



# BHP

## Country- by-Country Report

2022

**Bringing people and  
resources together to  
build a better world**



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## Introduction

### BHP has a long-standing commitment to transparency

Our Economic Contribution Report discloses our total direct economic contribution, including the taxes and royalties we paid on a country-by-country and project-by-project basis as well as information on our intra-group transactions. It aims to provide a greater understanding of BHP's global tax profile, tax contributions and the manner in which we govern and manage our tax obligations.

In FY2022, our tax, royalty and other payments to governments totalled US\$17.3 billion. Of this, 77.5 per cent or US\$13.4 billion was paid in Australia. This makes BHP one of the largest corporate taxpayers in Australia in FY2022. During the last decade, we paid US\$90.5 billion globally in taxes, royalties and other payments, including US\$70.0 billion (approximately A\$90.1 billion) in Australia. Our global adjusted effective tax rate in FY2022 was 32.1 per cent, which is broadly in line with our average adjusted effective tax rate over the past decade of 33.3 per cent. Once royalties are included, our FY2022 rate increases to 38.9 per cent.

We began our journey of voluntarily disclosing our payments of taxes and royalties in 2000 and since then, have progressively increased the detail of these annual disclosures meeting global and local tax transparency requirements but also voluntarily disclosing additional information above these requirements. Consistent with our commitment to transparency, we support the voluntary publication of country-by-country reports containing detailed quantitative data, such as revenue from related and unrelated parties, profit/(loss) before tax, effective tax rate and number of employees for each country in which a subsidiary entity is a tax resident and are again publishing our Country-by-Country Report data for FY2022.

We disclose our Country-by-Country Report data to incorporate the requirements of the Global Reporting Initiative (GRI) Standard 207: Tax issued by the Global Sustainability Standards Board. We provide additional relevant information for certain jurisdictions to assist with the interpretation of Country-by-Country Report data.

In this regard, this publication supplements and should be read in conjunction with our Economic Contribution Report 2022, which collectively comply in full with GRI 207.

The Basis of Report preparation section contains information about the content of this Report.





# 1 FY2022 total economic contribution

## Global Total economic contribution

Over last 10 years

**US\$90.5bn**

Global income taxes, royalty-related income taxes, royalties and other payments to governments

In FY2022

**US\$78.1bn**

Total economic contribution



**US\$17.3bn**

Income taxes, royalty-related income taxes, royalties and other payments to governments

**32.1%**

global adjusted effective tax rate

**38.9%**

once royalties are included

## Australia Total economic contribution

Over last 10 years

**~A\$90.1bn**

(US\$70.0bn) in Australian taxes, royalty-related income taxes, royalties and other payments to governments

In FY2022

**A\$79.3bn**

(US\$57.5bn) Total economic contribution in Australia



**A\$18.5bn\***

(US\$13.4bn) in Australian taxes, royalty-related income taxes, royalties and other payments to governments

**33.9%**

Australian adjusted effective tax rate

**42.7%**

once royalties are included

\* Calculated based on A\$ denominated payments.

## 2 Our Country-by-Country Report

### 2.1 Asia Pacific

Tax jurisdiction	Revenues from third-party sales US\$M	Revenues from intra-group transactions with other tax jurisdictions US\$M	Profit/(loss) before tax US\$M	Corporate income tax accrued on profit/(loss) US\$M	Country-by-Country effective corporate tax rate %	Corporate income tax paid on a cash basis US\$M	Number of employees	Tangible assets other than cash and cash equivalents US\$M
Australia	6,719.0	43,161.0	28,313.6	9,358.8	33.1	8,794.3	49,420	44,895.8
China	0.7	21.3	1.3	0.6	44.1	1.7	78	1.5
India	0.3	5.9	0.8	0.4	43.9	0.2	34	0.1
Indonesia <sup>1</sup>	—	—	(0.5)	—	—	—	—	—
Japan	0.2	2.5	0.5	0.2	33.8	0.2	13	1.0
South Korea <sup>2</sup>	—	—	—	—	—	—	—	—
Malaysia	0.5	41.7	3.0	0.8	27.7	0.9	642	14.9
Philippines	—	43.8	2.9	2.9	100.8	2.9	754	23.2
Singapore	50,492.2	494.2	1,988.0	102.7	5.2	45.7	504	491.3

Figures are rounded to the nearest decimal point.

1 Legacy administrative support services (in liquidation).

2 Our presence relates to an entity that conducted minimal activities through a branch in this jurisdiction.

#### Australia

BHP Group Limited's registered office and global headquarters are located in Melbourne, Australia. On 31 January 2022, we unified our company structure under BHP Group Limited, with a primary listing on the Australian Securities Exchange.

Our Minerals Australia business includes operated assets in Western Australia, Queensland, New South Wales and South Australia, focused on iron ore, metallurgical coal, copper, nickel and energy coal. On 3 May 2022, the divestment of our 80 per cent interest in BHP Mitsui Coal Pty Ltd (BMC), a metallurgical coal joint venture in Queensland operated by BMC, to Stanmore Resources was completed.

In FY2022, our Petroleum assets (including assets located in Australia) have been presented as Discontinued operations in BHP's Annual Report 2022. The merger of BHP's Petroleum business with Woodside Energy was completed on 1 June 2022 and the information is included up to the point of completion of sale in this Report (refer to Basis of Report preparation section).

Corporate income tax accrued on profit/loss is higher than the statutory corporate tax rate of 30 per cent primarily due to 'top up' tax being payable under the Australian controlled foreign company rules on Australian sourced profits of our Singapore Marketing operations, and petroleum production taxes.

BHP is one of the largest taxpayers in Australia.

#### China

The corporate office in Shanghai, China primarily provides marketing and logistics services to the Group.

Corporate income tax accrued on profit/loss is higher than the statutory corporate tax rate of 25 per cent, predominantly due to foreign exchange adjustments.

#### India

The corporate office in New Delhi, India primarily provides marketing and logistics services to the Group.

Corporate income tax accrued on profit/loss is higher than the statutory corporate tax rate of 25 per cent, predominantly due to foreign exchange adjustments.

