Our FY2026 due diligence related to externally supplied minerals or metals supplied into certain of our operated assets (all of which was sourced from Australian mines) and for minerals and metals we intend to market to a third-party (purchased from mines in South America, Asia, Europe and Australia).

We assessed 36.4 per cent of the origins of material externally supplied as medium risk and 9.1 per cent as high risk. The remaining origins of material externally supplied were assessed as low risk. Where modern slavery risks are identified as high, risk mitigation and monitoring activities are implemented in accordance with our responsible sourcing due diligence process.

For more information, see BHP's **Responsible Minerals Program Report 2026** at bhp.com/RMPR2026

56. Including the five-step risk-based due diligence framework set out in Annex I and the key risks identified in Annex II of the OECD Guidance.



3 Our actions to address modern slavery risks continued

3.4 Building capacity and raising awareness

The ESCT team builds capacity and raises awareness of modern slavery risks with our Sales and Marketing and Procurement teams who engage directly with our suppliers. This occurs on a routine, process-driven basis (e.g. formal approval routes) and on an ad hoc basis (e.g. business-initiated requests for support and formal and informal knowledge sharing events and engagements).

We also pursued the following capacity-building initiatives in FY2026:

- Delivered modern slavery awareness training to Local Buying Program suppliers and shared our FY2025 Statement, to highlight BHP's commitments and actions to address modern slavery.
- Reached alignment with one of our major suppliers to BHP's corporate offices to participate in a pilot of our Impact Project, which will involve providing subcontracted workers with access to Issara Institute's grievance mechanism and targeted outreach activities during FY2027.
- Collaborated with the Mekong Club, a non-profit focused on addressing modern slavery in corporate supply chains, and a corporate office management vendor in training to build shared understanding of modern slavery risks in facilities management supply chains, particularly subcontracted cleaning and security services.
- Attended the Global Business Initiative on Human Rights' member peer Learning workshop in Malaysia in May 2026, which included discussion of supply chain due diligence approaches and a roundtable discussion with the Governments of Malaysia and Indonesia.
- Conducted a three-day training workshop in Chile for Community and Indigenous Engagement, Land Access, and Non-Operated Joint Ventures teams from Brazil and Peru. The training focused on deepening the understanding of international practices for identifying, assessing and managing social and human rights impacts. It combined technical content with interactive learning through case studies and hypothetical scenarios of various human rights impacts, including modern slavery and child labour.
- Collaborated with ICMM to conduct a two-day human rights due diligence training workshop in Chile. The workshop brought together participants from across the mining industry to strengthen understanding of human rights due diligence and provided deep dives on topics such as human rights due diligence in supply chains, operationalising free, prior and informed consent, and grievance mechanisms.
- Participated in the Prospectors and Developers Association of Canada annual convention, including through our Human Rights and Social Performance representative speaking on a panel on stakeholder engagement and human rights due diligence. Using a child labour case study, the panel examined modern slavery risks in mining supply chains. We also joined side events on social and human rights risks, supporting knowledge sharing and industry collaboration on responsible business practices.

These activities complement BHP's learning program, through which over 300 employees and contractors completed our online human rights training in FY2026, including over 165 BHP Canada Inc. employees and contractors. This module included content relating to forced and child labour. Our online *Our Code* training continued to be mandatory for all employees and contractors.

3.5 Remediation

Under our Human Rights Policy Statement, BHP seeks to provide or cooperate in providing access to remedy where we have caused or contributed to adverse human rights impacts through our operations.

In FY2027, we plan to develop guidance for the business on how we respond to human rights-related allegations and seek to provide remedy where BHP causes or contributes to adverse human rights impacts in line with the UNGPs. The guidance is also expected to consider remedy in the circumstances where BHP is 'directly linked' through those business relationships as guided by the UNGPs framework.

Our reporting channels to raise misconduct concerns comprise an online portal and 24-hour multilingual call service. Our reporting channels are available to everyone via our website and the information provided in *Our Code*, which is provided to new suppliers during onboarding and annually communicated to all suppliers.

