



## Our Code

Your guide to living *Our Charter*  
and *Our Values* every day.



**BHP acknowledges and pays respect to the Traditional Custodians of the lands and waterways on which, or near where, our company is located and operates. We pay our respects to Elders past, present and emerging.**

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# Our Charter

**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

### Do what's Right

A sustainable future starts with safety and integrity, building trust with those around us

### Seek better Ways

Listening to learn and inspiring challenge is how we drive progress

### Make a Difference

The accountability to act, create value and have impact is on each of us, everyday





## CEO message

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

And how we do that, matters.

Our decisions and actions are guided by the values in *Our Charter*. In fact, it was BHP's commitment to these values that was one of the reasons I came to work here nearly two decades ago.

*Our Code* of Conduct brings these values to life. It reminds us why values are important and helps us understand them in practice.

*Our Code* is not just for employees and contractors. Operating with integrity is everyone's responsibility so *Our Code* applies to you if you work for us, with us, or on our behalf.

We use our values and *Our Code* to drive the best possible outcomes. They guide our partnerships with the communities in which we operate all the way through to how we work with our customers around the world. And we never compromise on these values.

They guide how we create a workplace where everyone, including those we work with, feel respected and safe to speak up if they see something that might contradict *Our Code*... and we won't tolerate retaliation against anyone who raises a concern.

BHP must be a place where people feel safe and free to contribute their best. But that's going to require every one of us to become active bystanders, have difficult conversations, reflect on our own biases and always call out poor behaviours.

We all have to come together and own this collectively.

I see the commitment from our people every day, and while we will always strive to be better, this makes me so proud to lead BHP.



**Mike Henry**  
Chief Executive Officer



**“We use our values and  
*Our Code* to drive the  
best possible outcomes.”**



# Our Code



# Our Code

## Our Code matters

At BHP, our purpose is to bring people and resources together to build a better world.

Everywhere we operate, we are committed to doing what is right and doing what we say we will do. We care as much about how results are achieved as the results themselves. That's why *Our Code* matters. It helps us deliver on our purpose and make the right decisions every day.

In *Our Code*, you'll find clear guidance on how *Our Charter and Our values* of Do what's right, Seek better ways and Make a difference can be put into practice. You'll know how *Our Code* applies to you and understand what is acceptable – and what's not – when working with colleagues, suppliers, contractors, customers, governments and communities. And while *Our Code* can't describe or anticipate every situation, if you see – or suspect – a breach of *Our Code*, you'll know how to raise your concern or seek help.

For a glossary of terms used within *Our Code* visit [bhp.com/ourcode](http://bhp.com/ourcode).



## Our Code applies to you

**Operating with integrity is everyone's responsibility so if you work for us, with us, or on our behalf, *Our Code* applies to you.**

We expect you to:

- read and understand *Our Code*
- complete annual mandatory training on *Our Code* and any role-specific training that is assigned to you
- comply with *Our Code*, the Global Standards, any BHP policies, statements, standards and commitments and any procedures that apply to your role, and all applicable laws of the country in which you're working
- understand *Our Code* applies to you at site, in offices, when working remotely, in camp or other BHP-provided accommodation, at BHP functions, when travelling, and at all times when you are representing BHP
- speak up and report any concerns or breaches of *Our Code*
- contribute to a culture in line with *Our Code*.

If you are in a leadership role, we also expect you to:

- lead by example and role model behaviour that's in line with *Our Code* and *Our Charter and Our values*
- ensure every member of your team understands their responsibilities to comply with *Our Code* at all times
- foster an inclusive culture where everyone feels safe to bring their whole selves to work and comfortable to speak up or ask questions without fear of retaliation
- respond to concerns promptly and appropriately, record any concerns in **Integrity@BHP** or the **BHP Protected Disclosure Reporting Channel** and maintain confidentiality.

## Don't look the other way, speak up

If you think a decision or action is not in line with *Our Code* or *Our Charter and Our values*, please speak up. If you're not sure, our Quick Test can help:



**Values:** does this fit with the values in *Our Charter*?



**Safety:** could this directly or indirectly endanger someone or cause them physical or mental harm?



**Media:** if this appeared as a story in the media, would I feel comfortable?



**Law:** is this legal and in line with our policies and procedures?



**Family:** what would I tell my partner, parent, child or friend to do?



**Conscience:** does this fit with my personal values?



**Feel:** what's my intuition or 'gut feel'? Would I feel comfortable if this was seen, overheard or shared with a colleague, leader or stranger?

### Feedback

We welcome your feedback and ideas for improving *Our Code*. Visit [bhp.com/ourcode](http://bhp.com/ourcode).

### **Speak up**

When raising a concern or reporting a breach of *Our Code*, be open, accurate and provide as much information as you can.

- If you're an employee or contractor, talk to your line leader, 2Up leader, Employee Relations advisor, HR Business Partner, Ethics and Investigations, Compliance or Legal. You can also raise your concern via **Integrity@BHP**.
- If you're a community member, former employee, supplier or vendor, you can speak with your BHP contact point, access the community complaints and grievance mechanism or contact **Integrity@BHP**.
- If you don't feel safe or comfortable to use the above channels or if you otherwise prefer, you can report your concern using **BHP Protected Disclosure Reporting Channel** or through another option set out in **BHP Whistleblower Policy**. Reports can be made anonymously. Reports may be subject to protections under BHP's Whistleblower Policy – see details **here**.

### **What happens when you speak up?**

We treat every report of a potential breach of *Our Code* sensitively, respectfully and confidentially.

- Once a concern is raised, it's assessed and triaged by our Ethics team according to the categories set out in the **Business Conduct Global Standard**.
- Sometimes, advice, support and guidance may resolve the concern. In some matters, our Ethics Support Service can also offer an alternative resolution option acceptable to the impacted person. If an investigation is warranted (and guided by the wishes of the impacted person where possible), we'll review in line with the process set out in the **Business Conduct Global Standard**.
- Depending on the nature of the matter reported and in line with the **Business Conduct Global Standard**, investigations may be performed by the Central Investigations Team within Ethics and Investigations, Compliance, a leader, HR/Employee Relations or an external investigator.
- If you have any concerns during the process, speak to your line leader, 2Up leader, Ethics and Investigations or **Integrity@BHP** or the **BHP Protected Disclosure Reporting Channel**.

### **Protecting those who speak up**

Ensuring you can speak up without threats, intimidation, harassment, exclusion or humiliation is critical. We won't tolerate retaliation or allow any form of punishment, discipline or retaliatory action to be taken against anyone for speaking up, intending to speak up or being suspected of speaking up, or for cooperating with an investigation. In some circumstances, you may also have legal protection when you speak up. Refer to **BHP Whistleblower Policy** for more information.

Anyone involved in retaliatory behaviour is breaching *Our Code* and will be subject to disciplinary action. In certain circumstances, retaliation may also breach whistleblower laws and **BHP Whistleblower Policy**. If you believe you or anyone else may be, or have been, retaliated against for speaking up, report to your line leader, 2Up leader, Ethics and Investigations, Compliance, Legal or **Integrity@BHP** or the **BHP Protected Disclosure Reporting Channel**.

Any information you provide will be kept in confidence to the fullest extent possible, consistent with law and good business practices. If you've disclosed your identity when making a report, this will only be disclosed if we're compelled to by law, if you've consented or if we determine it's appropriate to refer the matter to emergency services, law enforcement or a regulator. If you've chosen to make an anonymous report, we will respect your decision.

Nothing in *Our Code*, the Global Standards or any other document or procedure prevents you from, or requires approval for, reporting to an appropriate government authority or law enforcement body, or from seeking legal advice in relation to your rights.



### What happens if you breach Our Code?

Anyone found breaching *Our Code* can face serious consequences. Depending on the severity of the breach, this could include verbal counselling with a line leader or 2Up leader, a verbal warning, written warning, final written warning and termination of employment. In some cases, conduct that is a breach of *Our Code* may also be a breach of law and carry civil penalties or criminal charges.

#### Always

- Be open and honest and provide as much information as possible when raising a concern.
- Observe confidentiality requirements if you are involved in an investigation.

#### Never

- Engage in retaliation or detrimental conduct towards someone because they or someone else has, intends to or is suspected of speaking up.
- Lie to an investigator
- Take steps to identify an anonymous reporter.

# How to speak up

If you have questions about *Our Code*, speak to your line leader, 2Up leader, Ethics and Investigations, Compliance, Legal, Employee Relations advisor, HR Business Partner. Anyone who works with us, on our behalf, or is associated with us, can also raise concerns in either Integrity@BHP or the BHP Protected Disclosure Reporting Channel.