#### Japan

The corporate office in Tokyo, Japan primarily provides marketing and logistics services to the Group.

Corporate income tax accrued on profit/loss is broadly consistent with the statutory corporate tax rate of 31 per cent.

#### Malaysia

The corporate office in Kuala Lumpur, Malaysia provides business support services to the Group.

Corporate income tax accrued on profit/loss is broadly consistent with the statutory corporate tax rate of 24 per cent.

#### Philippines

The corporate office in Manila, Philippines provides business support services to the Group.

The statutory corporate tax rate is 25 per cent and corporate income tax accrued on profit/loss is higher due to withholding tax borne by the business in this jurisdiction in respect of service fee income. For completeness, we had a registration agreement with the Philippine Economic Zone Authority that granted an income tax holiday, which expired in November 2021.

#### Singapore

Our Sales and Marketing business is headquartered in Singapore. In addition to our Sales and Marketing business, we have teams from Maritime and Supply Chain Excellence, Technology, Finance, External Affairs, and Human Resources based in Singapore to support our activities.

The Maritime and Supply Chain Excellence Division manages BHP's enterprise-wide transportation strategy and the chartering of ocean freight to meet BHP's inbound and outbound transportation needs. Tangible assets other than cash and cash equivalents for Singapore include lease contracts for vessels used in its operations that are recognised under IFRS 16. Right-of-use assets recognised under IFRS 16 are included within the underlying asset classes in Property, plant and equipment.

Corporate income tax accrued on profit/loss is lower than the statutory corporate tax rate of 17 per cent, primarily due to tax incentives.

The profits made by the Singapore Sales and Marketing business from the sale of our Australian sourced commodities acquired from entities controlled by BHP are taxed in Australia at the normal corporate tax rate of 30 per cent under the Australian controlled foreign company rules. These taxes are reflected in the disclosures relating to Australia. For more information, refer to BHP's Economic Contribution Report 2022.

## 2 Our Country-by-Country Report continued

### 2.2 Europe, Middle East and Africa

Tax jurisdiction	Revenues from third-party sales US\$M	Revenues from intra-group transactions with other tax jurisdictions US\$M	Profit/(loss) before tax US\$M	Corporate income tax accrued on profit/(loss) US\$M	Country-by-Country effective corporate tax rate %	Corporate income tax paid on a cash basis US\$M	Number of employees	Tangible assets other than cash and cash equivalents US\$M
Algeria	171.7	0.3	122.1	95.8	78.4	—	—	—
Ethiopia <sup>1</sup>	—	—	(0.2)	—	—	—	—	—
Gabon <sup>1,2</sup>	0.1	—	0.1	—	0.5	—	—	—
Guernsey	5.6	223.9	167.3	4.7	2.8	3.2	—	—
Ireland <sup>2,3</sup>	—	—	—	—	—	—	—	—
Jersey <sup>4</sup>	0.6	—	1.8	—	—	—	—	—
Liberia <sup>1</sup>	—	—	—	—	—	—	—	—
Netherlands	25.4	0.4	25.1	—	0.1	86.1	—	—
South Africa <sup>1,2</sup>	—	—	—	—	—	—	—	—
Switzerland	—	2.0	0.7	0.1	14.3	0.2	3	—
United Kingdom	80.7	4.9	10.8	1.1	10.3	15.3	68	28.7

Figures are rounded to the nearest decimal point.

- 1 Our presence relates to entities that formerly conducted exploration activities through a branch in this jurisdiction.
- 2 Our presence relates to entities that are dormant, conduct minimal activities, are in deregistration/liquidation and/or are holding companies.
- 3 An ownership interest is accounted for as an equity accounted joint venture investment and not reported in this Report (refer to Basis of Report preparation section).
- 4 Legacy employment entity (dormant) and Employee Share Ownership Trusts.

#### Algeria

In FY2022, BHP held an interest in a Production Sharing Contract in Algeria prior to the merger of BHP's Petroleum business with Woodside in June 2022. The Petroleum assets have been presented as Discontinued operations in BHP's Annual Report 2022 and the information is included up to the point of completion in this Report (refer to Basis of Report preparation section).

Corporate income tax accrued included production entitlements paid in-kind, whereas corporate income tax paid on a cash basis does not include items that do not result in an outlay of cash, such as taxes paid in-kind. In FY2022, payments to governments included production entitlements of 1.2 million barrels of oil equivalent (boe) paid in-kind (approximately US\$93.3 million). For more information, refer to BHP's Economic Contribution Report 2022.

Corporate income tax accrued on profit/loss is higher than the statutory corporate tax rate of 26 per cent, primarily due to specific taxes that applied to these operations.

#### Guernsey

BHP has a captive insurance company incorporated in Guernsey, which provides insurance to our global portfolio of operated assets and our Sales and Marketing business. For more information, refer to BHP's Economic Contribution Report 2022.

The statutory corporate tax rate is nil and corporate income tax accrued on profit/loss is predominantly due to the application of Australian non-resident insurer income tax, which is applied to the value of insurance premiums paid by our Australian businesses to the insurance company.

In FY2022, the profits of the company were subject to Australian controlled foreign company rules and taxes payable in relation to these profits are reflected in the disclosures relating to Australia.

#### Netherlands

The Netherlands is primarily a legacy holding jurisdiction for certain Group companies and investments. On 11 January 2022, we completed the divestment of our 33.33 per cent interest in Cerrejón, a non-operated energy coal joint venture in Colombia, to Glencore.

The statutory corporate tax rate is 25.8 per cent and corporate income tax accrued on profit/loss is almost nil primarily due to exempt gains from the divestment of our interest in Cerrejón and the receipt of exempt dividends.

Corporate income tax paid includes withholding taxes borne. For more information, refer to Basis of Report preparation section.

#### Switzerland

Our Sales and Marketing business is conducted through a Singapore branch of a Swiss entity. The primary activities undertaken in Switzerland relate to head office functions such as administration (including company board activities), finance and management activities for our Sales and Marketing business. Further details are provided in the Our Sales and Marketing business section of BHP's Economic Contribution Report 2022.

Corporate income tax accrued on profit/loss is consistent with the statutory corporate tax rate of 12.5 per cent.