For more information, visit **How to Speak Up** at: bhp.com/about/our-code/how-to-speak-up

Our *Business Conduct Global Standard* provides that reports concerning potential human rights violations (including modern slavery in our supply chains) are referred to our Compliance team for investigation.

We did not receive any new complaints or reports relating to potential modern slavery practices through our reporting channels during FY2026 that required further investigation. Figure 9 below displays the types of business conduct concerns raised through our reporting channels in FY2026.[57]

Figure 9: Business conduct concerns raised in FY2026[58]



Disrespectful behaviours (including harassment and bullying) (1,139)	44.4%
Health, safety or environment breach (430)	16.8%
Sexual harassment (380)	14.8%
Fraud (279)	10.9%
Cybersecurity, data privacy or intellectual property breach (127)	5.0%
Racial harassment (86)	3.4%
Discrimination (74)	2.9%
Other* (48)	1.8%

* Other: This includes issues such as retaliation for speaking up; failure to report *Code of Conduct* breach; consensual relationship with power imbalance; attempting to identify an anonymous reporter, ask a question; improper political or governmental conduct.

For the purposes of paragraphs 11(3)(d) and (e) of the Canadian Act, in FY2026 BHP Canada Inc. did not take, or have occasion to take, any measures to remediate any forced or child labour or the loss of income to the most vulnerable families.

Community grievance mechanisms

Our Human Rights Policy Statement requires local-level community grievance mechanisms across our capital projects, operated assets and exploration regions, through which we acknowledge, address, track and report community concerns, complaints and grievances.

As reported in our FY2025 Statement, a second-line assurance review of the mechanisms at our operated assets identified opportunities to enhance accessibility, strengthen internal practices and improve data quality and evaluation.

In FY2026, we continued implementing these recommendations, including by establishing a Community Grievance Mechanism Working Group to drive ongoing improvements, targeted training for first-line community and Indigenous engagement teams, system improvements to support more consistent recording and tracking, preparing an online portal to raise concerns (launched for trial on 1 July 2026), and ongoing work to improve the accessibility of grievance mechanisms for affected stakeholders.

For more information on our community grievance mechanism online portal, see bhp.com/sustainability/communities/local-communities

These actions intend to support earlier identification of potential human rights issues, including modern slavery risks, and a more effective response where concerns are raised. Early indicators suggest an initial positive shift in internal practices. While we experienced an overall reduction in complaints since FY2025 (due to efforts to address blasting vibration and noise, increased road traffic, train movements and noise, and employee and contractor conduct issues) initial observations indicate that complaints were typically more promptly and accurately recorded, allowing for greater visibility and more timely resolutions.

The local-level community concerns, complaints and grievance mechanism for the Jansen potash project is maintained by BHP Canada Inc.'s Corporate Affairs team. It is accessible to community members via printed and online newsletters, posters and mail drops in local and Indigenous regional communities, and shared via community websites, newspapers, at public engagements, and as a standard agenda item during relevant face-to-face meetings with community stakeholders.

57. For more information on our remediation processes and grievance mechanisms for broader business conduct concerns, see the BHP Annual Report 2026, Operating and Financial Review 9.6 (Ethics and business conduct).
58. This excludes reports not containing a business conduct concern. FY2025 and FY2026 data includes all former OZ Minerals Australian assets and OZ Minerals Brazil assets.

3.6 OZ Minerals Brazil assets

The OZ Minerals Brazil assets included copper and gold projects and exploration tenements in Pará and Maranhão, Brazil. Brazil attracts a higher modern slavery risk rating. BHP completed divestment of all former OZ Minerals Brazil assets in FY2026.

Addressing modern slavery risks for OZ Minerals Brazil assets

Our FY2024 Statement described illegal gold mining occurring at some OZ Minerals Brazil exploration tenements. We divested our interest in those gold exploration tenements in FY2025 but retain the right to a royalty to future production. We did not own the land where these exploration tenements are located or possess a right to control access to, or activities occurring on, that land.

