

BHP

Our Code

How we live Our Values every day



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BHP acknowledges and pays respect to the Indigenous Peoples 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.

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



**“We use Our Values
and Our Code to
help drive the best
possible outcomes.”**

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 Our Values.

Our Code of Conduct (Our Code) 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 help drive the best possible outcomes. They guide our partnerships with the communities where we operate all the way through to how we work with our customers around the world.

They guide how we create a workplace where everyone feels respected and safe to speak up if they see something that might contradict *Our Code*... and we support those who speak up.

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

We must own this collectively.

Mike Henry
Chief Executive Officer

Our Code

Our Code brings Our Values to life and helps us make better decisions every day. It applies to everyone who works for us, with us or on our behalf.



Our Code matters

Everywhere we operate, we are committed to doing what is right and doing what we say we will do. That's why *Our Code* matters. It helps us deliver on our purpose and make better decisions every day.

Our Code:

- provides clear guidance on how Our Values are put into practice
- outlines the commitments that guide how we work together safely, respectfully, and ethically
- helps you make better decisions and know where to go for further information, or help
- explains how to raise concerns or seek help if you see or suspect a breach of *Our Code*.

How to use *Our Code*

- Our Values and *Our Code*, supported by *Our Requirements*, work together to guide your decisions, behaviour, and actions. *Our Requirements* are the suite of *Global Controlled Documents* (including *Global Standards*) that set the mandatory minimum performance requirements for BHP.

- *Our Code* outlines what BHP's commitments mean for you. Each section of *Our Code* sets out how BHP expects you to act.
- When local laws or regulations are less strict than *Our Code* or *Our Requirements*, it's important we adhere to BHP's higher standard of behaviour.

Our Code applies to us all

When you work for us, with us, or on our behalf, *Our Code* applies to you. *Our Code* applies when on site, in our offices, working remotely, in camp or other BHP-provided accommodation, at BHP functions, when travelling for work, and when you are representing BHP.

Our expectations of you:

- **Know Our Code:** Read and understand *Our Code*, staying up-to-date with our supporting resources and training.
- **Uphold Our Code and Our Requirements:** Comply with *Our Code* and *Our Requirements*, including any standards, processes and procedures that apply to your role, and all applicable laws and regulations of the country in which you're working.

- **Live Our Values:** Bring Our Values to life through your daily actions.
- **Make better decisions:** Use the Quick Test and guidance from your peers, leaders and other support resources to ensure your decisions align with Our Values.
- **Speak up:** Speak up and report any concerns or breaches.

Breaching Our Code

Breaching *Our Code*, breaking the law, or otherwise behaving in a way that compromises Our Values can have serious consequences, including removal from site, termination of employment or contract. In some cases, conduct causing a breach of *Our Code* may also be a breach of law and carry civil or criminal penalties.

Leading at BHP

Our leaders play an essential role at BHP. They set the tone for behaviour and decision making across our business, and have a significant influence on our safety, productivity, and wellbeing.

Role models: Our leaders lead by example, promoting ethical decision-making, a culture of care, and inclusion aligned to *Our Code* and *Our Values*.

Ensure compliance: Our leaders ensure their teams understand and can apply *Our Code*, *Our Requirements* and all applicable laws and regulations.

Listen and act: Our leaders listen to the concerns and questions raised by our people and respond appropriately. They encourage their teams to raise concerns or ask questions without fear of retaliation.

Accountable: Our leaders are accountable for their own actions and performance, and for enabling the actions and performance of their teams. They protect our people and BHP by managing risks and issues, and reporting any breaches of *Our Code*.

Making good decisions

Our Code can help you to make better decisions for BHP, our people, and the environment and communities where we operate. While *Our Code* can't predict every challenge or scenario we may face, it emphasises the importance of making good decisions every day.

Quick Test

The Quick Test is a tool to help you evaluate different aspects that contribute to making a good decision.

We use our Quick Test to make safe, responsible, and ethical decisions we can stand behind. All of our decisions should be guided by **Our Values**. You should consider:

- **Safety:** Could this directly or indirectly endanger someone?
- **Media:** How would this look in the news?
- **Law:** Is this compliant with *Our Code*, *Our Requirements*, and applicable laws and regulations?
- **Family:** What would I tell my partner, parent, child or friend to do?
- **Feel:** What's my intuition or 'gut feel'? How would I feel if this was seen, overheard or shared with a colleague, leader or stranger?