#### United Kingdom

In FY2022, the headquarters of BHP Group Plc were located in London, United Kingdom. On 31 January 2022, we unified our company structure following which BHP Group Plc (now known as BHP Group (UK) Ltd) became a subsidiary of BHP Group Limited.

The corporate office activities in the UK include our treasury and corporate financing activities relating to funding, liquidity management and financial risk management. Other activities undertaken in the UK relate to global functions.

The statutory corporate tax rate is 19 per cent. Corporate income tax was accrued on pre-unification profits relating to our legacy Petroleum assets in the UK against which losses cannot be offset.

Corporate income tax paid includes withholding taxes borne. For more information, refer to Basis of Report preparation section.

## 2 Our Country-by-Country Report continued

### 2.3 Americas

Tax jurisdiction	Revenues from third-party sales US\$M	Revenues from intra-group transactions with other tax jurisdictions US\$M	Profit/(loss) before tax US\$M	Corporate income tax accrued on profit/(loss) US\$M	Country-by-Country effective corporate tax rate %	Corporate income tax paid on a cash basis US\$M	Number of employees	Tangible assets other than cash and cash equivalents US\$M
Argentina <sup>1</sup>	—	—	—	—	—	—	—	—
Barbados <sup>2</sup>	—	—	(15.4)	—	—	—	—	—
Bolivia <sup>1</sup>	—	—	—	—	—	—	—	—
Brazil	0.4	—	(10.3)	(2.0)	19.4	1.6	58	9.9
Canada	26.1	3.8	(74.8)	(2.0)	2.6	16.3	1,108	3,748.8
Cayman Islands	—	0.6	(0.1)	0.1	*	325.3	—	—
Chile	12,434.0	778.2	5,556.2	1,752.5	31.5	1,957.0	24,671	18,300.1
Colombia	0.5	—	(0.5)	—	—	—	—	—
Ecuador <sup>2</sup>	—	—	(13.4)	—	—	—	84	0.4
Mexico	2.0	4.6	(41.7)	1.3	*	0.1	—	—
Panama <sup>1</sup>	—	—	—	—	—	—	—	—
Peru	0.4	—	(9.7)	—	—	—	31	0.3
Saint Lucia <sup>1</sup>	—	—	—	—	—	—	—	—
Trinidad and Tobago	516.7	22.2	382.7	186.1	48.6	0.1	9	—
United States of America	2,042.6	68.6	976.6	(2.8)	*	326.3	287	29.5

Figures are rounded to the nearest decimal point.

1 Our presence in these jurisdictions relates to entities that are dormant, conduct minimal activities, are in deregistration/liquidation and/or are holding companies.

2 Business activities relate to exploration activities, including through branches in this jurisdiction.

\* Negative Country by Country (CbC) effective corporate tax rate, arising from differences in accounting and taxable profit/loss. Refer to country summaries below.

#### Brazil

Our presence in Brazil includes holding companies and our 50 per cent interest in Samarco Mineração S.A. (Samarco), an iron ore operation in Minas Gerais, Brazil. Samarco is a non-operated joint venture owned by BHP Billiton Brasil Limitada (a Brazilian subsidiary of BHP) and Vale S.A. BHP's interest is accounted for as an equity accounted joint venture investment and not reported in this Report (refer to Basis of Report preparation section).

For information purposes, payments made by our significant equity accounted investments have been shown in our Economic Contribution Report. For more information, refer to page 6 of the Economic Contribution Report 2022.

An accounting loss was recognised in Brazil.

#### Canada

Our Canadian operation primarily consists of the Jansen Potash Project in Saskatchewan.

In FY2022, BHP approved an investment of US\$5.7 billion in capital expenditure for Jansen Stage 1, with first production expected in CY2027. Jansen Stage 1 includes the design, engineering and construction of an underground potash mine and surface infrastructure, including a processing facility, a product storage building and rail infrastructure.

Our other business activities in Canada include minerals exploration, including through holding interests in various Group investments.

An accounting loss was recognised in Canada primarily driven by the development of our Jansen Potash Project.

Corporate income tax paid on a cash basis relates primarily to withholding tax on dividends

received, and corporate income tax paid in relation to prior years. For more information, refer to Basis of Report preparation section.

#### Cayman Islands

Our presence in the Cayman Islands primarily relates to legacy holding companies which have equity accounted joint venture investments (including Antamina in Peru).

The statutory corporate tax rate is nil and corporate income tax accrued on profit/loss is predominantly related to withholding tax on interest income.

Corporate income tax paid on a cash basis relates primarily to withholding tax on dividends received, including in respect of these equity accounted joint venture investments.

#### Chile

The Minerals Americas asset group includes our operated copper assets in Chile – Escondida and Pampa Norte.

We own 57.5 per cent of the Escondida mine, a leading producer of copper concentrate, with by-products including gold and silver, and cathodes located in the Atacama Desert in northern Chile. Although Escondida is not wholly owned by BHP, it is included in this Report as it is consolidated for accounting purposes (refer to Basis of Report preparation section).

Pampa Norte consists of two wholly owned assets in the Atacama Desert in northern Chile – Spence and Cerro Colorado.

Corporate income tax accrued on profit/loss is higher than the statutory corporate tax rate of 27 per cent and this is predominantly due to the impact of specific taxes on mining activities, partially offset by differences in the treatment of certain expenditures for tax and accounting purposes. For more information, refer to BHP's Annual Report 2022.

#### Colombia

Our business activities in Colombia include minerals exploration through branch operations.

An accounting loss was recognised in Colombia.

In FY2022, the divestment of our one-third interest in Cerrejón to Glencore, was completed on 11 January 2022. BHP's interest was accounted for as an equity accounted joint venture investment and is not reported in this Report (refer to Basis of Report preparation section).



## 2 Our Country-by-Country Report continued

### Mexico

In FY2022, BHP's Petroleum business included appraisal and exploration options in the Trion field in Mexico before its merger with Woodside in June 2022. These Petroleum assets have been presented as Discontinued operations in BHP's Annual Report 2022 and the information is included up to the point of completion in this Report (refer to Basis of Report preparation section).

