

A woman wearing a white hard hat and an orange BHP work shirt is looking at a laptop. The background is a blurred industrial setting with large pipes and machinery. The lighting is warm and focused on the woman.

**BHP**

**Country-by-Country  
Report  
2020**

**The future  
is clear**

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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. In FY2020, our tax, royalty and other payments to governments totalled US\$9.1 billion. Of this, 82.2 per cent or US\$7.5 billion was paid in Australia. Our global adjusted effective tax rate in FY2020 was 33.2 per cent, which is broadly in line with our average adjusted effective tax rate over the past decade of 33.5 per cent. Once royalties are included, our FY2020 rate increases to 42.2 per cent.

We first disclosed our aggregate payments of taxes and royalties in 2000 and since then, have continually increased our level of disclosure. Consistent with our commitment to transparency, we have again increased our level of disclosure and we are publishing our Country-by-Country Report data for FY2020.

We disclose our Country-by-Country Report data to reflect 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 2021, which collectively comply in full with GRI 207.

The Basis of Report preparation and Definitions/glossary sections contain information about the content of this Report.



# We are BHP, a leading global resources company.



## Our Purpose

Our purpose is to bring people and resources together to build a better world.

## Our Values

### Sustainability

Putting health and safety first, being environmentally responsible and supporting our communities.

### Integrity

Doing what is right and doing what we say we will do.

### Respect

Embracing openness, trust, teamwork, diversity and relationships that are mutually beneficial.

### Performance

Achieving superior business results by stretching our capabilities.

### Simplicity

Focusing our efforts on the things that matter most.

### Accountability

Defining and accepting responsibility and delivering on our commitments.

We are successful when:

- Our people start each day with a sense of purpose and end the day with a sense of accomplishment.
- Our teams are inclusive and diverse.
- Our communities, customers and suppliers value their relationships with us and are better off for our presence.
- Our asset portfolio is world-class and sustainably developed.
- Our operational discipline and financial strength enables our future growth.
- Our shareholders receive a superior return on their investment.
- Our commodities support continued economic growth and decarbonisation.

## FY2020 total economic contribution

### Global

Total economic contribution

Over last 10 years

**US\$85.0bn**

Global taxes, royalties and other payments to governments

In FY2020

**US\$37.2bn**

Total economic contribution



**US\$9.1bn**

Global taxes, royalties and other payments to governments

**33.2%**

global adjusted effective tax rate

**42.2%**

once royalties are included

### Australia

Total economic contribution

Over last 10 years

**~A\$76.0bn**

(US\$64.2 billion) in Australian taxes, royalties and other payments to governments

In FY2020

**US\$22.4bn**

Total economic contribution in Australia



**US\$7.5bn**

in Australian taxes, royalties and other payments to governments

**31.7%**

Australian adjusted effective tax rate

**42.4%**

once royalties are included

**BHP remains one of the largest taxpayers in Australia.**



## Our Country-by-Country Report

### 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	4,604.4	26,082.0	12,517.5	4,243.4	33.9	4,841.9	44,915	49,086.5
China	0.3	27.7	3.3	1.1	32.0	1.8	124	5.3
India	0.2	5.4	0.6	0.4	63.3	0.2	19	0.2
Indonesia <sup>(1)</sup>	0.2	10.8	11.1	0.0	0.0	–	1	–
Japan	0.3	3.3	0.6	0.0	*	0.4	12	2.9
Korea, Republic of <sup>(2)</sup>	–	–	–	–	–	–	–	–
Malaysia	0.7	46.6	1.5	2.5	171.2	1.6	1,003	28.8
Papua New Guinea <sup>(3)</sup>	–	–	–	–	–	–	–	–
Philippines	–	25.5	(2.0)	0.0	*	1.1	587	30.8
Singapore	29,220.3	369.6	590.7	15.0	2.5	13.9	842	1,443.8

(1) Legacy administrative support services. Liquidation of certain entities in Indonesia gave rise to accounting entries during FY2020 that are recognised as revenue for accounting purposes.

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

(3) Liquidated during FY2020.