We speak up

Speak up

We all share the responsibility to speak up when something doesn't seem right. Ensuring everyone feels safe to speak up is crucial, which is why we have multiple ways you can voice your concern.

You can raise your concern with your line leader, or 2UP leader. Alternatively, you can reach out to Ethics and Investigations, Compliance, Legal, an Employee Relations advisor, or an HR Business Partner. Anyone who works with us, on our behalf, or is associated with us, can also raise concerns via **Integrity@BHP**.

If you're a community member, former employee or contractor, supplier or vendor, or you work for a supplier or vendor, you can speak with your BHP contact point, access the community complaints and grievance mechanisms available for each of our operations or contact **Integrity@BHP**.

If you don't feel safe or comfortable using the above channels or if you otherwise prefer, you can report your concern using the **BHP Protected Disclosure Reporting Channel** or through another option set out in the **BHP Whistleblower Policy**. Reports may be subject to protections under the **BHP Whistleblower Policy**.

Reports can be made anonymously. Anyone can raise concerns at **Integrity@BHP** or through the **BHP Protected Disclosure Reporting Channel**.



What happens when you speak up?

We treat every reported concern sensitively, respectfully and confidentially. Our Ethics and Investigations team will assess and triage reported concerns according to the categories set out in the *Business Conduct Global Standard*. If required, further investigation will be performed by Ethics and Investigations, Compliance, a leader, HR/Employee Relations and/or an external investigator.

We encourage employees and contractors to speak to their line leader, 2Up leader or Ethics and Investigations, to contact **Integrity@BHP** or the **BHP Protected Disclosure Reporting Channel** if they have any queries or issues during this process.



Protecting those who speak up

We encourage an open, inclusive and supportive environment and do not tolerate retaliation. This means we will not allow any form of punishment, discipline or retaliatory action to be taken against a person for speaking up, intending to speak up, being suspected of speaking up, or for cooperating with an investigation.

We encourage you to report any instance where you believe you or anyone else may be, or have been, retaliated against for speaking up. In some circumstances, you may also have legal protection when you speak up as outlined in the **BHP Whistleblower Policy**. We keep information reported confidential, consistent with applicable laws and regulations and good business practices, and your identity will only be disclosed if we are otherwise compelled by law, if you've consented, or if we determine it's necessary to refer the matter to emergency services, law enforcement or a regulator.

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**.

Nothing in *Our Code* or otherwise is intended to prevent 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.



1. Look out for one another

A healthy and safe workplace

Protecting the safety and wellbeing of our workforce is our priority.

At BHP, every person has the right to work in an environment that enables you to stay safe; physically and psychologically. Our approach to health and safety is grounded in Our Values, supported by *Our Requirements* and operational excellence.

What it means for you

We are all individually responsible for our own safety and the safety of others. Adhering to BHP's risk management and health and safety standards and procedures, is essential.

BHP is committed to psychologically safe workspaces. We demonstrate this commitment through our positive safety behaviours and showing care for ourselves and others. Our culture of care is part of how we work at BHP and is central to our approach to enabling psychologically safe workplaces, free from physical and psychosocial hazards.

We are vigilant in preventing, identifying and reporting unhealthy and unsafe events and behaviours. If work isn't safe, we don't walk past it – we stop it and make it safe.

Every day starts safely. This means we show up fit for work – physically and mentally well, rested, and drug and alcohol free. We value good mental health and wellbeing, for ourselves and others.

How you make an impact

You prioritise physical and psychological safety and wellbeing, actively raise, address and report all physical and psychosocial hazards (such as injuries, illnesses, near misses and actual events), follow our health and safety guidelines, and look out for one another.

Resources

- > Health Global Standard
- > Safety Global Standard
- > Security and Business Resilience Global Standard

Respect for all

Our behaviours bring Our Values to life.

We are committed to providing a workplace where everyone is treated with respect, and care. This means creating an inclusive environment that is free from harassment, sexual harassment, bullying, racism, and any other disrespectful behaviours. Ensuring respect and care for ourselves and others is fundamental to Our Values – and it's how we make work safe, productive and healthy for us all.

