



**BHP**

**Sustainability  
Reporting  
Navigator  
2019**

# Sustainability Reporting Navigator 2019

## BHP's Sustainability Reporting Navigator 2019 supplements our BHP Sustainability Report 2019. These reports have been prepared in accordance with the GRI Standards: Comprehensive option.

The Sustainability Reporting Navigator 2019 indicates the sections of BHP's Sustainability Report 2019, Annual Report 2019, Economic Contribution Report 2019, Climate Change: Portfolio Analysis Report, Climate Change: Portfolio Analysis Views after Paris and Modern Slavery Act 2015 (UK) FY2019 Statement that specifically address what we have done to address the GRI standards and uphold the 10 principles of the International Council on Mining and Metals and the United Nations Global Compact. The BHP Sustainability Report 2019 also serves as our Advanced Level Communication on Progress for the UN Global Compact.



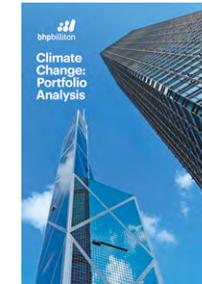
Sustainability Report 2019



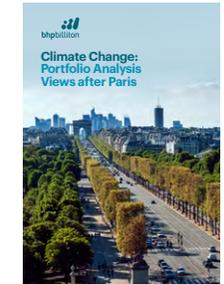
Annual Report 2019



Economic Contribution Report 2019



Climate Change: Portfolio Analysis



Climate Change: Portfolio Analysis Views after Paris





This is our **Communication on Progress** in implementing the principles of the **United Nations Global Compact** and supporting broader UN goals.

We welcome feedback on its contents.



CEO Water Mandate



## EY has provided:

- limited assurance in respect of the BHP Sustainability Report 2019 for the year ended 30 June 2019 ('Sustainability Report 2019'), including Subject Matters 1 to 4 of the ICMM Sustainable Development Framework;
- reasonable assurance in respect of the greenhouse gas emissions (Scope 1 and 2) included in the Sustainability Report 2019; and
- limited assurance over Asset Level Water data included in the Sustainability Report 2019.

A copy of EY's independent assurance report is in the Sustainability Report 2019.



## International Council on Mining and Metals

**Principle 1:** Implement and maintain ethical business practices and sound systems of corporate governance.

**Principle 2:** Integrate sustainable development considerations within the corporate decision-making process.

**Principle 3:** Uphold fundamental human rights and respect cultures, customs and values in dealings with employees and others who are affected by our activities.

**Principle 4:** Implement risk management strategies based on valid data and sound science.

**Principle 5:** Seek continual improvement of our health and safety performance.

**Principle 6:** Seek continual improvement of our environmental performance.

**Principle 7:** Contribute to conservation of biodiversity and integrated approaches to land use planning.

**Principle 8:** Facilitate and encourage responsible product design, use, re-use, recycling and disposal of our products.

**Principle 9:** Contribute to the social, economic and institutional development of the communities in which we operate.

**Principle 10:** Implement effective and transparent engagement, communication and independently verified reporting arrangements with our stakeholders.

WE SUPPORT



## United Nations Global Compact

### Human Rights

**Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights.

**Principle 2:** Make sure that they are not complicit in human rights abuses.

### Labour

**Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

**Principle 4:** The elimination of all forms of forced and compulsory labour.

**Principle 5:** The effective abolition of child labour.

**Principle 6:** The elimination of discrimination in respect of employment and occupation.

### Environment

**Principle 7:** Businesses should support a precautionary approach to environmental challenges.

**Principle 8:** Undertake initiatives to promote greater environmental responsibility.

**Principle 9:** Encourage the development and diffusion of environmentally friendly technologies.

### Anti-Corruption

**Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

## UN Global Compact Advanced Level Criterion

### Implementing the Ten Principles into Strategies and Operations

**Criterion 1:** The COP describes mainstreaming into corporate functions and business units.

**Criterion 2:** The COP describes value chain implementation.

### Robust Human Rights Management Policies and Procedures

**Criterion 3:** The COP describes robust commitments, strategies or policies in the area of human rights.

**Criterion 4:** The COP describes effective management systems to integrate the human rights principles.

**Criterion 5:** The COP describes effective monitoring and evaluation mechanisms of human rights integration.

### Robust Labour Management Policies and Procedures

**Criterion 6:** The COP describes robust commitments, strategies or policies in the area of labour.

**Criterion 7:** The COP describes effective management systems to integrate the labour principles.

**Criterion 8:** The COP describes effective monitoring and evaluation mechanisms of labour principles integration.

### Robust Environmental Management Policies and Procedures

**Criterion 9:** The COP describes robust commitments, strategies or policies in the area of environmental stewardship.

**Criterion 10:** The COP describes effective management systems to integrate the environmental principles.

**Criterion 11:** The COP describes effective monitoring and evaluation mechanisms for environmental stewardship.

### Robust Anti-Corruption Management Policies and Procedures

**Criterion 12:** The COP describes robust commitments, strategies or policies in the area of anti-corruption.

**Criterion 13:** The COP describes effective management systems to integrate the anti-corruption principle.

**Criterion 14:** The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption.

### Taking Action in Support of Broader UN Goals and Issues

**Criterion 15:** The COP describes core business contributions to UN goals and issues.

**Criterion 16:** The COP describes strategic social investments and philanthropy.

**Criterion 17:** The COP describes advocacy and public policy engagement.

**Criterion 18:** The COP describes partnerships and collective action.

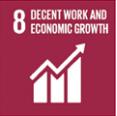
### Corporate Sustainability Governance and Leadership

**Criterion 19:** The COP describes CEO commitment and leadership.

**Criterion 20:** The COP describes Board adoption and oversight.

**Criterion 21:** The COP describes stakeholder engagement.

## United Nations Sustainable Development Goals

|   |  |   |  |   |  |
|---|--|---|--|---|--|
|  <p><b>1</b> NO POVERTY</p>                   | <p>End poverty in all its forms everywhere.</p>  |  <p><b>7</b> AFFORDABLE AND CLEAN ENERGY</p>               | <p>Ensure access to affordable, reliable, sustainable and modern energy for all.</p>   |  <p><b>13</b> CLIMATE ACTION</p>                         | <p>Take urgent action to combat climate change and its impacts*.</p>   |
|  <p><b>2</b> ZERO HUNGER</p>                  | <p>End hunger, achieve food security and improved nutrition and promote sustainable agriculture.</p>         |  <p><b>8</b> DECENT WORK AND ECONOMIC GROWTH</p>           | <p>Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.</p> |  <p><b>14</b> LIFE BELOW WATER</p>                       | <p>Conserve and sustainably use the oceans, seas and marine resources for sustainable development.</p>   |
|  <p><b>3</b> GOOD HEALTH AND WELL-BEING</p>   | <p>Ensure healthy lives and promote wellbeing for all at all ages.</p>                                       |  <p><b>9</b> INDUSTRY, INNOVATION AND INFRASTRUCTURE</p>   | <p>Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation.</p>            |  <p><b>15</b> LIFE ON LAND</p>                           | <p>Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss.</p> |
|  <p><b>4</b> QUALITY EDUCATION</p>            | <p>Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.</p> |  <p><b>10</b> REDUCED INEQUALITIES</p>                     | <p>Reduce inequality within and among countries.</p>   |  <p><b>16</b> PEACE, JUSTICE AND STRONG INSTITUTIONS</p> | <p>Promote peaceful and inclusive societies for sustainable development, provide access to justice for all, and build effective, accountable and inclusive institutions at all levels.</p>           |
|  <p><b>5</b> GENDER EQUALITY</p>             | <p>Achieve gender equality and empower all women and girls.</p>  |  <p><b>11</b> SUSTAINABLE CITIES AND COMMUNITIES</p>      | <p>Make cities and human settlements inclusive, safe, resilient and sustainable.</p>   |  <p><b>17</b> PARTNERSHIPS FOR THE GOALS</p>            | <p>Strengthen the means of implementation and revitalise the global partnership for sustainable development.</p>   |
|  <p><b>6</b> CLEAN WATER AND SANITATION</p> | <p>Ensure availability and sustainable management of water and sanitation for all.</p>                       |  <p><b>12</b> RESPONSIBLE CONSUMPTION AND PRODUCTION</p> | <p>Ensure sustainable consumption and production patterns.</p>   |   |  |