Contact Integrity@BHP online via [www.BHPbusinessconduct.ethicspoint.com](http://www.BHPbusinessconduct.ethicspoint.com) or by phone:

## Australia and Asia

<b>Australia</b>	Free call <b>1800 423 473</b>
<b>China</b>	Free call <b>4001204934</b>
<b>India</b>	Free call <b>022 5097 2896</b>
<b>Indonesia</b>	Direct <b>021 50996996</b>
<b>Japan</b>	Free call <b>0800 888 6016</b>
<b>Malaysia</b>	Free call <b>1 800 81 5138</b>
<b>Philippines</b>	Free call <b>285402036</b>
<b>Singapore</b>	Free call <b>800 492 2351</b>

## Europe

<b>Switzerland</b>	Free call <b>0800 888 008</b>
<b>United Kingdom</b>	Free call <b>0800 066 8767</b>

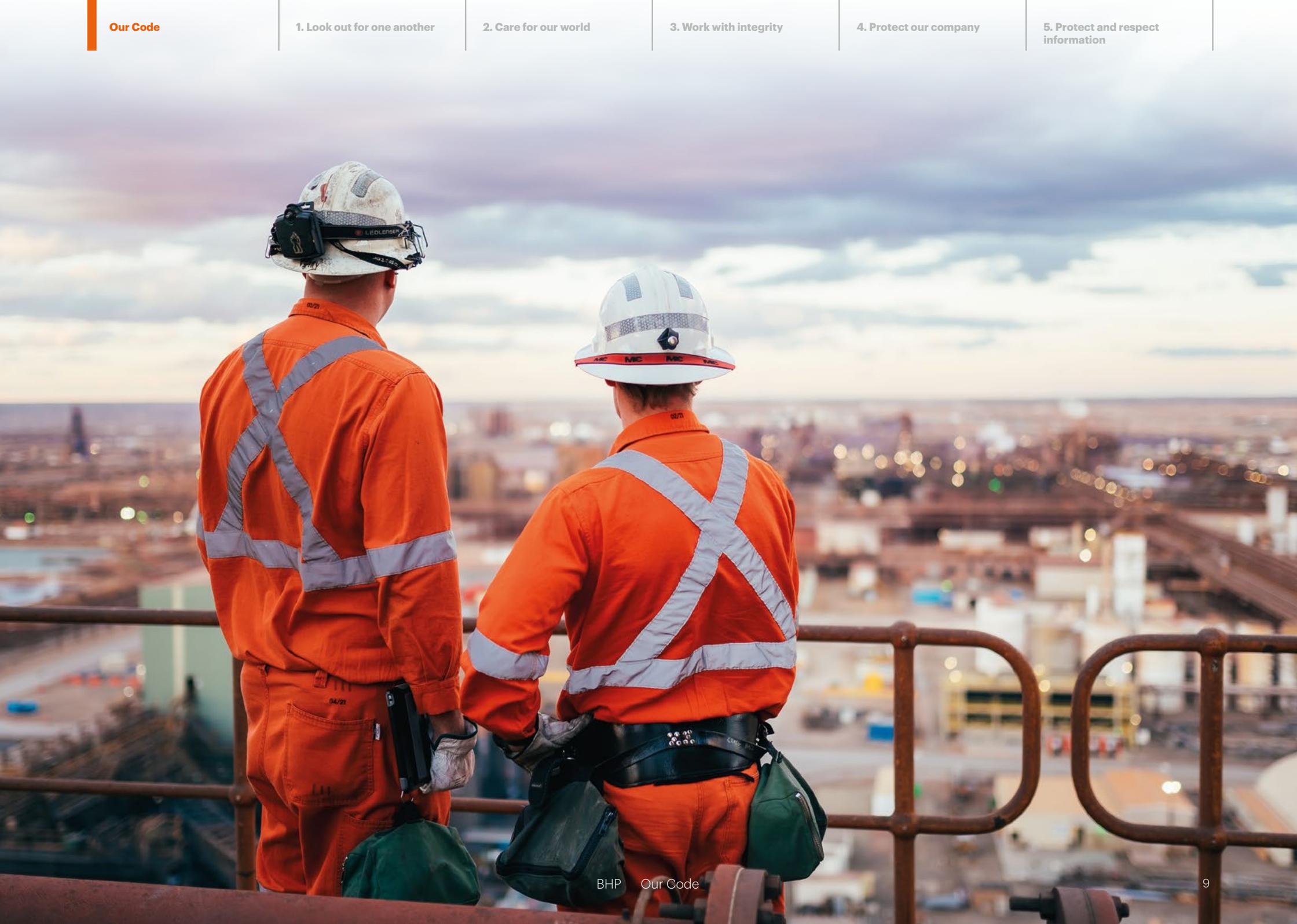
## Americas and Caribbean

<b>Brazil</b>	Free call <b>0800 000 2280</b>
<b>Canada</b>	Free call <b>1 844 297 4027</b>
<b>Chile</b>	Free call <b>800 800 660</b>
<b>Colombia</b>	Free call <b>01 800 5190938</b>
<b>Ecuador</b>	1. From an outside line dial the direct access number for your location: Ecuador: <b>1-800-001-146</b> 2. At the English prompt dial: <b>877 281 5508</b>

<b>Mexico</b>	Free call <b>8008800734</b>
<b>Peru*</b>	Free call <b>0800 74598</b>
<b>Trinidad/Tobago*</b>	Direct <b>1 868 224 7195</b>
<b>United States</b>	Free call <b>1 844 801 7783</b>
<b>Africa</b>	
<b>Algeria</b>	Collect call* (country exit code) <b>1 503 906 8492</b>
<b>South Africa</b>	Free call <b>087 195 1091</b>
<b>Guinea*</b>	Direct <b>00 61 3 9639 1234</b>



[www.BHPbusinessconduct.ethicspoint.com](http://www.BHPbusinessconduct.ethicspoint.com)





# 1. Look out for one another

Our priority is to provide a healthy, safe, inclusive workplace where everyone is treated with respect.

# A healthy and safe workplace

Ensuring a healthy and safe workplace is our priority and everyone's responsibility.

## What this means for you

To manage risks to physical safety, you must adhere to all global and local BHP health and safety standards, procedures and plans, including the **Health Global Standard** and **Safety Global Standard**. To manage risks to psychological safety and well being, you must not engage in disrespectful behaviours contrary to this Code – these behaviours can cause harm. It is everyone's responsibility to prevent and report workplace-related injuries, illnesses, hazards, near misses and actual events in line with these safety requirements and procedures. If preferred, safety issues and concerns can be reported anonymously via **Integrity@BHP** or the **BHP Protected Disclosure Reporting Channel**.

If you are a leader, you must implement these requirements and ensure supporting systems and processes are in place. You must also provide an environment where everyone is encouraged and feels safe to report any threats to their own health, safety or security, or to that of others.

Being fit for work means being able to perform your role safely. You are required to be alcohol and drug free at work and comply with applicable alcohol limitations at accommodation villages and during other work-related activities or travel. We may ask you to undergo random drug and alcohol testing and you must comply with these requests.

If you are concerned about a colleague, please talk to a leader or contact the Employee Assistance Program.

### Always

- Immediately stop any work that appears unsafe or if the required personal protective equipment is not used.
- Comply with relevant health, security and safety requirements, use all personal protective equipment provided and help others who work with you to do the same.

- Report all accidents, injuries, illnesses, unsafe or unhealthy conditions, incidents, spills or release of materials into the environment to your line leader or 2Up leader.
- Identify, assess and take steps to control health and safety hazards according to your site Health, Safety and Environment plans and procedures.
- Speak up to your line leader, or your 2Up leader if you have concerns about your fitness for work or a colleague's fitness for work or ability to carry out assigned work safely.
- Comply with alcohol consumption limits at villages, when travelling for work, representing BHP or participating in a BHP organised event such as a celebratory dinner.
- Be prepared for emergencies by ensuring you and any visitors are familiar with emergency procedures.
- Act on all complaints or warnings raised with you.

### Never

- Undertake work unless you are trained, competent, medically fit, free of alcohol and drugs and sufficiently rested and alert to do so.
- Undertake any work that appears unsafe, including if the required personal protective equipment is not available.
- Consume any drugs, be intoxicated or consume more than the local alcohol limit at a BHP accommodation village, while participating in a BHP organised event or representing BHP.
- Take prescribed or non-prescribed drugs without understanding and declaring the impact on your ability to safely do your job.
- Have illegal drugs or property in your possession on BHP sites.
- Bring firearms onto BHP premises without an approved firearms management plan in line with the **Security and Business Resilience Global Standard** and Business Continuity Plans.

## Hypothetical scenario

**Q:** I've been asked to complete a maintenance task before the end of the day that is critical to ensure our daily production targets are met. The task has a work instruction which requires a specific tool be used when carrying out the task however the tool is not available and my line leader has told me to get the job done. What should I do?

**A:** Safety procedures must never be compromised. Don't start the task until a safe system of work is established and you can access the right tools and equipment. If you're unable to resolve the matter with your line leader, contact your 2Up leader or a member of the Health, Safety and Environment function.



Our hypothetical scenarios will help you apply Our Code every day. Scan the QR Code or go to



<https://www.bhp.com/our-code-scenario1>



# Respect for all

**Harassment, bullying, sexual harassment, racism and other disrespectful behaviours can cause harm. Our commitment to safety means these behaviours have no place at BHP. The right to work in a healthy, safe, respectful and inclusive environment at all times is enshrined in *Our Charter*.**

We all have a responsibility to contribute to a safe, fair and respectful work environment, free from harassment, sexual harassment and sexual assault, bullying, racism (including racial harassment), and discrimination. This applies when you are at work, travelling, in accommodation villages, online or at work-related events.

## What this means for you

You need to understand and demonstrate the standards of behaviour expected of you. The behaviours listed on page 13 are all a breach of *Our Code*, have no place at BHP and will not be tolerated.

## Power imbalances in the workplace

We acknowledge that power imbalances can be present in the workplace and have the potential to be misused to pursue relationships. This is unacceptable, and can undermine efforts to create a safe and respectful workplace for everyone. As people leaders and those responsible for providing mentoring or training are in a position of trust, we expect they will not pursue romantic or intimate relationships with those in trainee, apprentice, graduate or intern positions.

## Take action

If you see, hear or experience behaviour that is not in line with *Our Code* or does not reflect ***Our Charter and Our values***, please speak up immediately or afterwards. Be supportive and provide compassion and encouragement to any colleagues (employees or contractors) who speak up.