In FY2025, we identified illegal copper mining occurring at a separate OZ Minerals Brazil exploration tenement. BHP divested this tenement during FY2026, with deferred and contingent payments due to BHP. Investigations conducted during prior reporting periods did not identify any evidence of modern slavery practices occurring in connection with the illegal mining.

Prior human rights risk assessments completed for certain OZ Minerals Brazil assets (described in our FY2025 Statement) identified inherent modern slavery-related risks in the external operating environment, as well as measures under OZ Minerals Brazil's procedures and applicable BHP mitigation processes. These measures included providing human rights training to relevant employees and informing new employees and contractors of reporting channels to raise misconduct concerns (see also the measures described below).

There were no further modern slavery-related reports or complaints requiring additional risk management action at the OZ Minerals Brazil sites in FY2026 before divestment. BHP continues to monitor for human rights risks where relevant to future royalty or consideration income streams from formerly owned OZ Minerals Brazil sites.

OZ Minerals Brazil supply chain

Figure 10 shows the main sourcing countries for goods and services procured by former OZ Minerals Brazil entities during FY2026, along with the key categories of goods and services sourced from each country.[59] Suppliers to former OZ Minerals Brazil entities are not integrated into BHP's vendor management system and the data is reported in accordance with OZ Minerals Brazil's systems and classifications.

Over 90 per cent of OZ Minerals Brazil's supplier spend in FY2026 was with in-country suppliers incorporated in Brazil, which scores as higher risk for modern slavery. In FY2026, other key sourcing countries for OZ Minerals Brazil also included China and Peru, which are rated higher risk for modern slavery, and countries which attract low (Australia, Finland and Germany) or medium (Canada, Chile, Switzerland, the United Kingdom and United States) risk scores.

Former OZ Minerals Brazil entities also purchased goods and services from industries rated higher risk for modern slavery, including capital equipment and machinery, drilling services, explosives and accessories, MRO parts, mine services, technology services and software, and transportation, cargo handling and warehousing services.

> "Modern slavery risks can be heightened in complex operating environments. Insights from our work in FY2026 contributed to our broader understanding of how to identify and manage these risks."
>
> **Edgar Basto**
> Chief Operating Officer

Addressing modern slavery risks in OZ Minerals Brazil supply chains

During FY2026, OZ Minerals Brazil's supplier onboarding and due diligence processes continued to apply until the date of completion of divestment of all OZ Minerals Brazil assets, which included:

- screening new suppliers against the Brazilian Ministry of Labour's Register of Employers found by government inspectors to have subjected workers to slavery-like working conditions (Lista Suja) where the contract value exceeds a certain monetary threshold;
- delivering online human rights training on issues covered in OZ Minerals Brazil's human rights procedure (including modern slavery practices) to 108 suppliers. During FY2026, the training remained mandatory for all new suppliers and existing suppliers entering new contracts.

In FY2026, BHP continued to supplement OZ Minerals Brazil's due diligence processes with bespoke controls to align with BHP's compliance approach until the date of completion of the divestment of all OZ Minerals Brazil assets.

These controls included screening for modern slavery risk via our third-party due diligence platform and second line review by our ECHR sub-function where the results indicated modern slavery risks or human rights impacts. Our ECHR sub-function engaged with OZ Minerals Brazil's supplier onboarding and due diligence processes and considered the effectiveness of existing and interim measures as appropriate up until the date of divestment.

Figure 10: Key sourcing countries for OZ Minerals Brazil[60]

Goods or service category	Brazil	Germany	Finland	Switzerland	United Kingdom	Australia	Peru	Canada	Chile	United States	China
Transport, cargo handling and warehousing services	●	●		●	●	●					●
MRO parts	●						●		●		
Mine services	●										
Drilling services	●										
General supplies[61]	●										
Technology services and software	●		●			●			●	●	
Equipment and machinery	●		●						●		
Consulting services	●					●		●			
Insurance	●				●						

59. Based on invoicing for the period 1 July 2025 to 2 April 2026.
60. Information displayed in Figure 10 relates to the FY2026 period up to the date of completed divestment (1 July 2025 to 2 April 2026). Based on payments to direct (tier one) suppliers, supplier country of incorporation and date of payment. Categories listed in descending order of spend. Category labels were provided by OZ Minerals Brazil procurement staff.
61. Includes facilities services and labour.