\* Refer to explanation below.

#### Australia

The headquarters of BHP Group Limited and the global headquarters of the combined Group are located in Melbourne, Australia.

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

Our Petroleum asset group also includes conventional assets located in Australia.

Corporate income tax accrued on profit/loss is higher than the statutory corporate tax rate of 30 per cent and this difference is primarily due to: Australian top up tax payable on Australian sourced profits of our Singapore Marketing operations under the Australian Controlled Foreign Company rules; Petroleum Resource Rent Tax; and differences in treatment for tax and accounting purposes of items such as rehabilitation provisions, capital allowances and resource rent tax.

BHP remains one of the largest taxpayers in Australia.

#### China

The corporate office in Shanghai, China primarily provides market consulting and logistics services.

Corporate income tax accrued on profit/loss is higher than the statutory corporate tax rate of 25 per cent and this is predominantly due to certain expenditure being treated as non-deductible for tax purposes, including entertainment, employee insurance policies and donations.

#### India

The corporate office in New Delhi, India primarily provides market consulting and logistics services.

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

#### Japan

The corporate office in Tokyo, Japan primarily provides market consulting and logistics services.

Corporate income tax accrued on profit/loss is lower than the statutory corporate tax rate of 31 per cent and this is primarily due to the utilisation of prior year tax losses.

#### Malaysia

The corporate office in Kuala Lumpur, Malaysia provides shared business support services.

Corporate income tax accrued on profit/loss is higher than the statutory corporate tax rate of 24 per cent and this is predominantly due to differences in the treatment of items such as provisions and capital allowances for tax and accounting purposes.

#### Philippines

The corporate office in Manila, Philippines provides shared business support services.

The statutory corporate tax rate is 30 per cent and corporate income tax accrued on profit/loss is nil due to concessional income tax rates applicable in this jurisdiction. Refer to BHP's Economic Contribution Report 2020 for further information.

Corporate income tax paid in the Philippines relates to withholding tax borne by an entity in this jurisdiction in respect of service fee income.

#### Singapore

The offices of our Sales and Marketing business are located to be close to our customers. Our global minerals Sales and Marketing business is headquartered in Singapore. In addition to our Sales and Marketing business, we have teams from Technology, Finance, External Affairs and Human Resources based in Singapore to support our activities in the region.

Maritime and Supply Chain Excellence manages BHP's enterprise wide transportation strategy and charters ocean freight to meet BHP's inbound and outbound transportation needs. The tangible assets for Singapore include lease contracts for vessels used in its operations recognised under IFRS 16.

Corporate income tax accrued on profit/loss is lower than the statutory corporate tax rate of 17 per cent and this is primarily due to the application of tax incentives available to our operations.

In addition, the profits made by the Singapore Sales and Marketing business from the sale of our Australian sourced commodities are taxed in Australia at the normal corporate tax rate of 30 per cent under the Australian Controlled Foreign Company rules. Refer to BHP's Economic Contribution Report 2020 for further information.

## Our Country-by-Country Report continued

## 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	158.8	0.0	98.5	64.8	65.8	–	–	109.5
Ethiopia <sup>(1)</sup>	–	–	(0.4)	–	–	–	–	–
Gabon <sup>(1) (2)</sup>	0.0	–	0.0	0.0	0.6	–	–	–
Guernsey	33.9	188.2	148.9	2.1	1.4	2.4	–	–
Ireland <sup>(2) (3)</sup>	–	–	–	–	–	–	–	–
Jersey <sup>(4)</sup>	0.1	0.1	(0.2)	–	–	0.0	–	–
Liberia <sup>(2)</sup>	0.0	–	0.0	–	–	–	–	–
Netherlands	1.6	6.2	0.0	1.4	*	9.2	–	–
South Africa <sup>(1) (2)</sup>	–	–	0.0	0.0	49.0	–	–	–
Switzerland	–	13.9	12.7	1.6	12.5	3.2	4	0.0
United Kingdom	380.1	66.2	(59.8)	12.1	*	27.1	64	34.9

(1) Our presence in this jurisdiction relates to an entity/entities that formerly conducted exploration activities through a branch.

