



Human Rights Policy Statement

Our Commitment

Human rights are the universal political, civil, economic, labour, social and cultural rights and freedoms to which all people are entitled, without discrimination¹.

We recognise our responsibility to respect human rights. Respecting human rights includes avoiding infringing on the human rights of others, addressing our adverse impacts, and contributing to the fuller enjoyment of human rights as part of our commitment to social value.

As a company, we are committed to:

- Respecting internationally recognised human rights as set out in the International Bill of Human Rights.
- Operating in a manner consistent with the United Nations (UN) Guiding Principles on Business and Human Rights (UNGPs) and the 10 UN Global Compact Principles.
- Being guided by the aims of the UN Declaration on the Rights of Indigenous Peoples, as articulated in our Indigenous Peoples Policy Statement.
- Complying with applicable laws and regulations of the countries in which we operate (and where differences exist between our standards and local customs, norms, rules or regulations, seeking to apply the higher standard).

Our Approach and Principles

This Policy Statement outlines our approach to respecting human rights across our operations (including our capital projects, operated assets, and exploration activities) and in our supply chain.

Our approach is founded in the belief that all human beings have the right to live a life of dignity. We commit to taking a rights-based approach throughout our own operations and in our supply chain, which means we will:

- Aim to identify and manage risks to people who may be impacted by our operations, not only risks to our operations.
- Consider how impacts may particularly affect those who are most marginalised, excluded, or discriminated against.
- Seek to engage with potentially impacted peoples, including vulnerable groups, to incorporate their voices in our approach to preventing and mitigating impacts from our operations and realising opportunities.
- Aim to prioritise preventing and mitigating the most severe adverse impacts to people, with a focus on our operations.
- Seek to provide or cooperate in providing access to remedy for adverse impacts that we cause or contribute to through our operations.

Due Diligence

Our approach to human rights due diligence includes assessing actual and potential impacts, integrating and acting upon the findings, monitoring effectiveness, and communicating how actual and potential impacts are addressed.

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.

We will conduct due diligence for our own operations and in our supply chain, and we will seek to initiate due diligence early in the development of new activities and relationships.

We will seek to continually improve our understanding of the historical, legal, social, environmental, cultural and political landscape where we operate or seek to operate in order to enhance our analysis of how our business activities and relationships may create or contribute to actual and potential impacts to human rights.

The findings from our due diligence will be integrated into our material risk framework at a company and operated asset level, so we can monitor and evaluate our approach to prevention and mitigation of adverse human rights impacts throughout our own operations and in our supply chain. Details regarding prioritised human rights themes for our business are provided in the Annexure.

Stakeholder Engagement and Relationships

We strive for early, meaningful, and ongoing dialogue with people whose human rights may be impacted by our operations. Where possible, we will engage with potentially affected people throughout our due diligence to seek to understand their perspectives, minimise any power imbalances and achieve relationships built on respect, trust, and transparency.

We will engage with civil society, industry, government, and other stakeholders on human rights issues related to our business, our sector, and, where appropriate, businesses at large to enhance collective action in support of the corporate responsibility to respect human rights.

Through our engagements, we will seek to develop and participate in knowledge-sharing and capacity building to enhance our shared understanding of human rights, allow for active participation in appropriate aspects of the design and implementation of our approach, and improve our collective performance.

Grievance Mechanisms and Remediation

BHP's Our Code of Conduct (Our Code) explains how to protect people who speak up. It applies to everyone. Our employees, those who work with us including contractors and suppliers, and those affected by our business globally, are encouraged to promptly raise any concerns they may have about anything that may be illegal, improper or involve misconduct.

BHP has a confidential, 24-hour, multilingual business conduct hotline (EthicsPoint) that is open to all, including employees and contractors and members of the public, and local community complaints and grievance mechanisms are required to be in place at our capital projects, operated assets, and exploration regions. We will acknowledge, review and document all issues raised through these mechanisms. Where complaints are investigated and substantiated, we will provide for or cooperate in their remediation, and we will continue to work with stakeholders to identify ways to communicate how complaints have been addressed and integrated back into our due diligence process.

Under Our Code, BHP does not allow any form of punishment, discipline or retaliatory action to be taken against anyone for speaking up or cooperating with an investigation.

Performance and Disclosure

We will take steps to assess adherence to BHP's mandatory minimum human rights performance requirements across our operated assets and develop improvement plans where necessary. We report annually on our human rights performance through our Annual Report, online sustainability disclosures and Modern Slavery Statement.

Governance

BHP's Board oversees our approach to respecting human rights.

Our Charter and *Our Code* set out our standards of behaviour for our people, as well as our expectations of the third parties we deal with, including our suppliers, contractors, community partners and governments. The human rights commitments in *Our Code* are implemented through mandatory minimum performance requirements in Our Requirements standards and through our other sustainability statements and policies.

We seek to use our influence to encourage our non-operated joint ventures to adopt similar practices and standards, aligned to international human rights best practice.

This Policy Statement will be reviewed annually by the Chief Legal, Governance and External Affairs Officer.

