

## Human Resources

# Issue Resolution Policy

## Managing employee grievances and concerns at BHP

### 1. What is the purpose of this document?

The purpose of this document is to establish the rules and provisions of the BHP Issue Resolution Policy (the “Policy”) and to establish a general framework for employees which encourages early resolution of grievances or matters of concern between employees, or in respect of other matters that arise in the course of an employee’s employment. This is to ensure that matters arising can be raised in a safe manner and, where possible and appropriate, resolved at the earliest opportunity at the level closest to the source.

BHP (also referred to in this document as “we” or “the Company”) is committed to providing a workplace where everyone feels respected and safe to speak up when experiencing a work-related grievance or matter of concern.

### 2. Who is eligible for this Policy?

The Policy applies to all BHP employees who do not otherwise have a prescribed issue or dispute resolution framework specifically in place under applicable local legislation or requirements, contract of employment, or an individual or collective agreement applicable to them. Specifically, this Policy does not apply to Minerals Americas employees covered by an applicable local issue or dispute resolution framework (as referred to in Section 4 of this Policy). In all instances any prescribed process set out in applicable local legislation or requirements, contracts of employment or individual or collective agreements will prevail over this Policy.

This Policy does not form part of, or is not incorporated in any way into, any employee’s contract of employment. The Company, in its absolute discretion, may amend the Policy from time to time.

*This Policy shall be applied free from discrimination based upon personal attributes unrelated to job performance, such as race, age, ethnicity, nationality, gender identity, sexual orientation, intersex status, physical or mental disability, mental health condition, relationship status, religion, political opinion and industry/union affiliations, pregnancy, breastfeeding or family responsibilities\**

\*Subject to BHP’s requirement to comply with local laws in jurisdictions in which we operate

### 3. What is the Issue Resolution Policy?

The Policy describes the framework in place at BHP to provide to an employee with a grievance or matter of concern, a mechanism to ensure that the issue is reviewed promptly, fairly and impartially.

#### 3.1 Scope

A *grievance or matter of concern* includes a concern, problem or complaint concerning the workplace, or that arises in the course of employment, that an employee wishes to raise or escalate.

It does not include business conduct concerns as outlined in the Business Conduct Global Standard, Our Code or the Response Options to Reported Misconduct Global Process, which should be raised in accordance with those documents. Issues or concerns which relate to suspected breaches of Our Code can be raised, including anonymously, directly through BHP's misconduct reporting channels, or can be raised to an employee's leader, Two Up Leader, Ethics & Investigations, Compliance, Legal, Human Resources or Employee Relations

The Policy, supported by the documents referred to in section 4 where applicable, sets out the approach to review *grievances or matters of concern* which an employee may wish to raise or escalate. It also helps ensure a fair process is applied in the consideration of *grievances or matters of concern*.

#### 3.2 Issue Resolution Framework

At all times BHP encourages the safe and fair resolution of a *grievance or matter of concern* at the lowest level possible. However, where an employee is concerned that an issue involving them has not been fairly reviewed then the following escalation process will apply.

- 3.2.1 **Direct Leader** - If an employee wishes to raise a *grievance or matter of concern*, the employee should first discuss it with their direct leader. In the absence of the direct leader or where the employee does not feel comfortable raising the *grievance or matter of concern* with their direct leader, the employee can escalate the *grievance or matter of concern* to the next step in this process.
- 3.2.2 **Next Level Supervision / Two Up Manager** - Where the *grievance or matter of concern* remains unresolved, the employee may discuss the *grievance or matter of concern* with the next level of supervision / Two Up manager. In the absence of the next level of supervision / Two Up manager, the employee can escalate the *grievance or matter of concern* to the next step in this process.
- 3.2.3 **Next Level Supervision / Three Up Manager** - Where the *grievance or matter of concern* remains unresolved, the employee may discuss the *grievance or matter of concern* with the next level of supervision / Three Up manager. In the absence of the next level of supervision / Three Up manager, the employee can escalate the *grievance or matter of concern* to the next step in this process.
- 3.2.4 **Next Level Supervision / Four Up Manager** - Where the *grievance or matter of concern* remains unresolved, the employee may discuss the *grievance or matter of concern* with the next level of supervision / Four Up manager. This is the final stage of escalation under this Policy. The review, decision or outcome following engagement of this level of supervision / the Four Up Manager is final.