(2) Our presence in this jurisdiction relates to entities that are dormant, conduct minimal activities, are in deregistration/liquidation and/or are holding companies.

(3) An ownership interest accounted for as an equity accounted joint venture investment and not reported in this Report (see Basis of Report preparation).

(4) Legacy employment entity (dormant) and Employee Share Ownership Trusts.

\* Refer to explanation below.

### Algeria

BHP holds an interest in a Production Sharing Contract in Algeria. Revenue and profit before tax reflect the production and marketing of hydrocarbons in Algeria through a branch operation.

The amount of corporate income tax accrued includes production entitlements paid in-kind, whereas items that do not result in an outlay of cash, such as taxes paid in-kind, are not included in corporate income tax paid on a cash basis. In FY2020, payments to governments included production entitlements of 1.5 million barrels of oil equivalent (boe) paid in-kind (approximately US\$86 million). Refer to BHP's Economic Contribution Report 2020 for further information.

Corporate income tax accrued on profit/loss is higher than the statutory corporate tax rate of 26 per cent and this is primarily due to the tax rates applicable to our operations that are calculated on barrel revenue. The tax rates vary based on price, production and cost and in FY2020 the tax rate was 69 per cent. In addition, some differences also arise due to the impact of permanent differences from the write off of inventory.

### Guernsey

BHP has an internal self-insurance company incorporated in Guernsey, which provides insurance to our global portfolio of operated assets and our Sales and Marketing business. Refer to BHP's Economic Contribution Report 2020 for further information.

The statutory corporate tax rate is nil and corporate income tax accrued on profit/loss is predominantly due to taxes paid in Australia in respect of insurance premiums paid by our Australian businesses.

### Netherlands

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

The statutory corporate tax rate is 25 per cent and corporate income tax accrued on profit/loss is due to tax on interest income.

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

### Switzerland

Our Asian Sales and Marketing business is conducted through a Singapore branch of a Swiss entity. Further details are provided in the Our Sales and Marketing business section of the Economic Contribution Report 2020.

The statutory corporate tax rate is 13 per cent and corporate income tax accrued on profit/loss is consistent with the statutory corporate tax rate.

### United Kingdom

The headquarters of BHP Group Plc are located in London, United Kingdom.

The corporate office activities in the UK include group financing/treasury and services provided to the BHP group of companies worldwide.

The statutory corporate tax rate is 19 per cent and corporate income tax accrued on profit/loss relates to our legacy Petroleum assets in the UK.

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



## Our Country-by-Country Report continued

## 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>	48.6	–	48.6	0.0	0.0	–	–	–
Barbados <sup>(2)</sup>	–	–	(3.2)	–	–	–	–	–
Bolivia <sup>(3)</sup>	–	–	–	–	–	–	–	–
Brazil	1.2	0.1	(157.5)	(6.9)	*	(1.4)	38	9.4
Canada	17.7	0.0	(201.9)	(7.5)	*	41.3	856	4,214.4
Cayman Islands <sup>(3)</sup>	–	3.8	2.0	0.4	22.0	5.7	–	–
Chile	8,315.4	188.5	1,409.4	667.6	47.4	764.4	28,263	16,929.0
Colombia	0.0	–	(0.1)	–	–	–	–	–
Ecuador <sup>(2)</sup>	0.0	–	(7.0)	–	–	–	50	1.2
Mexico	0.9	14.0	(153.7)	2.0	*	0.4	60	182.9
Panama <sup>(3)</sup>	–	–	–	–	–	–	–	–
Peru	1.2	–	(7.8)	–	–	–	30	1.0
Saint Lucia <sup>(3)</sup>	–	–	–	–	–	–	–	–
Trinidad and Tobago	192.5	0.6	(37.0)	71.8	*	–	325	711.0
United States of America	1,661.7	70.1	(191.8)	(218.5)	*	204.5	1,546	4,892.6

(1) The liquidation of an entity in Argentina gave rise to accounting entries during FY2020 that are recognised as revenue for accounting purposes.

