

# Periodic disclosures

## Disclosure controls

### Why is this important?

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 these requirements.

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

Further information on BHP's processes designed to ensure that the Group meets the disclosure obligation of the stock exchanges on which our securities are quoted, and the way in which information is communicated to shareholders, the investment community and the market can be found in our public Market Disclosure and Communications policy and the Corporate Governance Statement within our Annual Report.

### Which documents will require these 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 (Annual and Interim);
- debt investor documents such as the prospectus for the Euro or Australian Medium Term Notes, (on SEC Forms F-3 and F-6);
- the Annual Reporting Suite of documents including the Annual Report, Form 20-F and Notices of Meeting.

(Note that the Annual Reporting documents will have additional controls to those that are set out in this document, as managed by the Annual Report Project Team.)

### Principles

1. All disclosure documents must comply with relevant regulatory requirements.
2. The information disclosed by BHP in each disclosure document must be accurate, fair and not misleading.
3. 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).

## Disclosure controls required

The Group 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.	<b>Ownership of overall process</b>	Identify the single Group Function that has overall accountability of the disclosure document preparation process ( <b>Group Function Owner</b> ).
2.	<b>Allocation of content and section managers</b>	The Group 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.	<b>Timetable</b>	The Group Function Owner must prepare and distribute a disclosure document project timetable that allows sufficient time to prepare accurate and timely disclosures.
4.	<b>Content checklist</b>	<p>The Group 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 external auditor, as appropriate, must confirm that the disclosure document meets all relevant regulatory requirements.</p>
5.	<b>Internal legal review</b>	The Group Function Owner must arrange for internal legal review.
6.	<b>Arrangements for external review</b>	As required, external legal review will be arranged if a checklist is not prepared. External audit or review must be arranged for financial reports set out in disclosure documents (Results Announcements and Annual Report).
7.	<b>Verification</b>	<p>The Group 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 and keep a record of that support (verifiable file).</p>
8.	<b>Filing and registration requirements</b>	The Group Function Owner must work with Group Governance to ensure filing and registration requirements are met.
9.	<b>Continuous disclosure information review</b>	<p>Referral information that becomes known through the course of preparing the periodic disclosure must be notified to Group Governance by the Group Function as soon as possible by the Group Function Owner.</p> <p>Analysis and a recommendation to the Disclosure Committee will be prepared if information is identified that could require immediate disclosure.</p>
10.	<b>Approvals and document execution</b>	<p>The Group 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>Final approval of the Results Announcements and the Annual Report is by the Board. Release to the stock exchanges is either approved by the Board or delegate, usually the Group General Counsel &amp; Company Secretary.</p>