\* Acknowledging that the United Nations Framework Convention on Climate Change is the primary international, intergovernmental forum for negotiating the global response to climate change.

## Materiality assessment

We conduct a materiality assessment each year to identify the sustainability issues that are most critical to our business and stakeholders. We also assess the impact our activities have on the economy, the environment and society.

We review a wide variety of internal and external sources and consult with stakeholders using surveys, investor round tables and advisory groups to identify the issues of most concern to them and to our business. The Sustainability Committee

reviews the assessment and provides feedback on the issues. The Forum on Corporate Responsibility reviewed the methodology in November 2018.

This helps us to track ongoing issues and identify emerging ones. The materiality assessment informs our sustainability strategies and provides transparent coverage of key topics in line with Global Reporting Initiative (GRI) principles.

Water, dams, tailings and climate change are critical issues for us as they have the potential to impact safety, the environment and the community and have the potential to impact our ability to continue to operate and grow. The issue of trust in institutions and corporations was assessed as a material concern for BHP in FY2019. This drives our concerted efforts to build trust with all our stakeholders. The issues identified by the materiality assessment conducted in FY2019 are outlined below.

| Our material issues  | Section in the Sustainability Report 2019  |
|--|--|
| Trust in institutions; Board competency, succession and accountability; Governance and management of our non-operated joint ventures; Response to Samarco; Product stewardship; Dams and tailings management | Our sustainability approach  |
| Safety and health of our people and the community  | Health and safety  |
| Biodiversity and land management; Environmental impacts of our operations; Managing air emissions  | Environment  |
| Portfolio resilience; Physical impacts of climate change; Minimising greenhouse gas emissions from our operations and from the use of our products; Global response to climate change                        | Climate change   |
| Water management and access  | Water  |
| Community relationships; Respecting human rights; Indigenous peoples; Automation; Economic support for communities and social investment   | Society  |
| Inclusion and diversity; Training and development of our people  | People   |
| Anti-corruption and bribery; Transparency and disclosure   | Ethics and business conduct  |
| Tax and royalty payments   | Economic Contribution Report 2019 available online at <a href="http://bhp.com">bhp.com</a> |

## Our stakeholders

As a global company, we interact with a range of stakeholders. Our methods and frequency of engaging with and listening to stakeholders are diverse:

- Globally, we communicate via our Annual General Meetings, corporate publications (including the Annual Report, Sustainability Report and other topic-specific reports), our website (bhp.com), releases to the market and media, analyst briefings, speeches and interviews with senior executives.
- At a regional and local level, each asset is required to plan, implement and document stakeholder engagement activities. This includes community forums, newsletters and reports; community perception surveys and consultation groups; implementing community complaints and grievance mechanisms; representation on specific industry association committees and initiatives; and engagement to develop community programs.
- As a key stakeholder group, we also engage with our people (employees and contractors) via tailored internal channels. These channels include our intranet; email and newsletters; town halls; and by inviting feedback and comment through employee perception surveys. Key internal announcements and videos are made available in English and Spanish.

| Stakeholder   | Interest   | How we engage  |
|---|--|--|
| <b>Industry peers and associations</b>  |  |  |
| Commodity-specific associations, as well as sector-specific associations, at national and international levels. | Diverse range of issues associated with the sector or commodity, including environmental legislation, health and safety standards, and promotion of best practice.   | Representation on specific committees and engagement on specific projects with industry associations, both nationally and internationally, to develop guidelines, standards and programs, and share best practice. |
| <b>Investment community</b>   |  |  |
| Debt and equity analysts, socially responsible investment analysts and corporate governance analysts.           | Alignment of our performance with shareholder interests, including good financial returns, strong governance and performance, and elements of non-financial risk.  | Regular communication through analyst briefings of key issues, exchange releases, publicly available information; participation in external benchmarking initiatives.  |
| <b>Labour unions</b>  |  |  |
| Labour unions represented at many of our operations.  | Workers' rights and interests; collective bargaining; health and safety; remuneration; working hours; roster arrangements.   | Direct communication as required, respecting the rights of employees to freely join labour unions.   |
| <b>Local and Indigenous communities</b>   |  |  |
| A broad spectrum of local and Indigenous communities with interests and concerns.                               | Environmental and social impacts associated with our operations; opportunities for sustainable community development; interests and concerns as identified through stakeholder perception surveys, including local employment and business creation, support for social infrastructure and programs, improved community engagement mechanisms and environmental performance. | Community consultation, engagement and participation in BHP activities; work opportunities; community investment; preserving cultural heritage; targeted communications.   |

| Stakeholder  | Interest   | How we engage  |
|--|--|--|
| <b>Media</b>   |  |  |
| Representatives from print, online, broadcast and social media.  | Broad range of issues reflecting all stakeholder interests.  | Media releases, briefings, presentations and interviews, publicly available information (Annual Report, Sustainability Report, bhp.com, linkedin.com/company/bhp, youtube.com/bhp, twitter.com/bhp).                         |
| <b>Non-government organisations (NGOs)</b>   |  |  |
| Environmental, social and human rights organisations at local, national and international levels.  | Ethical, social and environmental performance of our operations, proposed operations, or closed operations; governance mechanisms, risk management and mitigation.   | Local engagement through each operation's stakeholder engagement plan; regular engagement at the Group level with relevant national and international organisations, and through the BHP Forum for Corporate Responsibility. |
| <b>Shareholders</b>  |  |  |
| A diverse group who have invested in our business, with significant representation in Australasia, Europe, South Africa and North America. | Creation of long-term shareholder value through consistent financial returns and good governance. Ensuring high-quality governance and maintaining focus on continuous improvement and understanding shareholder concerns. | Annual General Meeting; publicly available information (Annual Report, Sustainability Report, bhp.com); regular meetings with institutional shareholders and investor representatives; investment community presentations.   |
| <b>Society partners</b>  |  |  |
| Public or private organisations who we partner with on specific projects to benefit society, our host communities or the environment.      | Ethical, social and environmental performance of our operations, proposed operations, or closed operations; governance mechanisms, risk management and mitigation.   | Partnership boards and operating committees; Public documents (Annual Report, Sustainability Report, bhp.com); Regular engagement at the Group and Business level.   |
| <b>Suppliers</b>   |  |  |
| Businesses local to our operations, as well as large international suppliers.  | Supply agreements, payments and required supplier standards.   | Appropriate engagement throughout supplier life cycle determined according to supplier segmentation (HSEC, business conduct and commercial dependency requirements).   |

