

Periodic disclosures

Disclosure controls

1.1.1. Disclosure controls for periodic disclosures

The content in, and filing of, all of BHP's periodic disclosure documents must comply with relevant laws and regulations in each of the jurisdictions where BHP is listed. The purpose of these disclosure controls is to support the fulfilment of the relevant regulatory requirements.

These disclosure controls have been approved by the Disclosure Committee. Material changes to these controls must be approved by the Disclosure Committee.

1.1.2. Documents requiring disclosure controls

These disclosure controls must be in place for all periodic disclosure documents. Periodic disclosure documents are disclosure documents that BHP files to the stock exchanges under regulatory requirements, excluding disclosures made under a continuous disclosure requirement.

Periodic disclosure documents include:

- the Operational Review (quarterly);
- the Results Announcements and financial statements (annual and half-year);
- debt investor documents such as the prospectus for the Euro or Australian Medium Term Notes or US SEC Forms F-3 and F-6;
- Climate Change Reports or Climate Transition Action Plans;
- the Annual Reporting Suite documents including the Annual Report, US SEC Form 20-F, Economic Contribution Report, Modern Slavery Statement and Notice of Meeting. (Note that the Annual Reporting documents will have additional controls to those that are set out in this document and these are managed by the Annual Report Project Team); and
- other disclosure documents (including other United States disclosure statements).

1.1.3. Principles

- All disclosure documents must comply with relevant regulatory requirements.
- The information disclosed in each disclosure document must be accurate, balanced and provide investors with appropriate information to make informed investment decisions. This is to protect BHP from the potential liability under law and regulation for misleading statements, as well as from a reputational perspective.
- The relevant filing requirements must be met for each disclosure document. Consideration must be given to whether, during the preparation of the document, information becomes known such as to trigger continuous disclosure requirements. If so, the relevant information must be released immediately to the stock exchanges (prior to the scheduled release date of the periodic disclosure document), subject to the exceptions set out in the applicable listing rules and regulations.

1.1.4. Disclosure controls required

The Global Function that has overall ownership of preparation of the disclosure document is accountable for ensuring the following disclosure controls are in place.

	Control	Action
1.	Ownership of overall process	Identify the single Global Function that has overall accountability of the disclosure document preparation process (Global Function Owner). Global Function Owners are: Investor Relations (Operational Review and Results Announcements ('News Release-front end disclosures')); Accounting & Reporting (Results Announcements Financial Information and Annual Report Financial Statements); External Affairs (Annual Reporting Suite) and Treasury (Debt Programs disclosures).
2.	Allocation of content and section managers	The Global Function Owner must allocate managers to content or sections of the disclosure document, to enable allocation of drafting and verification responsibilities to appropriate subject matter experts.
3.	Timetable	The Global Function Owner must prepare and distribute a disclosure document project timetable that allows sufficient time to prepare accurate and timely disclosures.
4.	Content checklist	<p>The Global Function Owner must arrange for a content checklist to be prepared or updated for the whole disclosure document or particular sections of the document. Checklists must be updated and completed prior to the disclosure document being presented for approval.</p> <p>If a checklist is not used, external legal advisers or the external auditor, as appropriate, must confirm that the disclosure document meets all relevant regulatory requirements.</p>
5.	Internal legal review	The Global Function Owner must arrange for internal legal review.
6.	Arrangements for external review	As required, external legal review will be arranged. External audit or review must be arranged for financial reports set out in disclosure documents (Results Announcements and Annual Report).
7.	Verification	<p>The Global Function Owner must identify the key statements in the disclosure document that require verification, and communicate the verification requirements and process to the content and section managers.</p> <p>Content and section managers must identify appropriate support for key statements, with an additional focus on any forward-looking statements (BHP must be able to show reasonable grounds for any forward looking statements). Content and section managers must also keep a record of that support (verification file).</p>
8.	Filing and registration requirements	The Global Function Owner must work with Group Governance to ensure filing and registration requirements are met.
9.	Continuous disclosure information review	Any information that becomes known through the course of preparing the periodic disclosure which is material and could require immediate disclosure to the stock exchanges must be notified to the relevant Disclosure Officer or the Group Company Secretary by the Global Function as soon as possible by the Global Function Owner.
10.	Approvals and document execution	<p>The Global Function Owner must identify the internal approvals required for the disclosure document and reflect those requirements in the timetable. Document approval and execution must be arranged to meet regulatory requirements.</p> <p>Board approval is required for the Full Year Results Announcement, Half Year Results Announcement and the Annual Reporting Suite.</p>