Note: Under this Policy the most senior level of review and decision will occur at Head of, General Manager or Vice President level. Accordingly, for some employees the final escalation point and decision maker under this framework may be lower than the Four Up Manager as referenced in step 3.2.4. However, if the employee raising the *grievance or matter of concern* is a direct report of a Head of, General Manager or Vice President, or is a Head of, General Manager or Vice President level or above, the employee is entitled to escalate their grievance or matter of concern to 2 Up level review (3.2.2).

Employees are entitled at any stage of the escalation process to have an appropriate support person present. An appropriate support person may include a work colleague (who is not involved in the *grievance or matter of concern*), a family member or other person or representative of the employee's choosing. An employee who has raised a *grievance or matter of concern* progressing through this Policy must, while the issue is being reviewed, continue to

work in accordance with their contract of employment (or as otherwise required by local legislation), unless the employee has a reasonable concern about an imminent risk to their health or safety, in which case the employee must comply with any reasonable direction given by the Company to perform other available work, either at the same workplace or at another workplace.

It is expected that the review of any *grievance or matter of concern* under this Policy is dealt with in a timely manner, and that any employee raising a *grievance or matter of concern* receives appropriate feedback on the outcome or resolution. Line leaders (or any other party reviewing a *grievance or matter of concern* raised under this Policy) are encouraged to document any process responding to the *grievance or matter of concern*, outcome or resolution where appropriate and to observe confidentiality and data privacy requirements as required. While it is intended that this issue resolution framework is managed by the relevant line leaders, a representative from Human Resources may participate in this process by exception if deemed appropriate, or in line with any local country or Asset arrangements.

Nothing in the escalation process set out above is intended to derogate from or displace any legislative right that an employee may have to escalate a *grievance or matter of concern* to any relevant governmental, judicial, regulatory or administrative agency or body.

## 4. What are the related documents to this Policy?

Policy Schedules, process documents and other supporting resources related to this Policy are detailed in the below table. These documents may be updated from time to time.

Type	Document
	Our Code
Global Standard	Business Conduct Global Standard
Global Process	Response Options to Reported Misconduct
Standard	BHP Whistleblower Policy
Procedure	Employee Handbook – United Kingdom (including, in particular, Appendix 2 – Grievance Procedure)
Procedure	Nickel West Fair Treatment Procedure
Procedure	Employee Handbook – India
Regulation	<i>Reglamento Interno de Orden, Higiene y Seguridad</i> - Spence
Regulation	<i>Reglamento Interno de Orden, Higiene y Seguridad</i> - CMCC
Regulation	<i>Reglamento Interno de Orden, Higiene y Seguridad</i> – BHP Chile Inc.
Regulation	<i>Reglamento Interno de Orden, Higiene y Seguridad</i> - Escondida
Regulation	<i>Reglamento Interno de Orden, Higiene y Seguridad</i> - CAS

## 5. What is the Governance for this Policy?

This section details the ownership, approval and review details the Policy.

<b>Policy Name: Issue Resolution Policy</b>	<b>Document Code: GER-SPC-00006</b>
<b>Policy Owner:</b> Head of Employee Relations – Performance & Conduct / Head of Employee Relations Americas	<b>Policy Approver:</b> Group Employee Relations Officer
<b>Last Reviewed by:</b> Principal Employee Relations	
<b>Date last reviewed:</b> July 2025	<b>Date of next review:</b> July 2028
This Policy must be reviewed at minimum every 3 years and will be updated with legislation changes.	

## 6. What are the exceptions to this Policy?

Exceptions to this Policy are as follows:

- Alternative issue, dispute or grievance resolution processes prescribed by local legislation or requirements, contracts of employment or individual or collective agreements prevail at all times over this Policy. Any matter which has been dealt with under any such alternative resolution process cannot separately be raised under this Policy notwithstanding protection or investigative measures that the Company must take in relation to the aforementioned alternative resolution processes.

**Note:** Any exceptions to this Policy must be approved by the Head of Employee Relations – Performance & Conduct or their delegate at the employee’s location.