# Sustainability Reporting Navigator 2019 continued

| GENERAL DISCLOSURES | GRI Standard Number  | Disclosure Title  | BHP Response | ICMM Principles | UNGC Principles | UNGC Advanced Level Criterion | UN SDGs |
|---------------------|--|---|--------------|-----------------|-----------------|-------------------------------|---------|
|                     | 102-1  | Name of the organization  | BHP          |                 |                 |                               |         |
| 102-2 (a)           | Activities, brands, products, and services                   | BHP at a glance p.2, BHP locations p.94-95; <b>Annual Report 2019</b> section 1.4.6 Locations   |              |                 |                 |                               |         |
| 102-3               | Location of headquarters                                     | BHP locations p.94-95; <b>Annual Report 2019</b> section 1.4.6 Locations  |              |                 |                 |                               |         |
| 102-4               | Location of operations                                       | BHP at a glance p.2, BHP locations p.94-95; <b>Annual Report 2019</b> section 1.4.6 Locations   |              |                 |                 |                               |         |
| 102-5               | Ownership and legal form                                     | <b>Annual Report 2019</b> section 7.3 Organisational structure  |              |                 |                 |                               |         |
| 102-6               | Markets served   | <b>Annual Report 2019</b> section 1.6 Our operating environment   |              |                 |                 |                               |         |
| 102-7               | Scale of the organization                                    | <b>Annual Report 2019</b> sections 1.4.6 Locations, 1.9.2 Employees and contractors, 1.12 Summary of financial performance, 1.13 Performance by commodity, 7.3 Organisational structure   |              |                 |                 |                               |         |
| 102-8               | Information on employees and other workers                   | People, p.70, Performance data – People p.91<br>Information on whether a significant portion of the reporting organisation's activities are performed by workers who are not employees is not relevant to BHP. BHP does not report employment type by gender, as this information is not available due to the nature of contracting services. |              |                 | 6               |                               | 8       |
| 102-9               | Supply chain   | Promoting sustainability in our value chain p.16  |              |                 |                 | 2                             |         |
| 102-10              | Significant changes to the organization and its supply chain | Reporting boundary and scope p.6; <b>Annual Report 2019</b> section 1.12.1 Group overview   |              |                 |                 |                               |         |
| 102-11              | Precautionary Principle or approach                          | Chief Executive Officer's review p.3, Our sustainability approach p.12-15, Environment p.33; <b>Annual Report 2019</b> section 1.6.4 Risk management  |              | 2,4             | 7               |                               |         |
| 102-12              | External initiatives   | About this Sustainability Report (includes Voluntary initiatives and public commitments) p.7; <b>Sustainability Reporting Navigator 2019</b> (mapping to ICMM and UNGC principles).   |              | 10              |                 |                               |         |
| 102-13              | Membership of associations                                   | About this Sustainability Report p.7<br>A list of our associations that hold an active position on climate and energy policy can also be found online at bhp.com.   |              |                 |                 |                               |         |
| 102-14              | Statement from senior decision-maker                         | Chief Executive Officer's review p.3  |              | 2               |                 | 19                            |         |
| 102-15              | Key impacts, risks, and opportunities                        | Chief Executive Officer's review p.3, Our sustainability approach p.12-15, Each subsequent focus area contains the key risks/issues; <b>Annual Report 2019</b> section 1.6.4 Risk management  |              | 2,4             |                 | 19                            |         |

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## Sustainability Reporting Navigator 2019 continued

|                     | GRI Standard Number | Disclosure Title  | BHP Response   | ICMM Principles | UNGC Principles | UNGC Advanced Level Criterion | UN SDGs |
|---------------------|---------------------|---|--|-----------------|-----------------|-------------------------------|---------|
| GENERAL DISCLOSURES | 102-16              | Values, principles, standards, and norms of behavior                          | <i>Our Charter</i> inside cover; Our sustainability approach p.12-15, Our FY2019 sustainability performance p.8, Ethics and business conduct p.75-76                 | 1,2             | 10              | 12,13,14                      | 16      |
|                     | 102-17              | Mechanisms for advice and concerns about ethics                               | Ethics and business conduct p.75-76; <b>Annual Report 2019</b> section 2.3 Shareholder engagement  | 1,2             | 10              | 12,13,14                      | 16      |
|                     | 102-18              | Governance structure  | Sustainability governance p12; <b>Annual Report 2019</b> section 2.13 Board committees   | 1,2             |                 | 1,20                          |         |
|                     | 102-19              | Delegating authority  | Sustainability governance p.12; <b>Annual Report 2019</b> sections 2.13 Board committees, 2.15 Management  | 1,2             |                 | 1,20                          |         |
|                     | 102-20              | Executive-level responsibility for economic, environmental, and social topics | Sustainability governance p.12; <b>Annual Report 2019</b> sections 2.13 Board committees, 2.13.4 Sustainability Committee Report                                     | 1,2             |                 | 1,20                          |         |
|                     | 102-21              | Consulting stakeholders on economic, environmental, and social topics         | Forum on Corporate Responsibility p.13; <b>Annual Report 2019</b> sections 2.3 Shareholder engagement, 4.8 Employee policies   | 1,2,10          |                 | 1,20                          | 16      |
|                     | 102-22              | Composition of the highest governance body and its committees                 | <b>Annual Report 2019</b> sections 2.5 Board membership, 2.8 Director skills, experience and attributes, 2.10 Independence   | 1,2             |                 | 1,20                          | 5,16    |
|                     | 102-23              | Chair of the highest governance body  | <b>Annual Report 2019</b> sections 2.6 Chairman, 2.10 Independence   | 1,2             |                 | 1,20                          | 16      |
|                     | 102-24              | Nominating and selecting the highest governance body                          | <b>Annual Report 2019</b> sections 2.1 Governance at BHP, 2.5 Board membership, 2.8 Director skills, experience and attributes                                       | 1,2             |                 | 1,20                          | 5,16    |
|                     | 102-25              | Conflicts of interest   | <b>Annual Report 2019</b> section 2.10 Independence (Conflict of interest)   | 1,2             |                 | 1,20                          | 16      |
|                     | 102-26              | Role of highest governance body in setting purpose, values, and strategy      | <b>Annual Report 2019</b> sections 2.4 Role and responsibilities of the Board, 4.9 Corporate governance  | 1,2             |                 | 1,20                          |         |
|                     | 102-27              | Collective knowledge of highest governance body                               | <b>Annual Report 2019</b> sections 2.8 Director skills, experience and attributes, 2.9 Director induction, training and development                                  | 1,2             |                 | 1,20                          | 4       |
|                     | 102-28              | Evaluating the highest governance body's performance                          | <b>Annual Report 2019</b> section 2.11 Board evaluation  | 1,2             |                 | 1,20                          |         |
|                     | 102-29              | Identifying and managing economic, environmental, and social impacts          | Our sustainability approach p.9; <b>Annual Report 2019</b> section 2.4 Role and responsibilities of the Board  | 1,2             |                 | 1,20                          | 16      |
|                     | 102-30              | Effectiveness of risk management processes                                    | Our sustainability approach p.9; <b>Annual Report 2019</b> section 2.4 Role and responsibilities of the Board  | 1,2,4           |                 | 1,20                          |         |
|                     | 102-31              | Review of economic, environmental, and social topics                          | Sustainability governance p.12; <b>Annual Report 2019</b> sections 2.12 Board meetings and attendance, 2.13 Board committees, 2.13.4 Sustainability Committee Report | 1,2,4           |                 | 1,20                          |         |

