



Responsible Minerals Policy

Consistent with our purpose to bring people and resources together to build a better world, BHP is committed to the responsible production and sourcing of minerals and metals in our supply chain. We acknowledge that companies involved in the mining and trade of minerals and metals have the potential to contribute to sustainable development and prosperity, support livelihoods and foster local advancement. We also recognise that, particularly for conflict-affected and/or high-risk areas, companies may be at risk of directly or indirectly contributing to or being associated with actual or potential adverse impacts, such as serious human rights abuses, conflict and financial crimes.

BHP values long term relationships. We have established a fit-for-purpose, risk based due diligence program for our minerals and metals supply chain (**Responsible Minerals Program**) to align with the [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition](#) and is also guided by the OECD Handbook on Environmental Due Diligence (**OECD Guidance**).

The Responsible Minerals Program is applicable to suppliers selling minerals and/or metals directly into our operated assets that will physically form part of our products or selling minerals and/or metals to BHP that BHP intends to market to a third party.

The Responsible Minerals Program adopts the OECD's five-step framework for risk-based due diligence in alignment with Annex I of the OECD Guidance. The Responsible Minerals Program, consisting of a due diligence management system, reflects BHP's commitment to work to identify, assess and mitigate, and to publicly report on potential or actual adverse risks in our inbound minerals and metals supply chain. The Responsible Minerals Program includes, where applicable, arranging independent third party audits at identified control points within BHP's supply chain.

As identified in Annex II of the OECD Guidance, the critical human rights and governance risks associated with Conflict Affected and High Risk Areas which our due diligence program covers include:

1. Serious human rights abuses associated with the extraction, transport or trade of minerals or metals, including:
 - a. any forms of torture, cruel, inhuman and degrading treatment;
 - b. any forms of forced or compulsory labour, which means work or service that is exacted from any person under the menace of penalty and for which the person has not offered themselves voluntarily;
 - c. the worst forms of child labour;
 - d. other gross human rights violations and abuses such as widespread sexual violence;
 - e. war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide;
2. Direct or indirect support to non-state armed groups;
3. Direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals or metals at point of access to mine sites, along transportation routes or at points where minerals or metals are traded; or illegally tax or extort intermediaries, export companies or international traders;
4. Bribery and fraudulent misrepresentation of the origin of minerals or metals;
5. Money laundering; and
6. Non-payment of taxes, fees and royalties due to governments.

Our due diligence program also includes prioritised environmental risks based on their potential significance for our minerals and metals supply chain as set out in the OECD Environment Handbook.

BHP expects our suppliers of minerals and metals to carry out due diligence on their minerals and metals supply chains to identify, assess, and mitigate, at a minimum, the risks contained in Annex II as set out in the OECD Guidance and prioritised environmental risks guided by the OECD Environment Handbook, as part of our program. This expectation is applicable to all upstream tiers of suppliers from the origin of the mined mineral or metal through to supply to BHP. Where risks are identified, BHP's intent is to work collaboratively with our suppliers and, where appropriate, other stakeholders to enable the management of such risks. In the event such risks are considered by BHP as untenable, BHP may seek to discontinue its relationship with the supplier of such mineral or metal.

BHP has an established grievance mechanism for internal and external stakeholders that is open to third parties (including suppliers) to report any risk, complaints or other grievances, in a confidential, or if chosen, anonymous manner without fear of retaliation, punishment or discipline. This mechanism is managed through Integrity@BHP and is available through BHP's website at bhp.com.

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May 2025