(2) Business activities relate to exploration activities, including through branch operations.

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

\* Refer explanation below.

## Brazil

We hold a 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 and Vale S.A. BHP's interest is accounted for as an equity accounted joint venture investment and not reported in this Report (see Basis of Report preparation).

For information purposes, payments made by our significant equity accounted investments have been shown in our Economic Contribution Report. Refer to page 4 of the Economic Contribution Report 2020 for further information.

An accounting loss was recognised in Brazil.

## Canada

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

Our other business activities in Canada include minerals and hydrocarbon exploration.

An accounting loss was recognised in Canada.

## Chile

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

We own 57.5 per cent of the Escondida mine, a leading producer of copper concentrate 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 (see Basis of Report preparation).

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 and the impact of accounting impairments in respect of Cerro Colorado that are not deductible for tax purposes. Refer to BHP's Annual Report 2020 for further information.

## Colombia

In FY2020, we held a one-third interest in Cerrejón, which owns, operates and markets one of the world's largest open-cut export energy coal mines, located in the La Guajira province of Colombia. BHP's interest was accounted for as an equity accounted joint venture investment and is not reported in this Report (see Basis of Report preparation).

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

For information purposes, payments made by our significant equity accounted investments have been shown in our Economic Contribution Report. Refer to page 4 of the Economic Contribution Report 2020 for further information.

An accounting loss was recognised in Colombia.

## Mexico

Our Petroleum asset group includes appraisal and exploration options in Mexico.

An accounting loss was recognised in Mexico.

## Our Country-by-Country Report continued

### Peru

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 (see Basis of Report preparation).

Business activities in Peru include minerals exploration through a branch operation.

For information purposes, payments made by our significant equity accounted investments have been shown in our Economic Contribution Report. Refer to page 4 of the Economic Contribution Report 2020 for further information.

An accounting loss was recognised in Peru.

### Trinidad and Tobago

Our Petroleum asset group includes conventional assets, as well as appraisal and exploration options, located in Trinidad and Tobago.

We operate the Greater Angostura field (45 per cent interest in the production sharing contract), an integrated oil and gas development located offshore 40 kilometres east of Trinidad. Revenue and profit before tax reflect the production and marketing of hydrocarbons in Trinidad and Tobago through a branch operation.

A group company incorporated in Trinidad and Tobago holds an undeveloped offshore petroleum block in Trinidad with declared oil and gas reserves.

Other business activities include hydrocarbon exploration through branch operations.

The amount of corporate income tax accrued includes production entitlements paid in-kind, whereas items that do not result in an outlay of cash, such as taxes paid in-kind, are not included in corporate income tax paid on a cash basis. In FY2020, payments to governments included production entitlements of 3.1 million barrels of oil equivalent (boe) paid in-kind

(approximately US\$53.4 million). Refer to BHP's Economic Contribution Report 2020 for further information.

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

### United States

Our Petroleum asset group includes conventional assets located in the United States Gulf of Mexico.

We operate two fields in the United States waters of the Gulf of Mexico – Shenzi (44 per cent interest) and Neptune (35 per cent interest). We hold non-operating interests in two other fields – Atlantis (44 per cent interest) and Mad Dog (23.9 per cent interest). 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 (see Basis of Report preparation)

An accounting loss was recognised in the United States.