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## Sustainability Reporting Navigator 2019 continued

|                     | GRI Standard Number | Disclosure Title   | BHP Response   | ICMM Principles | UNGC Principles | UNGC Advanced Level Criterion | UN SDGs |   |
|---------------------|---------------------|--|--|-----------------|-----------------|-------------------------------|---------|---|
| GENERAL DISCLOSURES | 102-32              | Highest governance body's role in sustainability reporting | Sustainability governance p.12, Materiality analysis p.15; <b>Annual Report 2019</b> section 2.13.4 Sustainability Committee Report  | 1,2             |                 | 1,20                          |         |   |
|                     | 102-33              | Communicating critical concerns                            | Ethics and business conduct p.75-76, Addressing social risks and impacts p.60; <b>Annual Report 2019</b> section 2.3 Shareholder engagement. In addition to a corporate feedback mechanism (EthicsPoint), feedback mechanisms have been implemented at all of our operations and significant projects. Significant incidents related to health, safety, environment and the community are reviewed by the Sustainability Committee of our Board. Feedback is rated on a scale of seriousness, and critical concerns are flagged. | 1,2,10          |                 | 1,20                          |         |   |
|                     | 102-34              | Nature and total number of critical concerns               | Ethics and business conduct p.76, Community concerns raised in FY19 p.61; <b>Annual Report 2019</b> sections 2.3 Shareholder engagement, 2.13.4 Sustainability Committee Report.   | 1,2,10          |                 | 1,20                          |         |   |
|                     | 102-35              | Remuneration policies                                      | Sustainability governance p.12, Climate change p.38, People p.71; <b>Annual Report 2019</b> sections 3.1 Annual statement by Remuneration Committee Chairman, 3.2 Remuneration policy report, 3.3 Annual report on remuneration  | 1,2             |                 | 1,20                          |         |   |
|                     | 102-36              | Process for determining remuneration                       | <b>Annual Report 2019</b> sections 3.1 Annual statement by Remuneration Committee Chairman, 3.2 Remuneration policy report, 3.3 Annual report on remuneration  | 1,2             |                 | 1,20                          |         |   |
|                     | 102-37              | Stakeholders' involvement in remuneration                  | <b>Annual Report 2019</b> sections 3.1 Annual statement by Remuneration Committee Chairman, 3.2 Remuneration policy report, 3.3 Annual report on remuneration  | 10              |                 | 1,20                          | 16      |   |
|                     | 102-38              | Annual total compensation ratio                            | Performance data – People p.92   |                 |                 | 6                             | 1,20    |   |
|                     | 102-39              | Percentage increase in annual total compensation ratio     | Performance data – People p.92   |                 |                 | 6                             | 1,20    |   |
|                     | 102-40              | List of stakeholder groups                                 | Our stakeholders p.12; <b>Sustainability Reporting Navigator 2019</b> – Our stakeholders   | 10              |                 |                               | 21      |   |
|                     | 102-41              | Collective bargaining agreements                           | Employee relations p.73<br>BHP does not disclose per cent of total employees covered by Collective bargaining agreements.  | 3               | 1,3             |                               |         | 8 |
|                     | 102-42              | Identifying and selecting stakeholders                     | Our Stakeholders p.12; <b>Sustainability Reporting Navigator 2019</b> – Our stakeholders   | 10              |                 |                               | 21      |   |
|                     | 102-43              | Approach to stakeholder engagement                         | Our Stakeholders p.12; <b>Sustainability Reporting Navigator 2019</b> – Our stakeholders   | 10              |                 |                               | 21      |   |

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## Sustainability Reporting Navigator 2019 continued

|                     | GRI Standard Number | Disclosure Title   | BHP Response  | ICMM Principles                | UNGC Principles | UNGC Advanced Level Criterion | UN SDGs  |
|---------------------|---------------------|--|---|--------------------------------|-----------------|-------------------------------|----------|
| GENERAL DISCLOSURES | 102-44              | Key topics and concerns raised                             | Our material sustainability issues p.15, Engaging with communities p.60-61; <b>Sustainability Reporting Navigator 2019</b> – Our stakeholders                               | 10                             |                 | 21                            |          |
|                     | 102-45              | Entities included in the consolidated financial statements | Reporting boundary and scope p.6, BHP locations p.94-95; <b>Annual Report 2019</b> section 7.3 Organisational structure   |                                |                 |                               |          |
|                     | 102-46              | Defining report content and topic Boundaries               | About this Sustainability Report p.6, Our material sustainability issues p.15; <b>Sustainability Reporting Navigator 2019</b> – Our stakeholders                            |                                |                 |                               |          |
|                     | 102-47              | List of material topics                                    | Our material sustainability issues p.15; <b>Sustainability Reporting Navigator 2019</b> – Materiality assessment  |                                |                 |                               |          |
|                     | 102-48              | Restatements of information                                | Footnotes throughout the Sustainability Report  |                                |                 |                               |          |
|                     | 102-49              | Changes in reporting                                       | About this Sustainability Report p.6, Sustainability governance p.13; <b>Annual Report 2019</b> sections 2.3 Shareholder engagement, 2.13.4 Sustainability Committee Report |                                |                 |                               |          |
|                     | 102-50              | Reporting period   | Reporting boundary and scope p.6  | 10                             |                 |                               |          |
|                     | 102-51              | Date of most recent report                                 | FY2019  |                                |                 |                               |          |
|                     | 102-52              | Reporting cycle  | Annual  | 10                             |                 |                               |          |
|                     | 102-53              | Contact point for questions regarding the report           | Contact us at bhp.com   | 10                             |                 |                               |          |
|                     | 102-54              | Claims of reporting in accordance with the GRI Standards   | Our reporting approach p.6, Our material sustainability issues p.15, Water p.46   |                                |                 |                               |          |
|                     | 102-55              | GRI content index  | <b>Sustainability Reporting Navigator 2019</b>  |                                |                 | 19                            |          |
|                     | 102-56              | External assurance   | Our reporting approach p.6, EY assurance statement p.93; <b>Annual Report 2019</b> section 5.6 Independent Auditor's reports  |                                |                 |                               |          |
|                     | MANAGEMENT APPROACH | 103-1  | Explanation of the material topic and its Boundary  | In each section of the Report. |                 |                               |          |
| 103-2               |                     | The management approach and its components                 | <b>Annual Report 2019</b> section 2.15 Management   |                                |                 |                               | 1,5,8,16 |
| 103-3               |                     | Evaluation of the management approach                      | <b>Annual Report 2019</b> section 2.15 Management   |                                |                 |                               |          |