What it means for you

Respect for all means we treat each other fairly, communicate openly, celebrate success, and show appreciation for a job well done. Treating everyone with respect, regardless of their personal attributes or status, is essential.

Positive behaviours include listening actively, communicating openly, and supporting our colleagues. We are committed to preventing physical or psychosocial harm and stand against behaviours that are harassing, offensive, intimidating, or exclusive. If we witness or experience behaviour that contradicts Our Values, we speak up and address it.

BHP values the diversity of our people and are committed to creating an inclusive work environment that drives safer and better results for everyone.

Our commitments extend to work-related circumstances beyond the workday and traditional work environments. Our people always look out for one another, at all places – including online, while travelling for work, and in work-related social situations.

How you make an impact



You respect one another, are confident about what's not acceptable, challenge behaviour that doesn't align to Our Values, and speak up with any concerns.

Resources

- > Response Options to Reported Misconduct Global Process

Behaviours that have no place at BHP

There are some behaviours that undermine Our Values and that have no place at BHP. Some examples include sexual harassment, bullying, racial harassment, or discrimination. We are all responsible for ensuring none of our people are exposed to these behaviours, and that we speak up if we observe them.

Our leaders are accountable for lifting the performance of their teams through regular coaching and feedback, which is not harassment or bullying if it is respectful and constructive.

Sexual harassment

Sexual harassment is an unwelcome sexual advance, unwelcome request for sexual favours, or other unwelcome conduct of a sexual nature, which makes a person feel offended,

humiliated, and/or intimidated, where a reasonable person would anticipate that reaction in the circumstances. Sexual harassment includes displaying or sharing offensive material.

Racial harassment

Racial harassment is a racial slur, derogatory joke, comment, image or unwanted conduct based on race, descent, ancestry, ethnicity, ethnic origin, nationality, national origin, country of origin, colour or status as an immigrant. Racial harassment also includes displaying or sharing offensive material.

Discrimination

Discrimination occurs when a person, or group of people, is treated less favourably than another person or group, because of a personal attribute. A personal attribute can include gender identity, sex, age, origin, ethnicity, race, sexual orientation, intersex status, gender reassignment, transgender

status, disability, marital and civil partnership status, religion, political opinion, pregnancy, breastfeeding, family responsibilities or experience of family and domestic violence.

Harassment

Harassment includes unwelcome behaviour that offends, humiliates or intimidates a person. Generally harassment occurs because of a personal attribute (as described above).

Bullying

Bullying is repeated behaviour directed towards a worker or group of workers that a reasonable person, having considered the circumstances, may see as unreasonable, including victimising, mocking, humiliating, intimidating or threatening behaviour, displaying or sharing offensive material.



2. Care for people and planet

Respect human rights

All human beings have the right to be treated equally and without discrimination.

Human rights are the universal political, civil, economic, labour, social and cultural rights and freedoms to which every individual is entitled, regardless of nationality, sex, ethnicity, religion or any other status¹. Respecting human rights is critical to the sustainable operation of our business and meeting our commitments to internationally recognised human rights standards. Our commitments are described in our Human Rights Policy Statement and Indigenous Peoples Policy Statement.

What it means for you

BHP undertakes due diligence and engages with people and communities whose rights could be impacted by our operations, using their views to inform how to avoid or lessen potential impacts. When we cause or contribute to adverse human rights impacts, we work with people and communities to find solutions that address those impacts.

We create a supportive and fair workplace for our employees and contractors by committing to take steps to operate in a manner consistent with the ILO Declaration on Fundamental Principles

and Rights at Work, including the four Core international Labour Standards related to the freedom of association, the right to collective bargaining, prohibiting child and forced labour, and eliminating discrimination.

Our approach to security management respects human rights in line with the Voluntary Principles on Security and Human Rights, and our security providers must do the same.

We recognise that humans depend on the environment in which we live and acknowledge the United Nations General Assembly's recognition of the right to a clean, healthy and sustainable environment. BHP engages with people and communities to understand how their human rights are connected to air, land, water and biodiversity, and seeks to involve them in designing solutions to best manage environmental impacts from our operations.