If you are a leader, you have an obligation to report business conduct concerns of which you become aware (only naming the impacted person with their consent) into **Integrity@BHP or the BHP Protected Disclosure Reporting Channel**. Health and safety issues can alternatively be reported via established safety reporting procedures.

### Always

- Act professionally at all times and treat everyone with respect.
- Speak up if you see, hear or experience disrespectful behaviour directed towards you or anyone else.
- Challenge inappropriate, exclusionary or discriminatory behaviour, whether it's intentional or not.
- Make any employment-related decisions, including recruitment, promotion, training, development and remuneration, based on merit according to skills, qualifications and capabilities.

### Never

- Engage in harassment, sexual harassment, bullying, racism (including racial harassment), or discrimination.
- Behave in a way that would be reasonably viewed as offensive, insulting, intimidating, malicious or humiliating, including making comments about someone's personal characteristics.
- Distribute, display or share any material that could reasonably offend including: pornography; racist, homophobic, transphobic, sexist or culturally inappropriate photos, videos, cartoons and social media content; and any personal information that does not relate to you found online.
- Take part in or facilitate hospitality or entertainment of an inappropriate nature (for example, sexually oriented) or at inappropriate venues, including accepting or facilitating gifts which are inappropriate.

- Make unwelcome requests for a romantic or intimate relationship with a colleague.
- Pursue a romantic or intimate relationship with a trainee, apprentice, graduate or intern if you are a people leader or responsible for providing mentoring or training.
- Treat someone differently for taking or not taking part in industrial activities such as belonging or not belonging to an industrial and/or union association.
- Discriminate against any individual or group based on personal attributes unrelated to job performance.

### Hypothetical scenario

**Q:** I'm a maintenance contractor trainee and the trainer for my crew has been supportive but they're now paying more attention to me than others in the crew. The other night, they asked me to go back to their place. I feel very uncomfortable and not sure what to do. I'm scared I'll lose my traineeship.

**A:** It's not ok for a trainer to try and start a romantic or intimate relationship with any trainee, considering the power imbalance between you and the trainer. Talk to your 2Up leader immediately or contact your Employee Relations advisor, HR Business Partner, Ethics Support Service or **Integrity@BHP or the BHP Protected Disclosure Reporting Channel**. You can also talk to a colleague or someone you trust for support within the business.

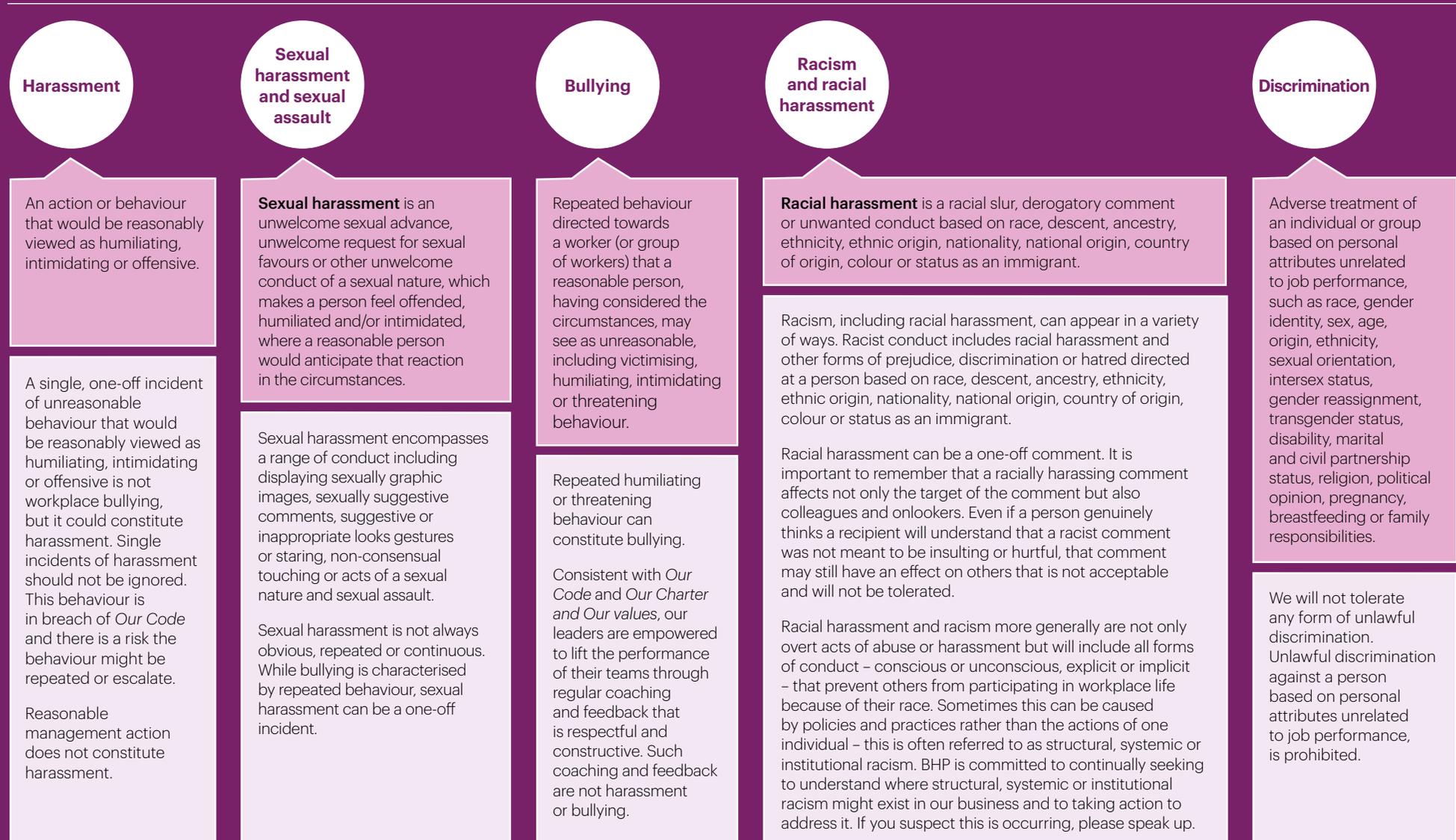


Our hypothetical scenarios will help you apply *Our Code* every day. Scan the QR Code or go to



<https://www.bhp.com/our-code-scenario2>

## Behaviours that have no place at BHP



The possible impact of the action or behaviour on the recipient considering all the circumstances (not just the intent of the person using the behaviour) is considered when determining whether the action or behaviour is bullying, harassment of any kind or discrimination.

## 2. Care for people and planet

As part of our commitment to creating enduring social value for people, planet and prosperity, we all have a role to play in respecting human rights, supporting our communities and demonstrating environmental responsibility, as required by the Social Value and Sustainability Global Standard.



# Respect human rights

## Upholding and advancing human rights are critical to the sustainable operation of our business.

Human rights are basic political, civil, economic, labour, social and cultural rights and freedoms to which all people are entitled, without discrimination<sup>1</sup>. We commit to operating in a manner consistent with the internationally recognised human rights and standards as described in our **Human Rights Policy Statement** and **Indigenous Peoples Policy Statement**. Respecting human rights and contributing to the realisation of rights is critical to the sustainable operation of our business and the right thing to do. We also respect the role of human rights defenders in upholding civic freedoms and their significant voice in understanding and addressing human rights challenges.

## What this means for you

Our Human Rights Policy Statement and Indigenous Peoples Policy Statement provide guidance on BHP's positions and commitments.

You must consider the human rights and social and community impacts for our operations, tailings storage facilities, major projects, new activities in high-risk countries, decisions around acquisitions and divestments, and the closure of our sites.

Always comply with applicable laws. Where differences exist between Our Code and local customs, norms, rules or regulations, apply the higher standard. Identify, mitigate or eliminate any risks to human rights that may arise through our activities, including any arising from the activities of our suppliers and service providers.

- Uphold the commitments as set out in our Indigenous Peoples Policy Statement. This includes working to obtain free, prior and informed consent for new operations and projects, and changes to existing operations and

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

projects, located on lands traditionally owned by, or under customary use of, Indigenous peoples and likely to have adverse impacts on Indigenous peoples.

- Consider the connection between environmental sustainability and human rights. If community resettlement is required, comply with the International Finance Corporation Performance Standard 5: Land Acquisition and Involuntary Resettlement.
- Suppliers are expected to apply our human rights related mandatory minimum requirements as outlined in our Minimum Requirements for Suppliers.
- Communicate our commitment to the Voluntary Principles on Security and Human Rights (VPSHR) to any private security providers engaged or any public security providers you arrange to support BHP activities.

### Always

- Raise any human rights concerns via the community complaints and grievance process or **Integrity@BHP or the BHP Protected Disclosure Reporting Channel**.
- Consider the human rights implications of BHP activities, including across our value chain.
- Identify and address human rights risks and adverse impacts from the perspective of the person who holds the right.
- Undertake due diligence on our suppliers to assess their alignment with human rights.
- Ensure human rights concerns and complaints are investigated and remedied, if appropriate, and the outcomes reported to relevant stakeholders.

### Never

- Threaten, punish, discipline, or retaliate against anyone, inside or outside BHP, for raising or helping to address a human rights concern.

## Hypothetical scenario

**Q:** I'm aware the local Indigenous community has strong connections to the land on which we operate, but I'm not sure if there is any active engagement to ensure their significant sites are effectively identified and managed. I raised this with my team and they didn't know if any engagement is happening either. What should I do?