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## Impact boundary key

1. Employees and contractors; 2. Business partners (JVs); 3. Local communities;
4. Customers; 5. Labour unions; 6. Shareholders and investor groups;
7. Industry peers and associations; 8. Government and regulators; 9. Suppliers;
10. Community organisations and NGOs (including environment)

| GRI Standard Number              | Disclosure Title   | BHP Response  | ICMM Principles | UNGC Principles | UNGC Advanced Level Criterion | UN SDGs       | Impact boundary         |
|----------------------------------|--|---|-----------------|-----------------|-------------------------------|---------------|-------------------------|
|                                  |  |   |                 |                 |                               |               |                         |
| <b>Economic Performance</b>      |  |   |                 |                 |                               |               |                         |
| 201-1                            | Direct economic value generated and distributed                                | BHP at a glance p.2, Society p.58, Performance – Society p.77; <b>Economic Contribution Report 2019</b> , available online at bhp.com   | 9               |                 | 9,10,11                       | 2,5,7,8,9     | 1, 2, 3, 5, 7, 8, 9, 10 |
| 201-2                            | Financial implications and other risks and opportunities due to climate change | Climate change – Managing risk and opportunity p.42-43; <b>Annual Report 2019</b> section 1.6.4 Risk management. Also see our <b>Climate Change: Portfolio Analysis</b> (2015) and <b>Climate Change: Portfolio Analysis – Views after Paris</b> (2016) reports, and our most recent CDP response, all of which are available online at bhp.com/climate | 6               | 7               | 9,10,11,17                    | 13            |                         |
| 201-3                            | Defined benefit plan obligations and other retirement plans                    | <b>Annual Report 2019</b> section 5.1 Consolidated Financial Statements Note 25 Pension and other post-retirement obligations   |                 |                 |                               |               |                         |
| 201-4                            | Financial assistance received from government                                  | BHP does not receive significant financial assistance from governments.   |                 |                 |                               |               |                         |
| <b>Market Presence</b>           |  |   |                 |                 |                               |               |                         |
| 202-1                            | Ratios of standard entry level wage by gender compared to local minimum wage   | Performance data – People p.92  |                 | 6               | 6                             | 1,5,8         |                         |
| 202-2                            | Proportion of senior management hired from the local community                 | Performance data – People p.92  | 9               | 6               | 6                             | 8             |                         |
| <b>Indirect Economic Impacts</b> |  |   |                 |                 |                               |               |                         |
| 203-1                            | Infrastructure investments and services supported                              | Working with communities p.59; <b>Economic Contribution Report 2019</b> , available online at bhp.com. Currently infrastructure investments do not form part of our Social Investment framework.  | 9               |                 | 15,16,18                      | 2,5,7,9,11    | 1,2,3,7,8,9,10          |
| 203-2                            | Significant indirect economic impacts  | Working with communities p.59, Transparency and accountability p.75; <b>Economic Contribution Report 2019</b> , available online at bhp.com   | 9               |                 | 15,16,18                      | 1,2,3,8,10,17 |                         |
| <b>Procurement Practices</b>     |  |   |                 |                 |                               |               |                         |
| 204-1                            | Proportion of spending on local suppliers                                      | Supporting local economic growth p.65   | 9               |                 | 2                             | 12            | 2,3,4,9,10              |

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- 10. Community organisations and NGOs (including environment)

| ECONOMIC | GRI Standard Number               | Disclosure Title  | BHP Response  | ICMM Principles | UNGC Principles | UNGC Advanced Level Criterion | UN SDGs | Impact boundary    |
|----------|-----------------------------------|---|---|-----------------|-----------------|-------------------------------|---------|--------------------|
|          | <b>Anti-corruption</b>            |   |   |                 |                 |                               |         |                    |
|          | 205-1                             | Operations assessed for risks related to corruption                             | Anti-corruption p.76<br>More information on our anti-corruption compliance program (including risk assessments, training and communication) is available online at <a href="http://bhp.com/anticorruption">bhp.com/anticorruption</a> . | 1               | 10              | 12,13,14                      | 16      | 1,2,3,6,8,9,10     |
|          | 205-2                             | Communication and training about anti-corruption policies and procedures        | Anti-corruption p.76<br>More information on our anti-corruption compliance program (including risk assessments, training and communication) is available online at <a href="http://bhp.com/anticorruption">bhp.com/anticorruption</a> . | 1,2             |                 | 12,13,14                      | 16      |                    |
|          | 205-3                             | Confirmed incidents of corruption and actions taken                             | BHP does not disclose our EthicsPoint data cases, due to this being sensitive and privileged information.   | 1               | 10              | 12,13,14                      | 16      |                    |
|          | <b>Anti-competitive behaviour</b> |   |   |                 |                 |                               |         |                    |
|          | 206-1                             | Legal actions for anti-competitive behavior, anti-trust, and monopoly practices | This is not material for BHP and is not reported.   |                 |                 |                               | 16      | 1,2,3,4,6,7,8,9,10 |

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| ENVIRONMENT   | GRI Standard Number | Disclosure Title   | BHP Response  | ICMM Principles | UNGC Principles | UNGC Advanced Level Criterion | UN SDGs        | Impact boundary |
|---------------|---------------------|--|---|-----------------|-----------------|-------------------------------|----------------|-----------------|
|               | <b>Materials</b>    |  |   |                 |                 |                               |                |                 |
|               | 301-1               | Materials used by weight or volume                         | Performance data – Environment p.78   | 6               | 7,8             |                               | 8,12           |                 |
|               | 301-2               | Recycled input materials used                              | Performance data – Environment (only as it relates to water) p.78   | 6               | 8,9             |                               | 8,12           |                 |
|               | 301-3               | Reclaimed products and their packaging materials           | As a producer of raw materials, we do not use recycled input materials. The majority of BHP's product tonnage is sold in bulk form and therefore has little or no packaging.  | 6               | 8               | 9,10,11                       | 8,12           |                 |
|               | MM11                | Programs and progress relating to materials stewardship    | Promoting sustainability in our value chain p.16  | 2,8             | 8,9             |                               | 7,8,9,13,12,17 |                 |
| <b>Energy</b> |                     |  |   |                 |                 |                               |                | 2,3,8,10        |
|               | 302-1               | Energy consumption within the organization                 | Performance data – Climate change p.80  | 6               | 7,8             | 9,10,11                       | 7,8,12,13      |                 |
|               | 302-2               | Energy consumption outside of the organization             | Performance data – Climate change p.80  | 6               | 8               |                               | 7,8,12,13      |                 |
|               | 302-3               | Energy intensity   | Performance data – Climate change p.80  | 6               | 8               |                               | 7,8,12,13      |                 |
|               | 302-4               | Reduction of energy consumption                            | Performance data – Climate change p.80  | 6               | 8,9             |                               | 7,8,12,13      |                 |
|               | 302-5               | Reductions in energy requirements of products and services | Supporting sustainable use of our products p.16, Performance data – Environment p.67; Scope 3 Emissions Calculation Methodology 2019, which is available online at <a href="http://bhp.com/climate">bhp.com/climate</a> . We are improving our collection of data to disclose additional information in future. | 6               | 8,9             |                               | 7,8,12,13      |                 |
| <b>Water</b>  |                     |  |   |                 |                 |                               |                | 2,3,7,8,10      |
|               | 303-1               | Interactions with water as a shared resource               | Our water target and goal p.55, Water performance summary p.56, Performance data – Environment p.78, Performance data – Water p.87-90   |                 |                 |                               |                |                 |
|               | 303-2               | Management of water discharge-related impacts              | Water and risk at BHP p.48-53, Water performance p.54, Performance data – Environment p.78  | 6               | 8               | 9,10,11                       | 6              |                 |
|               | 303-3               | Water withdrawal   | Performance data – Environment p.78, Performance data – Water p.87-90   |                 | 8               |                               | 6,8,12         |                 |
|               | 303-4               | Water withdrawal by source                                 | Our water target and goal p.55, Water performance summary p.56, Performance data – Environment p.78, Performance data – Water p.87-90   | 6               | 7,8             |                               | 6              |                 |
|               | 303-5               | Water Consumption  | Our water target and goal p.55, Water performance summary p.56, Performance data – Environment p.78, Performance data – Water p.87-90   |                 |                 |                               |                |                 |