## Our Country-by-Country Report continued

## Our 2020 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	158.8	0.0	98.5	64.8	65.8	–	–	109.5
Argentina	48.6	–	48.6	0.0	0.0	–	–	–
Australia	4,604.4	26,082.0	12,517.5	4,243.4	33.9	4,841.9	44,915	49,086.5
Barbados	–	–	(3.2)	–	–	–	–	–
Bolivia	–	–	–	–	–	–	–	–
Brazil	1.2	0.1	(157.5)	(6.9)	*	(1.4)	38	9.4
Canada	17.7	0.0	(201.9)	(7.5)	*	41.3	856	4,214.4
Cayman Islands	–	3.8	2.0	0.4	22.0	5.7	–	–
Chile	8,315.4	188.5	1,409.4	667.6	47.4	764.4	28,263	16,929.0
China	0.3	27.7	3.3	1.1	32.0	1.8	124	5.3
Colombia	0.0	–	(0.1)	–	–	–	–	–
Ecuador	0.0	–	(7.0)	–	–	–	50	1.2
Ethiopia	–	–	(0.4)	–	–	–	–	–
Gabon	0.0	–	0.0	0.0	0.6	–	–	–
Guernsey	33.9	188.2	148.9	2.1	1.4	2.4	–	–
India	0.2	5.4	0.6	0.4	63.3	0.2	19	0.2
Indonesia	0.2	10.8	11.1	0.0	0.0	–	1	–
Ireland	–	–	–	–	–	–	–	–
Japan	0.3	3.3	0.6	0.0	*	0.4	12	2.9
Jersey	0.1	0.1	(0.2)	–	–	0.0	–	–
Korea, Republic of	–	–	–	–	–	–	–	–
Liberia	0.0	–	0.0	–	–	–	–	–
Malaysia	0.7	46.6	1.5	2.5	171.2	1.6	1,003	28.8
Mexico	0.9	14.0	(153.7)	2.0	*	0.4	60	182.9
Netherlands	1.6	6.2	0.0	1.4	*	9.2	–	–
Panama	–	–	–	–	–	–	–	–
Papua New Guinea	–	–	–	–	–	–	–	–
Peru	1.2	–	(7.8)	–	–	–	30	1.0
Philippines	–	25.5	(2.0)	0.0	*	1.1	587	30.8
Saint Lucia	–	–	–	–	–	–	–	–
Singapore	29,220.3	369.6	590.7	15.0	2.5	13.9	842	1,443.8
South Africa	–	–	0.0	0.0	49.0	–	–	–
Switzerland	–	13.9	12.7	1.6	12.5	3.2	4	0.0
Trinidad and Tobago	192.5	0.6	(37.0)	71.8	*	–	325	711.0
United Kingdom	380.1	66.2	(59.8)	12.1	*	27.1	64	34.9
United States of America	1,661.7	70.1	(191.8)	(218.5)	*	204.5	1,546	4,892.6
<b>Country-by-Country Report total</b>	<b>44,640.0</b>		<b>14,023.0</b>			<b>5,917.8</b>		<b>77,684.2</b>

\* Refer to explanation in country summaries.

## Our Country-by-Country Report continued

### Country-by-Country Report and our FY2020 Annual Reporting Suite

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 2020 Annual

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

The relevant reconciliations are provided below.

Reconciliation to Annual Report 2020 Section 5.1.1 Consolidated Income Statement	Revenues from third-party sales US\$M
Revenue	42,931
Other income	777
Net foreign exchange gains	603
Financial income	351
<b>Line items from Section 5.1.1 Consolidated Income Statement subtotal</b>	<b>44,662</b>
Adjustments	(22)
<b>Country-by-Country Report total</b>	<b>44,640</b>

Reconciliation to Annual Report 2020 Section 5.1.1 Consolidated Income Statement	Profit/(loss) before tax US\$M
Profit/(loss) before tax	13,510
Loss/(profit) from equity accounted investments, related impairments and expenses	512
Other/rounding	1
<b>Country-by-Country Report total</b>	<b>14,023</b>

Reconciliation to Annual Reporting Suite 2020	Corporate income tax paid on a cash basis US\$M
Corporate income taxes	5,459
Royalty-related income taxes	459
<b>Country-by-Country Report total and Total income taxes paid in Economic Contribution Report 2020</b>	<b>5,918</b>
Excluded amounts <sup>(1)</sup>	25
Other/adjustments	2
<b>Net income tax and royalty-related taxation paid in section 5.1.4 Consolidated Cash Flow Statement</b>	<b>5,945</b>

(1) Tax and other payments to governments not reported in Economic Contribution Report – refer Economic Contribution Report 2020 (Basis of Report preparation) for further information.

