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**Contact:** **Helen Ratsey +44 (0) 20 7802 7540**

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## BHP Group Plc – Economic Contribution Report 2019

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### **Introduction**

Our Economic Contribution Report (**Report**) for the year ended 30 June 2019 was released today.

BHP has a long-standing commitment to transparency. We believe it enhances understanding, builds trust and holds us and others to account.

We've disclosed details of our tax and royalty payments for more than 19 years and during that time we have continually updated and expanded our disclosures. As in prior years, this Report discloses our total direct economic contribution, including the taxes and royalties we paid on a country-by-country and project-by-project basis. We also disclose additional voluntary information, such as details of each of our subsidiary entities in 'tax haven' countries and tax incentives we have been granted by some of our host governments. In addition, we disclose our intra- group transactions and relationships with tax authorities in compliance with the Australian Voluntary Tax Transparency Code.

The Report complies with a number of different transparency regimes. The information on our payments to governments is set out in accordance with the UK Regulations, which implement the EU Accounting Directive. By issuing the Report, we comply with the Australian Voluntary Tax Transparency Code. Beyond these requirements, this year, we disclose more information including additional reconciliation data, comparative data from prior years and further information regarding our approach to tax risk management and governance. Also, we support the voluntary disclosure of country-by-country reports that contain quantitative data, such as revenue from related and unrelated parties, profit/(loss) before tax, and number of employees for each country in which a subsidiary entity of a corporate group is tax resident. We will be publishing our country-by-country data for FY2019, separately to this Report. In addition, in this Report we include details of our settlement with the Australian Taxation Office (**ATO**) of the long-standing transfer pricing dispute concerning the value at which commodities are sold to our Singapore Sales and Marketing business. The settlement resolved this dispute for all prior years (from 2003 onwards) and also provides certainty for both the ATO and BHP regarding the taxation treatment of our Singapore Sales and Marketing business for future years.

Our Economic Contribution Report 2019 has today been submitted to the National Storage Mechanism and will shortly be available for inspection at: [www.morningstar.co.uk/uk/NSM](http://www.morningstar.co.uk/uk/NSM). It is also available to be downloaded on the BHP website at:

<https://www.bhp.com/investor-centre/-/media/documents/investors/annual-reports/2019/bhpeconomiccontributionreport2019.pdf>

BHP's purpose is to bring people and resources together to build a better world. We are proud of the valuable contribution we make to the communities where we operate and to society as a whole. The economic contribution we make is an important part of this. Our total direct economic contribution for

FY2019 was US\$46.2 billion. This includes payments to suppliers, wages and benefits for our more than 72,000 employees and contractors, dividends, taxes and royalties, and US\$93.5 million voluntarily invested in social projects across the communities where we operate.

In FY2019, our tax, royalty and other payments to governments totalled US\$9.1 billion. Of this, 78.7 per cent or US\$7.1 billion was paid in Australia. During the last decade, we paid US\$84.3 billion globally in taxes, royalties and other payments, including US\$62.5 billion (approximately A\$71 billion) in Australia.

Below are extracted sections of our full Economic Contribution Report 2019 that together meet the UK Regulations.

## Our payments to governments

BHP has prepared this information in accordance with the UK Regulations. Our Report addresses BHP's reporting obligations under DTR 4.3A of the Financial Conduct Authority's Disclosure Guidance and Transparency Rules. The 'Basis of preparation' and 'Glossary' contain information about the content of the Report and form part of the Report.

### Payments made by country and level of government

The information on taxes paid by classification and country presented below has been prepared on the basis set out in the 'Basis of report preparation' section of the Report.