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| ENVIRONMENT      | GRI Standard Number | Disclosure Title  | BHP Response  | ICMM Principles | UNGC Principles | UNGC Advanced Level Criterion | UN SDGs       | Impact boundary |
|------------------|---------------------|---|---|-----------------|-----------------|-------------------------------|---------------|-----------------|
|                  | <b>Biodiversity</b> |   |   |                 |                 |                               |               |                 |
|                  | 304-1               | Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas   | Performance data – Designated protected areas p.79<br>We are improving our collection of data to disclose additional information in future. | 2,7             | 8               | 9,10,11                       | 6,14,15       |                 |
|                  | 304-2               | Significant impacts of activities, products, and services on biodiversity   | Environment section p.33-36   | 7               | 8               | 9,10,11                       | 6,14,15       |                 |
|                  | 304-3               | Habitats protected or restored  | Environment section p.34-36, Performance data p.78, or see our Environment case studies at bhp.com  | 6,7             | 8               | 9,10,11                       | 6,14,15       |                 |
|                  | 304-4               | IUCN Red List species and national conservation list species with habitats in areas affected by operations  | Protecting threatened environments p.33   |                 | 8               |                               | 6,14,15       |                 |
|                  | MM01                | Amount of land (owned or leased, and managed for production activities or extractive use) disturbed or rehabilitated  | Performance data – Environment p.78   | 2,6,7           | 8               |                               | 3,6,12,14,15  |                 |
|                  | MM02                | The number and percentage of total sites identified as requiring biodiversity management plans according to stated criteria, and the number (percentage) of those sites with plans in place | Environment section p.32, Performance data – Environment p.78   | 2,6,7           | 7,8             |                               | 6,14,15       |                 |
|                  | MM10                | Number and percentage of operations with closure plans  | Rehabilitation and closure p.34, Performance data – Environment p.78  | 6,9             | 7               |                               |               |                 |
| <b>Emissions</b> |                     |   |   |                 |                 |                               |               | 2,3,9,10        |
|                  | 305-1               | Direct (Scope 1) GHG emissions  | Operational emissions p.38, Performance data – Climate change p.80  | 6               | 7,8             | 9,10,11                       | 3,12,13,14,15 |                 |
|                  | 305-2               | Energy indirect (Scope 2) GHG emissions   | Operational emissions p.38, Performance data – Climate change p.80  |                 | 7,8             | 9,10,11                       | 3,12,13,14,15 |                 |
|                  | 305-3               | Other indirect (Scope 3) GHG emissions  | Scope 3 emissions p.39-41, Performance data – Climate change p.81. Scope 3 Calculation Methodology 2018 (online at bhp.com/climate)         | 6               | 7,8             | 9,10,11                       | 3,12,13,14,15 |                 |
|                  | 305-4               | GHG emissions intensity   | Performance data – Climate change p.80  |                 | 8               | 9,10,11                       | 13,14,15      |                 |
|                  | 305-5               | Reduction of GHG emissions  | Operational emissions performance p.38, Performance data – Climate change p.80-81   | 6               | 7,8,9           | 9,10,11                       | 13,14,15      |                 |
|                  | 305-6               | Emissions of ozone-depleting substances (ODS)   | This has not been identified as a relevant/material issue and not included in our environmental data collection systems.                    |                 |                 |                               | 3,12,13       |                 |
|                  | 305-7               | Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions   | Performance data – Environment p.78<br>Other significant air emissions are not material to BHP.   | 6               | 7,8             | 9,10,11                       | 3,12,13,14,15 |                 |

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| ENVIRONMENT                              | GRI Standard Number        | Disclosure Title   | BHP Response   | ICMM Principles | UNGC Principles | UNGC Advanced Level Criterion | UN SDGs      | Impact boundary |
|--|----------------------------|--|--|-----------------|-----------------|-------------------------------|--------------|-----------------|
|  | <b>Effluents and Waste</b> |  |  |                 |                 |                               |              |                 |
|  | 306-1                      | Water discharge by quality and destination   | Water performance summary p.56, Performance data – Water p.88, BHP asset level water data summary p.90   | 6               | 8               | 9,10,11                       | 3,6,12,14    |                 |
|  | 306-2                      | Waste by type and disposal method  | Performance data – Environment p.78  | 6               | 8               | 9,10,11                       | 3,6,12       |                 |
|  | 306-3                      | Significant spills   | Our FY2019 sustainability performance – zero significant environmental incidents p.8, Samarco p.18-21  | 6               | 8               | 9,10,11                       | 3,6,12,14,15 |                 |
|  | 306-4                      | Transport of hazardous waste   | BHP does not transport, import or export hazardous waste or ship hazardous waste internationally.  |                 |                 | 8                             | 9,10,11      | 3,12            |
|  | 306-5                      | Water bodies affected by water discharges and/or runoff                              | Water and risk at BHP p.48, BHP Water sensitivity across BHP assets p.49, Detailed significant water-related risks p.50  |                 |                 | 8                             | 9,10,11      | 6,15            |
|  | MM03                       | Total amounts of overburden, rock, tailings, and sludges and their associated risks. | BHP's operated and non-operated tailings portfolio p.24, Performance data – Environment p.78   | 7               |                 | 9,10,11                       | 3,6,12       |                 |
| <b>Environmental Compliance</b>          |                            |  |  |                 |                 |                               |              | 2,8             |
|  | 307-1                      | Non-compliance with environmental laws and regulations                               | Performance data – Environment p.79; <b>Annual Report 2019</b> section 4.17 Performance in relation to environmental regulation  | 6               | 8               | 9,10,11                       | 16           |                 |
| <b>Supplier Environmental Assessment</b> |                            |  |  |                 |                 |                               |              | 2,8             |
|  | 308-1                      | New suppliers that were screened using environmental criteria                        | Promoting sustainability in our supply chain p.16<br>It is within <i>Our Code of Conduct</i> that contracted suppliers must state acceptance in the Pre-qualification Questionnaire and non-contracted suppliers must accept before a service/good is provided for BHP. As of June 30, 2019 as part of our new Supplier on boarding process via the Global Contractor Management System (GCMS) 5816 suppliers had been screened. All new suppliers must register via GCMS. |                 |                 |                               |              |                 |
|  | 308-2                      | Negative environmental impacts in the supply chain and actions taken                 | Promoting sustainability in our value chain p.16,<br>No significant negative environmental impacts reported during FY2019  |                 |                 |                               |              |                 |

