

# BHP

Bringing people and  
resources together to  
build a better world

MODERN  
SLAVERY  
STATEMENT  
2024



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 2024 Report Suite



BHP recognises modern slavery affects many people across the globe. We are not immune to these risks. Our actions to combat modern slavery in our operations and throughout our supply chain are founded on the collective conviction that everyone has fundamental human rights to freedom, safety and dignity. We take our responsibility to respect human rights seriously.

As one of the world's leading resource companies, we also have an opportunity to extend our impact by fostering greater awareness and understanding of the mechanisms necessary to combat modern slavery. This includes partnering with expert non-government organisations, providing free access to their tools and resources to our suppliers, and providing tailored training to local and Indigenous suppliers in our Local Buying Program. In FY2024, we also deepened our understanding of modern slavery risks in our extended supply chain, improved our country-of-origin data collection, particularly for manufactured goods, and conducted audits on supply chain categories to monitor high-risk goods more effectively.

I am proud of BHP and our partners' continuing efforts to create ethical and transparent operations and supply chains."

Mike Henry  
Chief Executive Officer



## BHP Modern Slavery Statement 2024

BHP Group Limited. ABN 49 004 028 077. Registered in Australia. Registered office and global headquarters: 171 Collins Street, Melbourne, Victoria 3000, Australia.

This publication is BHP's Slavery and Human Trafficking Statement (United Kingdom) and Joint Modern Slavery Statement (Australia) (together, Statement) for the financial year ended 30 June 2024. This Statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and section 14(1) of the Australian Modern Slavery Act 2018 (Cth) and was approved by the Board of BHP Group Limited on 27 August 2024. In May 2024, BHP Canada Inc. published its first modern slavery statement under Canada's newly enacted Fighting Against Forced Labour and Child Labour in Supply Chains Act for the financial year 1 July 2022 to 30 June 2023.

For the purposes of the Australian Modern Slavery Act, the reporting entities covered by this Statement are identified in Appendix 1 and BHP Group Limited's approval was given as the 'higher entity' within the meaning of section 14(2)(d)(ii) of the Australian Modern Slavery Act.

In this Statement, the terms 'BHP', the 'Company', the 'Group', 'our business', 'organisation', 'we', 'us', 'our' and 'ourselves' refer to BHP Group Limited and its subsidiaries as defined in the basis of preparation to the Financial Statements in our Annual Report 2024. This Statement covers functions, major projects and assets that were wholly owned and/or operated by BHP or owned as a BHP-operated joint venture ('operated assets' or 'operations') from 1 July 2023 to 30 June 2024.<sup>1</sup> We use the term 'business' to describe those functions, major projects and operated assets, as well as other activities undertaken by the Group. We adopt the Australian Modern Slavery Act's definition of 'modern slavery', which captures trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour. We consider this definition suitable to align with the intended interpretation of slavery and human trafficking in the UK Modern Slavery Act.

On 2 May 2023, we completed a transaction to acquire 100 per cent of the shares in OZ Minerals and are progressively integrating OZ Minerals Australia operations and functions into our business. We are currently undertaking a strategic review of OZ Minerals Brazil assets. Former OZ Minerals entities and BHP's financial reporting periods have been aligned to 30 June 2024. Unless otherwise stated, the operational and supply chain data and content presented in the main body of the Statement does not include former OZ Minerals entities. However, we have presented specific data and content for former OZ Minerals entities (relating to the 18-month period 1 January 2023 to 30 June 2024) on pages 10-11. Where data for former OZ Minerals entities is reported in this Statement, it has been prepared in accordance with OZ Minerals standards due to ongoing integration of OZ Minerals Australia and strategic review of OZ Minerals Brazil.

BHP holds interests in joint venture assets that are not operated by BHP (referred to in this Statement as 'non-operated joint ventures' or 'non-operated assets'). Non-operated assets are not included in the BHP Group and as a result, statements regarding our operations, assets and values apply only to our operated assets, unless stated otherwise. Data for non-operated assets is not presented here. However, this Statement includes a description of how we generally approach risks and engagement, including with respect to modern slavery, in relation to our interests in non-operated assets and other investments.