Our suppliers and partners are required to demonstrate respect for human rights through their strong management systems and responsible sourcing.

We take a risk-based approach to due diligence and monitor the human rights performance of our suppliers and partners through constructive engagements with them.

How you make an impact

You treat others with respect, consider how your decisions can impact the rights of people, and speak up with any concerns about any potential or actual adverse impacts to a person's human rights.

Resources

- > Human Rights Policy Statement
- > Indigenous Peoples Policy Statement
- > Community and Indigenous Peoples Global Standard
- > Security and Business Resilience Global Standard
- > Minimum Requirements for Suppliers

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.

Support communities and Indigenous peoples

We commit to building long-term partnerships based on respect, transparency and shared value.

Our activities, behaviours and decisions can impact the social, physical and economic wellbeing of local and Indigenous communities. An understanding of their perspectives, concerns and aspirations enables us to design better projects that contribute to sustainable outcomes for communities, employees, partners and our operations.

What it means for you

Our communication with communities is respectful, honest and transparent. We invite community feedback regarding our business activities, and when issues arise, our people handle them with care; seeking timely solutions.

BHP acknowledges the unique connection that Indigenous peoples have to the customary lands, waters, plants, animals and cultural heritage that they rely upon

for their collective identity and survival as distinct peoples. Respecting their rights and cultural knowledge is central to how we develop projects that achieve long-term benefits for them and us. We seek the free, prior and informed consent of Indigenous peoples for new operations and capital projects in accordance with our Indigenous Peoples Policy Statement.

The important bond that communities and Indigenous peoples have with specific places contributes to a sense of their identity, history and belonging. This is why we take all reasonable steps, to avoid or minimise involuntary resettlement of communities and manage activities with potential impact to cultural heritage.

We support the development of thriving and empowered local communities by partnering to deliver jointly defined economic, social and environmental outcomes that have the potential to continue beyond the life of our operated assets.

We contribute to our communities transparently and with due diligence, through taxes and royalties, local hire and purchases, and supporting social investment projects, sponsorships and donations.

How you make an impact



You seek to understand the concerns, perspectives and interests of impacted communities, you respect their cultures and customs, you have the right training and support to engage respectfully and in a culturally appropriate way with communities and Indigenous peoples, and you act with integrity in all your interactions.

Resources

- > Indigenous Peoples Policy Statement
- > Community and Indigenous Peoples Global Standard
- > Social Value and Sustainability Global Standard



2. Care for people and planet continued

Contribute to a healthy environment for all

Our environmental performance and contribution to restoring a healthy environment for all, will help build a better world and a more sustainable future for BHP.

A healthy environment means the natural world around us is balanced and resilient. The world must achieve this to support biodiversity, people and economies into the future.

It is our role to be environmentally responsible, show care, and seek to contribute to the restoration of a healthy environment – producing our commodities in the most effective way, while avoiding or minimising adverse impacts to the ecosystem services we all depend on. These services include clean water, a stable climate and cultural connections that enhance our way of life.

What it means for you

Our people act responsibly, recognising the environmental values of the areas we operate in. BHP engages with those we share the environment with to seek to understand what healthy environment

means to them. We put the right controls in place before work commences, and check these controls are effective on a regular basis.

Throughout the mine life cycle, we proactively avoid or minimise environmental impacts – seeking ways to reduce threats to biodiversity, minimise our emissions to air, water, land, and ensure waste is managed responsibly. We ensure our rehabilitation and closure work contributes to healthy environment outcomes.

A healthy environment requires the collective effort of our value chain, so alignment with our approach is an important consideration when working with suppliers and partners in our supply chain.

If something is not right, we act – stopping and doing what is right to ensure environmental impacts are avoided or minimised. All actual and potential environmental events are recorded consistently in line with *Our Requirements* and procedures, and we take time to investigate and learn from them.

Our environmental performance is critical for operational excellence, building trust with those around us and creating social value. Our actions today shape our legacy.

How you make an impact



You acknowledge the value of a healthy environment for all, show care, report and manage environmental events and play your part to avoid or minimise environmental impacts.