An accounting loss was recognised in Mexico.

### Peru

Our business activities in Peru include minerals exploration through a branch operation.

We own 33.75 per cent of Antamina, a large, low-cost copper and zinc mine in north central Peru. Antamina is a joint venture and is operated independently by Compañía Minera Antamina S.A. Antamina by-products include molybdenum and silver. BHP's interest is accounted for as an equity accounted joint venture investment and is not reported in this Report (refer to Basis of Report preparation section).

For information purposes, payments made by our significant equity accounted investments have been shown in our Economic Contribution Report. For more information, refer to page 6 of the Economic Contribution Report 2022.

An accounting loss was recognised in Peru.

### Trinidad and Tobago

In FY2022, BHP's Petroleum business owned assets located in Trinidad and Tobago before its merger with Woodside in June 2022. These Petroleum assets have been presented as Discontinued operations in BHP's Annual Report 2022 and the information is included up to the point of completion in this Report (refer to Basis of Report preparation section).

Corporate income tax accrued included production entitlements paid in-kind, whereas corporate income tax paid on a cash basis does not include items that do not result in an outlay of cash, such as taxes paid in-kind. In FY2022, payments to governments included production entitlements of 5.4 million barrels of oil equivalent (boe) paid in-kind (approximately US\$277.9 million). For more information, refer to BHP's Economic Contribution Report 2022.

Corporate income tax accrued on profit/loss is higher than the statutory corporate tax rate of 30 per cent due to there being a separate tax regime for companies involved in petroleum operations.

### United States

In FY2022, BHP's Petroleum business owned assets located in the United States Gulf of Mexico before its merger with Woodside in June 2022. These Petroleum assets have been presented as Discontinued operations in BHP's Annual Report 2022 and the information is included up to the point of completion in this Report (refer to Basis of Report preparation section).

BHP's 57.5 per cent share of Escondida is also owned through the United States.

We own 45 per cent of the Resolution Copper project in Arizona. BHP's interest is accounted for as an equity accounted joint venture investment and is not reported in this Report (refer to Basis of Report preparation section).

The statutory corporate tax rate is 21 per cent and corporate income tax accrued on profit/loss is almost nil due to tax losses from prior years offsetting current year income. Corporate income tax paid on a cash basis includes withholding taxes borne in respect of dividends received from Escondida. For more information, refer to Basis of Report preparation section.





## 2 Our Country-by-Country Report continued

## Our 2022 Country-by-Country Report

Tax jurisdiction	Revenues from third-party sales US\$M	Revenues from intra-group transactions with other tax jurisdictions US\$M	Profit/(loss) before tax US\$M	Corporate income tax accrued on profit/(loss) US\$M	Country-by-Country effective corporate tax rate %	Corporate income tax paid on a cash basis US\$M	Number of employees	Tangible assets other than cash and cash equivalents US\$M
Algeria	171.7	0.3	122.1	95.8	78.4	—	—	—
Argentina	—	—	—	—	—	—	—	—
Australia	6,719.0	43,161.0	28,313.6	9,358.8	33.1	8,794.3	49,420	44,895.8
Barbados	—	—	(15.4)	—	—	—	—	—
Bolivia	—	—	—	—	—	—	—	—
Brazil	0.4	—	(10.3)	(2.0)	19.4	1.6	58	9.9
Canada	26.1	3.8	(74.8)	(2.0)	2.6	16.3	1,108	3,748.8
Cayman Islands	—	0.6	(0.1)	0.1	*	325.3	—	—
Chile	12,434.0	778.2	5,556.2	1,752.5	31.5	1,957.0	24,671	18,300.1
China	0.7	21.3	1.3	0.6	44.1	1.7	78	1.5
Colombia	0.5	—	(0.5)	—	—	—	—	—
Ecuador	—	—	(13.4)	—	—	—	84	0.4
Ethiopia	—	—	(0.2)	—	—	—	—	—
Gabon	0.1	—	0.1	—	0.5	—	—	—
Guernsey	5.6	223.9	167.3	4.7	2.8	3.2	—	—
India	0.3	5.9	0.8	0.4	43.9	0.2	34	0.1
Indonesia	—	—	(0.5)	—	—	—	—	—
Ireland	—	—	—	—	—	—	—	—
Japan	0.2	2.5	0.5	0.2	33.8	0.2	13	1.0
Jersey	0.6	—	1.8	—	—	—	—	—
South Korea	—	—	—	—	—	—	—	—
Liberia	—	—	—	—	—	—	—	—
Malaysia	0.5	41.7	3.0	0.8	27.7	0.9	642	14.9
Mexico	2.0	4.6	(41.7)	1.3	*	0.1	—	—
Netherlands	25.4	0.4	25.1	—	0.1	86.1	—	—
Panama	—	—	—	—	—	—	—	—
Peru	0.4	—	(9.7)	—	—	—	31	0.3
Philippines	—	43.8	2.9	2.9	100.8	2.9	754	23.2
Saint Lucia	—	—	—	—	—	—	—	—
Singapore	50,492.2	494.2	1,988.0	102.7	5.2	45.7	504	491.3
South Africa	—	—	—	—	—	—	—	—
Switzerland	—	2.0	0.7	0.1	14.3	0.2	3	—
Trinidad and Tobago	516.7	22.2	382.7	186.1	48.6	0.1	9	—
United Kingdom	80.7	4.9	10.8	1.1	10.3	15.3	68	28.7
United States of America	2,042.6	68.6	976.6	(2.8)	*	326.3	287	29.5
<b>Country-by-Country Report total</b>	<b>72,519.7</b>		<b>37,386.9</b>			<b>11,577.4</b>		<b>67,545.5</b>

Figures are rounded to the nearest decimal point.

\* Refer to explanation in country summaries.

## 2 Our Country-by-Country Report continued

### Country-by-Country Report and our Annual Reporting Suite 2022

GRI 207-4 requires the data reported for Revenues from third-party sales, Profit/(loss) before tax, Tangible assets other than cash and cash equivalents and Corporate income tax paid

on a cash basis to be reconciled with the data stated in our audited financial statements, or the financial information filed on public record for the time period reported. Our Annual Reporting Suite 2022, including the BHP Annual Report and Economic Contribution Report, is available on our website.

