

Bringing people and resources together to build a better world

COUNTRY-BY-COUNTRY REPORT 2024



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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 and project basis as well as information on our material 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 FY2024, our tax, royalty and other payments to governments totalled US\$11.2 billion. Of this, 85 per cent or US\$9.5 billion was paid in Australia. BHP was one of the largest corporate taxpayers in Australia in FY2024. During the last decade, we paid US\$95.1 billion globally in taxes, royalties and other payments to governments, including US\$76.6 billion (approximately A\$107.1 billion) in Australia. Our global adjusted effective tax rate in FY2024 was 32.5 per cent. Once royalties are included, our FY2024 rate increases to 41.7 per cent.

We began our journey of voluntarily disclosing our payments of taxes and royalties in 2000 when we first disclosed these payments in our annual Environment and Community Report. Since then, we 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. We support the establishment of a globally consistent regulatory disclosure framework, including equivalency provisions between jurisdictions. In addition, we support alignment between the quantitative data provided to tax authorities to comply with country-by-country reporting obligations and the data to be disclosed pursuant to any global standards advocating public country-by-country reporting.

We disclose our Country-by-Country Report data to incorporate the requirements of the Global Reporting Initiative (GRI) Standard 207. 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 2024, which collectively comply in full with GRI 207.

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





# 1. FY2024 total economic contribution

Global

Total economic contribution

Over last 10 years

US\$**95.1** bn

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

In FY2024

US\$**49.2**bn

Total economic contribution



Total payments to governments

US\$**11.2**bn

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

32.5% Global adjusted effective tax rate 41.7%
Once royalties are included

**Australia** 

Total economic contribution

Over last 10 years

~A\$107.1 bn

(US\$76.6 bn) Australian income taxes, royalty-related income taxes, royalties and other payments to governments

In FY2024

A\$**52.9**bn

(US\$34.7 bn)
Total economic contribution in Australia



**Total payments to governments** 

A\$**14.5**bn¹

(US\$9.5 bn) Australian income taxes, royalties and other payments to governments

32.1%
Australian adjusted effective tax rate

44.4%

Once royalties are included

# 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)	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	4,231.9	34,287.6	15,852.5	4,972.7	31.4%	5,308.2	49,892	50,724.7
China	0.4	51.6	27.4	6.8	24.8%	7.1	121	4.9
India	0.2	6.7	1.4	0.4	28.3%	_	50	0.3
Indonesia <sup>1</sup>	_	_	_	_	_	_	_	_
Japan	0.1	2.3	0.6	0.5	82.0%	0.4	12	0.8
Malaysia	_	39.8	3.5	1.6	45.4%	1.1	725	8.9
Philippines		43.6	3.6	2.5	69.8%	2.6	1,415	19.3
Singapore	39,451.8	526.6	1,160.0	68.5	5.9%	50.4	535	735.2

Figures are rounded to the nearest decimal point.

### **Australia**

BHP Group Limited's registered office and global headquarters are located in Melbourne. Australia.

Our Minerals Australia business includes operated assets in Western Australia, Queensland, New South Wales and South Australia, focused on iron ore, copper, steelmaking coal, nickel and energy coal.

Corporate income tax accrued on profit/(loss) is higher than the statutory corporate tax rate of 30 per cent primarily due to income tax being payable under the Australian controlled foreign company rules on profits of our Singapore Sales and Marketing business from the sale of our Australian commodities and profits made by our Guernsey captive insurance business.

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 broadly consistent with the statutory corporate tax rate of 25 per cent.

### India

The corporate office in New Delhi, India primarily provides marketing, technology 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 higher than the statutory corporate tax rate of 31 per cent, predominantly due to foreign exchange adjustments.

### Malaysia

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

Corporate income tax accrued on profit/(loss) is higher than the statutory corporate tax rate of 24 per cent, predominantly due to non-deductible depreciation in relation to certain assets.

### **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 respect of service fee income.

We maintain a registration with the Board of Investment and the Philippine Economic Zone Authority, that grants certain fiscal and non-fiscal incentives, including a concessional income tax rate of 5 per cent. Profits made in the Philippines from services provided to Australian companies are subject to tax in Australia at the normal corporate tax rate of 30 per cent under the Australian controlled foreign company rules.

### Singapore

Our Sales and Marketing business is headquartered in Singapore.