Resources

- > Environment Global Standard
- > Climate Change Global Standard
- > Water Management Global Standard
- > Closure and Legacy Management Global Standard
- > HSEC Reporting, Event Management and Investigation Global Standard
- > Social Value and Sustainability Global Standard





3. Work with integrity

Foster open, constructive government relationships

The way we work with governments directly impacts our operations today, and into the future.

Our ability to operate effectively is closely linked to our relationships with governments and the decisions they make. By acting with transparency, integrity, and consistency, we contribute to trusted and enduring relationships with governments and the communities they represent.

What it means for you

We actively engage with governments, their agencies and officials, sharing relevant information and insights about our operations and industry. BHP is proactive and responsive

when addressing enquiries or making submissions to government – we ensure our communications are accurate, clear and represent Our Values.

We share our views on industry and policy-related matters. We communicate with a wide range of external stakeholders about the actions we take to improve Our Requirements in different policy areas. Our focus is on maintaining a fair and transparent approach to our interactions, avoiding any actions that could be perceived as improperly influencing political decision-making.

We partner with government on matters such as anti-corruption, competition laws, sanctions, and financial markets. In situations where our involvement with government representatives may raise concerns about conflicts of interest, we exercise caution and follow Our Requirements.

Employees can participate in the political process in a private capacity, being sure to avoid all conflicts with their role at BHP.

How you make an impact



You are truthful, accurate and cooperative when dealing with government, comply with *Our Requirements*, relevant laws and regulations, and seek support from *Global Corporate Affairs* when engaging with government or related stakeholders. You understand and comply with our Business Conduct Global Standard, including before communicating on public policy issues.

Resources

- > Business Conduct Global Standard
- > Conflict of Interest Register

3. Work with integrity *continued*

Refuse to participate in corruption or bribery

We stand against bribery and corruption in all forms.

We do not engage in or tolerate any form of bribery or corruption.

What it means for you

BHP is committed to transparent and ethical business practices. 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 authority to waive this requirement.

We do not offer, give, or promise anything of value (directly or through a partner or supplier) to influence anyone in their role, or to encourage them to perform their work disloyally or improperly.

We do not make payments of any size to government officials to facilitate routine services that are legally available (known as facilitation payments). However, payments made in response to an imminent threat to the health or safety of an employee, contractor or someone accompanying them are not facilitation payments. These situations and payments must be reported to Compliance as soon as possible.

Managing bribery and corruption risk is a shared responsibility. We speak up and immediately report any concerns about bribery or corruption risks. BHP fully

supports our employees, contractors, suppliers and partners who refuse to pay bribes or engage in unethical practices.

How you make an impact

You understand and comply with our *Business Conduct Global Standard*, refuse any request that you think may be corrupt (and support partners or suppliers who also refuse these requests) and immediately report any concerns.

Resources

- > Business Conduct Global Standard

Value supplier relationships

We are committed to responsible and respectful supplier relationships.

Our suppliers play an important role in our business. BHP uses fair practices to carefully select responsible suppliers that share Our Values and commitment to high standards of safety and conduct.

What it means for you

We work with responsible and reputable suppliers that share our commitment to lawful business practices, ethical business conduct, human rights (including in

relation to labour rights and modern slavery), and health, safety, community, and environmental standards.

When selecting suppliers, we conduct risk-based due diligence to understand their practices and assess whether they share Our Values and align with our purpose. BHP aims to engage suppliers that have a track record of operating safely and ethically.

Our suppliers of non-traded goods and services must comply with the *Minimum Requirements for Suppliers*. We actively monitor our suppliers and conduct regular reviews of supplier relationships and performance, committing to act if we identify any activity that is unlawful, unethical, or breaches *Our Code*.

How you make an impact

You work with responsible suppliers that meet *Our Requirements*, you communicate with our suppliers clearly and honestly, and raise any concerns or potential issues about suppliers immediately.

Resources

- > Minimum Requirements for Suppliers
- > Supply Global Standard
- > Contractor Management Global Standard
- > Business Conduct Global Standard

Avoid conflicts of interest

We make decisions that are in the best interest of BHP.

A conflict of interest happens when your personal interests or situation interferes with your ability to make impartial decisions in your role at BHP. Conflicts can come from a range of circumstances, such as your personal relationships, an outside role or affiliation, your investments – anything that might sway your judgement. Conflicts can also arise during a normal business relationship due to a change in circumstances. Conflicts of interest can be damaging for you, our business, and stakeholder relationships because they undermine trust in our integrity. For these reasons, it's important we limit, report and manage conflicts of interest.