The relevant reconciliations are provided below.

Reconciliation to Annual Report 2022 Consolidated Income Statement	Revenues from third-party sales US\$bn
<b>Continuing operations</b>	
Revenue	65.1
Other income	1.4
Net foreign exchange gains	0.3
Financial income	0.1
<b>Total</b>	<b>66.9</b>
<b>Discontinued operations</b>	
Revenue	6.4
Other income	0.2
<b>Total</b>	<b>6.6</b>
Exceptional items	(0.8)
Adjustments/other	(0.2)
<b>Country-by-Country Report total</b>	<b>72.5</b>

Reconciliation to Annual Report 2022 Consolidated Income Statement	Profit/(loss) before tax US\$bn
Profit before taxation – Continuing operations	33.1
Profit before taxation from operating activities - Discontinued operations	4.2
Exceptional items	0.1
<b>Country-by-Country Report total</b>	<b>37.4</b>

Reconciliation to Annual Reporting Suite 2022	Corporate income tax paid on a cash basis US\$M
Corporate income taxes	10,632
Royalty-related income taxes	945
<b>Country-by-Country Report total and Total income taxes paid in Economic Contribution Report 2022</b>	<b>11,577</b>
<b>Discontinued operations</b>	
Corporate income taxes	621
Royalty-related income taxes	560
<b>Total</b>	<b>1,181</b>
<b>Continuing operations</b>	
Corporate income taxes	10,011
Royalty-related income taxes	385
<b>Total</b>	<b>10,396</b>
<b>Net income tax and royalty-related taxation paid in section 1.4 Consolidated Cash Flow Statement</b>	<b>10,396</b>

Reconciliation to Annual Report 2022 Section 1.3 Consolidated Balance Sheet	Tangible assets other than cash and cash equivalents US\$bn
Inventories (current)	4.9
Inventories (non-current)	1.3
Property, plant and equipment	61.3
<b>Country-by-Country Report total</b>	<b>67.5</b>



### 3 Basis of Report preparation

This Report contains our topic-specific disclosures in respect of GRI 207-4 Country-by-Country reporting. This disclosure is generally the reporting of financial, economic, and tax related information for each jurisdiction in which the organisation operates.

This Report has been prepared in accordance with the requirements of the Tax standard (GRI 207) of the Global Sustainability Standards Board of the GRI on the following basis:

- The Country-by-Country Report is prepared for the BHP Group including BHP Group Limited and its subsidiaries/business units that are consolidated for accounting purposes.
- Unless otherwise stated, the data has been prepared using financial data recorded in BHP's financial systems (i.e. consolidated group reporting package), being the same data and financial systems used to prepare BHP's Financial Statements in the Annual Report 2022. Non-financial items relied upon information from BHP's subsidiary management systems and other sources, where appropriate.
- The data used from BHP's financial systems apply the accounting standards and interpretations in BHP's Financial Statements in the Annual Report. For more information, refer to BHP's Annual Report 2022 (Basis of preparation). A presentation currency of US dollars has been applied, consistent with the predominant functional currency of BHP's operations. Transactions and monetary items denominated in foreign currencies are translated into US dollars. For more information, refer to BHP's Annual Report 2022 (Foreign currencies). Amounts and information are prepared in respect of the same reporting period as the Group (i.e. from 1 July to 30 June), using consistent accounting policies. For more information, refer to BHP's Annual Report 2022 (Principles of consolidation).
- The data included in this Report follows accounting principles and includes those separate business units which are included in the consolidated Financial Statements of the Group for financial reporting purposes. This includes subsidiaries and joint operations, including branches/permanent establishments (for this purpose, referred to as Constituent Entities). Unless otherwise noted, joint ventures and associates accounted for in the consolidated Financial Statements of the Group for financial reporting purposes as an equity accounted investment are not reported in the Country-by-Country Report (as these entities are not Constituent Entities). The data is prepared on a 100 per cent or proportionally consolidated basis (or otherwise no amounts are included for our investments in joint ventures and associates using the equity accounting method) based on relevant accounting principles. For more information, refer to BHP's Annual Report 2022 (Principles of consolidation). A list of significant entities in the Group, including subsidiaries, joint arrangements and associates at year-end is contained in the notes 'Subsidiaries', 'Investments accounted for using the equity method' and 'Interests in joint operations' of BHP's Financial Statements in the Annual Report 2022.
- Amounts disclosed for a relevant jurisdiction are based on the Constituent Entities that are tax resident in that jurisdiction (including where Constituent Entities may be incorporated in another jurisdiction). Permanent establishments or branches of a Constituent Entity are disclosed and listed by reference to the tax jurisdiction in which the permanent establishment/branch is situated rather than the jurisdiction in which the underlying company or entity is tax resident.
- The amounts have been prepared and disclosed for a relevant jurisdiction on a consolidated basis.
- Where an acquisition, divestment or disposal has been completed during the relevant reporting period, the information for the Constituent Entities has been included up to the point of completion. For more information, refer to BHP's Annual Report 2022 (Discontinued operations).

### 3 Basis of Report preparation continued

## Glossary

The data to be included in the Country-by-Country Report follows the relevant reporting requirements and guidance outlined in GRI 207-4. The basis upon which the data has been prepared for these items is described below.

#### Revenues from third-party sales

Revenue in this Report predominantly includes the following group accounts as disclosed in BHP's consolidated Financial Statements in the Annual Report 2022:

- revenue
- other income
- net foreign exchange gains/losses (to the extent the net position is a gain)
- financial income

This typically includes revenues from the production and sale of commodities, other income earned from transactions outside the course of BHP's ordinary activities and may include certain management fees from non-controlling interests and joint arrangements, royalties and commission income. It excludes investment related items, e.g. dividends, and exceptional items from Financial Statements Note 3 'Exceptional items' in our Annual Report 2022.

Revenue items are disclosed on a net basis from the information available in BHP's Financial Statements. To the extent certain items are in a net expense position within a jurisdiction, the expense has not been included in the reported revenue amount.