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| GRI Standard Number                   | Disclosure Title  | BHP Response   | ICMM Principles | UNGC Principles | UNGC                     | UN SDGs | Impact boundary |
|---------------------------------------|---|--|-----------------|-----------------|--------------------------|---------|-----------------|
|                                       |   |  |                 |                 | Advanced Level Criterion |         |                 |
| <b>Employment</b>                     |   |  |                 |                 |                          |         |                 |
| 401-1                                 | New employee hires and employee turnover  | Performance data – People p.92   |                 | 6               | 6,7,8                    | 5,8     | 1,3,5           |
| 401-2                                 | Benefits provided to full-time employees that are not provided to temporary or part-time employees                            | <b>Annual Report 2019</b> sections 3.2. Remuneration policy report, 4.8 Employee policies and engagement   |                 | 6               | 6,7,8                    | 8       |                 |
| 401-3                                 | Parental leave  | Performance data – People p.91<br>In FY2019, 1,609 employees made use of parental leave, of which 38.39 per cent were women and 61.61 per cent were men. Data on return to work is not reported due to methodology limitations and will be addressed in future reports.                                |                 | 6               | 6,7,8                    | 5,8     |                 |
| <b>Labor/Management Relations</b>     |   |  |                 |                 |                          |         |                 |
| 402-1                                 | Minimum notice periods regarding operational changes  | Minimum notice periods for termination of employment can vary from one to fourteen weeks, depending on the employee's location, role and terms of contract, and may extend up to six months for senior management. Provisions for consultation and negotiation are specified in collective agreements. | 3               | 3               | 6,7,8                    | 8       | 1,3,5           |
| MM04                                  | Number of strikes and lock-outs exceeding one week's duration, by country   | Employee relations p.73  | 3               | 3               | 6,7,8                    | 8       |                 |
| <b>Occupational Health and Safety</b> |   |  |                 |                 |                          |         |                 |
| 403-1                                 | Workers representation in formal joint management-worker health and safety committees   | Field leadership p.27, Health p.29   | 5               |                 | 6,7,8                    | 8       | 1,2,3,7,9       |
| 403-2                                 | Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities | Performance data – People p.91<br>We do not collect this data by gender.   | 5               | 1               | 2,6,7,8                  | 3,8     |                 |
| 403-3                                 | Workers with high incidence or high risk of diseases related to their occupation  | Health p.29-31, Performance data – People p.91   | 5               | 1               | 6,7,8                    | 3,8     |                 |
| 403-4                                 | Health and safety topics covered in formal agreements with trade unions   | Field leadership p.27<br>We do not have access to this information in formal agreements with trade unions.   | 5               | 3               | 6,7,8                    | 8       |                 |

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| SOCIETY | GRI Standard Number                                     | Disclosure Title   | BHP Response  | ICMM Principles | UNGC Principles | UNGC Advanced Level Criterion | UN SDGs | Impact boundary |
|---------|---|--|---|-----------------|-----------------|-------------------------------|---------|-----------------|
|         | <b>Training and Education</b>                           |  |   |                 |                 |                               |         | 1,3,5           |
|         | 404-1   | Average hours of training per year per employee  | On average, our employees each received 28.1 hours of training in FY2019. This included health and safety training, as well as training to meet local and position-specific requirements. We do not collect this data by gender or employee category.   | 5               | 6               | 6,7,8                         | 4,5,8   |                 |
|         | 404-2   | Programs for upgrading employee skills and transition assistance programs                                      | Developing our Capabilities p.71-72<br>Employees who leave BHP via retrenchment ordinarily receive support services through our allocated providers in each region.   | 3               | 6               | 6,7,8                         | 8       |                 |
|         | 404-3   | Percentage of employees receiving regular performance and career development reviews                           | Developing our Capabilities p.71-72<br>We are improving our collection of data to disclose additional information in future.  | 3               | 6               | 6,7,8                         | 5,8     |                 |
|         | <b>Diversity and Equal Opportunity</b>                  |  |   |                 |                 |                               |         | 1,3             |
|         | 405-1   | Diversity of governance bodies and employees   | Inclusion and diversity p.72-73   |                 | 6               | 6,7,8                         | 5,8     |                 |
|         | 405-2   | Ratio of basic salary and remuneration of women to men   | Performance data – People p.92  |                 | 1,6             | 6,7,8                         | 5,8,10  |                 |
|         | <b>Non-discrimination</b>                               |  |   |                 |                 |                               |         | 1,3             |
|         | 406-1   | Incidents of discrimination and corrective actions taken   | Society p.72<br>We are improving our collection of data to disclose additional information in future.   |                 |                 |                               |         |                 |
|         | <b>Freedom of Association and Collective Bargaining</b> |  |   |                 |                 |                               |         | 1,2,3,8,9       |
|         | 407-1   | Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk | Promoting sustainability in our value chain p.16, Respecting human rights p.65, Employee relations p.73<br>Further information on human rights in our supply chain is available online at <a href="http://bhp.com/respectinghumanrights">bhp.com/respectinghumanrights</a> and in <b>Modern Slavery Act 2015 (UK) FY2019 Statement</b> , available on <a href="http://bhp.com">bhp.com</a> . For supplier risk profiles, see p.5-6, 10.   | 3               | 1,2,3           | 2,3,4,5                       | 8       |                 |
|         | <b>Child Labor</b>                                      |  |   |                 |                 |                               |         | 1,2,3,9         |
|         | 408-1   | Operations and suppliers at significant risk for incidents of child labor                                      | Promoting sustainability in our value chain p.16, Employee relations p.73, Respecting human rights p.65<br>Further information on human rights in our supply chain is available online at <a href="http://bhp.com/respectinghumanrights">bhp.com/respectinghumanrights</a> and in <b>Modern Slavery Act 2015 (UK) FY2019 Statement</b> , available on <a href="http://bhp.com">bhp.com</a> . For supplier risk profiles, see p. 5-6, 10.<br>Note: No operations have been identified as having significant risks for incidents of child labour. | 3               | 1,2,5           | 2,3,4,5                       | 8,16    |                 |