What it means for you

We act in the best interest of BHP by declaring and following instructions to manage conflicts, including the perception of a conflict, consistent with *Our Requirements*.

This means you must declare any actual, potential, or perceived conflict of interest in the *Conflict of Interest Register*, or to your BHP contact if you are a supplier.

Examples of conflicts, or potential conflicts, you must declare include:

- awarding BHP business opportunities to a company owned by you or a close friend or relative
- holding outside jobs or affiliations, including directorships
- intending to participate as an individual in the political process, e.g. running for political office
- being in a close personal relationship with someone in your reporting line, including as a close relative, or in a romantic or intimate relationship.

Receiving gifts, services or offers of travel or accommodation from external parties can also be an actual, potential or perceived conflict of interest. We follow *Our Requirements* to manage these risks and ask for advice if uncertain.

How you make an impact



You remain alert for actual, potential or perceived conflicts of interest and disclose them in the *Conflict of Interests Register*. You seek advice if you're unsure whether a situation represents a conflict of interest.

Resources

- > Conflict of Interest Register
- > Business Conduct Global Standard



3. Work with integrity *continued*

Manage competition law risks

Competing fairly benefits everyone.

Competition laws promote fair competition and prohibit practices such as price-fixing and market allocation. We are committed to full compliance with applicable competition laws – this compliance helps maintain trust in BHP and the markets we participate in.

What it means for you

We never collude with competitors or potential competitors by fixing prices, dividing markets, agreeing production levels or colluding on costs of goods or services (including in relation to recruitment activities such as employee salaries and benefits).

Our people avoid any action that may have the appearance of collusion. We maintain our independence in dealings with third parties including in relation to pricing, marketing or selling.

Competition laws are complex and can be different across the countries where we work. Following *Our Requirements* helps to ensure compliance with these laws, especially when communicating competitively sensitive information, when joining an organisation involving competitors or when considering new cooperation arrangements with a competitor or potential competitor.

How you make an impact

You follow applicable competition laws and *Our Requirements*, seek advice when unsure about the right thing to do, and immediately report any actual or alleged anti-competitive behaviour, including by third parties.

Resources

> Business Conduct Global Standard

Respect trade control laws

We trade responsibly and in compliance with all applicable trade control laws.

BHP respects and follows the international trade laws, sanctions, and export controls that govern our transactions and complies with all applicable trade control laws. This includes export controls that impose restrictions of licensing requirements on exports of goods or technology. It also includes trade and financial sanctions that prohibit or restrict transactions with certain individuals, entities, vessels, countries or regions, and anti-boycott laws. BHP is committed to actions that ensure the activities within our control do not facilitate money laundering or terrorist financing.

Our compliance with trade control laws safeguards our reputation and avoids the risks of criminal penalties and interruption to our business.

What it means for you

When transacting with third parties, we carefully follow onboarding and due diligence processes – this enables us to comply with trade controls programs that are often subject to change.

If our customers are on-selling BHP commodities, we obtain assurances these are not being on-sold to sanctioned parties, countries or territories.

We stay alert to suspicious activities and transactions – such as transactions involving sanctioned parties or countries, and transactions that don't make economic sense or seem overly complex – and we get help from our Compliance teams to resolve the issue before proceeding with the transaction.

Following trade control laws protects our business and our people.

How you make an impact

You understand and comply with trade control laws, follow onboarding and due diligence processes, follow the Business Conduct Global Standard and raise concerns or potential violations with Compliance immediately.

Resources

> Business Conduct Global Standard



4. Protect our company



Protect our assets

We protect BHP's assets, safeguarding and using resources appropriately and responsibly.

At BHP, safeguarding and protecting our assets is everyone's responsibility. Our assets include our operations and physical items like equipment, inventory, and tools, as well as intangible assets like our intellectual property, technology, data, and sensitive data or information.

What it means for you

Our operational discipline is one of our strengths, and we're committed to maintaining it by understanding the risks related to our tasks and following *Our Requirements*. We recognise the importance of our resource and mine plans, so we work and act in an integrated way when we make decisions about our assets. This approach is technically sound and helps us safeguard BHP's world-class asset portfolio.