US\$ millions	Corporate income taxes	Royalty-related income taxes	Taxes levied on production	Total taxes paid	Royalties	Production entitlements	Fees	Payments for Infra-structure improvements	Signature, discovery and production bonuses	Total payments as defined by the UK Regulations	Other payments	Total payments to governments
<b>Total payments to governments</b>	<b>5393.2</b>	<b>491.4</b>	<b>157.2</b>	<b>6041.8</b>	<b>2500.2</b>	<b>164.7</b>	<b>84.1</b>	<b>0.7</b>	<b>0.0</b>	<b>8791.5</b>	<b>290.8</b>	<b>9082.3</b>
<b>Algeria(1)</b>	-	-	-	-	-	106.0	-	-	-	<b>106.0</b>	-	<b>106.0</b>
DIRECTORATE GENERAL OF TAXES	-	-	-	-	-	106.0	-	-	-	<b>106.0</b>	-	<b>106.0</b>
<b>Australia (4)</b>	<b>4252.0</b>	<b>392.4</b>	<b>37.1</b>	<b>4681.5</b>	<b>2206.8</b>	-	<b>24.7</b>	-	-	<b>6913.0</b>	<b>232.9</b>	<b>7145.9</b>
AUSTRALIAN TAXATION OFFICE	4252.0	392.4	37.1	<b>4681.5</b>	-	-	2.6	-	-	<b>4684.1</b>	40.3	<b>4724.4</b>
CENTRAL HIGHLANDS REGIONAL COUNCIL	-	-	-	-	-	-	-	-	-	-	2.4	<b>2.4</b>
ISAAC REGIONAL COUNCIL (QUEENSLAND)	-	-	-	-	-	-	-	-	-	-	7.8	<b>7.8</b>
MACKAY REGIONAL COUNCIL (QUEENSLAND)	-	-	-	-	-	-	-	-	-	-	0.5	<b>0.5</b>
SHIRE OF ASHBURTON (WESTERN AUSTRALIA)	-	-	-	-	-	-	-	-	-	-	0.4	<b>0.4</b>
SHIRE OF EAST PILBARA (WESTERN AUSTRALIA)	-	-	-	-	-	-	-	-	-	-	0.9	<b>0.9</b>
SHIRE OF LEONARA (WESTERN AUSTRALIA)	-	-	-	-	-	-	-	-	-	-	0.7	<b>0.7</b>
SHIRE OF WILUNA (WESTERN AUSTRALIA)	-	-	-	-	-	-	-	-	-	-	0.9	<b>0.9</b>
STATE OF NEW SOUTH WALES	-	-	-	-	116.3	-	1.4	-	-	<b>117.7</b>	6.7	<b>124.4</b>
STATE OF QUEENSLAND	-	-	-	-	801.8	-	1.0	-	-	<b>802.8</b>	49.3	<b>852.1</b>
STATE OF SOUTH AUSTRALIA	-	-	-	-	48.3	-	3.9	-	-	<b>52.2</b>	16.5	<b>68.7</b>
STATE OF VICTORIA	-	-	-	-	-	-	-	-	-	-	6.2	<b>6.2</b>
STATE OF WESTERN AUSTRALIA	-	-	-	-	1078.3	-	15.7	-	-	<b>1094.0</b>	87.6	<b>1181.6</b>
TOWN OF PORT HEDLAND (WESTERN AUSTRALIA)	-	-	-	-	-	-	-	-	-	-	12.1	<b>12.1</b>
WESTERN AUSTRALIA DEPARTMENT OF MINES AND PETROLEUM	-	-	-	-	162.1	-	-	-	-	<b>162.1</b>	-	<b>162.1</b>
OTHER AUSTRALIAN GOVERNMENTS	-	-	-	-	-	-	0.1	-	-	<b>0.1</b>	0.6	<b>0.7</b>





DEPARTMENT OF NATURAL RESOURCES (LOUISIANA)	-	-	-	-	4.5	-	0.1	-	-	4.6	-	4.6
DEWITT COUNTY TEXAS COUNTY TAX ASSESSOR-COLLECTOR	-	-	-	-	-	-	-	-	-	-	1.1	1.1
INTERNAL REVENUE SERVICE	-	-	-	-	-	-	-	-	-	-	1.3	1.3
LOUISIANA DEPARTMENT OF REVENUE	18.1	-	24.4	42.5	-	-	-	-	-	42.5	6.7	49.2
RAILROAD COMMISSION OF TEXAS	-	-	-	-	-	-	0.2	-	-	0.2	0.2	0.4
STATE OF TEXAS	-	-	-	-	-	-	-	-	-	-	12.1	12.1
TEXAS COMPTROLLER	-	-	70.6	70.6	-	-	-	-	-	70.6	-	70.6
US DEPARTMENT OF THE INTERIOR	-	-	-	-	0.1	-	-	-	-	0.1	-	0.1
US DEPARTMENT OF THE TREASURY	-	-	-	-	-	-	-	-	-	-	0.1	0.1
VAN BUREN COUNTY COLLECTOR	-	-	-	-	-	-	-	-	-	-	0.2	0.2
OTHER US GOVERNMENTS	-	-	-	-	-	-	-	-	-	-	0.1	0.1

Figures are rounded to the nearest decimal point.