In addition to our Sales and Marketing business, we have teams in Maritime and Supply Chain Excellence based in Singapore to support our activities in the region. Other activities undertaken in Singapore relate to global functions.

The Maritime and Supply Chain Excellence Division manages BHP's enterprise-wide maritime transportation strategy and the chartering of ocean freight to meet BHP's inbound and outbound transportation needs.

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

Profits of our Singapore Sales and Marketing business from the sale of our Australian commodities 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 2024.

<sup>1.</sup> Legacy administrative support services (in liquidation).

# 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
Bermuda <sup>1</sup>	_	_	_	_	_	_	_	_
Ethiopia <sup>1</sup>	_	_	(0.1)	_	_	_	_	_
Gabon <sup>1</sup>	_	_	_	_	_	_	_	_
Guernsey	117.9	200.9	242.4	3.7	1.5%	3.1	_	_
Ireland <sup>1</sup>	_	_	_	_	_	_	_	_
Jersey <sup>2</sup>	_	0.2	(0.5)	_	_	_	_	_
Luxembourg <sup>1</sup>	_	_	(3.1)	_	_	_	_	_
Netherlands		14.1	(11.8)	0.1	*	13.2	_	_
Serbia <sup>3</sup>	_	_	(0.1)	_	_	_	1	_
South Africa <sup>1</sup>	_	_	_	_	_	_	_	_
Sweden <sup>3</sup>			(1.8)				1	_
Switzerland	_	29.6	28.1	3.5	12.5%	2.5	3	_
United Kingdom	168.7	85.1	50.1	3.9	7.7%	3.4	88	15.5

Figures are rounded to the nearest decimal point.

- 1. Our presence relates to entities that are dormant, conduct minimal activity, are in deregistration/liquidation and/or holding companies.
- 2. Employee Share Ownership Trusts and legacy employment entity (dormant).
- 3. Business activities relate to exploration activities.

### 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 2024.

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

Profits made by our captive insurance company are subject to tax in Australia at the normal corporate rate of 30 per cent under the Australian controlled foreign company rules. These taxes are reflected in the disclosures relating to Australia.

## **Netherlands**

The Netherlands is primarily a legacy holding jurisdiction for certain Group companies and investments.

An accounting loss was recognised in the Netherlands. Corporate income tax accrued on profit/(loss) arises predominantly due to the impact of certain entities making losses for both accounting and tax purposes, and other entities paying tax on profits made during the period. Corporate income tax paid relates to withholding taxes on dividend income.

### **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.

Corporate income tax accrued on profit/(loss) primarily relates to interest income and is consistent with the statutory corporate tax rate of 12.5 per cent.

### **United Kingdom**

The corporate office activities in the United Kingdom 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.

Corporate income tax accrued on profit/(loss) is lower than the statutory corporate tax rate of 25 per cent, predominantly due to the utilisation of previously unrecognised carried forward tax losses.

<sup>\*</sup> Negative Country-by-Country effective corporate tax rate predominantly arising from the derivation of a net loss before tax.

### 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)	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
Brazil	88.2	0.5	(59.9)	50.0	*	55.0	52	412.4
Canada	23.1	29.3	(292.5)	28.7	*	(0.1)	2,022	6,507.8
Cayman Islands	_	24.5	24.5	6.9	28.1%	26.7	_	_
Chile	12,559.9	210.2	5,011.5	1,826.2	36.4%	1,275.5	33,213	20,211.6
Colombia <sup>1</sup>	_	_	(0.1)	_	_	_	_	_
Ecuador <sup>1</sup>	0.1	_	(2.9)				7	0.2
Jamaica <sup>2</sup>	_	_	_	_	_	_	_	_
Panama <sup>2</sup>								
Peru	_	_	(13.8)	_		_	114	0.5
United States	214.7	69.1	(111.7)	87.4	*	204.9	208	26.4

Figures are rounded to the nearest decimal point.

- 1. Our presence relates to entities that conducted exploration activities through a branch in this jurisdiction.
- 2. Our presence relates to entities that are dormant, conduct minimal activity, are in deregistration/liquidation and/or holding companies.

#### 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 to governments made by our significant equity accounted investments have been shown in our Economic Contribution Report. For more information, refer to page 5 of the Economic Contribution Report 2024.