Protecting BHP's assets means we use them as intended, in accordance with *Our Requirements* and supporting procedures.

Maintaining world-class assets helps us create long-term value and ensure our success. Safeguarding our assets keeps our operations running and our people safe.

How you make an impact



You consider the mining value chain and interconnected nature of operational risks before making decisions, you protect our assets, observe confidentiality, do not share commercially sensitive information, and speak up immediately about any suspected misuse, damage, loss, theft or negligence that could jeopardise our assets.

Resources

- > Technology and Cybersecurity Global Standard
- > Data Global Standard
- > Geoscience Global Standard
- > Water Management Global Standard
- > Geotechnical Global Standard
- > Tailings and Water Storage Facilities Global Standard
- > Closure and Legacy Management Global Standard
- > Mine Engineering and Planning Global Standard
- > Business Conduct Global Standard

4. Protect our company continued

Safeguard our technology, systems and data

Protecting our digital assets is crucial to our operations and our stakeholders.

Our digital assets are the technology, systems, applications and data we use to do our jobs, and they are vital to BHP's operations. Inappropriate use of these digital assets may expose BHP to risks and vulnerabilities, which can result in security breaches, theft or loss of BHP assets, breach of law, and regulatory non-compliance.

We share collective responsibility for protecting our digital assets as doing so helps to ensure the confidentiality, integrity and availability of our data, enabling us to operate securely and efficiently.

What it means for you

Our people play an important role in ensuring our systems and data are secure, and preventing unauthorised

or accidental access, loss, or misuse of BHP's information. We stay vigilant against phishing, malware, and other cyber threats and fraud, and are proactive in reporting any suspicious activity.

Information and data is handled with care, and we are mindful of the need for some data and records to be retained. BHP maintains records according to our policies – ensuring they are stored securely and disposed of appropriately as authorised.

Maintaining the privacy and confidentiality of our data is important to us. We use approved and secure methods for storing, sharing, and disposing data, and follow *Our Requirements* to manage risk and protect our digital assets.

Our digital assets' content is free from inappropriate materials. Our communication, both internal and external, reflects Our Values, promotes inclusivity, and contributes to our culture of care by being free from harmful or disrespectful content, including content related to violence, hatred, discrimination or sexual matters.

How you make an impact



You handle our digital assets with care, comply with *Our Requirements*, use approved technology systems and applications, report any damage, loss or theft or unauthorised access and speak up about possible breaches immediately.

Resources

- > Technology and Cybersecurity Global Standard
- > Data Global Standard
- > Communications and Brand Global Standard
- > Business Conduct Global Standard



Protect our intellectual property

Our intellectual property (IP) is valuable, and we protect and respect it.

IP rights play a crucial role in safeguarding and enabling various aspects of our technology, processes, documents, products, and brands. These rights encompass a wide range of creations, including inventions, innovations, trademarks, designs, and copyright-protected works like text, images, and software, as well as our confidential information and data. These assets help us be innovative and competitive, and protecting them is an important part of how we are successful.

What it means for you

We protect BHP's IP by ensuring all our work and innovations are secure. We understand what protection options are available, including the creation or recognition of legal rights, and take steps to ensure the right controls and protections are in place.

By following our applicable standards and procedures, BHP keeps its IP safe. We protect confidential information, and we do not share it unless we have been authorised to do so or are required to by law.

BHP respects the IP rights of others, including our suppliers, competitors, and customers. When working with a third party's IP (including in contracts), we make sure we have the right permissions, and we handle others' IP with the same respect we give our own IP.

When we are creating or improving processes or materials, we ensure these will not infringe third party's IP.

How you make an impact



You handle our IP with care, comply with *Our Requirements*, respect the IP rights of others, follow contractual and confidentiality protocols, speak up about any misuse or potential infringement of BHP's IP and the IP of others immediately.

Resources

- > Data Global Standard
- > Legal Services, Risks, Contracts & Disputes Global Standard
- > Business Conduct Global Standard





5. Protect and respect information

Communicate consistently and truthfully

We communicate and report clearly and truthfully to build trust and meet our responsibilities.