(1) Production entitlements of 1.9 million barrels of oil equivalent (boe) paid in-kind.

(2) Income and mining taxes are paid in Chile on a calendar year basis. However, for the purpose of this Report, taxes paid are included for BHP's financial year (1 July 2018 to 30 June 2019). For reference, income tax and specific tax on mining activities paid by Escondida and Pampa Norte for Calendar Year 2018 amount to US\$672 million (Escondida) and US\$180 million (Pampa Norte).

(3) Production entitlements of 2.7 million boe paid in-kind.

(4) Payments made for royalties in relation to the North West Shelf of \$162.1 million relate to the ad valorem royalty over which the Commonwealth has jurisdiction. Under the Offshore Petroleum (Royalty) Act 2006, the royalties are assessed and collected on behalf of the Commonwealth by the Western Australia Department of Mines and Petroleum (DMP). Payments are currently allocated between the Commonwealth (approximately one third) and Western Australia (approximately two thirds).

## Payments made on a project-by-project basis

Taxes paid by classification and project are presented in this section and have been prepared on the basis set out in the 'Basis of report preparation' section of the Report.

US\$ millions	Corporate income taxes	Royalty-related income taxes	Taxes levied on production	Total taxes paid	Royalties	Production entitlements	Fees	Payments for Infra-structure improvements	Signature, discovery and production bonuses	Total payments as defined by the UK Regulations	Other payments	Total payments to governments
<b>Total payments to governments</b>	<b>5393.2</b>	<b>491.4</b>	<b>157.2</b>	<b>6041.8</b>	<b>2500.2</b>	<b>164.7</b>	<b>84.1</b>	<b>0.7</b>	<b>-</b>	<b>8791.5</b>	<b>290.8</b>	<b>9082.3</b>
<b>Petroleum</b>	<b>411.9</b>	<b>428.9</b>	<b>60.1</b>	<b>900.9</b>	<b>401.5</b>	<b>164.7</b>	<b>27.0</b>	<b>0.2</b>	<b>-</b>	<b>1494.3</b>	<b>23.6</b>	<b>1517.9</b>
Algeria Joint Interest Unit (1)	0.1	-	-	0.1	-	106.0	-	-	-	106.1	-	106.1
Australia Joint Interest Unit	2.1	-	-	2.1	-	-	-	-	-	2.1	-	2.1
Australia Production Unit - Victoria	5.4	18.2	-	23.6	-	-	-	-	-	23.6	-	23.6
Australia Production Unit - Western Australia	-32.8	101.8	-	69.0	-	-	0.4	-	-	69.4	5.0	74.4
Bass Strait	104.3	308.9	-	413.2	-	-	-	-	-	413.2	7.6	420.8
Closed Sites	8.9	-	-	8.9	-	-	0.4	0.2	-	9.5	0.6	10.1
Gulf of Mexico	4.2	-	23.0	27.2	239.4	-	10.2	-	-	276.8	3.2	280