Revenue from third-party sales includes amounts that were received from entities other than Constituent Entities of the Group.

#### Revenues from intra-group transactions with other tax jurisdictions

For the purposes of this Report, "intra-group" includes all Constituent Entities of the Group (i.e. entities that are included in BHP's consolidated Financial Statements in the Annual Report 2022).

Revenues from intra-group transactions include amounts that were received from Constituent Entities of the Group. It excludes investment related items from Constituent Entities, e.g. dividends, gains or impairments on investments. The numbers are prepared on a country consolidated basis and include cross border transactions only (i.e. intra-group transactions within the same tax jurisdiction are not reported).

#### Profit/(loss) before tax

Profit/(loss) before tax is prepared on a consolidated basis and when presented by country excludes certain investment related items, e.g. dividends (consistent with revenues), share of operating profit/loss and related amounts from equity accounted investments, and exceptional items from Financial Statements Note 3 'Exceptional items' in our Annual Report 2022.

Profit/(loss) before tax has been prepared from BHP's consolidated Financial Statements in the Annual Report 2022. Local financial statements may need to comply with local accounting standards.

#### Corporate income tax accrued on profit/(loss)

Income tax accrued is current year tax expense (as disclosed in the income tax expense note to BHP's Financial Statements in the Annual Report 2022) less amounts under/over provided in prior years, provisions for uncertain tax positions, withholding tax on dividends received and tax on exceptional items.

#### Country-by-Country effective corporate tax rate

This is the effective tax rate computed under GRI 207-4-b-x calculated by reference to the corporate income tax accrued on the profit/(loss) before tax for the period.

#### Corporate income tax paid on a cash basis

Income tax paid includes corporate income tax (including interest and dividend withholding tax) and royalty-related taxes on a cash tax basis. The figures stated are based on the source data used for BHP's Economic Contribution Report which outlines BHP's approach to transparency and tax. Payments of withholding tax are reported in the jurisdiction of the entity where the withholding tax is borne rather than the country in which the taxes are remitted.

#### Number of employees

Number of employees includes employees and other workers (e.g. contractors), following GRI 207 Guidance. The number of employees by region shows a 'point in time' snapshot of employees as at 30 June 2022 including employees on extended absence. Contractor data is collected from internal surveys and the organisation's systems and averaged for a 10-month period, July 2021 and April 2022. For more information, refer to BHP's Annual Report 2022. There may also be workers of external organisations engaged in outsourced arrangements to provide services to BHP which are not included in these figures.

#### Tangible assets other than cash and cash equivalents

Tangible assets (other than cash and cash equivalents) represent the sum of net accounting values of Inventories, Property plant and equipment (both current and non-current, as relevant) and Assets held for sale (to the extent they relate to the latter two asset categories) as at 30 June 2022.



## 4 Resident entities for each tax jurisdiction

### Algeria

BHP Petroleum (International Exploration) Pty. Ltd. (Algeria Branch)

### Argentina

BHP Petroleum (Argentina) S.A.

### Australia

Agnew Pastoral Company Pty Ltd  
Albion Downs Pty Limited  
BHP (AUS) DDS Pty Ltd  
BHP (Towage Services) Pty Ltd  
BHP Aluminium Australia Pty Ltd  
BHP Billiton Finance (USA) Limited  
BHP Billiton Finance Limited  
BHP Billiton Petroleum Holdings LLC  
BHP Billiton SSM Development Pty Ltd  
BHP Capital No. 20 Pty Limited  
BHP Coal Pty Ltd  
BHP Direct Reduced Iron Pty Limited  
BHP Energy Coal Australia Pty Ltd  
BHP Freight Pty Ltd  
BHP Group Limited  
BHP Group Operations Pty Ltd  
BHP Innovation Pty Ltd  
BHP IO Mining Pty Ltd  
BHP IO Workshop Pty Ltd  
BHP Iron Ore (Jimblebar) Pty Ltd  
BHP Iron Ore Holdings Pty Ltd  
BHP Iron Ore Pty Ltd  
BHP Lonsdale Investments Pty Ltd  
BHP Manganese Australia Pty Ltd  
BHP Marine & General Insurances Pty Ltd  
BHP Metals Exploration Pty Ltd  
BHP MetCoal Holdings Pty Ltd  
BHP Minerals Asia Pacific Pty Ltd  
BHP Minerals Holdings Proprietary Limited  
BHP Minerals Pty Ltd  
BHP Mitsui Coal Pty Ltd  
BHP Nickel Operations Pty Ltd  
BHP Nickel West Pty Ltd  
BHP Olympic Dam Corporation Pty Ltd  
BHP Petroleum (Australia) Pty Ltd  
BHP Petroleum (Bass Strait) Pty Ltd  
BHP Petroleum (International Exploration) Pty Ltd  
BHP Petroleum (North West Shelf) Pty Ltd  
BHP Petroleum (Tankers) Limited  
BHP Petroleum (Victoria) Pty Ltd  
BHP Petroleum International Pty Ltd  
BHP Petroleum Investments (Great Britain) Pty Ltd  
BHP Petroleum Pty Ltd  
BHP Pty Ltd  
BHP Queensland Coal Investments Pty Ltd  
BHP Queensland Coal Limited