Reconciliation to Annual Report 2020 Section 5.1.3 Consolidated Balance Sheet	Tangible assets other than cash and cash equivalents US\$M
Inventories (current)	4,101
Inventories (non-current)	1,221
Property, plant and equipment	72,362
<b>Country-by-Country Report total</b>	<b>77,684</b>



## 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.

GRI 207-4 recognises that country-by-country report information for the time period covered by the most recent audited consolidated financial statements may not be available and therefore permits disclosures of information for the time period covered by the audited consolidated financial statements immediately preceding the most recent period. Accordingly, we comply with GRI 207-4 by reporting country-by-country information for the year ended 30 June 2020.

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

- The Country-by-Country Report is prepared for the BHP Group including BHP Group Limited, BHP Group plc and the subsidiaries/business units of each company 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. 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. Refer to BHP Group's Annual Report (Basis of preparation) for further information. A presentation currency of US dollars has been applied, consistent with the predominant functional currency of the Group's operations. Monetary items denominated in foreign currencies are translated into US dollars. Refer to BHP Group's Annual Report (Foreign currencies) for further information. 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. Refer to BHP Group's Annual Report (Principles of consolidation) for further information.
- 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 – refer to BHP Group's Annual Report (Principles of consolidation) for further information. 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 our Financial Statements in the Annual Report.
- 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 Constituent 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. Refer to BHP Group's Annual Report (Discontinued operations) for further information.

## Definitions/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 the Group's consolidated Financial Statements in the Annual Report:

- revenue
- other income
- net foreign exchange gains/losses
- financial income

This typically includes revenues from the production and sale of commodities, other income earned from transactions outside the course of the Group's ordinary activities and may include certain management fees, royalties or commission income. It excludes investment related items, e.g. dividends.

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 the Group's consolidated Financial Statements in the Annual Report).

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 from equity accounted investments is excluded.

Profit/(loss) before tax has been prepared from the Group's consolidated Financial Statements in the Annual Report. 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 the Financial Statements in the Annual Report) less amounts under/over provided in prior years, provisions for uncertain tax positions and withholding tax on dividends received.

### 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 for the period.

### Corporate income tax paid on a cash basis

Income tax paid includes corporate income tax (including interest & dividend withholding tax) and royalty-related taxes on a cash tax basis. The figures stated are based on the source data used for the BHP Group'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 workers (e.g. contractors), following GRI 207 Guidance. The number of employees by region shows the weighted average number of employees based on BHP ownership. Contractor data is collected from internal surveys and the organisation's systems and averaged for a 10-month period from July 2019 to April 2020, which is then used as the average for FY2020. Refer to BHP Group's Annual Report for further information. 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) represents the sum of Inventories, Assets held for sale and Property plant and equipment (both current and non-current, as relevant). BHP adopted IFRS 16 Leases with effect from 1 July 2019, which categorises some leases as assets on the balance sheet and these are included in the tangible assets disclosed.



## Resident entities for each tax jurisdiction

### Algeria

BHP Billiton 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 IO Pilbara Mining Pty Ltd  
 BHP Billiton Iron Ore Pty Limited  
 BHP Billiton Minerals Pty Ltd  
 BHP Billiton Mitsui Coal Pty Ltd  
 BHP Billiton Nickel West Pty Ltd  
 BHP Billiton Olympic Dam Corporation Pty Ltd  
 BHP Billiton Petroleum (Australia) Pty Ltd  
 BHP Billiton Petroleum (Bass Strait) Pty Ltd  
 BHP Billiton Petroleum (International Exploration) Pty Ltd  
 BHP Billiton Petroleum (North West Shelf) Pty Ltd  
 BHP Billiton Petroleum (Victoria) Pty Ltd  
 BHP Billiton Petroleum Holdings LLC  
 BHP Billiton Petroleum International Pty Ltd  
 BHP Billiton Petroleum Investments (Great Britain) Pty Ltd  
 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 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 Lonsdale Investments Pty Ltd  
 BHP Manganese Australia Pty Ltd  
 BHP Marine & General Insurances Pty Ltd  
 BHP MetCoal Holdings Pty Ltd  
 BHP Minerals Asia Pacific Pty Ltd  
 BHP Minerals Holdings Proprietary Limited  
 BHP Nickel Operations Pty Ltd  
 BHP Petroleum (Cambodia) Pty Ltd  
 BHP Petroleum (Tankers) Limited  
 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 Darwin) Pty Ltd  
 BHP Towage Services (RT Discovery) Pty Ltd  
 BHP Towage Services (RT Eduard) Pty Ltd  
 BHP Towage Services (RT Endeavour) Pty Ltd  
 BHP Towage Services (RT Enterprise) Pty Ltd  
 BHP Towage Services (RT Force) 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  
 BHPB Freight 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  
 Southern Natural Gas Development Pty Limited  
 The Broken Hill Proprietary Company Pty Ltd  
 UMAL Consolidated Pty Ltd

