



## Responsible Minerals Policy

Consistent with our responsibility to respect human rights, BHP is committed to the responsible production and sourcing of minerals and metals in our supply chain. We acknowledge that companies involved in the mining and trade of minerals and metals have the potential to contribute to sustainable development and prosperity, support livelihoods and foster local advancement. We also recognise that, particularly for conflict-affected and/or high-risk areas, companies may be at risk of directly or indirectly contributing to or being associated with actual or potential adverse impacts, such as serious human rights abuses, conflict and financial crimes.

BHP values long term relationships. We have established a fit-for-purpose due diligence program for our minerals and metals supply chain (**Responsible Minerals Program**) to align with the [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition \(OECD Guidance\)](#).

The Responsible Minerals Program is applicable to both BHP's operated mining production and our suppliers of minerals and metals where the production or inbound supply chain of these minerals or metals involves extraction, transportation or trade from or through any conflict-affected and/or high-risk area. In determining conflict-affected and high-risk areas, BHP considers [TDI Sustainability's Conflict-Affected and High-Risk Areas \(CAHRA\) list](#), as a comprehensive list of CAHRAs. Where we refer to inbound supply chain, we are specifically referring to the sourcing of mined minerals or metals for the purpose of either: (a) feeding BHP's operated assets' production where the input forms a physical part of BHP's product; or (b) selling that sourced material directly into the market.

The Responsible Minerals Program adopts the OECD's five-step framework for risk-based due diligence in alignment with Annex I of the OECD Guidance. The Responsible Minerals Program, consisting of a due diligence management system, reflects BHP's commitment to work to identify, assess and mitigate, and to publically report on potential or actual adverse risks in our own production and inbound supply chain that are associated with CAHRAs. The Responsible Minerals Program includes, where applicable, arranging independent third party audits at identified control points within BHP's supply chain.

As identified in Annex II of the OECD Guidance, the critical risks associated with CAHRAs include:

1. Serious human rights abuses associated with the extraction, transport or trade of minerals or metals, including:
  - a. any forms of torture, cruel, inhuman and degrading treatment;
  - b. any forms of forced or compulsory labour, which means work or service that is exacted from any person under the menace of penalty and for which the person has not offered themselves voluntarily;
  - c. the worst forms of child labour;
  - d. other gross human rights violations and abuses such as widespread sexual violence;
  - e. war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide;
2. Direct or indirect support to non-state armed groups;
3. Direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals or metals at point of access to mine sites, along transportation routes or at points where minerals or metals are traded; or illegally tax or extort intermediaries, export companies or international traders;
4. Bribery and fraudulent misrepresentation of the origin of minerals or metals;
5. Money laundering; and
6. Non-payment of taxes, fees and royalties due to governments.

BHP expects our suppliers of minerals and metals to carry out due diligence on their minerals and metals supply chains to identify, assess, and mitigate, at a minimum, the risks contained in Annex II of the OECD Guidance that are associated with CAHRAs. This expectation is applicable to all upstream tiers of suppliers from the origin of the mined mineral or metal through to supply to BHP. Where risks are identified, BHP's intent is to work collaboratively with our supplier and, where appropriate, other stakeholders to enable the management of such risks. In the event such risks are considered by BHP as untenable, BHP may seek to discontinue its relationship with the supplier of such mineral or metal.

BHP has an established grievance mechanism for internal and external stakeholders that also enables parties across the supply chain to report any risk, complaints or other grievances, in a confidential, or if chosen, anonymous manner without fear of retaliation, punishment or discipline. This mechanism is managed through [Ethics Point](#) and is available through BHP's website at [bhp.com](http://bhp.com).

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