Date Approved: February 2024

Annexure: Prioritised Human Rights Themes

Human Rights Theme	Our Approach
Labour Conditions	<p>We take steps to operate in a manner consistent with the terms of the ILO Declaration on Fundamental Principles and Rights at Work, including the four Core Labour Standards the subject of the ILO Conventions upon which the Declaration is based, concerning:</p> <ul style="list-style-type: none"> • freedom of association and the effective recognition of the right to collective bargaining; • the elimination of all forms of forced or compulsory labour²; • the effective abolition of child labour; and • the elimination of discrimination in respect of employment and occupation. <p>Under <i>Our Code</i>, we do not tolerate harassment or bullying of any kind, or discrimination based on personal attributes unrelated to job performance, such as race, ethnicity, gender identity, sexual orientation, intersex status, physical or mental disability, mental illness, religion, political opinion, pregnancy, breastfeeding or family responsibilities.</p>
Host Communities	<p>There are many human rights potentially relevant to the communities where we operate, including rights related to freedom of expression and self-determination as well as economic, social and cultural rights, such as health and wellbeing, work, adequate housing and water and sanitation. We aim to take a rights-based approach to the way we partner with the communities where we operate, including how we address resettlement, engage with stakeholders, assess potential impacts, implement complaints and grievance mechanisms, and make social investment. Our Community and Indigenous Peoples Global Standard details the way we work, including our approach to undertaking community and human rights due diligence for our own operations and in our supply chain and how the findings from our due diligence are integrated into our material risk framework and the development of business plans.</p>
Indigenous Peoples	<p>We recognise our approach must be founded in a deep respect for the distinct cultures, rights, perspectives and aspirations of Indigenous Peoples. Our Indigenous Peoples Policy Statement and Community and Indigenous Peoples Global Standard outlines our approach to respecting the rights of and partnering with Indigenous Peoples including our approach to free, prior and informed consent.</p>
Healthy Environment	<p>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 as a human right. The nature of our operations can have significant environmental impacts and those impacts can affect human rights. We recognise the global environmental challenges of climate change, biodiversity and other nature loss, pollution and waste can exacerbate adverse environmental impacts and further affect human rights. We apply our Environment Global Standard and Social Value and Sustainability Global Standard , which outline our approach to minimising adverse environmental impacts through the entire lifecycle of our operations. Our <i>Water Stewardship Position Statement</i> outlines how we contribute to progress toward our vision for a ‘water secure’ world.</p>

² Forced or compulsory labour includes slavery or slave like practices, various forms of debt bondage, and human trafficking.

Human Rights Theme	Our Approach
Climate Change	We recognise climate change may pose risks to fundamental human rights, including the rights to life, health, food, and an adequate standard of living. We continue to work towards our climate change targets and goals and the implementation of our Adaptation Strategy, which outlines the proactive and collaborative approach we need to take to build the safety, productivity and climate resilience of our operated assets, investments, portfolio, supply chain, communities, and ecosystems by adapting to climate-related physical risks. Our Climate Change Global Standard, Social Value and Sustainability Global Standard, and Climate Change Position Statement provide more detail on our approach.
Security Providers	The Security and Business Resilience Global Standard sets out how we work to comply with the Voluntary Principles on Security and Human Rights (VPSHR) . We require that private security providers (engaged by BHP), and request that public security providers (supporting BHP activities), confirm their commitment to the VPSHR. Private security providers engaged by BHP must also be signatories to, or agree in writing to comply with, The International Code of Conduct for Private Security Service Providers (ICoCA) .
Tailings Storage Facilities	Our Tailings Storage Facility Policy Statement and Tailings and Water Storage Facilities Global Standard outline our approach to managing tailings storage facilities and require the assessment and management of tailings storage facilities failure risks in a manner that aligns with the Global Industry Standard on Tailings Management, which seeks to respect human rights.
Supply Chain	<p>Our <i>Supply Global Standard</i> applies supplier prequalification, contracting and ongoing monitoring requirements to manage supplier risks (including in relation to human rights) and global minimum requirements for suppliers. Risk-based supply chain due diligence for goods and services in our inbound supply chain targets modern slavery practices and other key human rights risks and occurs under our Ethical Supply Chain and Transparency Program.</p> <p>Our Responsible Minerals Program due diligence management system for our minerals and metals supply chain aligns with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas (OECD Guidance). The Program is designed to enable effective identification, assessment and management of human rights risks, in accordance with the OECD Guidance's international good practice five step risk-based due diligence framework in Annex I and ethic risks in Annex II, where any conflict-affected and high-risk areas may be involved. Our commitment to OECD-aligned minerals supply chain due diligence, as well as expectations for our minerals and metals suppliers, is set out in our Responsible Minerals Policy.</p>
Equitable Change and Transition	We recognise that changes in our business, ranging from the opening to the closing of a mine, can have significant, and sometimes disproportionate, effects on communities where we operate. We also recognise that these same communities are navigating broader shifts in the global economy and that the scope and nature of these transitions will continue to evolve. We are committed to working with communities we are part of in periods of change and transition to achieve long-term mutual value. Our approach to equitable change and transition can be found in section 7.1 of our Annual Report 2022 .
Civil Society	Our Forum on Corporate Responsibility provides access to independent civil society leaders in various sustainability fields who provide advice that helps us engage with our stakeholders, develop our standards and gain insight into current issues and emerging trends. This group meets with BHP's CEO, senior leadership and the Board. We also engage with a range of other civil society organisations relevant to our operations and activities in the course of doing business.

Human Rights Theme	Our Approach
	<p>We respect the first pillar of the UN Guiding Principles on Business and Human Rights that outlines the State's duty to protect human rights by engaging with governments and regulators, supporting efforts to improve policy coherence, and reinforcing the need for more effective government action (and where appropriate for business to be involved). BHP is committed to respecting the role of human rights defenders and we acknowledge the risks they face in upholding civic freedoms and their significant voice in understanding and addressing human rights challenges in areas in which we operate.</p>