For more information on our non-operated joint ventures refer to the **BHP Annual Report 2024 Operating and Financial Review 5 (Our assets)**.



In addition to BHP's internal verification process, our external auditors – Ernst & Young Australia – have provided limited assurance over this Statement (refer to **Appendix 3**).

1. References in this Statement to a 'joint venture' are used for convenience to collectively describe assets that are not wholly owned by BHP. Such references are not intended to characterise the legal relationship between the owners of the asset.

## Key areas of action in FY2024

In FY2024, our priority actions focused on deepening our understanding of the risks of modern slavery in our operations and supply chains so we can amplify the impact of our actions to address those risks.



### Assessing the risks

Assessing risks of modern slavery practices in our operations and supply chains

#### Completed community and human rights impact and opportunity assessments

We completed community and human rights impact and opportunity assessments for all operated assets and certain exploration regions in FY2024. Work is underway to build upon and improve the methodology for our community and human rights impact and opportunity assessments in FY2025



For more information see page 15

#### Conducted supply chain deep-dives

We deepened our analysis of our extended supply chains in certain higher-risk sectors



For more information see page 12

#### Partnered with experts

We joined or established partnerships with expert non-government organisations: the Issara Institute, the Mekong Club and the International Seafarers' Welfare and Assistance Network



For more information see pages 21-23



### Addressing risks

Addressing risks of modern slavery practices in our operations and supply chains

#### Improved internal due diligence systems and processes

We refined our supplier due diligence tool and processes



For more information see page 16

#### Delivered modern slavery training and engagement

We delivered face-to-face modern slavery training to key personnel



For more information see page 22



### Assessing effectiveness

Assessing the effectiveness of actions being taken to assess and address modern slavery risks

## Our structure, business and supply chains

BHP is a global natural resources company. We extract, process and explore for metals and minerals, including copper, iron ore, nickel and coal (predominantly steelmaking coal) and are moving into potash (with production expected to commence late CY2026). The commodities we produce are essential to meeting the demands created by population growth, urbanisation and the energy transition. Iron ore and steelmaking coal are needed to build cities and renewable energy infrastructure. Copper is vital for electrification. Potash helps with more sustainable farming and food security.

Sustainability is key to our purpose of bringing people and resources together to build a better world. We approach sustainability in terms of our social value framework. Under the Responsible supply chains pillar of our social value framework, we seek to create sustainable, ethical and transparent supply chains together with our partners. Playing our part in combatting modern slavery is part of how we seek to achieve our purpose and adhere to our values: do what's right, make a difference and seek better ways.

 For more information on BHP's approach to and definition of sustainability refer to the [BHP Annual Report 2024 Operating and Financial Review 6 \(Sustainability\)](#) and [Additional information 10 \(Glossary; Other terms\)](#).

### Structure

BHP Group Limited is the parent company of the BHP Group and is headquartered in Melbourne, Australia.

BHP Group Limited is incorporated in Australia and has a primary listing on the Australian Securities Exchange (ASX) (ticker BHP), an international secondary listing on the London Stock Exchange (LSE) (ticker BHP), a secondary listing on the Johannesburg Stock Exchange (ticker BHG) and an American Depositary Receipt program listed on the New York Stock Exchange (ticker BHP). The BHP Group is led by BHP Group Limited's Board of Directors and management team.

In FY2024, we operated our business under three main divisions:

- Minerals Australia, comprising our iron ore, coal and nickel assets in Western Australia, Queensland and New South Wales
- Copper South Australia, comprising our copper assets in South Australia
- Minerals Americas, comprising our copper assets in Chile and potash project in Canada

We also advanced our global programs focusing on early-stage exploration opportunities in Australia, Canada, Chile, Peru, Sweden, Serbia and the United States.