4 Assessing our effectiveness

We assess the effectiveness of our actions to address modern slavery risks through internal assurance, monitoring, evaluation and continuous improvement processes.

Internal assurance

Under BHP's three-line risk management model (described in section 3.1), the first and second lines review risks and controls. The third line conducts internal audits focused on Group risk themes and particular regions or assets where relevant.

Relevant risk information is recorded in BHP's enterprise risk management system to support continuous improvement and to share risk intelligence across the Group. Risk management performance insights are reported to the Board, relevant Board Committees and senior management as applicable.

Human rights risks are considered to be a Group-level risk given their significance and the level of oversight required. BHP manages, monitors and evaluates material human rights risks related to responsible sourcing, modern slavery in our inbound supply chain and human rights impacts on communities and Indigenous peoples. Several of the improvement initiatives described in section 3.3 were informed by evaluations of this Group risk category and of individual material risks.

BHP Operating System

Addressing the effectiveness of our actions is inherent to the BHP Operating System (**BOS**). BOS is our unique way of working that aims to embed continuous improvement into how we work every day. It provides structured tools and practices, including how to identify improvement opportunities, solve the cause of problems, share countermeasures and manage improvements to have impact. Through BOS, second-line initiatives, such as our supplier ethical trade audit program (see section 3.3C above), cascade to frontline personnel as key performance indicators for first-line leaders.

Monitoring our grievance mechanisms

We monitor our misconduct reporting channels and community-level grievance mechanisms for reports of modern slavery indicators. We also monitor for the absence of reporting where this may suggest barriers to access, awareness or trust. We review submissions to ensure concerns are appropriately addressed. Insights from case data, user feedback and internal assurance activities, such as layered audits, are used to assess and strengthen the effectiveness of these channels over time.

Ethical Supply Chain and Transparency Framework

In FY2026, we advanced a more integrated ESCT Framework evaluation model, which built upon the model reported in our FY2025 Statement and remains under development. We also revised and updated our existing ESCT Framework to reflect organisational changes, particularly the formation of the Human Rights and Social Performance team as the ESCT Framework owner.

Monitoring of ESCT controls occurs through annual framework-owner review, verification by our Compliance Systems and Monitoring team, and routine oversight of supplier due diligence activities. In FY2026, this included defined monitoring activity, control-testing discussions, refinement of monitoring scope and structured debriefs with the ESCT Framework owner. This approach supports assessment of whether controls are designed, implemented and operating as intended, and supports identification of opportunities to strengthen governance and effectiveness over time.

Human Rights Effectiveness Framework

In FY2026, we began developing a Human Rights Effectiveness Framework, which will be informed by the outcomes of our Saliency Assessment. This Framework intends to support more consistent evaluation of whether our actions reduce risks and improve outcomes for rightsholders, including workers in relation to modern slavery, through a combination of qualitative and quantitative indicators, strengthened feedback circuits and clearer accountability. Implementation will be sequenced following completion of the Saliency Assessment, with initial rollout expected from FY2027.



5 Consultation and collaboration

5.1 Consultation

BHP operates and is managed as an integrated group with overarching policies, systems and processes that are designed to be consistently applied across our operated assets and functions. Consultation between BHP entities in relation to this Statement occurred as described below.

Under BHP's centralised management structure and shared resources, the consultation process included the reporting entities under the Australian Act and Canadian Act (including former OZ Minerals Australia entities which were integrated in FY2025), and their owned or controlled entities. OZ Minerals Brazil assets were not integrated and therefore BHP also engaged with relevant former OZ Minerals Brazil personnel in relation to OZ Minerals Brazil's modern slavery risks and actions they took to address those risks up to the time of completion of divestment of those assets.