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| GRI Standard Number                 | Disclosure Title   | BHP Response  | ICMM Principles | UNGC Principles | UNGC                     | UN SDGs | Impact boundary |
|-------------------------------------|--|---|-----------------|-----------------|--------------------------|---------|-----------------|
|                                     |  |   |                 |                 | Advanced Level Criterion |         |                 |
| <b>Forced or Compulsory Labor</b>   |  |   |                 |                 |                          |         |                 |
| 409-1                               | Operations and suppliers at significant risk for incidents of forced or compulsory labor   | Promoting sustainability in our value chain p.16, Employee relations p.73, Respecting human rights p.65<br>Further information on human rights in our supply chain is available online at <a href="http://bhp.com/respectinghumanrights">bhp.com/respectinghumanrights</a> and in <b>Modern Slavery Act 2015 (UK) FY2019 Statement</b> , available on <a href="http://bhp.com">bhp.com</a> . For supplier risk profiles, see p. 5-6, 10.<br>Note: No operations have been identified as having significant risks for incidents of child labour. | 3               | 1,2,4           | 2,3,4,5                  | 8       | 1,2,3,9         |
| <b>Security Practices</b>           |  |   |                 |                 |                          |         |                 |
| 410-1                               | Security personnel trained in human rights policies or procedures  | Security p.66<br>Security and security-related human rights training is conducted regularly. We are revising our strategy to identify areas where we need to implement specific, security-related human rights controls.  | 3               | 1,2             | 3,4,5                    | 16      | 1,2,3,9         |
| <b>Rights of Indigenous Peoples</b> |  |   |                 |                 |                          |         |                 |
| 411-1                               | Incidents of violations involving rights of indigenous peoples   | There have been no reported incidents of violations involving rights of Indigenous peoples.   | 3               | 1,2             | 3,4,5                    | 2       | 3,8,10          |
| MM05                                | Total number of operations taking place in or adjacent to Indigenous Peoples' territories, and number and percentage of operations or sites where there are formal agreements with Indigenous Peoples' communities | Performance data – Society p.91   | 3,10            | 1,2             | 3,4,5                    | 1,2     |                 |
| MM06                                | Number and description of significant disputes relating to land use, customary rights of local communities and Indigenous Peoples  | There have been no reported significant disputes relating to land use, customary rights of local communities and Indigenous peoples.  | 10              | 1               |                          | 1,2     |                 |
| MM07                                | The extent to which grievance mechanisms were used to resolve disputes relating to land use, customary rights of local communities and Indigenous Peoples, and the outcomes  | Community concerns raised in FY2019 p.61  | 9,10            | 1               |                          | 1,2     |                 |
| <b>Human Rights Assessment</b>      |  |   |                 |                 |                          |         |                 |
| 412-1                               | Operations that have been subject to human rights reviews or impact assessments  | Human rights due diligence and risk management p.66   | 3               | 1,2             | 3,4,5                    |         | 1,2,3,9         |
| 412-2                               | Employee training on human rights policies or procedures   | Capacity Building and collaboration, p.66, <b>Modern Slavery Act 2015 (UK) FY2019 Statement</b> p.12<br>In FY2019 over 38,500 members of our workforce completed the <i>Our Code of Conduct</i> Training (which includes Human rights commitments and standards). We are improving our collection of data to disclose this information in future.   | 3               | 1,2,3,4,5,6     | 3,4,5                    |         |                 |

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**Impact boundary key**

- 1. Employees and contractors; 2. Business partners (JVs); 3. Local communities;
- 4. Customers; 5. Labour unions; 6. Shareholders and investor groups;
- 7. Industry peers and associations; 8. Government and regulators; 9. Suppliers;
- 10. Community organisations and NGOs (including environment)

| SOCIETY | GRI Standard Number               | Disclosure Title  | BHP Response  | ICMM Principles | UNGC Principles | UNGC Advanced Level Criterion | UN SDGs      | Impact boundary |              |
|---------|-----------------------------------|---|---|-----------------|-----------------|-------------------------------|--------------|-----------------|--------------|
|         | 412-3                             | Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening  | Respecting human rights p.65-66<br>Further information on human rights in our supply chain and community partnerships is available in <b>Modern Slavery Act 2015 (UK) FY2019 Statement</b> , available on bhp.com | 2               | 1,2,3,4,5,6     | 3,4,5                         |              |                 |              |
|         | MM08                              | Number (and percentage) or company operating sites where artisanal and small-scale mining (ASM) takes place on, or adjacent to, the site; the associated risks and the actions taken to manage and mitigate these risks | We have no reported artisanal and small-scale mining on or adjacent to our operations.  |                 |                 | 7                             | 1,2,3,6,8,12 |                 |              |
|         | MM09                              | Sites where resettlements took place, the number of households resettled in each, and how their livelihoods were affected in the process  | There were no resettlements undertaken at our operated assets.  | 3,10            | 1               |                               | 1,2          |                 |              |
|         | <b>Local Communities</b>          |   |   |                 |                 |                               |              |                 | 1,2,3,6,8,10 |
|         | 413-1                             | Operations with local community engagement, impact assessments, and development programs  | Society p.59  | 9               | 1               |                               |              |                 |              |
|         | 413-2                             | Operations with significant actual and potential negative impacts on local communities  | Engaging with communities p.60, Addressing social risks and impacts p.60, Community concerns raised in FY2019 p.61  | 9               | 1               |                               | 1,2          |                 |              |
|         | <b>Supplier Social Assessment</b> |   |   |                 |                 |                               |              |                 | 1,2,3,9      |
|         | 414-1                             | New suppliers that were screened using social criteria  | Promoting sustainability in our value chain p.16; <b>Modern Slavery Act 2015 (UK) FY2019 Statement</b> , available at bhp.com   |                 |                 |                               | 5,8,16       |                 |              |
|         | 414-2                             | Negative social impacts in the supply chain and actions taken   | Promoting sustainability in our value chain p.16; <b>Modern Slavery Act 2015 (UK) FY2019 Statement</b> , available at bhp.com   |                 |                 |                               | 5,8,16       |                 |              |
|         | <b>Public Policy</b>              |   |   |                 |                 |                               |              |                 | 1,2,3,8      |
|         | 415-1                             | Political contributions   | <b>Annual Report 2019</b> section 4.13 Political donations  | 1               | 10              | 12,13,14                      | 16           |                 |              |
|         | <b>Customer Health and Safety</b> |   |   |                 |                 |                               |              |                 | 1,2,4,9      |
|         | 416-1                             | Assessment of the health and safety impacts of product and service categories   | Promoting sustainability in our supply chain p.16, Society p.59   | 8               | 1               |                               |              |                 |              |
|         | 416-2                             | Incidents of non-compliance concerning the health and safety impacts of products and services   | Performance data – Regional Safety Fines levied p.91  | 8               |                 |                               | 16           |                 |              |
|         | <b>Socioeconomic Compliance</b>   |   |   |                 |                 |                               |              |                 | 1,2,3,8      |
|         | 419-1                             | Non-compliance with laws and regulations in the social and economic area  | <b>Annual Report 2019</b> Directors' Report, sections 4.17 Environmental fines, 6.6 Legal proceedings   | 4               | 10              | 12,13,14                      | 16           |                 |              |

BHP reports are prepared in accordance with the Global Reporting Initiative (GRI) Standards but may not achieve the full definition of each GRI indicator.

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