What we say publicly matters – it has an impact on our reputation, our people, the communities where we operate and our broader stakeholders and partners. Keeping our messages honest, clear, accurate and consistent is key to maintaining trust and meeting our market disclosure obligations.

It's important to record our internal data and information accurately and completely, and maintain appropriate source documents because this information is used for decision-making, financial and non-financial reporting, and communications, and supports verification and compliance processes.

What it means for you

We only speak for BHP or share BHP information publicly if we have received authorisation. This means having approval before publishing articles, making speeches or presentations at external events, or disclosing BHP information publicly. We follow *Our Requirements* to help us manage risk and obtain the right reviews and approvals.

Our authorised spokespersons have received approval to speak to the media, investors and other external stakeholders on behalf of BHP. They play an important role in ensuring our public communication is timely, accurate, and meets stakeholder expectations.

We make sure to always report any material information or major developments about BHP to Group Governance and Investor Relations. This enables BHP to immediately release, on the stock exchanges, any information which a reasonable person would expect to have a material effect on BHP's share price or value.

On social media, we communicate responsibly and respectfully when commenting about or on behalf of BHP, being mindful that we are representing BHP, and we obtain the required reviews and approvals if disclosing BHP information.

What we communicate can have legal consequences, and how we communicate impacts our reputation, our business, people and communities, and can cause a breach of law.

How you make an impact



You consider the impact of any communication about BHP, communicate in a way that aligns with our brand and Our Values, obtain all relevant reviews and approvals before releasing any BHP information externally or to the broad BHP workforce, and you report any material BHP information to Group Governance and Investor Relations immediately.

Resources

- > Market Disclosure Global Standard
- > Social Value and Sustainability Global Standard
- > Communications and Brand Global Standard
- > Community and Indigenous Peoples Global Standard

Respect personal information and privacy

We handle personal information with respect and protect the privacy of all individuals.

Personal information is any information or opinion about a person that can be used to identify them. Protecting personal information and privacy is essential to prevent harm and maintain trust.

What it means for you

BHP only collects personal information when necessary to meet business purposes. We are transparent and seek permission before collecting or using personal information and do not use personal information in any way that is not legal and required for a reasonable business purpose, or for personal gain.

Our Requirements help us safeguard this information against unauthorised or inappropriate access, disclosure or use. We act immediately if something doesn't seem right.

A breach or misuse of personal information may cause serious harm to others.

How you make an impact

You handle personal information with care and respect and follow *Our Requirements*.

Resources

- > Global Privacy Notice for BHP Workers
- > Privacy Policy
- > Data Global Standard

Inside information and insider trading

We don't engage in insider trading.

Insider trading is when a person trades in financial or commodity markets based on inside information, and it is illegal. This includes buying or selling shares or securities in a company, physical commodities or commodity derivatives.

While working with us, you may have access to inside information – this is information about BHP or another company that is not public and, if made publicly available, a reasonable person would expect to have a positive or negative effect on the price of securities. This includes non-public information about financial or operational performance, significant contracts or strategic decisions.

What it means for you

We keep inside information confidential and understand the serious consequences that misusing inside information may

have personally, for BHP, and on financial and commodity markets. Non-public information is handled with great care and is not shared or discussed improperly.

When we hold inside information, we never use it for personal gain or trade in BHP or other companies' securities, physical commodities or commodity derivatives. We never recommend or suggest that anyone else trade in securities or physical or derivative commodities when holding inside information.

Before trading, we always ask ourselves if we have any inside information. If we have inside information and are considering trading in securities or transacting in physical or derivative commodities, we seek advice from our Compliance teams.

We never share inside or non-public information with others unless authorised to do so. This includes discussing non-public information in public or with family or friends.

BHP takes these responsibilities seriously and has clear policies, procedures and support in place to help our people to make ethical and lawful choices.

Maintaining the confidentiality of BHP information and the integrity of securities and commodities markets upholds the credibility of our people, company and industry.

How you make an impact

You keep inside information strictly confidential, never trade in securities or commodities if you have inside information, follow our policies for securities dealing, seek guidance if needed before you trade in securities or commodities, and speak up immediately about any concerns about insider trading.

Resources

- > Securities Dealing Global Standard