**A:** Engaging with the traditional owners of the land and managing cultural heritage matters is an integral part of our business. All our assets must implement a framework for identifying, documenting and managing aspects of cultural significance. BHP works to obtain the consent of Indigenous communities for projects that are located on lands traditionally owned by, or under customary use of, Indigenous peoples and are likely to have significant adverse impacts on Indigenous peoples. If you are unsure whether these requirements are being met or have any concerns, speak with your line leader or 2Up leader, use the local complaints and grievance process or contact **Integrity@BHP or the BHP Protected Disclosure Reporting Channel**.



Our hypothetical scenarios will help you apply Our Code every day. Scan the QR Code or go to



<https://www.bhp.com/our-code-scenario3>



# Support our communities

## We are committed to building long-term partnerships based on respect, transparency and mutual value.

We seek to understand the interests, concerns and aspirations of the communities where we operate and recognise our everyday interactions, activities, behaviours and decisions can impact positively and negatively on our long-term viability and the social and economic wellbeing of those communities.

## What this means for you

If you are responsible for working with our community stakeholders, community development projects or donations, you must read and understand the **Community and Indigenous Peoples Global Standard**.

All communication with external stakeholders must be delivered honestly, respectfully and transparently. Engage with people impacted by operations and ensure their views (including vulnerable and disadvantaged groups) are taken into consideration when making business decisions.

If you are engaging with Indigenous or First Nations stakeholders, complete the necessary culture awareness training and engage in a manner which respects the rights of Indigenous Peoples as set out in our **Indigenous Peoples Policy Statement**.

If people raise concerns or complaints during your engagements with community stakeholders, record these in line with the relevant asset complaints and grievance process. If the concerns or complaints allege a violation of human rights or other conduct in breach of *Our Code*, record the concern in **Integrity@BHP** or the **BHP Protected Disclosure Reporting Channel**. If a community investment (donation, project or sponsorship) is being considered, undertake due diligence on the recipient organisation(s) and obtain pre-approval before confirming any partner or agency to implement a program as per the **Community and Indigenous Peoples Global Standard**.

If you are working on our behalf, we expect the same level of respect in your interactions. Familiarise yourself with our requirements when engaging and working with host communities.

## Always

- Respect the cultures and customs of the communities and countries in which we operate, as long as they do not conflict with *Our Code* or the law.
- Engage with respect, honesty and transparency.
- Take the views and expectations of stakeholders into account in decision-making.
- Investigate concerns and complaints and report outcomes back to relevant stakeholders.
- Obtain any necessary compliance pre-approvals, in accordance with the **Community and Indigenous Peoples Global Standard**, before offering, promising or approving expenditure for a community project, sponsorship or donation on behalf of BHP.
- Contact Compliance for advice if you have any concerns about the legitimacy of a proposed community project, sponsorship or donation, or contact Ethics and Investigations if you have an undisclosed potential conflict of interest.



- Engage regularly with suppliers and partners to share *Our Code* and implement robust contract management processes to ensure the respectful behaviours and performance of vendors in the communities in which we do business.

## Never

- Intentionally favour individuals from one political, religious or ethnic group on the basis of their membership of that group. The exception is when such action supports a BHP approved or legally required program of positive discrimination (for example, to assist historically disadvantaged groups in the community).
- Contribute to any religious organisation for religious purposes on behalf of BHP.
- Implement a community development project that will intentionally, or likely replace, take over or destabilise the authority of any level of government.



Our hypothetical scenarios will help you apply *Our Code* every day. Scan the QR Code or go to



<https://www.bhp.com/our-code-scenario4>



# Be environmentally responsible

## Our environmental performance and management of environmental impacts is an important part of our contribution to social value.

We recognise the importance of a healthy environment and steward a nature-positive approach to the management, conservation and restoration of land, water and biodiversity. Our environmental responsibility is to understand and avoid or minimise environmental impacts and contribute to the resilience of, and positive impact to, the natural environment at every stage of our operations.

Our role in responding to global challenges is set out in our position statements on **Climate Change** and **Water Stewardship** and our approach to environmental management in the **Environment Global Standard**, **Climate Change Global Standard**, **Water Management Global Standard** and **Closure and Legacy Management Global Standard**. We also have company-level public environmental targets and longer-term goals for water, biodiversity and greenhouse gas emissions and report publicly on a range of indicators in metrics, which are available on our website.

We identify, assess and control risks in accordance with the **Risk Management Global Standard** and work in partnership with others to contribute to a resilient environment.

## What this means for you

You must understand the potential environmental risks, threats and opportunities, of the tasks you perform in accordance with the **Environment Global Standard**, **Climate Change Global Standard**, **Water Management Global Standard** and **Closure and Legacy Management Global Standard**. You must also understand environmental regulatory requirements relating to the tasks you perform and look at ways to avoid, minimise and rehabilitate impacts to air, water, land, cultural values and biodiversity, including greenhouse gas emissions. Where actual or potential environmental events occur, including non-compliances with environmental regulatory requirements, you must report these in BHP's Event Management system, regardless of severity.

Those who work with us are encouraged to actively contribute to improving our environmental performance and comply with our environmental requirements, including at an Asset level. Refer to the **Environment Global Standard**, **Climate Change Global Standard**, **Water Management Global Standard** and **Closure and Legacy Management Global Standard** or speak to your primary BHP contact for more information about our environmental requirements or any suggestions you have on how we can improve environmental stewardship.

### Always

- Immediately stop any work that may contribute to a significant environmental or community event such as an accident, incident, spill or release of material.
- Report any actual or potential impact to the environment or communities from an environmental event to your line leader or 2Up leader (don't assume someone else will report).
- Identify, understand and comply with any environmental and regulatory requirements that relate to your work, including any land disturbance, water, air, biodiversity, dust, noise and waste management requirements.
- Identify, assess and take steps to avoid and minimise adverse environmental impacts associated with your work and take opportunities to improve environmental performance.
- Encourage those who work with us and our customers to minimise their environmental impacts and take opportunities to improve performance.

### Never

- Operate in a location or way that is not in accordance with the **Environment Global Standard**, **Climate Change Global Standard**, **Water Management Global Standard** and **Closure and Legacy Management Global Standard**, local regulatory requirements, or site environmental procedures.

- Undertake work that has the potential to impact on the environment unless you are trained and competent to do so and controls are in place to minimise environmental impacts.
- Engage contractors, suppliers, customers or joint venture partners without an assessment that takes into account their environmental and community impacts, risks, controls and performance.

## Hypothetical scenario

**Q:** Our waste is disposed off-site by a licensed waste facility that is audited by our regulators. Do I also have to review their performance?

**A:** Yes, you should review the performance of all suppliers to ensure they manage their environmental performance appropriately. Direct, indirect and cumulative environmental impacts and their associated risks and controls need to be assessed by BHP. This includes environmental impacts associated with our direct operational activities, impacts from others as a result of activities on which our operations rely and impacts from others that may increase the severity of our own impacts.



Our hypothetical scenarios will help you apply Our Code every day. Scan the QR Code or go to



<https://www.bhp.com/our-code-scenario5>



# 3. Work with integrity

We care as much about how results are achieved as we do about the results themselves.



## Foster open, constructive government relationships

**Our ability to conduct business is directly affected by government decision-making. We regularly share information and opinions with governments on issues that affect our operations and our industry.**

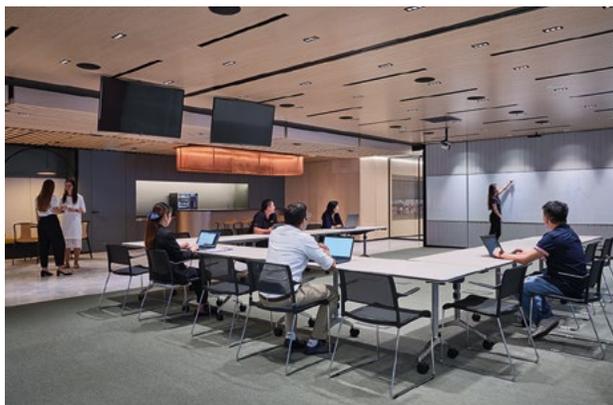
### What this means for you

Always act with integrity and maintain honest, transparent relationships with governments and their agencies, officials and personnel.

- If you are engaging with governments on matters other than of a routine regulatory nature, speak with your Corporate Affairs representative before proceeding.
- Before making a submission to government on behalf of BHP, including responding to government inquiries or papers on proposed legislative reforms, obtain approval from Corporate Affairs.
- Before submitting an official BHP response to an anti-corruption, competition, sanctions, state secrets or financial markets enforcement agency, obtain approval in line with the **Business Conduct Global Standard**.
- Before participating in events or activities organised by a political party, politician, elected official or candidate for public office, obtain approval in line with the **Business Conduct Global Standard**. Your participation in these events or activities must be for business, related to policy briefing and supported by your line leader, and cannot be related to political fundraising.
- Exercise care in situations where a perception could arise that BHP is sharing information or opinions with a government on behalf of, or in coordination with, a business partner that is associated with a foreign government.
- Notify your line leader or 2Up leader if you wish to participate as an individual in the political process, including running for political office. Record in the **Conflict of Interest register**.

### Always

- Be truthful, accurate and cooperative when dealing with government officials and comply with all laws and regulations.
- Speak to Corporate Affairs before you engage with government officials or their representatives on public policy or issues that could impact BHP's reputation or licence to operate.
- Speak with Corporate Affairs or Compliance (as required by the **Business Conduct Global Standard**) before engaging on behalf of BHP with government or regulators regarding government inquiries or regulatory investigations, and before issuing notifications on behalf of BHP to regulators.
- Consider potential corruption risks when dealing with government officials.
- Seek approval for involvement in any business-related event or activity organised by, or on behalf of, a political party or candidate and be transparent when undertaking such activities.
- Discuss with your line leader and 2Up leader and advise in writing if you plan to seek or accept a role in public office.