The Statement was prepared as part of BHP's broader annual reporting suite and was reviewed by relevant internal and external stakeholders as part of that process, including members of the BHP Ventures, BHP Xplor, BHP Foundation, Communications, Compliance Minerals Americas, CoreX Copper Brazil, Ethics and Compliance, Ethics and Investigations, Exploration, Governance and Social Value Procurement, Group Accounting and Reporting, Group Governance, HR Governance and Risk, Learning Systems, Human Rights and Social Performance, Jansen, Legal, Maritime and Supply Chain Excellence, Non-Operated Joint Ventures, Portfolio Strategy and Development, Risk, Sustainability, Procurement, Marketing Sustainability, and Sales and Marketing teams.

Members of our Executive Leadership Team also reviewed and provided feedback on this Statement during the drafting process. The Board's Sustainability Committee reviewed this Statement before it was submitted to the Board for final review and approval.

5.2 Collaboration

In FY2026, we continued to:

- engage with industry peers and businesses exposed to similar modern slavery and human rights risks via expert and industry forums, including the UN Global Compact Network of Australia's Modern Slavery Community of Practice, UN Forum on Business and Human Rights, UN Permanent Forum on Indigenous Issues, Prospectors and Developers Association of Canada, and the Human Rights Resources and Energy Collaborative (Australia)
- engage in ongoing government consultations in relation to proposed amendments to the Australian Act
- collaborate and engage with expert non-government organisations such as Issara Institute, ISWAN and the Mekong Club
- participate in developing responsible sourcing and production standards and guidance, including through engagement with the ICMM and Consolidated Mining Standard Initiative (**CMSI**)
- respond to enquiries on modern slavery controls and risk management from our customers and investors



Appendix 1

Glossary

Term	Meaning
$	References to dollar values are to US dollars (US$), unless stated otherwise
3PR	BHP's third-party risk assessment tool
Australian Act	Modern Slavery Act 2018 (Cth)
BHP, 'BHP Group', the 'Group', 'our business', 'organisation', 'we', 'us', or 'our'	BHP Group Limited and its subsidiaries
Canadian Act	Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023
CMSI	Consolidated Mining Standard Initiative
ESCT	Ethical Supply Chain and Transparency
FY2026, 'year' or 'reporting period'	The financial year ended 30 June 2026
ICMM	International Council on Mining and Metals
ILO	International Labour Organization
Impact Project	A pilot project that involves BHP partnering with an NGO to deliver programs within our supply network designed to promote responsible recruitment and improve labour monitoring, worker voice and access to grievance mechanisms
In-country suppliers	Suppliers incorporated in the same country as the BHP entity purchasing its goods or services
ISWAN	International Seafarers' Welfare and Assistance Network
Local Buying Programs	A program delivered through strategic partnerships to support small, local and Indigenous businesses to competitively bid for supply opportunities with BHP through a streamlined onboarding, procurement and payment process, at no additional transaction costs. The programs provide education and advice to help build capacity and capability for local and Indigenous businesses to enter BHP's supply chain and positions those businesses to enter the supply chains of other large companies.
Local suppliers	Suppliers headquartered in the local regions where we operate, as well as Traditional Owner and Indigenous suppliers for local assets
MRO	Maintenance, repair and operations
Non-traded goods and services	Goods and services that are not part of BHP's finished product portfolio, such as raw materials and associated supporting services, such as export shipment
OECD	Organisation for Economic Co-operation and Development
OECD Guidance	OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
OECD Handbook	OECD Handbook on Environmental Due Diligence in Mineral Supply Chains
Saliency Assessment	Human Rights Saliency Assessment
SMETA	Sedex Members Ethical Trade Audit
Trade related inputs	Goods and services that are used as part of BHP's finished product portfolio, such as chemicals, fuels, utilities, power (including some renewable energy power purchase agreements) and carbon credits
UK Act	Modern Slavery Act 2015
UNGPs	United Nations Guiding Principles on Business and Human Rights
UNSPSC	United Nations Standard Products and Services Code

Appendix 2

Australian and Canadian reporting entities

The following companies qualify as reporting entities for the purposes of the Australian Act.