BHP Shared Business Services Pty Ltd  
BHP SSM Indonesia Holdings Pty Ltd  
BHP SSM International Pty Ltd  
BHP Titanium Minerals Pty Ltd  
BHP Towage Services (Boodarie) Pty Ltd  
BHP Towage Services (Iron Brolga) Pty Ltd  
BHP Towage Services (Iron Corella) Pty Ltd  
BHP Towage Services (Iron Ibis) Pty Ltd  
BHP Towage Services (Iron Kestrel) Pty Ltd  
BHP Towage Services (Iron Osprey) Pty Ltd  
BHP Towage Services (Iron Whistler) Pty Ltd  
BHP Towage Services (Mallina) Pty Ltd  
BHP Towage Services (Mount Florance) Pty Ltd  
BHP Towage Services (RT Atlantis) Pty Ltd  
BHP Towage Services (RT Clerke) Pty Ltd  
BHP Towage Services (RT Darwin) Pty Ltd  
BHP Towage Services (RT Discovery) Pty Ltd  
BHP Towage Services (RT Endeavour) Pty Ltd  
BHP Towage Services (RT Enterprise) Pty Ltd  
BHP Towage Services (RT Imperieuse) Pty Ltd  
BHP Towage Services (RT Inspiration) Pty Ltd  
BHP Towage Services (RT Rotation) Pty Ltd  
BHP Towage Services (RT Sensation) Pty Ltd  
BHP Towage Services (RT Tough) Pty Ltd  
BHP WAIO Pty Ltd  
BHP Western Mining Resources International Pty Ltd  
BHP Yakabindie Nickel Pty Ltd  
Billiton Australia Finance Pty Ltd  
BM Alliance Coal Marketing Pty Limited  
BM Alliance Coal Operations Pty Limited  
Broadmeadow Mine Services Pty Ltd  
Central Queensland Services Pty Ltd  
Coal Mines Australia Pty Ltd  
Dampier Coal (Queensland) Proprietary Limited  
Hay Point Services Pty Limited  
Hunter Valley Energy Coal Pty Ltd  
Mt Arthur Coal Pty Limited  
Mt Arthur Underground Pty Ltd  
North West Shelf Gas Pty Limited  
North West Shelf Liaison Company Pty Ltd  
North West Shelf Lifting Coordinator Pty Ltd  
North West Shelf Shipping Service Company Pty Ltd  
OS ACPM Pty Ltd  
OS MCAP Pty Ltd  
Pilbara Gas Pty Limited  
Red Mountain Infrastructure Pty Ltd  
South Blackwater Coal Pty Limited  
The Broken Hill Proprietary Company Pty Ltd  
UMAL Consolidated Pty Ltd  
United Iron Pty Ltd  
WMC Finance (USA) Limited

### Barbados

BHP Billiton Petroleum (Bimshire) Limited (Barbados Branch)  
BHP Petroleum (Carlisle Bay) Limited (Barbados Branch)

### Bolivia

BHP Billiton Boliviana de Petroleo Inc. (Sucursal Bolivia Branch)

### Brazil

Araguaia Participações Ltda  
BHP Billiton Brasil Exploração e Produção de Petróleo Limitada  
BHP Billiton Brasil Investimentos de Petróleo Ltda  
BHP Billiton Brasil Ltda  
BHP Internacional Participações Ltda  
Consórcio Santos Luz de Imóveis Ltda  
Jenipapo Recursos Naturais Ltda  
WMC Mineração Ltda

### Canada

BHP Billiton (Trinidad-2C) Ltd  
BHP Canada Inc.  
BHP SaskPower Carbon Capture and Storage (CCS) Knowledge Centre Inc.  
BHP Petroleum (New Ventures) Corporation  
BHP World Exploration Inc.  
Rio Algom Exploration Inc.  
Rio Algom Investments (Chile) Inc.  
Rio Algom Limited  
BHP Investments Canada Inc

### Cayman Islands

Global BHP Copper Ltd  
RAL Cayman Inc.  
Riocerro Inc.  
Riochile Inc.

### Chile

BHP Chile Inversiones Limitada  
BHP Chile Inc. (Chile Branch)  
BHP Explorations Chile SpA  
Compañía Minera Cerro Colorado Limitada  
Kelti S.A.  
Minera Escondida Ltda  
Minera Spence SA  
RAL Cayman Inc (Agencia Chile Branch)  
Tamakaya Energía SpA  
BHP Copper Inc. (Chile Branch)

### China

BHP Billiton International Trading (Shanghai) Co. Ltd  
BHP Billiton Technology (Shanghai) Co Ltd  
BHP Minerals (Shanghai) Co., Ltd

### Colombia

BHP World Exploration Inc. (Sucursal Colombia branch)  
BHP Exploration Chile SpA (Colombia Branch)

## Resident entities for each tax jurisdiction continued

### Ecuador

BHP Exploration Chile SpA (Ecuadorian Branch)  
Cerro-Quebrado S.A.  
Cerro-Yatsur S.A.

### Ethiopia

BHP Billiton World Exploration Inc.  
(Ethiopia Branch)

### Gabon

BHP Billiton World Exploration Inc.  
(Gabon Branch)

### Guernsey

Stein Insurance Company Limited

### India

BHP Marketing Services India Pvt Ltd  
BHP Minerals India Private Limited

### Indonesia

PT BHP Billiton Indonesia  
PT Billiton Indonesia

### Ireland

Billiton Investments Ireland Limited

### Japan

BHP Japan Limited  
BMA Japan KK

### Jersey

BHP Billiton Limited Employee Equity Trust  
BHP Billiton Services Jersey Limited  
Billiton Employee Share Ownership Trust

### South Korea

Broken Hill Proprietary (USA) Inc.  
(Korea Branch)

### Liberia

BHP Billiton World Exploration Inc.  
(Liberia Branch)

### Malaysia

BHP Shared Services Malaysia Sdn. Bhd.

### Mexico

BHP Billiton Petróleo Holdings de México S. de R.L. de C.V.  
BHP Billiton Petróleo Operaciones de México S. de R.L. de C.V.  
BHP Billiton Petróleo Servicios Administrativos S. de R.L. de C.V.  
BHP Billiton Petróleo Servicios de México S. de R.L. de C.V.  
Operaciones Conjuntas S. de R.L. de C.V.  
Perdido Mexico Pipeline Holdings, S.A. de C.V.  
Perdido Mexico Pipeline, S. de R.L. de C.V.

### Netherlands

BHP Billiton Company B.V.  
BHP Billiton International Metals B.V.  
Billiton Development B.V.  
Billiton Marketing Holding B.V.

### Panama

Marcona International S.A.

### Peru

BHP World Exploration Inc.  
(Sucursal del Peru branch)

### Philippines

BHP Billiton (Philippines) Inc.  
BHP Billiton World Exploration Inc.  
(Philippines Branch)  
BHP Shared Services Philippines Inc.  
QNI Philippines Inc.