An accounting loss was recognised in Brazil. Corporate income tax accrued on profit/(loss) and corporate income tax paid on a cash basis arose predominantly as a result of the restructure of Samarco's debts under the Judicial Reorganisation process that completed in December 2023. For more information, refer to page 148 of the Annual Report 2024.

### Canada

Our Canadian operations primarily consist of the Jansen Potash Project in Saskatchewan.

At the end of FY2024, Jansen Stage 1 was 52 per cent complete and on track to achieve first production in late CY2026.

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.

### **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 and cathodes, with by-products including gold and silver, 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. Spence produces copper cathodes and copper concentrate, with by-products including gold, silver and molybdenum. Cerro Colorado transitioned to temporary closure in December 2023.

Corporate income tax accrued on profit/(loss) is higher than the statutory corporate tax rate of 27 per cent, predominantly due to a higher mining tax rate applicable from 1 January 2024 (due to changes to the Chilean mining tax regime).

### 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 with by-products including molybdenum and silver, located in north central Peru. Antamina is a joint venture and is operated independently by Compañía Minera Antamina S.A. 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 to governments made by our significant equity accounted investments have been shown in our Economic Contribution Report. For more information, refer to page 5 of the Economic Contribution Report 2024.

An accounting loss was recognised in Peru.

### **United States**

BHP's business activities in the United States includes holding our 57.5 per cent share of Escondida, 45 per cent of the Resolution Copper project in Arizona and certain legacy assets that are in a state of closure or post-closure.

BHP's interest in Resolution Copper is accounted for as an equity accounted joint venture investment and is not reported in this Report (refer to Basis of Report preparation section).

An accounting loss was recognised in the United States. Corporate income tax accrued on profit/(loss) arises predominantly due to the impact of certain entities making losses for accounting purposes only, and other entities paying tax on profits made during the period. Corporate income tax paid on a cash basis primarily relates to Chilean withholding tax in respect of dividends received from Escondida.

<sup>\*</sup> Negative Country-by-Country effective corporate tax rate predominantly arising from the derivation of a net loss before tax.

# 2. Our Country-by-Country Report continued

# **Our 2024 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)	Country- by-Country effective corporate tax rate	Corporate income tax paid on a cash basis	Number of Employees	Tangible assets other than cash and cash equivalents US\$M
Australia	4,231.9	34,287.6	15,852.5	4,972.7	31.4%	5,308.2	49,892	50,724.7
Bermuda	_	_	_	_	_	_	_	_
Brazil	88.2	0.5	(59.9)	50.0	*	55.0	52	412.4
Canada	23.1	29.3	(292.5)	28.7	*	(0.1)	2,022	6,507.8
Cayman Islands	_	24.5	24.5	6.9	28.1%	26.7	_	_
Chile	12,559.9	210.2	5,011.5	1,826.2	36.4%	1,275.5	33,213	20,211.6
China	0.4	51.6	27.4	6.8	24.8%	7.1	121	4.9
Colombia	_	_	(0.1)	_	_	_	_	_
Ecuador	0.1	_	(2.9)	_	_	_	7	0.2
Ethiopia	_	_	(0.1)	_	_	_	_	_
Gabon	_	_	_	_	_	_	_	_
Guernsey	117.9	200.9	242.4	3.7	1.5%	3.1	_	_
India	0.2	6.7	1.4	0.4	28.3%	_	50	0.3
Indonesia	_	_	_	_	_	_	_	_
Ireland	_	_	_	_	_	_	_	_
Jamaica	_	_	_	_	_	_	_	_
Japan	0.1	2.3	0.6	0.5	82.0%	0.4	12	0.8
Jersey	_	0.2	(0.5)	_	_	_	_	_
Luxembourg	_	_	(3.1)	_	_	_	_	_
Malaysia	_	39.8	3.5	1.6	45.4%	1.1	725	8.9
Netherlands	_	14.1	(11.8)	0.1	*	13.2	_	_
Panama	_	_	_	_	_	_	_	_
Peru	_	_	(13.8)	_	_	_	114	0.5
Philippines	_	43.6	3.6	2.5	69.8%	2.6	1,415	19.3
Serbia	_	_	(0.1)	_	_	_	1	_
Singapore	39,451.8	526.6	1,160.0	68.5	5.9%	50.4	535	735.2
South Africa	_	_	_	_	_	_	_	_
Sweden	_	_	(1.8)	_	_	_	1	_
Switzerland	_	29.6	28.1	3.5	12.5%	2.5	3	_
United Kingdom	168.7	85.1	50.1	3.9	7.7%	3.4	88	15.5
United States	214.7	69.1	(111.7)	87.4	*	204.9	208	26.4
Country-by-Country Report total	56,857.1		21,907.5			6,954.1		78,668.5

Figures are rounded to the nearest decimal point.