Name	Description
Avanco Resources Pty Ltd	Holding company for the BHP Group's OZ Minerals Brazil interests
BHP Billiton Finance Limited	Treasury entity for the BHP Group
BHP Billiton Finance (USA) Limited	Treasury entity for the BHP Group
BHP Capital No. 20 Pty Limited	Holding company
BHP Coal Pty Ltd	Participant in the BHP Group's BHP Mitsubishi Alliance joint venture that owns steelmaking coal assets in central Queensland
BHP Energy Coal Australia Pty Ltd	Holding company for the BHP Group's New South Wales Energy Coal asset
BHP Group Limited	BHP Group Limited is the ultimate parent entity of the BHP Group and substantially all its operations are carried on through its subsidiaries
BHP Iron Ore Pty Ltd	Operates the BHP Group's Western Australia Iron Ore (WAIO) assets
BHP Iron Ore (Jimblebar) Pty Ltd	Incorporated joint venture with Mitsui and ITOCHU that owns the Jimblebar iron ore mine
BHP Lonsdale Investments Pty Ltd	Holding company
BHP MetCoal Holdings Pty Ltd	Provides services to Minerals Australia assets
BHP Minerals Holdings Proprietary Limited	Holding company
BHP Minerals Pty Ltd	Holds the BHP Group's interests in the joint ventures with Mitsui, ITOCHU and POS-Ore that own the BHP Group's Western Australia Iron Ore (WAIO) assets
BHP Nickel West Pty Ltd	Owns and operates the BHP Group's Nickel West asset in Western Australia (Nickel West is currently in temporary suspension)
BHP Olympic Dam Corporation Pty Ltd	Owns and operates the BHP Group's Olympic Dam asset in South Australia
BHP Queensland Coal Limited	Holding company
BHP Queensland Coal Investments Pty Ltd	Participant in the BHP Group's BHP Mitsubishi Alliance joint venture that owns steelmaking coal assets in central Queensland
BHP Titanium Minerals Pty Ltd	Manages funds for the rehabilitation of the Beenup Titanium Minerals mine
BHP (Towage Services) Pty Ltd	Provides towage services to the BHP Group's Western Australia Iron Ore (WAIO) joint ventures
Carrapateena Pty Ltd	Holding company
Hunter Valley Energy Coal Pty Ltd	Operates the BHP Group's New South Wales Energy Coal asset
Minotaur Resources Holdings Pty Ltd	Holding company
OZ Minerals Brazil (Holdings) Pty Ltd	Holding company
OZ Minerals Carrapateena Pty Ltd	Owns and operates the BHP Group's Carrapateena mining operations in South Australia
OZ Minerals Prominent Hill Operations Pty Ltd	Owns and operates the BHP Group's Prominent Hill mining operations in South Australia
OZ Minerals Prominent Hill Pty Ltd	Holding company
OZ Minerals Pty Ltd	Holding company for the entities and assets acquired from OZ Minerals Ltd
OZM Carrapateena Pty Ltd[62]	Holding company
The Broken Hill Proprietary Company Pty Ltd	Holding company

The following companies qualify as reporting entities for the purposes of the Canadian Act.

Name	Description
BHP Canada Inc.	Holding company for the Jansen potash project and the closed Island Copper mine site

Approval and attestation

This Statement was approved and attested by the Directors of BHP Canada Inc. in accordance with section 11(4)(a) and 11(5) of the Canadian Act.



Karina Gistelinck
Director, BHP Canada Inc.

18 August 2026

I have the authority to bind BHP Canada Inc.

62. In preparing this Statement, we identified that OZM Carrapateena Pty Ltd was inadvertently omitted from our FY2024 and FY2025 Statements.

Appendix 3

How we have addressed reporting criteria

The table below sets out where in this Statement we have addressed the recommended reporting criteria under the UK Act and mandatory reporting criteria under the Australian Act and Canadian Act.