### Never

- Authorise, offer, give or promise anything of value directly or indirectly to a government official to influence official action.
- Attend an event or activity during work hours or on behalf of BHP which is intended for political fundraising.
- Present information or an opinion to a government on behalf of a business partner that is associated with a foreign government without first talking to Corporate Affairs.
- Attempt to obstruct the lawful collection of information, data, testimony or records by appropriately authorised government or regulatory officials or hinder the lawful and proper provision of such information by another employee.
- Take retaliatory action against anyone who lawfully and properly cooperates with government agencies.
- Accept information about a government's competitive selection of a supplier or competitor's bid or proposal (unless the government has specifically and lawfully authorised the release of the information).
- Use, or allow others to use, any BHP information, assets or resources (including donations or sponsorships) for a political campaign, party or candidate, elected official or any of their affiliated organisations.
- Pay wages or salaries, fringe benefits or remuneration of any kind to a BHP employee working for a political party or candidate during normal working hours.



**Our hypothetical scenarios will help you apply Our Code every day. Scan the QR Code or go to**



<https://www.bhp.com/our-code-scenario6>

# Manage corruption risks

## Bribery and corruption are prohibited in our business.

We do not engage in bribery or corruption of any kind. Everyone who works for us, with us or on our behalf (including partners and suppliers) must comply with anti-corruption laws and no-one has the authority to waive these requirements. Where anti-corruption laws are not respected, criminal and civil penalties (including a term of imprisonment) can apply. Any concerns regarding corruption must be reported immediately.

## What this means for you

You must not authorise, offer, give or promise anything of value, directly or indirectly (for example, through a third party), to anyone to influence them in their role, or to encourage them to perform their work disloyally or improperly. You must not request or accept anything of value, directly or indirectly, to improperly influence you in your work for BHP.

You should never make payments of any size to government officials to facilitate routine services that are legally available. However, a payment made to protect the health or safety of an employee, contractor or someone with them who is imminently threatened by a third party, is not a facilitation payment. If you do make a health and safety payment, report it to Compliance as soon as possible.

The **Business Conduct Global Standard** standard sets out details of when you must obtain pre-approval to offer or provide something of value to an external person. In all cases, items must:

- only be offered or provided for a legitimate business purpose
- not be offered or provided to improperly influence or reward action
- be legal under local laws
- be of appropriate value and nature considering local customs and law, the position of the recipient and the circumstances

- regardless of value, not be offered or provided with a frequency which could reasonably be seen as being intended to improperly influence any person
- not be capable of causing reputational damage to BHP.

You must also get pre-approval for engaging a supplier who will interact with others on our behalf, offering to undertake a community donation or project, or offering to sponsor an event.

### Always

- Immediately report any corruption concerns.
- Understand the identity, role and interests of the person or business who you are dealing with (including the beneficial ownership of companies).
- Gain pre-approval before offering or giving anything of value, according to the thresholds in the **Business Conduct Global Standard**, or for commercial sponsorships and community donations or projects.
- Provide accurate and complete information when seeking pre-approvals.
- Record all transactions accurately and in reasonable detail to reflect their true nature.

### Never

- Offer, promise, give or approve anything of value of any kind to a government official (including a political party, elected official or candidate for public office or a person who holds or performs the duties of an appointment, office or position created by tradition, custom or convention) to influence official action.
- Award business to a company owned by a government official, their relatives or associates in exchange for a benefit to you or BHP.

- Offer, promise, give or approve schemes or arrangements which give an improper benefit to anyone.
- Establish a hidden or incorrectly recorded fund for prohibited payments.
- Use personal funds, divide payments into smaller amounts to avoid approval thresholds, or hide activity which would otherwise need pre-approval.
- Use a supplier if you are concerned they will engage in corrupt or improper conduct on our behalf.
- Deal with a party that refuses to disclose its true identity (including details of company beneficial ownership).

## Hypothetical scenario

**Q:** I speak regularly with a government official who is responsible for making decisions that will affect BHP. His son has recently graduated with first class honours from university at a location where we have an office and wants to find a job so he can stay in the country. The official has enquired if BHP has any jobs and whether I can do anything to help his son.

**A:** A job is something of value and the son is a close relative of an influential government official. Given the official is currently making decisions which will affect BHP, this could be used or misinterpreted as a form of bribery and could constitute a breach of anti-corruption laws. The official's son can apply for advertised jobs and his application will be assessed on its merits in the same manner as any other job application. For further guidance, contact our Compliance team.



Our hypothetical scenarios will help you apply Our Code every day. Scan the QR Code or go to



<https://www.bhp.com/our-code-scenario7>

## Value supplier relationships

### We value our relationships with suppliers and aim to have an effective and streamlined supply process.

Suppliers who act illegally or unethically can significantly impact our reputation and potentially expose BHP and our employees to criminal and civil penalties. We only seek to work with suppliers who are willing to adhere to similar values as our own.

We use fair and equitable procurement process which aim to clearly inform potential suppliers of our expectations and standards and the requirements applicable to them. We encourage our suppliers to be transparent on matters important to society, including on their beneficial ownership.

### What this means for you

If you are required to source goods or services on behalf of BHP, always be careful when choosing a supplier and encourage them to uphold our standards and contribute positively to our reputation in line with **Our Charter**.

Only engage suppliers who share our commitment to:

- lawful business practices
- high standards of business conduct
- management practices that respect the rights of all employees and local communities
- minimising impacts on the environment
- providing a safe and healthy workplace
- our Minimum Requirements for Suppliers.

Always source goods or services in accordance with the **Supply Global Standard** and **Legal Services, Risks, Contracts and Disputes Global Standard** and the relevant Procurement Functional Level Requirements (FLRs).

Conduct a health and safety risk assessment before any sourcing process and ensure commercial decisions do not compromise health and safety. If there is any doubt about

the supplier, or potential supplier's, integrity or ability to perform the contract, address these issues immediately.

Always ensure the supplier (including their beneficial owners): is reputable, competent and qualified to perform the work for which they are being hired; will operate safely and ethically; and that compensation sought is reasonable. Take steps to monitor and assess the supplier's performance. This will require, at a minimum, carefully checking Service Entry Sheets and invoices and raising queries with the supplier about any unclear or excessive charges. Always inform suppliers where they can access *Our Code* so they understand our expectations of them.

### Always

- Speak up about any activity by a supplier that is inconsistent with *Our Code*.
- Ensure suppliers are reputable, competent and qualified to perform the work, will operate safely and ethically and compensation sought is reasonable.
- Seek approval to engage high-risk suppliers in accordance with the **Business Conduct Global Standard**.
- Ensure a valid purchase order has been received by the supplier before they start work or provide goods or services, and that agreements clearly state the goods or services to be provided, the basis for earning payment and the rate or fee.
- Conduct regular reviews of supplier relationships and performance in line with the **Contractor Management Global Standard**.
- Verify that Service Entry Sheets or invoices clearly and fairly represent goods and services provided. Raise queries about unclear or excessive charges.
- Make payments only to contractual counterparties that actually provide the goods or services.

### Never

- Use suppliers who breach, or do not meet, our **Supply Global Standard**.
- Ignore warning signs that a supplier may be engaging in inappropriate behaviour.
- Award or influence the award of business to a supplier you have a direct or indirect financial interest in or who is in anyway associated with a close relative or with whom you have a personal relationship.
- Suggest or directly request a personal gift, hospitality or anything of value from a supplier.
- Commit BHP by signing a supplier's contract or any supplier documentation unless you are authorised as per BHP Powers of Attorney to do so.
- Give one supplier's confidential business information (for example, proposed rates or winning bid information) directly or indirectly to another supplier.
- Approve a purchase requisition that does not meet BHP requirements or expectations.
- Allow a representative of a supplier to approve a Service Entry Sheet or invoice for that supplier.
- Knowingly enter into any fraudulent or otherwise illegal transactions or fail to report them as soon as you suspect such arrangements may exist.
- Award business to a supplier who would present a corruption risk or who refuses to disclose their beneficial ownership to BHP as required.



Our hypothetical scenarios will help you apply **Our Code every day**. Scan the QR Code or go to



<https://www.bhp.com/our-code-scenario8>

# Avoid conflicts of interest

## Every decision we make should be in the best interests of BHP and free from personal bias.

Conflicts of interest, whether actual, potential or perceived, must be appropriately disclosed and managed. A conflict of interest can arise when your interests or activities affect, or have the appearance of affecting, your judgement, objectivity or independence. This could include (but is not limited to):

- pursuing, awarding or maintaining BHP business opportunities for personal gain or the benefit of close relatives or friends
- holding outside jobs or affiliations, including directorships
- holding investments in businesses that are suppliers to BHP or which BHP has or may invest in
- receiving money, property, services or gifts, hospitality or entertainment from suppliers or other third parties doing, or proposing to do, business with BHP
- being in a close personal relationship with someone in your reporting line, including a close relative, or a romantic or intimate relationship.

## What this means for you

Avoid business and personal dealings that create a conflict of interest or a potential or a perceived conflict of interest, even if you don't think there is one. Conflicts can also arise during the course of a normal business relationship due to a change in circumstances.

Report all actual, potential or perceived conflicts of interest in the **Conflict of Interest register**.