<sup>\*</sup> Negative Country-by-Country effective corporate tax rate predominantly arising from the derivation of a net loss before tax.

## Country-by-Country Report and our Annual Reporting Suite 2024

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 2024, including the BHP Annual Report and Economic Contribution Report, is available on our website.

The relevant reconciliations are provided below.

Reconciliation to Annual Report 2024 Consolidated Income Statement	Revenues from third-party sales US\$M
Revenue	55,658
Other income	1,285
Financial Income	709
Total	57,652
Exceptional items	(877)
Other adjustments	82
Country-by-Country Report total	56,857
Reconciliation to Annual Report 2024 Consolidated Income Statement	Profit/(loss) before tax US\$M
Profit before taxation	16,048
Exceptional items	3,568
Equity accounted investments	2,656
Total	22,272
Other adjustments	(365)
Country-by-Country Report total	21,907
Reconciliation to Annual Reporting Suite 2024	Corporate income tax paid on a cash basis US\$M
Corporate income taxes	6,708
Royalty-related income taxes	246
Country-by-Country Report total and total income taxes paid in Economic Contribution Report 2024	6,954
Other adjustments	2
Net income tax and royalty-related taxation paid in Consolidated Cash Flow Statement	6,956
Reconciliation to Annual Report 2024 Consolidated Balance Sheet	Tangible assets other than cash and cash equivalents US\$M
Inventories (current)	5,828
Inventories (non-current)	1,211
Property, plant and equipment	71,629
Country-by-Country Report total	78,668

# 3. Basis of 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.
- 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 2024, as a primary source. 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 2024 (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 2024 (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 2024 (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 2024 (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 2024.

- 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.

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 2024:

- revenue
- other income
- 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 2024.

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 2024).

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 2024.

Profit/(loss) before tax has been prepared from BHP's consolidated Financial Statements in the Annual Report 2024. Local financial statements may need to comply with local accounting standards.

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

Corporate Income tax accrued on profit/(loss) is current year tax expense (as disclosed in the income tax expense note to BHP's Financial Statements in the Annual Report 2024) less amounts under/over provided in prior years, provisions for uncertain tax matters, 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

Corporate income tax paid includes corporate income tax (including interest and dividend withholding tax) and royalty-related income tax 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**

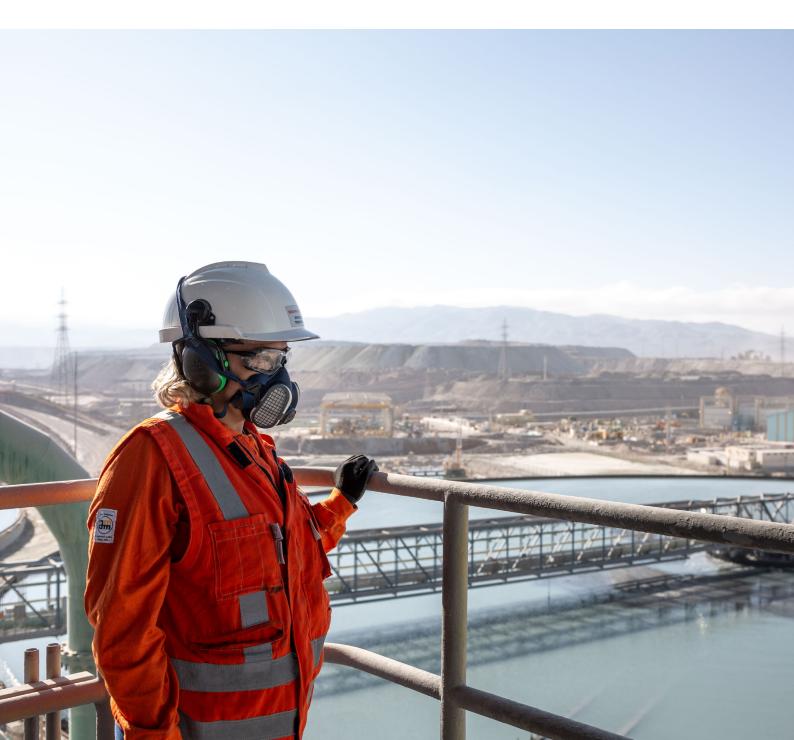
Number of employees includes employees and other workers (e.g. contractors), following GRI 207 Guidance. The number of employees by region shows a 'point in time' snapshot of employees as at 30 June 2024, including employees on extended absence. Contractor data is collected from internal organisation systems and averaged for a 10-month period, July 2023 and April 2024.