### Saint Lucia

BHP (Trinidad) Holdings Ltd.

### Singapore

BHP Billiton Freight Singapore Pte Limited  
BHP Billiton Marketing AG (Singapore Branch)  
BHP Billiton Marketing Asia Pte Ltd  
BHP Billiton SSM Indonesia Pte Ltd  
BM Alliance Marketing Pte Ltd  
Westminster Insurance Pte Ltd

### South Africa

BHP Billiton Petroleum (South Africa 3B/4B) Limited (South Africa Branch)  
Consolidated Nominees Proprietary Limited  
Phoenix Mining Finance Company  
Proprietary Limited

### Switzerland

BHP Billiton Marketing AG

### Trinidad & Tobago

BHP (Trinidad-3A) Ltd  
BHP Billiton (Trinidad-2C) Ltd. (Trinidad and Tobago Branch)  
BHP Billiton Petroleum (Trinidad Block 23B) Limited (Trinidad and Tobago Branch)  
BHP Billiton Petroleum (Trinidad Block 7) Limited (Trinidad and Tobago Branch)  
BHP Petroleum (Trinidad Block 14) Limited (Trinidad and Tobago Branch)  
BHP Petroleum (Trinidad Block 23A) Limited (Trinidad and Tobago Branch)  
BHP Petroleum (Trinidad Block 28) Limited (Trinidad and Tobago Branch)  
BHP Petroleum (Trinidad Block 29) Limited (Trinidad and Tobago Branch)  
BHP Petroleum (Trinidad Block 3) Limited (Trinidad and Tobago Branch)  
BHP Petroleum (Trinidad Block 5) Limited (Trinidad and Tobago Branch)  
BHP Petroleum (Trinidad Block 6) Limited (Trinidad and Tobago Branch)

### United Kingdom

BHP Billiton (UK) DDS Limited  
BHP Billiton (UK) Limited  
BHP Billiton Finance B.V.  
BHP Billiton Finance Plc  
BHP Billiton Group Limited  
BHP Billiton Holdings Limited  
BHP Billiton International Services Limited  
BHP Billiton Marketing UK Limited  
BHP Petroleum (Bimshire) Limited  
BHP Billiton Petroleum (South Africa 3B/4B) Limited  
BHP Billiton Petroleum (Trinidad Block 23B) Limited  
BHP Billiton Petroleum (Trinidad Block 7) Limited  
BHP Billiton Petroleum Great Britain Limited  
BHP Billiton Petroleum Limited  
BHP Billiton Sustainable Communities  
BHP Billiton UK Holdings Limited  
BHP Billiton UK Investments Limited  
BHP BK Limited  
BHP Finance Limited  
BHP Group Holdings Limited  
BHP Group (UK) Ltd  
BHP Holdings Limited  
BHP International Services Limited  
BHP Marketing UK Limited  
BHP Minerals Europe Limited  
BHP Petroleum (Egypt) Limited  
BHP Petroleum (Carlisle Bay) Limited  
BHP Petroleum (Mexico) Limited  
BHP Petroleum (Trinidad Block 14) Limited  
BHP Petroleum (Trinidad Block 23A) Limited  
BHP Petroleum (Trinidad Block 28) Limited  
BHP Petroleum (Trinidad Block 29) Limited  
BHP Petroleum (Trinidad Block 3) Limited  
BHP Petroleum (Trinidad Block 5) Limited  
BHP Petroleum (Trinidad Block 6) Limited  
Billiton Executive Pension Scheme  
Trustee Limited  
Billiton Guinea B.V.  
Billiton Investment 3 B.V.  
Billiton Investment 8 B.V.  
Billiton Suriname Holdings B.V.



## Resident entities for each tax jurisdiction continued

### United States

141 Union Company

BHP Billiton Boliviana de Petróleo Inc.

BHP Foundation

BHP Billiton Marketing Inc.

BHP New Mexico Coal Inc.

BHP Billiton Petroleum (Americas) Inc.

BHP Billiton Petroleum (Deepwater) Inc.

BHP Billiton Petroleum (GOM) Inc.

BHP Petroleum (North America) LLC

BHP Billiton Petroleum Holdings (USA) Inc.

BHP Marketing North America Inc.

BHP Chile Inc.

BHP Copper Inc.

BHP Escondida Inc.

BHP Finance (International) Inc.

BHP Foreign Holdings Inc.

BHP Hawaii Inc.

BHP Holdings (International) Inc.

BHP Holdings (Resources) Inc.

BHP Holdings (USA) Inc.

BHP Holdings International (Investments) Inc.

BHP International Finance Corp

BHP Mineral Resources Inc.

BHP Minerals Exploration Inc.

BHP Minerals International Exploration Inc.

BHP Minerals International LLC

BHP Minerals Service Company

BHP Peru Holdings Inc.

BHP Petroleum (Arkansas Holdings) LLC

BHP Petroleum (Foreign Exploration Holdings) LLC

BHP Petroleum (Mexico Holdings) LLC

BHP Resources Inc.

BHP Resolution Holdings LLC

Broken Hill Proprietary (USA) Inc.

Carson Hill Gold Mining Corporation

Hamilton Brothers Petroleum Corporation

Hamilton Oil Company LLC

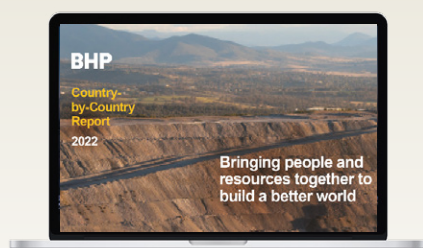
Rio Algom Mining LLC

WMC (Argentina) Inc.

WMC Corporate Services Inc.

### How to access information on BHP

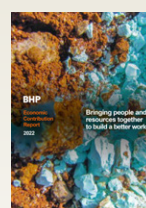
You will be able to access and read our Country-by-Country Report on our website at [bhp.com](https://bhp.com), along with our Annual Report, Economic Contribution Report and a range of other publications that BHP produces



Read our reports at [bhp.com](https://bhp.com)



Annual Report 2022



Economic Contribution Report 2022



Modern Slavery Statement 2022

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