Reject offers of travel and accommodation from external parties. If there is a valid business purpose to attend an event or function, BHP will pay for travel and/or accommodation costs.

If you're a leader of someone who has an actual, potential or perceived conflict of interest:

- ensure the details are documented in the **Conflict of Interest register**
- agree, document and implement an appropriate course of action that removes or manages the conflict
- monitor and regularly validate adherence to the agreed course of action
- adjust the documented course of action as required.

### Always

- Excuse yourself from any decision-making process where you have an interest that could influence your ability to make an objective decision.
- Report all actual, potential or perceived conflicts of interest in the Conflict of Interest register.

### Never

- Hire, promote or directly supervise a close relative, or use businesses of close relatives unless this has been specifically authorised via the **Conflict of Interest register**.
- Appoint or award business to any party that you are personally or financially associated with.
- Misuse BHP resources (including information) or your position of influence at BHP to promote or assist an external activity or party.
- Interfere in the fair and transparent operation of bid or tender activities.
- Accept gifts, hospitality, entertainment or other favours or benefits from anyone you are evaluating in a bid or tender with BHP.

## Hypothetical scenario

**Q:** My partner's consultancy specialises in an area where BHP needs advice. Can I recommend their business?

**A:** You can make the team aware of your partner's connection to the business, however, you should be completely transparent about your interest so Procurement's processes can be independently applied. Discuss the recommendation with your line leader, ensure the details are registered in the **Conflict of Interest register** and that a suitable plan to manage this potential conflict of interest is put in place.



Our hypothetical scenarios will help you apply Our Code every day. Scan the QR Code or go to



<https://www.bhp.com/our-code-scenario9>



# Manage competition law risks

## We are committed to full compliance with competition laws.

Competition laws promote fair competition and prevent a range of practices that restrain trade or restrict free and fair competition, including price fixing, market sharing, bid rigging or abuses of a dominant position. A breach of competition laws may result in serious consequences for you and BHP, including fines and imprisonment.

## What this means for you

To ensure you do not breach or appear to breach competition laws, contact Compliance or Legal:

- before exchanging competitively sensitive information, directly or indirectly, with a competitor or potential competitor
- before joining an organisation involving competitors or potential competitors
- when potentially inappropriate contact is initiated by a competitor or potential competitors
- when considering new cooperation arrangements with a competitor or potential competitor, including joint production, joint procurement, joint marketing, and shared logistics
- when a complaint is made about the competitive behaviour of BHP
- when you suspect a third party is acting in an anti-competitive manner towards BHP
- if you are contacted by a competition authority.

If you suspect an employee, contractor or third-party may be engaging in anti-competitive behaviour report it immediately.

### Always

- Maintain BHP's independence in dealings with third parties, including in relation to pricing, marketing and selling.
- Consider the appearance and implications of interacting with a competitor or potential competitor, whether in a business or personal setting.
- Avoid any action which could imply illegal coordination with competitors or potential competitors.
- Ensure written communications are clear and accurate.
- Obtain approval pursuant to the Business Conduct Global Standard before submitting any information on behalf of BHP to a competition authority.
- Comply with joint venture ring fencing protocols.
- Consult with Compliance or Legal before accusing a third party of anti-competitive behaviour.



Our hypothetical scenarios will help you apply Our Code every day. Scan the QR Code or go to



<https://www.bhp.com/our-code-scenario10>

### Never

- Agree with a competitor to fix, raise, lower or stabilise prices of goods sold or purchased, including in relation to recruitment activities, such as employee salaries and benefits.
- Agree other competitive terms with a competitor such as pricing formulae, discounts, margins, rebates, commissions or credit terms.
- Limit production or agree with a competitor to reduce or limit production capacity.
- Rig a bid or otherwise illegally coordinate bidding or tendering activities.
- Allocate markets, customers, suppliers or geographic territories with a competitor.
- Agree with a competitor to boycott any customer or supplier.
- Obstruct a competition authority by providing false or misleading information, preventing a legitimate onsite investigation, concealing or destroying documents or alerting any third party to the fact of a competition law investigation.



# Respect trade control laws

## International trade is critical to our business.

We respect the international trade laws that govern our transactions and comply with all applicable trade control laws, including export controls that impose restrictions of licensing requirements on exports of goods or technology, trade and financial sanctions that prohibit or restrict transactions with certain individuals, entities, vessels, countries or regions, and anti-boycott laws. Our systems screen suppliers and customers to prevent unauthorised transactions. We also seek to ensure our activities do not facilitate money laundering or terrorist financing.

Governments implement trade control laws to support their foreign policy and national security objectives. If we are involved in a transaction that breaches or is inconsistent with these laws, it may expose BHP and our employees to criminal penalties (including imprisonment) or civil penalties, sanctions or other consequences, and could cause significant damage to our reputation and interruption to our business.

## What this means for you

You must always comply with trade control laws. With trade controls programs subject to frequent change, ensure you follow our onboarding and due diligence processes whenever you transact with a third party. If you become aware of any activity involving BHP and any sanctioned party, or sanctioned country/territory or their residents, entities, or government, contact Compliance immediately.

If you are involved in exporting, you must be familiar with export licensing requirements. The **Business Conduct Global Standard** provides initial guidance. If you are unsure, seek assistance from Compliance.

If you are asked to withhold goods or services from a party for boycott-related reasons, contact Compliance. Keep in mind these requests may be included in contract clauses, requests for proposal, purchase orders, letters of credit or other documents, or may even be made orally.

If you become aware of any suspicious transaction (such as a transaction which does not make economic sense or which seems overly complex), notify Compliance immediately.

## Always

- Follow BHP due diligence requirements for suppliers, customers, vessels and any other third parties with whom we transact.
- Obtain any necessary export control licences or approvals before proceeding with a transaction.
- Understand the intermediate and ultimate destinations of goods, software, technology and other items or associated technical assistance we provide to third parties, and the source (including country of origin and country of export) of goods, services and other items that third parties are providing to us.
- Understand whether your customer is on-selling BHP commodities. Obtain assurances that such goods are not being on-sold to sanctioned parties, countries or territories.
- Investigate any trade controls red flag in a transaction and do not proceed with the transaction until the issue has been resolved.
- Promptly notify Compliance of any suspected boycott requests received, and any third-party or government inquiries or communications related to compliance with trade control laws and regulations and await guidance on how to proceed.

## Never

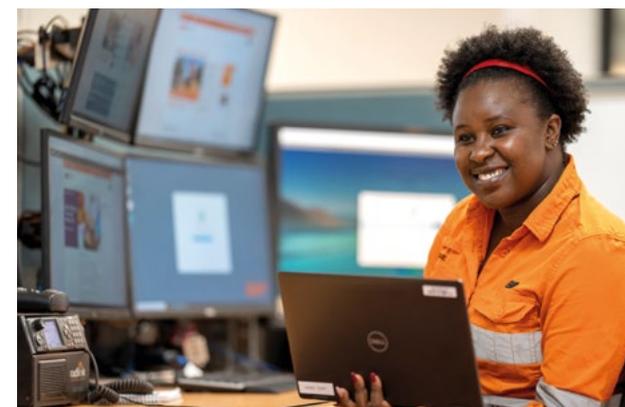
- Undertake any business activity with a party that is sanctioned or owned by or operating from a sanctioned country or territory without prior approval from Compliance.
- Proceed with a business transaction without prior approval from Compliance if there is any doubt as to whether the transaction might breach trade control laws.
- Conceal the true identity of the counterparty or other relevant facts of a transaction, or otherwise take any action to evade or avoid trade controls restrictions.



Our hypothetical scenarios will help you apply **Our Code every day. Scan the QR Code or go to**



<https://www.bhp.com/our-code-scenario11>





# 4. Protect our company

If you work for us or on our behalf, you have an obligation to protect BHP's property and respect intellectual property rights.

## Protect our assets

**We all have an obligation to protect BHP's assets and use them for their intended purpose. Assets include physical and non-physical property such as equipment, inventory, technology, money, intellectual property (IP) and company information and data.**

Competitively sensitive and proprietary information are also considered assets. This includes:

- operational data, such as production and maintenance data, master data and data related to our equipment sensors and process control systems
- strategic and marketing plans
- information used in trading activities
- research and other technical data.

### What this means for you

You are responsible for appropriately using and safeguarding BHP's assets. You are also expected to respect the physical and non-physical assets of others, and never knowingly damage or misappropriate those assets including information and technology.

You are expected to capture or create data that meets our data quality standards. If you're not sure of the standards, refer to the BHP Data Catalogue.

Never share confidential information or competitively sensitive information without authorisation from your line leader. If unsure, ask your leader, 2-Up, Ethics and Investigations, Compliance or Legal.

We are all responsible for protecting BHP's assets and this includes preventing and detecting fraud. Fraud is any deliberate act of deception which is undertaken for personal or third-party gain, and which may result in financial or non-financial loss to BHP or another party. Examples may include, but are not limited to, making false statements or falsifying documents to obtain a personal commission or award, misusing BHP's information for personal advantage or physical theft.

### Always

- Use our assets for their intended purpose.
- Protect our assets from waste, damage, misuse, interference, unauthorised access, modification or disclosure loss, fraud and theft.
- Report any potential waste, damage, misuse, loss, fraud or theft of our assets.
- Prevent unauthorised personnel from accessing our facilities, information, data or other assets, where possible and safe to do so.
- Report suspicious emails, text or calls to Cybersecurity.
- Immediately report actual or suspected ransomware or cyber extortion incidents to Cybersecurity.
- Refer to data retention and disposal schedules in the BHP Data Catalogue before disposing of data.
- Follow the **Data Global Standard** when creating, capturing or managing information.

