

Human Rights Policy Statement

Our Commitment

Human rights are the basic political, civil, economic, labour, social and cultural rights and freedoms to which all people are entitled, without discrimination¹. It is expected that businesses respect human rights throughout the value chain.

We believe that respecting human rights and contributing to the realisation of rights is not only critical to the sustainable operation of our business, it is the right thing to do. We see human rights as critical to our ability to contribute meaningful and ongoing social value to our stakeholders. Simply put, our success depends upon how well we respect the rights of individuals and groups who interact with and are impacted by our business operations and relationships.

We demonstrate our commitment to respecting human rights by:

- Respecting internationally recognised human rights as set out in the Universal Declaration on Human Rights.
- Complying with applicable laws and regulations of the countries in which we operate, and where differences exist between [Our Code of Conduct](#) (*Our Code*) and local customs, norms, rules or regulations, we apply the higher standard.
- Operating in a manner consistent with the United Nations (UN) Guiding Principles on Business and Human Rights, the 10 UN Global Compact Principles, the Voluntary Principles on Security and Human Rights and the International Council on Mining and Metals (ICMM) Indigenous Peoples Position Statement.

We are committed to respecting and contributing to the realisation of all human rights, prioritising those based on risk to the people, including vulnerable or marginalised groups, potentially impacted by our operations and business relationships and the related risk to BHP. These include rights related to:

- workplace health, safety and labour conditions – including recognition of freedom of association and voluntary collective bargaining and the avoidance of forced and bonded labour, human trafficking and child labour;
- freedom from discrimination based on personal attributes unrelated to job performance, such as race, ethnicity, gender identity, sexual orientation, intersex status, physical or mental disability, mental illness, relationship status, religion, political opinion, pregnancy, breastfeeding or family responsibilities;
- the activities of security providers;
- land access and use;
- water and sanitation;
- Indigenous peoples' culture, identity, traditions and customs; and
- communities that live near our operations – including resettlement and consultation and consent processes.

We recognise we must continually assess the human rights context of our activities, including impacts that we may cause and those to which we may contribute or be directly linked. This determines the prevention, mitigation and remedy measures required, including using leverage in our business relationships.

¹ As defined by the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.

Our Approach

We respect human rights by embedding relevant international standards and frameworks in our systems and processes.

Governance and Due Diligence

Our Code sets our human rights commitments and the standards of behaviour for our people, as well as our expectations for all third parties we deal with, including our suppliers, contractors and customers, community partners and governments. The human rights commitments in *Our Code* are implemented through mandatory minimum performance requirements in [Our Requirements](#) standards and through our Policy Statements. We recognise that human rights may be impacted by many different business activities, therefore *Our Requirements* standards require we take a risk-based approach that considers human rights, social and community, environmental, direct, indirect and cumulative impacts in a range of circumstances, including:

- For our operations, we set the standard and provide guidance for regular completion of human rights due diligence and human rights impact assessments; planning, documenting and responding to stakeholder engagement including complaints and grievance management; respecting Indigenous peoples' rights and meeting our commitment to the ICMM Indigenous Peoples Position Statement; and considering community resettlements.
- For decisions around acquisitions and divestments, new activities in high-risk countries and major projects, human rights, social and community impact issues must be considered and a human rights impact assessment performed for the key phases of our major projects.
- For the closure of our sites, we require a risk assessment that includes risks associated with social, environmental, direct, indirect and cumulative impacts and an external stakeholder engagement plan, including community, for the site lifecycle.
- *Our Requirements for Security, Crisis and Emergency Management and Business Continuity Plans* standard sets out how we must comply with the Voluntary Principles on Security and Human Rights.

- *Our Requirements for Supply* standard maintains supplier prequalification, contracting and ongoing monitoring requirements to manage supplier risks, including in relation to human rights, and applies globally defined *Minimum supplier requirements* for suppliers and contractors.
- Our [Indigenous Peoples Policy Statement](#) and Strategy is aligned to the ICMM Indigenous Peoples Position Statement and drives our approach to engaging and supporting Indigenous peoples and addressing the principle of free, prior and informed consent.
- We acknowledge the connection between environmental sustainability and human rights and, through *Our Requirements for Environment and Climate Change* standard, set standards and governance and risk management processes to sustainably manage air, land, biodiversity and water resources.
- Our Position Statements on [Climate Change](#) and [Water Stewardship](#) recognise the shared challenge of addressing these global issues and set our commitments and approaches to playing our part.

Human rights are also integrated into BHP's risk management system through these standards. Our Board [Sustainability Committee](#) assists with governance and monitoring of our approach, overseeing health, safety, environment, community (HSEC) and other human rights matters, including the adequacy of the systems in place to identify and manage HSEC-related risks, legal and regulatory compliance and overall performance.

Stakeholder engagement

Meaningful stakeholder engagement is essential to our efforts to meet the responsibility to respect human rights. We engage with and respond to civil society, communities and investors on issues related to our business and strive for transparency in our interactions.

We undertake regular engagement with our stakeholders to listen, understand, prevent and mitigate the adverse impacts of our activities on human rights from new country entry to closure. We recognise the significance of two-way dialogue in highlighting concerns and perspectives and human rights are a core element of our approach to social value assessments and planning.

Our [Forum on Corporate Responsibility](#) provides access to independent civil society leaders in various sustainability fields who help us engage with our stakeholders, develop our standards and gain insight into current and emerging issues. This group meets regularly with BHP's CEO and other senior leaders and also engages with our Board.

Relationships

We seek opportunities to work with our employees, contractors and suppliers to develop and participate in knowledge-sharing and training, increasing our shared understanding of human rights and improving our collective performance. We seek to use our leverage, wherever possible, to encourage our non-operated joint ventures and minority interests to adopt similar practices and standards, aligned to international human rights best practice.

We recognise the potential for human rights risks in all jurisdictions and are committed to building an ongoing dialogue with stakeholders, including industry associations, civil society, governments and regulators to improve our understanding of these risks and promote respect through engagement, collaboration and public policy.

Remediation and Reporting

BHP's *Speaking up with confidence* guidance note, embedded in *Our Code*, explains how to protect people who speak up. It applies to everyone. We encourage our employees, everyone who works with us, and all those affected by our business globally to promptly raise a concern about anything that they reasonably believe may be illegal, improper or involve misconduct. This includes a concern about a safety or environmental issue, a financial matter (including tax affairs), a breach of *Our Charter* values or *Our Code*, including a human rights violation, or a concern about retaliation for speaking up.

A confidential, 24-hour, multilingual [business conduct hotline \(EthicsPoint\)](#) and local-level, complaints and grievance mechanisms are required to be in place and we acknowledge, investigate as appropriate and document all concerns raised through these mechanisms. Where concerns are investigated and substantiated, we take appropriate remedial actions, advise the reporter (where possible) and document the outcomes. We will provide, or cooperate in providing, appropriate remediation where we have caused or contributed to adverse human rights impacts. We report annually on EthicsPoint cases and complaints and grievances.

BHP is committed to respecting the role of human rights defenders and we acknowledge the risks they face in

upholding civic freedoms and their significant voice in understanding and addressing human rights challenges in the areas in which we operate. Under *Our Code*, BHP does not allow any form of punishment, discipline or retaliatory action to be taken against anyone for speaking up, or cooperating with an investigation.

We have systemic processes to audit adherence to BHP's mandatory minimum human rights performance requirements across our operated activities, and develop improvement plans where necessary. We report annually on our human rights performance, including key elements of our commitments to international standards, through our Sustainability Report and applicable Modern Slavery reporting laws.

This Policy Statement will be reviewed annually.