United Iron Pty Ltd  
 Weebo Pastoral Company 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 Billiton Canada Inc.  
 BHP Billiton Petroleum (Philippines) Corporation  
 BHP Petroleum (New Ventures) Corporation  
 BHP SaskPower Carbon Capture and Storage (CCS) Knowledge Centre Inc.  
 BHP World Exploration Inc.  
 Rio Algom Exploration Inc.  
 Rio Algom Investments (Chile) Inc.  
 Rio Algom Limited  
 WMC Resources Marketing Limited

### Cayman Islands

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

### Chile

BHP Billiton 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)  
 Rio Algom Investments (Chile) Inc. (Chile Branch)  
 Tamakaya Energía SpA

### China

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

## Resident entities for each tax jurisdiction continued

**Colombia**

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

**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 BHP Billiton Services 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  
Billiton ESOP Trustee Limited

**Korea**

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

**Liberia**

BHP Billiton World Exploration Inc.  
(Liberia Branch)  
Blue Ocean Bulk Shipping Limited

**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.

**Papua New Guinea**

BHP Billiton PNG Services Limited

**Peru**

BHP Billiton World Exploration Inc.  
(Peru Branch)

**Philippines**

BHP Billiton (Philippines) Inc.  
BHP Billiton Petroleum (Philippines)  
Corporation (Philippines Branch)  
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  
Westminer 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 Aluminium Limited  
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 Investment Holdings Limited  
BHP Billiton Marketing UK Limited  
BHP Billiton 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 Plc  
BHP Holdings Limited  
BHP International Services Limited  
BHP Marketing UK Limited  
BHP Minerals Europe Limited  
BHP Petroleum (Brazil) 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.  
The World Marine & General Insurance Plc

## Resident entities for each tax jurisdiction continued

### United States

141 Union Company  
 BHP Billiton Boliviana de Petróleo Inc.  
 BHP Billiton Marketing Inc.  
 BHP Billiton New Mexico Coal Inc.  
 BHP Billiton Petroleum (Americas) Inc.  
 BHP Billiton Petroleum (Deepwater) Inc.  
 BHP Billiton Petroleum (GOM) Inc.  
 BHP Billiton Petroleum Holdings (USA) Inc.  
 BHP Capital Inc.  
 BHP Chile Inc.  
 BHP Copper Inc.  
 BHP Escondida Inc.  
 BHP Finance (International) Inc.  
 BHP Foreign Holdings Inc.  
 BHP Foundation  
 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 L.L.C  
 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 Petroleum (North America) LLC  
 BHP Resolution Holdings LLC  
 BHP Resources Inc.  
 Broken Hill Proprietary (USA) Inc.

Carson Hill Gold Mining Corporation  
 Hamilton Brothers Petroleum Corporation  
 Hamilton Oil Company Inc.  
 Rio Algom Mining L.L.C  
 WMC (Argentina) Inc.  
 WMC Corporate Services Inc.

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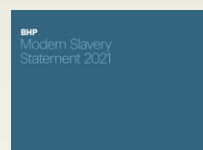
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 (photographer)



Annual Report 2021



Economic Contribution Report 2021



Modern Slavery Statement 2021



Climate Transition Action Plan 2021



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