### Never

- Use BHP's assets for personal gain.
- Take physical property or information assets belonging to BHP for personal use.
- Transfer BHP data or information outside of BHP systems without prior approval from your line leader and/or information owner.
- Enter into any fraudulent or illegal transactions or fail to report any fraudulent activity.
- Take any action that undermines the integrity of vendor or customer data in our systems.
- Permit unauthorised entry to a BHP site or office, or access to our information technology.
- Ignore security complaints or an inadequate security procedure that may present threats to our people or assets.



**Our hypothetical scenarios will help you apply Our Code every day. Scan the QR Code or go to**



<https://www.bhp.com/our-code-scenario12>



# Safeguard our technology, systems and data

## Safeguarding our technology systems and data is the responsibility of everyone who works for us or on our behalf.

Inappropriate use of technology or data may expose our company to risks and vulnerabilities, including viruses, ransomware attacks, security breaches, theft or loss of BHP property and more. This could result in financial loss, legal impact or reputational damage.

All BHP hardware, software and data is the property of BHP. This includes BHP data stored on personal and BHP devices. To mitigate risk and comply with relevant laws, regulations and standards across the global locations in which we operate, the use of BHP technology and systems is monitored, reported and, where required, blocked without prior notice. Data stored on BHP technology and systems may be accessed, reviewed or disclosed for the purposes of maintenance, business needs or to meet legal, regulatory or policy requirements.

## What this means for you

To protect against damage, loss, theft, misuse, interference and unauthorised alteration, access and disclosure, you must safeguard and use our technology and data securely and appropriately.

Never use our technology or data to commit cybercrime, duplicate or sell software or media files, share your account password, use data for non-BHP business purposes or cause reputational damage to BHP. Our technology must never be used as a platform to create or spread information that is not truthful.

Disciplinary action may be taken and civil or criminal authorities notified, if you use our technology and data inappropriately, or inappropriate material is accessed or stored using our systems. Inappropriate material includes pornographic or sexually explicit or exploitative images or text, materials promoting violence, hatred, racism, religious beliefs, terrorism or the intolerance of others, or any other material that is deemed obscene or abusive.

Never use, modify, transfer, publish, share, remove or delete BHP data or intellectual property without written authorisation from your line leader.

Moderate personal use of BHP technology is permitted, provided you comply with the above requirements.

## Always

- Follow the **Technology and Cybersecurity Global Standard** and our **Communications and Brand Global Standard** when using BHP's technology, systems and data.
- Treat emails and other electronic forms of communication as official records.
- Use authorised applications for business communications or to conduct business activities.
- Ensure your personal and corporate devices have the latest security updates – do this by connecting BHP devices to our corporate network at least once a month.
- Return BHP equipment and all BHP information assets upon termination of your employment or contract.
- Report the damage, loss or theft of BHP equipment, or unauthorised access to, or use or disclosure of BHP data to your line leader and Technology as quickly as possible.
- Protect any hardware, software and data for which you are responsible from damage, loss, theft, interference and unauthorised access, modification, disclosure or use.
- Report suspicious emails to Technology as phishing.
- Lock your screen when you are away from your workstation.
- Inform Workplace Technology when travelling to a high-risk country on BHP's behalf to request a single use device where appropriate.

## Never

- Divulge your BHP system, devices or application passwords or allow anyone else to gain access to BHP technology and systems using your login credentials.
- Leave BHP technology or mobile devices unattended in public places.
- Engage in fraud, commit a crime online or fail to report a fraud.
- Install software on or connect hardware to BHP devices without authorisation from Technology.
- Deliberately access, store, send, post or publish inappropriate material, or ignore these activities if you know of others doing so.
- Access applications or systems for which there is no business justification.
- Use unauthorised applications (such as WhatsApp, WeChat) for documenting or agreeing business transactions. See our **Communications and Brand Global Standard** for details.
- Store, send, post or publish BHP data or proprietary information outside of our systems or devices including social media without prior authorisation from your line leader.
- Use non-BHP storage solutions (external hard drives, USBs, personal email, personal clouds or internet storage services) to store BHP data.
- Copy or transfer files that violate copyright laws.
- Ship our hardware or software outside of the country of origin without engaging Technology.
- Disable security measures on BHP technology systems.
- Receive compensation for the disposal of BHP equipment.



Our hypothetical scenarios will help you apply Our Code every day. Scan the QR Code or go to



<https://www.bhp.com/our-code-scenario13>

# Protect our intellectual property

## Intellectual property (IP) rights protect and enable our technology, processes, documents, products and brands.

IP can cover inventions and innovations, trademarks, designs, and copyright works such as text, images, drawings and software, as well as confidential information (including algorithms and know-how) and data. BHP both owns IP and licenses IP from third parties. New IP is created every day in our operations through copyright in new documents or software code, innovations or discoveries from our exploration or research and development, and from working with our suppliers to improve or adapt their products.

Like other BHP property, IP rights have financial value and strategic value. We can stop others from copying BHP's IP or we can obtain a licence to use other people's IP in our business to gain a competitive edge. The value of our IP can be lost by improper disclosure or use, inappropriate contractual terms or failing to follow necessary formalities for protection, such as registration.

Infringing other people's IP could result in costly legal disputes that may impede our freedom to operate and damage BHP's reputation.

## What this means for you

You should always safeguard BHP's IP, respect the IP rights of others (including suppliers and competitors) and take appropriate steps to manage infringement risks.

Never disclose BHP's confidential information without authorisation, even if your employment or contract with BHP has concluded. If there is a legitimate reason to share BHP's confidential information, such as where required to work with a supplier, obtain the prior approval of your line leader and a written confidentiality agreement with the other party.

To protect our IP and data, use BHP's standard contracts when contracting suppliers wherever possible. Follow required approval processes if using any alternative terms.

Where new IP is created through innovations or improvements to our processes, keep the information confidential. If you are unsure if any other protection is required, seek advice from Legal. Only access a third party's IP, if permitted in writing by that party (for example, in a contract with a supplier), or otherwise as permitted by law where you have advice from Legal. Before you copy or share something provided by a third party, or develop or deploy new technology, always check whether a third party's IP rights may be infringed.

### Always

- Enter into a confidentiality agreement before starting negotiations or any other engagement with a person outside BHP who may receive or access BHP's confidential IP or information.
- Be aware of what information is confidential and comply with BHP's Information Protection Framework (for example, classifying and marking documents). Only give confidential information to people who need to know it.
- Ensure onboarding processes confirm ongoing confidentiality obligations and that departing personnel have not retained any confidential materials.
- Use BHP's standard contracts wherever possible when contracting with third parties, and only depart from BHP's standard IP and confidentiality terms after obtaining appropriate internal approvals.
- Keep any new IP created, such as innovations or improvements to our processes, confidential and check with Legal if any additional protection is required.
- Ensure no third party IP rights may be infringed before you copy, share, develop or deploy new technology or processes. If unsure, seek guidance.
- Use a third party's IP only as permitted in writing by that party (for example in a contract with a supplier) or otherwise as permitted by law where you have advice from Legal.

### Never

- Disclose BHP's IP without first obtaining permission from your line leader and, if the IP is confidential, making sure the recipient has a legal obligation to keep the information confidential (for example under a confidentiality agreement).
- Bring to BHP or use any confidential information, including documents or computer records, from prior employers or clients without their written permission.
- Share, copy or deploy a new technology or process without first ensuring you are not infringing a third party's IP.
- Use third parties' copyright materials (for example software, photographs, text, audio or video downloaded from the internet) or trademarks in materials you are producing including for use on BHP intranet sites, without first obtaining permission from the copyright or trademark owner.



Our hypothetical scenarios will help you apply Our Code every day. Scan the QR Code or go to



<https://www.bhp.com/our-code-scenario14>





## 5. Protect and respect information

As a publicly listed company, we must comply with regulations about sharing information.

# Communicate consistently and truthfully

## Engaging with our external stakeholders in a consistent way helps build, protect and enhance our reputation and licence to operate, and ensures we meet our regulatory requirements.

All public disclosures are carefully managed and can only be made by authorised spokespeople. Any public communication that can be attributed to BHP, or to one of our employees or contractors, may be seen as a public disclosure. This includes:

- regulatory filings, such as annual reports, stock exchange releases, briefings on profit and business performance
- media releases, interviews, speeches, presentations, articles and reports
- digital information available on websites, social media and messaging channels.

## What this means for you

Always act in accordance with the **Market Disclosure Global Standard, Social Value and Sustainability Global Standard, Our Charter, Our values, Our Code** and our **Communications and Brand Global Standard**.

Know and understand the difference between company information that can be shared informally (information that is published and in the public domain) and material information which can only be communicated by authorised BHP spokespeople. If you think you possess or have released material information that has not been disclosed to the public, report it immediately to Investor Relations, a Disclosure Officer or Group Governance.

If you are an authorised spokesperson or work in a team responsible for market disclosure, you must immediately release, through the relevant exchanges, any information or major developments which a reasonable person would

expect to have a material effect on the share price or value. This includes information that would, or would be likely to, influence persons who commonly invest in securities in deciding whether to acquire or dispose of securities.

Ensure all materials developed for external use, including speeches, articles and presentations are approved by Corporate Affairs.

Know how our **Communications and Brand Global Standard** applies to you. Social media activity may feel casual and spontaneous however it is permanently retained, can be traced back to you and linked to BHP. When using social media, messaging or other digital channels, always do so in accordance with **Our Charter, Our values** and **Our Code**.