This does not include employees and contractors of BHP Billiton Mitsubishi Alliance Blackwater and Daunia operations, sold to Whitehaven Coal during FY2024, and employees and contractors of the operations located in Brazil, that were acquired as part of the OZ Minerals acquisition completed during FY2023.

For more information, refer to BHP's Annual Report 2024. 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 2024.



# 4. Resident entities for each tax jurisdiction

### Australia

**BHP Group Limited** 

Agnew Pastoral Company Pty Ltd

Albion Downs Pty Limited

Avanco Holdings Pty Ltd

Avanco Resources Pty Ltd

AVB Brazil Pty Ltd

AVB Carajas Holdings Pty Ltd

AVB Copper Pty Ltd

AVB Minerals Pty Ltd

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 SSM Development Pty Ltd

BHP Capital No. 20 Pty Limited

BHP Coal Pty Ltd

BHP Direct Reduced Iron Pty Ltd

BHP Energy Coal Australia Pty Ltd

BHP Freight Pty Ltd

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 Holdings Proprietary Limited

BHP Minerals Pty Ltd

BHP Nickel Operations Pty Ltd

BHP Nickel West Pty Ltd

BHP Olympic Dam Corporation 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 Ptv 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 Quail) Pty Ltd

BHP Towage Services (Iron Robin) Pty Ltd

BHP Towage Services (Iron Whistler) Pty Ltd BHP Towage Services (Iron Wren) Pty Ltd

BHP Towage Services (Mallina) Pty Ltd

BHP Towage Services (RT Atlantis) Pty Ltd

BHP Towage Services (RT Clerke) Ptv 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 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

Carrapateena Pty Ltd

Cassini Resources Pty Ltd

Central Queensland Services Pty Ltd

Coal Mines Australia Pty Ltd

Crossbow Resources Pty Ltd

CTP Assets Pty Ltd

CTP Operations Pty Ltd

Estrela Metals Pty Ltd

Ethel Creek Company Partnership

Hay Point Services Pty Limited

Hunter Valley Energy Coal Pty Ltd

Minotaur Resources Holdings Pty Ltd

Mt Arthur Coal Pty Limited

Mt Arthur Underground Pty Ltd

Mt Keith Pastoral Partnership

OS ACPM Pty Ltd

OS MCAP Pty Ltd

OZ Exploration Pty Ltd

OZ Minerals Brazil (Holdings) Pty Ltd

OZ Minerals Carrapateena Pty Ltd

OZ Minerals Equity Pty Ltd

OZ Minerals Group Treasury Pty Ltd

OZ Minerals Holdings Pty Ltd

OZ Minerals International (Holdings) Pty Ltd

OZ Minerals Investments Pty Ltd

OZ Minerals Musgrave Holdings Pty Ltd

OZ Minerals Musgrave Operations Pty Ltd

OZ Minerals Prominent Hill Operations Pty Ltd OZ Minerals Prominent Hill Pty Ltd

OZ Minerals Pty Ltd

OZ Minerals Services Pty Ltd

OZ Minerals Zinifex Holdings Pty Ltd

OZM Carrapateena Pty Ltd

Pilbara Gas Pty Limited

Pilbara Pastoral Company Pty Limited

South Blackwater Coal Pty Ltd

The Broken Hill Proprietary Company Pty Ltd

UMAL Consolidated Pty Ltd

United Iron Pty Ltd

Wirraway Metals & Mining Pty Ltd

WMC Finance (USA) Limited

ZRUS Holdings Pty Ltd

### Bermuda

ARL Holdings Ltd

ARL South America Exploration Ltd

#### **Brazil**

ACG Mineracao Ltda

Araguaia Participações Ltda

Avanco Resources Mineracao Ltda

AVB Mineracao Ltda

BHP Billiton Brasil Ltda

BHP Internacional Participacoes Ltda

Consórcio Santos Luz de Imóveis Ltda

Jenipapo Recursos Naturais Ltda.