North West Shelf	280.8	-	37.1	317.9	162.1	-	0.1	-	-	480.1	-	480.1
Trinidad and Tobago Production Unit (2)	0.7	-	-	0.7	-	58.7	14.3	-	-	73.7	2.1	75.8
UK Production Unit	29.4	-	-	29.4	-	-	-	-	-	29.4	-	29.4
Other	8.8	-	-	8.8	-	-	1.6	-	-	10.4	5.1	15.5
<b>Minerals Americas</b>	<b>1066.2</b>	<b>99</b>	<b>0.8</b>	<b>1166</b>	<b>-</b>	<b>-</b>	<b>32.5</b>	<b>0.5</b>	<b>-</b>	<b>1199</b>	<b>15</b>	<b>1214</b>
Escondida	762.3	98.9	-	861.2	-	-	16.5	-	-	877.7	0.6	878.3
New Mexico Coal	-1.0	-	-	-1.0	-	-	-	-	-	-1.0	-	-1.0
Other Copper	3.2	-	-	3.2	-	-	3.9	-	-	7.1	1.6	8.7
Pampa Norte	244.7	0.1	-	244.8	-	-	2.8	-	-	247.6	1.6	249.2
Potash Canada	14.7	-	-	14.7	-	-	9.3	0.5	-	24.5	3.7	28.2
Head office - BHP Billiton Brasil Ltda	23.9	-	0.8	24.7	-	-	-	-	-	24.7	7.5	32.2
Head office - RAL Cayman Inc	18.4	-	-	18.4	-	-	-	-	-	18.4	-	18.4
<b>Minerals Australia</b>	<b>3734.1</b>	<b>-36.5</b>	<b>-</b>	<b>3697.6</b>	<b>2044.7</b>	<b>-</b>	<b>24.3</b>	<b>-</b>	<b>-</b>	<b>5766.6</b>	<b>210.3</b>	<b>5976.9</b>
IndoMet	-1.4	-	-	-1.4	-	-	-	-	-	-1.4	-	-1.4
New South Wales Energy Coal	-	-	-	-	116.3	-	3.4	-	-	119.7	9.6	129.3
Nickel West	54.5	-	-	54.5	20.8	-	3.5	-	-	78.8	13.6	92.4
Olympic Dam	30	-	-	30	48.3	-	4.2	-	-	82.5	17	99.5
Other Coal	8.5	-	-	8.5	-	-	-	-	-	8.5	4.1	12.6
Queensland Coal (3)	1015	-	-	1015	799.8	-	1	-	-	1815.8	71	1886.8
Western Australia Iron Ore	2627.5	-36.5	-	2591	1059.5	-	12.2	-	-	3662.7	95	3757.7
<b>Group and Unallocated</b>	<b>162.9</b>	<b>-</b>	<b>-</b>	<b>162.9</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>162.9</b>	<b>15.5</b>	<b>178.4</b>
Corporate	142.4	-	-	142.4	-	-	-	-	-	142.4	12.3	154.7
Commercial	20.5	-	-	20.5	-	-	-	-	-	20.5	3.2	23.7
<b>Discontinued Operations</b>	<b>18.1</b>	<b>-</b>	<b>96.3</b>	<b>114.4</b>	<b>54</b>	<b>-</b>	<b>0.3</b>	<b>-</b>	<b>-</b>	<b>168.7</b>	<b>26.4</b>	<b>195.1</b>
North America Shale (Fayetteville)	-	-	1.3	1.3	-	-	-	-	-	1.3	2.1	3.4
North America Shale (Haynesville)	-	-	95.0	95.0	54.0	-	0.1	-	-	149.1	21	170.1
North America Shale (Permian Basin, Eagle Ford)	-	-	-	-	-	-	0.2	-	-	0.2	3.3	3.5
Other	18.1	-	-	18.1	-	-	-	-	-	18.1	-	18.1

Figures are rounded to the nearest decimal point.

(1) Production entitlements of 1.9 million boe paid in-kind.

(2) Production entitlements of 2.6 million boe paid in-kind.

(3) Royalties, fees and other payments made by BHP Billiton Mitsubishi Alliance Coal Operations Pty Ltd have been included in total payments to the extent of BHP's ownership of the operating entity, being 50 per cent.

## **Basis of report preparation**

This Report has been prepared in accordance with UK Regulations.

The Report is prepared from data recorded in our financial systems, being the same data and financial systems used to prepare our financial statements. The Report is prepared on a basis that is consistent with the draft guidance material produced by the Australian Accounting Standards Board.

Taxes, royalties and other payments to governments are presented in this Report on a cash paid and cash received basis for the year ended 30 June 2019.

This Report includes all such amounts paid and received by BHP in respect of each of our operations, including the Onshore US assets, whose sale by BHP was announced on 27 July 2018. Completion of the sales was announced on 28 September 2018 (Fayetteville Onshore US gas assets) and 1 November 2018 (Eagle Ford, Haynesville and Permian Onshore US oil and gas assets). For our controlled assets, amounts included in our total payments to governments are 100 per cent of the assets' payments to governments. For our non-operated and operated joint ventures, amounts included in our payments to governments are 100 per cent of the amounts paid by BHP and, in the case of BHP Mitsubishi Alliance (BMA), 50 per cent of payments made by the operating entity for BMA in which BHP has a 50 per cent ownership. For our investments in joint ventures and associates that are equity accounted by BHP, no amounts have been included in our total payments to governments as BHP is not the operator and does not make payments on behalf of the operation. For information purposes, 100 per cent of the payments made by our significant equity accounted investments have been shown on page 4 even though no amounts have been included in our total payments to governments. Taxes, royalties and other payments, both cash and in-kind (non-cash), to governments, net of refunds, are collectively referred to in this Report as 'Total payments to governments' and include the following payment categories:

### **Corporate income taxes**

Payments to governments based on taxable profits under legislated income tax rules. This also includes payments made to revenue authorities in respect of disputed claims and withholding taxes. For the purposes of allocating Corporate income taxes to particular countries

in 'Payments made by country and level of government' in this Report, withholding taxes are allocated to the country to which the withholding taxes are remitted – for example, Chilean withholding taxes paid to the Chilean Government are allocated to Chile.

### **Royalty-related income taxes**

Payments to governments in relation to profits from the extraction of natural resources, including Petroleum Resource Rent Tax (PRRT) in Australia and Specific Tax on Mining Activities (STMA) in Chile. This also includes payments to revenue authorities in respect of disputed claims. Royalty-related income taxes are presented as income tax in section 5.1.1 Consolidated Income Statement in the Annual Report 2019.

### **Taxes levied on production**

Payments to governments in relation to crude excise, carbon tax and severance tax on the extraction of natural resources. Taxes levied on production are presented as expenses, not income tax, in section 5.1.1 Consolidated Income Statement in the Annual Report 2019.

### **Royalties**

Payments to governments in relation to revenue or production generated under licence agreements. This also includes payments to revenue authorities in respect of disputed claims. Royalties are presented as expenses, not income tax, in section 5.1.1 Consolidated Income Statement in the Annual Report 2019. Royalty-related income taxes are excluded from Royalties.

### **Production entitlements**

Payments to governments entitled to a share of production under production-sharing agreements. Production entitlements are most often paid in-kind. In-kind payments are measured based on the market value of the commodity on the date of delivery to the government.



## **Fees**

Payments to governments in the form of fees typically levied on the initial or ongoing right to use a geographical area for exploration, development and/or production. This includes licence fees, rental fees, entry fees and other payments for licences and/or concessions.

## **Payments for infrastructure improvements**

Payments to governments for the construction of public infrastructure, such as roads, bridges and port facilities.

## **Dividend payments**

Payments to governments with ownership interests in specific assets; not payments to governments as holders of ordinary shares in BHP. There were no dividend payments to governments for the year ended 30 June 2019.

## **Signature, discovery or production bonuses**

Payments to governments upon signing an oil and gas lease, when discovering natural resources, and/or when production has commenced. There were no payments of signature, discovery or production bonuses to governments for the year ended 30 June 2019.

## **Other payments**

Payments to governments under other legislated tax rules such as payroll tax, fringe benefits tax, excise duties, property tax, land tax and black lung tax. These payments are not specifically required to be disclosed by the UK Regulations.

## **Excluded amounts**

The following are not included in total payments to governments:

### **Taxes collected**

Tax payments made to governments on behalf of our employees.

### **Indirect taxes**

Tax payments made to, or received from, governments in the nature of sales tax, value added tax and goods and services tax.

### **Penalties and interest**

Payments to governments resulting from the imposition of penalties, fees or interest.

## **Other**

Certain payments, whether made as a single payment or as a series of related payments below US\$100,000 (being a lower amount than the £86,000 threshold set out in the UK Regulations).

## **Projects**

Payments made on a project-by-project basis (Payments made on a project-by-project basis section of this Report) present payments by entity when not specifically attributable to a project.

Payments in relation to Corporate Head Office and the Commercial function have been included in the Total payments to governments as defined by the UK Regulations. The payments are not attributable to specific projects. 'Corporate Head Office' and 'Commercial Offices' comprise functional support for the Group that in FY2019 consists entirely of projects that undertake relevant activities as defined by the UK Regulations.

The Payments made on a project-by-project basis section presents corporate income tax amounts for each project/entity taking into account the effects of tax consolidation in Australia. These include the following:

- losses from one entity can be offset against taxable income of another entity within the same tax consolidated group;
- only the head entity of a tax consolidated group is liable to make corporate income tax payments to the Australian Tax Office (ATO);
- typically, corporate tax groups allocate the aggregate corporate income tax payments made by the head entity to the ATO amongst entities within the Australian tax consolidated group.