### Always

- Follow the rules relating to who can make public statements on behalf of BHP.
- Obtain all relevant approvals prior to publicly releasing material.
- Report media and investor/analyst inquiries promptly to Corporate Affairs or Investor Relations.
- Comply with the **Communications and Brand Global Standard** in relation to attendance at external events, presenting speeches and participating in external panel discussions.
- Ensure anything you share on social media channels is publicly available information and aligns with **Our Charter, Our values** and **Our Code**.
- Immediately report any information or major developments that could have a material effect on the share price or investment decisions to Investor Relations, a Disclosure Officer or Governance.

### Never

- Disclose information to the public or divulge confidential information unless you are specifically authorised to do so.
- Say anything that may disclose confidential information or cause harm to our reputation.
- Conceal facts or omit information that may be relevant to a disclosure.
- Use BHP trademarks or branding unless you are specifically authorised to do so.
- Post content or comments in private messaging groups or on public social media channels that are obscene, defamatory, threatening, harassing, discriminatory or hateful to any person, group or entity.



Our hypothetical scenarios will help you apply **Our Code** every day. Scan the QR Code or go to



<https://www.bhp.com/our-code-scenario15>



# Respect personal information and privacy

## We respect your personal information and privacy and expect you to respect the personal information and privacy of others.

Personal information is any information or opinion relating to an identified or identifiable individual (such as current, former or prospective employees, contractors and business contacts). This information can include names, addresses, job applications, employment information, performance records, health and safety information, location data, opinions and correspondences to and from an individual.

More information on how we collect and process personal information, and the rights a person has in relation to the personal information we hold about them is in our **Global Privacy Notice for BHP Workers** (for those who work for BHP) and **Privacy Policy** (for all other individuals who provide personal information to BHP).

## What this means for you

Follow our standards and procedures on handling personal information and protecting privacy and only collect, use, disclose, retain or process personal information that is necessary to meet business requirements, as permitted by law in places where we operate.

Always treat the personal information and privacy of others with respect.



### Always

- Have a legal, legitimate and specific BHP business purpose for collecting, sharing, using or handling personal information and do not use it for any other purpose. If you are unsure about the purposes for which you are entitled to collect, share, use or handle personal information, seek advice from Legal.
- Collect the *minimum* amount of personal information legitimately necessary for the specific business purpose.
- Maintain the accuracy of your personal information as well as any personal information that you handle or process.
- Retain personal information for the minimum amount of time necessary and securely dispose of it when it is no longer required as detailed in the **Data Global Standard**.
- Notify individuals why their personal information is required and how it will be used and allow them to exercise their legal rights in relation to their personal information.
- Adequately safeguard personal information against unauthorised or unlawful handling, access, use, modification, sharing, loss, interference, destruction or damage.
- Check and comply with the country-specific legal requirements for handling personal information, as applicable from time to time.
- Follow the **Data Global Standard** when creating, capturing or managing information including records, non-records, personal information and controlled documents.
- Follow the Privacy by Design Checklist when designing a new or changed processing activity that involves personal information.

- Immediately report any actual or suspected unauthorised access to, modification or disclosure of, or loss, misuse or interference of personal information to your line leader and **cybersecurity@bhp.com**.

### Never

- Access or use or share personal information without specific authorisation from your line leader or a clear business requirement.
- Retain personal information for longer than legally required or necessary for the purpose it was collected (or any other purpose permitted by law).
- Collect or process sensitive personal information unless explicit consent has been obtained from the individual or it is permitted by applicable laws and regulations.
- Store files without adequate protection and access restrictions if they contain sensitive personal information, such as health data or payroll information.



Our hypothetical scenarios will help you apply **Our Code** every day. Scan the QR Code or go to



<https://www.bhp.com/our-code-scenario16>



# Report truthfully

## Reporting truthfully ensures we maintain the trust of our stakeholders.

When creating and maintaining data it must be accurate, complete and appropriate. There is never a justification for falsifying records, misrepresenting facts or engaging in any other fraudulent behaviour. All financial and non-financial reports must be evidenced by appropriate source documents, verified for validity, accuracy and completeness, properly authorised and accurately and completely recorded in the relevant accounts, systems and records.

## What this means for you

If you are responsible for reporting financial or non-financial information, ensure you follow processes and establish adequate internal controls to achieve truthful, accurate, appropriate, complete, consistent, timely and understandable reports that represent BHP and our business activities. Understand and comply with the Global Standards as they apply to your role, and all applicable financial, regulatory and reporting requirements, laws and regulations in the relevant jurisdiction.

If you have any concerns about the validity of any reporting process or record-keeping activity, or believe you are being asked to create false or misleading information, report immediately to your 2Up, Ethics and Investigations, Compliance or via **Integrity@BHP** or the **BHP Protected Disclosure Reporting Channel**.

### Always

- Make and keep books, records and accounts which, in reasonable detail, accurately and fairly reflect BHP's transactions in accordance with all applicable laws, regulations, standards and procedures.
- Speak up immediately if you suspect fraudulent activity and report any actual or suspected irregularities or weaknesses in internal controls, accounting or reporting.

- Cooperate with our internal and external auditors and disclose all pertinent information that could reasonably impact the data verification process and results of an audit.
- Ensure no undisclosed or unrecorded account, fund or asset is established or maintained.
- Ensure work-related expenses are legitimate, reasonable and supported by valid receipts and invoices.
- Return or transfer the custody of all relevant business records if you change roles within the company or if you leave BHP. Do not keep personal copies.

### Never

- Falsify any record or make a false or misleading entry including omitting any information.
- Circumvent review and approval procedures for reporting financial or non-financial information.
- Allow others to do anything that would compromise the integrity of BHP's records or reports.
- Disclose or disseminate confidential information or competitively sensitive information without prior authorisation.
- Misstate your qualifications, experience or achievements.
- Dispose of documents and records without knowing what is being discarded or whether they must be kept for legal reasons.

### Hypothetical scenario

- Q:** I have been asked to provide a written update on the progress of one of our team's key improvement initiatives. We are behind schedule but I know we will catch up in the next month or two. Do I need to specifically say we are behind schedule?

- A:** All reporting we do across the organisation should be factual and not give the impression that work has been completed when it is has not, even if there is a strong belief the work will be completed soon.



Our hypothetical scenarios will help you apply Our Code every day. Scan the QR Code or go to



<https://www.bhp.com/our-code-scenario17>



# Don't engage in insider trading

**In the course of your job, you may have access to inside information about BHP or another company before it is made public. You are expected to act in accordance with legal and regulatory requirements or market practice.**

Insider trading refers to trading in financial and/or physical markets (for example, trading shares in a company) on the basis of 'insider information', which may be illegal. 'Inside information' is information that is not generally available including:

- the financial performance of BHP against market expectations
- entry into or termination of a significant contract
- production curtailment or shutdown
- major strategic decisions including actual or proposed mergers or demergers, acquisitions or divestments, or joint ventures
- actual or possible discoveries of, or significant adjustments to ore bodies or oil reserves.

If insider information is made publicly available, a reasonable person would expect it to have a material effect (positive or negative) on the price of the particular securities and influence an investor's decision making.

In many countries, it is a criminal offence to buy, sell or otherwise deal in securities of a company likely to be impacted by the release of inside information. It may also be a criminal offence to disclose inside information to someone else, if you suspect or have reason to believe that the person is likely to buy, sell or otherwise deal in the relevant securities. Under some circumstances, it is an offence to buy, sell or deal in physical commodities and commodity derivatives on the basis of insider information, or encourage others to do the same.

## What this means for you

Unless you are authorised to do so, if you have inside information you must not:

- deal in the securities of BHP (or any other company), physical commodities or commodity derivatives potentially impacted.
- advise, procure or encourage another person to deal in the securities of BHP (or any other company), physical commodities or commodity derivatives potentially impacted.
- pass on inside information to any other person (whether directly or indirectly)

It may also be a breach of your obligations of confidentiality to disclose confidential information, whether or not the information is used to deal in the company's relevant securities. With specific reference to BHP securities, if you have been placed on a Securities Dealing Restricted List or you are a Person Discharging Managerial Responsibilities in accordance with the **Securities Dealing Global Standard**, you must gain approval from a designated Clearance Officer before engaging in any transactions involving BHP securities. If you have been placed on such a list, then you must not deal or encourage others to deal in BHP securities.

If you are an employee participating in any employee share scheme (excluding Shareplus), you must not buy, sell or otherwise deal in BHP securities during any close period, regardless of whether you hold inside information.

## Always

- Maintain the confidentiality of BHP confidential information and take measures to avoid accidentally sharing inside information.
- Seek advice from Group Governance, Ethics and Investigations, Compliance or Legal if you have inside information and are considering dealing in a company's relevant securities or are transacting in the physical or derivative commodities market and have any doubt.

## Never

- Trade relevant securities of BHP (or any other potentially impacted company), either directly or indirectly, while you are in possession of inside information.
- Recommend or suggest that anyone else trade in the relevant securities of BHP (or any other potentially impacted company), or transact in potentially impacted financial and physical commodities markets, while you are in possession of inside information.
- Disclose inside information to anyone outside BHP unless you are authorised to do so.
- Discuss confidential information in public or leave confidential information in a public place. If you accidentally share inside information, contact Group Governance, Ethics and Investigations, Compliance or Legal immediately.



**Our hypothetical scenarios will help you apply Our Code every day. Scan the QR Code or go to**



<https://www.bhp.com/our-code-scenario18>



# BHP