MCT Mineracao Ltda

Mineracao Aguas Boas Ltda

SLM Santa Lucia Mineracao Ltda

WMC Mineracao Ltda.

### Canada

BHP Canada Inc.

BHP Investments Canada Inc

BHP World Exploration Inc.

Rio Algom Exploration Inc.

Rio Algom Investments (Chile) Inc

Rio Algom Limited

# **Cayman Islands**

Global BHP Copper Ltd.

RAL Cayman Inc.

Riocerro Inc

Riochile Inc

### Chile

BHP Chile Inc. (Chile Branch)

BHP Chile Inversiones Limitada

BHP Copper Inc (Chile Branch)

BHP Exploration Chile SpA

Compania Minera Cerro Colorado Limitada

Kelti S A

Minera Escondida Ltda

Minera Spence SA

Operation Services Chile SpA

RAL Cayman Inc. (Chile Branch) Tamakaya Energía SpA

China BHP Billiton International Trading (Shanghai)

Co., Ltd. BHP Minerals (Shanghai) Co., Ltd

# Colombia

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

# **Ecuador**

BHP Exploration Chile SpA (Ecuador Branch) Cerro Quebrado S.A.

# **Ethiopia**

BHP World Exploration Inc. (Ethiopia Branch)

BHP World Exploration Inc. (Gabon Branch)

## Guernsey

Stein Insurance Company Limited

### India

BHP Marketing Services India Pvt Ltd BHP Minerals India Pvt Limited

### Indonesia

PT Billiton Indonesia

### Ireland

Billiton Investments Ireland Limited

### **Jamaica**

**OZ Minerals Jamaica 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

### Luxembourg

Avanco Lux S.ar.l Avanco Lux S.C.S.

## Malaysia

BHP Shared Services Malaysia Sdn. Bhd.

### **Netherlands**

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

Marcona International, S.A.

BHP World Exploration Inc. (Peru Branch) OZ Minerals Peru S.A.C.

### **Philippines**

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

### Serbia

BHP Metals Exploration d.o.o. Beograd

### Singapore

BHP Billiton Freight Singapore Pte Limited BHP Billiton Marketing AG (Singapore Branch) BHP Billiton Marketing Asia Pte Ltd. BM Alliance Marketing Pte Ltd OZ Minerals Insurance Pte Ltd Westminer Insurance Pte Ltd

Basis of preparation

### **South Africa**

Consolidated Nominees (Proprietary) Limited Phoenix Mining Finance Company Proprietary Limited

### Sweden

BHP Midgard A.B.

### Switzerland

BHP Billiton Marketing AG

### **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 Billiton Petroleum Great Britain Limited

BHP Billiton Sustainable Communities

BHP Billiton UK Holdings Limited

BHP Billiton UK Investments Limited

BHP BK Limited

**BHP Finance Limited** 

BHP Group (UK) Ltd

BHP Group Holdings Limited

**BHP Holdings Limited** 

BHP International Services Limited

BHP Marketing UK Limited

**BHP Minerals Europe 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.

### **United States**

141 Union Company

BHP Chile Inc.

BHP Copper Inc

BHP Escondida Inc.

BHP Finance (International) Inc.

BHP Foreign Holdings Inc.

**BHP** Foundation

BHP Holdings (International) Inc.

BHP Holdings (USA) Inc.

BHP Holdings International (Investments) Inc.

BHP International Finance Corp.

BHP Marketing North America Inc.

BHP Mineral Resources Inc.

BHP Minerals Exploration Inc.

BHP Minerals International Exploration Inc.

BHP Minerals International LLC

**BHP Minerals Service Company** 

BHP New Mexico Coal Inc. BHP Peru Holdings Inc.

BHP Resolution Holdings LLC

BHP Ventures US Inc

Carson Hill Gold Mining Corporation

Oz Exploration (USA) LLC

Rio Algom Mining LLC

WMC Corporate Services Inc.

### How to access information on BHP

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Modern Slavery Statement 2024



Climate Transition Action Plan 2024