### **Reporting currency**

All payments to governments on pages 18 to 23 have been reported in US dollars. Payments denominated in currencies other than US dollars are translated for this Report at the exchange rate at the date of the payment.

### **Discontinued operations**

Following BHP's sale of the Onshore US assets announced on 27 July 2018, the contribution of these assets to the Group's tax payments are presented in this Report as Discontinued operations (refer to Section 5 in the Annual Report 2019 for more information on the accounting treatment). To enable more meaningful comparisons with prior year disclosures, and to comply with applicable statutory requirements, this Report includes data from Continuing and Discontinued operations, unless specified otherwise. Refer to the Glossary section for definitions of reported data.

### **Glossary**

#### **Adjusted effective tax rate**

Total taxation expense for our Continuing operations excluding exceptional items and exchange movements included in taxation expense divided by Profit for our Continuing operations before taxation and exceptional items.

#### **Adjusted effective tax and royalty rate**

Total taxation expense for our Continuing operations excluding exceptional items and exchange movements included in taxation expense plus royalty expense divided by Profit for our Continuing operations before taxation, royalties and exceptional items.

#### **BHP or the Group**

BHP Group Limited and BHP Group Plc and their respective subsidiaries.

#### **Current tax expense**

The amount of corporate income tax and royalty-related income tax and production entitlements currently payable and attributable to the year, measured at rates enacted or substantively enacted at year-end, together with any adjustment to those taxes payable in respect of previous years.

#### **Deferred tax expense**

The amount of corporate income tax and royalty-related income tax and production entitlements attributable to the current year but payable in future years provided using the balance sheet liability method.

#### **Employees and contractors**

The weighted average number of employees and contractors across the Group is calculated from the actual number of employees on the last day of the month over the 10-month period from July 2018 to April 2019 at each BHP-controlled site. It includes the Executive Director, 100 per cent of employees of subsidiary companies and our share of proportionate consolidated entities. Employees of equity accounted entities are not included. Part-time employees are included on a full-time equivalent basis. Employees of businesses acquired or disposed of during the year are included for the period of ownership.

#### **Government**

Any national, regional or local authority of a country (includes a department, agency or undertaking that is a subsidiary undertaking where the authority is the parent undertaking).

### **Income tax expense**

The total of current tax expense and deferred tax expense.

### **Low-tax jurisdictions**

In classifying which countries are 'low-tax jurisdictions', we have applied the EU list of non-cooperative jurisdictions for tax purposes, issued in December 2017 by the European Union and subsequently updated. The updated list used in this Report was issued in June 2019.

**Payments to shareholders, lenders and investors** Geographical distribution is based on the registered address of shareholders (for returns to shareholders including dividends) and country of incorporation of the borrower for interest payments and loan repayments.

### **Profit before taxation**

Profit before taxation when presented by country is adjusted for intercompany dividends.

### **Project**

Consistent with the UK Regulations, a project is defined as the operational activities that are governed by a single contract, licence, lease, concession or similar legal agreements and form the basis for payment liabilities with a government. If multiple such agreements are 'substantially interconnected', they may be considered a project. For these purposes, 'substantially interconnected' means forming a set of operationally and geographically integrated contracts, licences, leases or concessions or related agreements with substantially similar terms that are signed with a government, giving rise to payment liabilities.

### **Report**

The Report has been prepared for BHP's financial year from 1 July 2018 to 30 June 2019.

### **Social investment**

Includes community contributions and associated administrative costs (including costs borne by BHP to facilitate the operation of the BHP Foundation), and BHP's equity share in community contributions for both operated and non-operated joint ventures.

### **UK Regulations**

The Reports on Payments to Governments Regulations 2014, as amended by the Reports on Payments to Governments (Amendment) Regulations 2015. The UK Regulations implement the EU Accounting Directive (Chapter 10, Directive 2013/34/EU) in the United Kingdom.

### **BHP Group Plc Registration number 3196209**

Registered in England and Wales

Registered Office: Nova South, 160 Victoria Street, London SW1E 5LB United Kingdom

**A member of the BHP Group which is headquartered in Australia**