Australian Act mandatory reporting criteria	Canadian Act mandatory reporting criteria	UK Act recommended reporting criteria	Location in this Statement
Identify each reporting entity covered by the joint statement	Entity's structure, activities and supply chains	Organisation's structure, its business and its supply chains	1. Our structure, business and supply chains Appendix 2: Australian and Canadian reporting entities
Describe the structure, operations and supply chains of each reporting entity covered by the joint statement			
Describe the risks of modern slavery practices in the operations and supply chains of each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or controls	The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk	Parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk	2. Assessing our modern slavery risks
Describe the actions taken by each reporting entity covered by the joint statement, and any entities that each of those reporting entities owns or controls, to assess and address these risks, including due diligence and remediation processes	The entity's policies and due diligence processes in relation to forced labour and child labour	Organisation's policies in relation to slavery and human trafficking Organisation's due diligence processes in relation to slavery and human trafficking in its business and supply chains	2. Assessing our modern slavery risks 3. Our actions to address modern slavery risks Case Studies
	Any measures taken to remediate any forced labour or child labour		
	Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains		
	The training provided to employees on forced labour and child labour	Training about slavery and human trafficking available to the organisation's staff	
Describe how each reporting entity covered by the joint statement assesses the effectiveness of actions being taken to assess and address modern slavery risks	How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains	Organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	4. Assessing our effectiveness
Describe the process of consultation with each reporting entity covered by the joint statement and with any entities that each of those reporting entities own or control			5. Consultation and collaboration
Any other relevant information	Steps taken during the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the organisation or of goods imported into Canada by the organisation		Introduction 3. Our actions to address modern slavery risks 5. Consultation and collaboration

Appendix 4

Independent Auditor's Review Report to the Directors of BHP Group Limited

Shape the future with confidence

Conclusion

Ernst & Young ('EY', 'we') was engaged by BHP Group Limited ('BHP') to undertake a Limited Assurance engagement as defined by the International Auditing Standards, hereafter referred to as a 'review' over the Statement for the year ended 30 June 2026.

We have conducted a review of the following information in the Modern Slavery Statement of BHP Group Limited (BHP, or the Company) and its subsidiaries (collectively the Group) for the year ended 30 June 2026 (the 'subject matter'):

Subject matter	Criteria	Location in Modern Slavery Statement 2026
BHP Modern Slavery Statement 2026 for the year ended 30 June 2026 (the 'Statement')	The requirements in the United Kingdom's *Modern Slavery Act 2015*, the Australian *Modern Slavery Act 2018* and the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023* (collectively, 'the Acts') BHP management's own publicly disclosed criteria relating to quantitative disclosures as articulated throughout the Statement	Entirety of the Statement

Based on the procedures we have performed and the evidence we have obtained, we have not become aware of any matter in the course of our review that makes us believe that the Statement for the Group is not prepared, in all material respects, in accordance with the criteria for the year ended 30 June 2026.

Basis for conclusion

Our review has been conducted in accordance with ASSA 5000 *General Requirements for Sustainability Assurance Engagements* (ASSA 5000) issued by the Auditing and Assurance Standards Board. Our review includes obtaining limited assurance about whether the subject matter is free from material misstatement.

The procedures in a review vary in nature and timing from, and are less in extent than for, an audit. Consequently, the level of assurance obtained in a review is substantially lower than the assurance that would have been obtained had an audit been performed. See the *Summary of the work performed* section of our report.

Our responsibilities under ASSA 5000 are further described in the *Auditor's responsibilities* section of our report.

We are independent of the Group in accordance with the ethical requirements of *APES 110 Code of Ethics for Professional Accountants (including Independence Standards)* issued by the Accounting Professional & Ethical Standards Board Limited (November 2018 incorporating all amendments to June 2024) (the Code), that is relevant to review of the subject matter of public interest entities in Australia. We have also fulfilled our other ethical responsibilities in accordance with the Code.

Our firm applies Australian Standard on Quality Management ASQM 1 *Quality Management for Firms that Perform Audits or Reviews of Financial Reports and Other Financial Information or Other Assurance or Related Services Engagements*, which requires the firm to design, implement and operate a system of quality management, including policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Other matter

Comparative information was not subject to an assurance engagement in the prior period. In connection with our review on the subject matter, our responsibility is to determine whether the comparative information is appropriately presented, by evaluating its consistency with the disclosures presented in the prior period and the consistency of the criteria with the criteria applied in the current period. Our conclusion is not modified in respect of this matter.

Responsibilities for the subject matter

The management of the Company are responsible for:

- The identification, selection and development of suitable criteria;
- The preparation of the subject matter in accordance with the criteria; and
- Designing, implementing and maintaining such internal control necessary to enable the preparation of the subject matter, in accordance with the criteria that is free from material misstatement, whether due to fraud or error.

Inherent limitations

Our report does not extend to any disclosures or assertions made by BHP relating to future performance plans and/or strategies disclosed in the BHP Modern Slavery Statement 2026.

Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

Auditor's responsibilities

Our objectives are to plan and perform the review to obtain limited assurance about whether the subject matter, defined in the *Conclusion* section of our report, is free from material misstatement, whether due to fraud or error, and to issue a review report that includes our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence decisions of users taken on the basis of the subject matter.

As part of a review in accordance with ASSA 5000, we exercise professional judgement and maintain professional scepticism throughout the engagement. We also:

- Perform risk assessment procedures, including obtaining an understanding of internal control relevant to the engagement, to identify and assess the risks of material misstatements, whether due to fraud or error, at the disclosure level but not for the purpose of providing a conclusion on the effectiveness of the entity's internal control.
- Design and perform procedures responsive to assessed risks of material misstatement at the disclosure level. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Summary of the work performed

A review is a limited assurance engagement and involves performing procedures to obtain evidence about the subject matter. The nature, timing and extent of procedures selected depend on professional judgement, including the assessed risks of material misstatement at the disclosure level, whether due to fraud or error.

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Appendix 4 continued

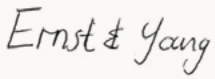
In conducting our review, the procedures we performed included, but were not limited to:

- Conducted interviews with key personnel to understand the reporting process for complying with the Acts; the disclosures on governance structure; and the internal activities as presented in the statement;
- Assessing the Statement against requirements of the Acts;
- Evaluating the suitability of the Criteria (other than with respect to the Acts) and that the Criteria have been applied appropriately to the Statement;
- Reviewing disclosures made in the Statement relating to third party information to check accuracy;
- Undertaking analytical procedures of the quantitative disclosures in the Statement to determine the reasonableness of the information presented;
- On a sample basis, for qualitative and quantitative statements within the Statement, based on our professional judgement, reviewing underlying data to source information and data to assess completeness of claims; re-performing calculations to check accuracy; and reviewing explanations about the performance data and statements;
- Undertaking a process walkthrough of and reviewing evidence related to BHP's relevant processes for consistency with disclosures made in the Statement;
- Reviewing evidence of BHP's supplier risk assessment and audits to confirm consistency with disclosures made in the Statement;
- Reviewing referenced policies and documents for consistency with disclosures made in the Statement;
- Assessing whether the information disclosed in the Statement is consistent with our understanding and knowledge of BHP's supply chain management, governance accountability and other sustainability matters; and
- Reviewing BHP media coverage relating to modern slavery and human rights to identify material events that may require disclosure.

Use of our Assurance Report

We disclaim any assumption of responsibility for any reliance on this assurance report to any persons other than management and the directors of BHP Group Limited, or for any purpose other than that for which it was prepared.

Our assurance procedures were performed over certain web-based information that was available via web links as of the date of this assurance report. We provide no assurance over changes to the content of this web-based information after the date of this assurance report.



Ernst & Young



Meg Fricke
Partner

Melbourne, Australia
18 August 2026

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BHP

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