These divisions are supported by our global functions, including:

- Commercial, which includes our Sales and Marketing, Maritime, Procurement and Global Business Services teams (among others)
- External Affairs, which includes our Global Corporate Affairs, Sustainability and Social Value, Compliance, Communications, Legal and Group Governance teams
- Finance, which includes our Risk and Internal Audit teams (among others)
- Human Resources
- Portfolio Strategy and Development

 Refer to pages 4-5 for a map of our locations

Consistent with our strategy to secure growth in future-facing commodities, in FY2024:

- We progressed integration of former OZ Minerals Australia operations and functions that form part of our Copper South Australia business and West Musgrave asset into our business following our acquisition of OZ Minerals on 2 May 2023. The strategic review of OZ Minerals Brazil is ongoing.
- We announced an investment of US\$4.9 billion for Stage 2 of the Jansen Potash Project, which will increase planned production capacity to approximately 8.5 million tonnes per annum upon completion. Potash is used in fertiliser to assist with improving agricultural yields and production.
- We completed the sale of two Queensland steelmaking coal mines (Blackwater and Daunia) operated through the BHP Mitsubishi Alliance on 2 April 2024 to Whitehaven Coal. This Statement includes operational and supply chain data and information relating to Daunia and Blackwater up to the date of completion of their divestment.

### Other business activities

BHP's principal operations continue to be complemented by additional activities, including:

- **Non-operated joint ventures:** In FY2024, our non-operated joint ventures included Antamina in Peru (33.75 per cent ownership, copper), Resolution Copper in Arizona, United States (45 per cent ownership, copper) and Samarco in Brazil (50 per cent ownership, iron ore).
- **Social investment:** Guided by our social value framework, our social investment aims to make a meaningful contribution to the resilience of the communities where we operate and the environment, aligned with our broader business priorities. One of our social investment activities is funding the BHP Foundation, a separate charitable entity headquartered in the United States with its own management and operations. The BHP Foundation currently works with 42 partner organisations on 49 projects being implemented across 48 countries to address some of the world's most complex social and environmental challenges.
- **Financial investments:** In FY2024, we continued to build our portfolio of options in future facing commodities via high potential exploration projects, equity investments, joint ventures and farm-in agreements. BHP Ventures is BHP's dedicated venture capital unit. We seek to take non-operating stakes in innovative technologies and emerging companies to help drive sustainable development and advance decarbonisation technologies. BHP Xplor is our global accelerator program to invest in and support innovative, early-stage mineral exploration companies to find critical resources necessary to drive the energy transition. It involves providing financial support to qualifying companies through grants to support the development of their exploration opportunities.

 For more information on BHP Ventures and BHP Xplor refer to [bhp.com/about/our-businesses](https://bhp.com/about/our-businesses).

## Business model



### Exploration and acquisition

We seek to add high-quality Tier 1 interests through our exploration activities and early-stage entry and acquisition options.

### Our strategy

We will responsibly manage the most resilient long-term portfolio of assets, in highly attractive commodities, and will grow value through being excellent at operations, discovering and developing resources, acquiring the right assets and options, and capital allocation.

Through our differentiated approach to social value, we will be a trusted partner who creates value for all stakeholders.



### Development and mining

We strive to achieve the industry's best performance in safety, operational excellence, project management and allocation of capital.



### Process and logistics

We process and refine ore and seek to safely manage waste. Our objective is to efficiently and sustainably transport our products to customers.



### Sales, marketing and procurement

We maximise value through our centralised marketing and procurement organisations, commercial expertise, understanding of markets and customer and supplier relationships.



### Closure and rehabilitation

We consider closure and rehabilitation throughout the asset lifecycle to help minimise our impact and optimise post-closure value for all stakeholders and partners.

## Our structure, business and supply chains continued

### Locations

#### Minerals Australia

**Western Australia Iron Ore**  
Western Australia

**BHP Mitsubishi Alliance**  
Queensland

**New South Wales Energy Coal**  
New South Wales

**Western Australia Nickel**  
Western Australia

**Copper South Australia**  
South Australia

**Copper South Australia**  
South Australia

#### Minerals Americas

**Escondida**  
Chile

**Pampa Norte**  
Chile

**Antamina\***  
Peru

**Carajás**  
Brazil

**Samarco\***  
Brazil

**Jansen Potash Project**  
Canada

**Resolution Copper\***  
United States

#### BHP principal office locations

**Adelaide**  
Minerals Australia office, Australia

Copper South Australia

**Belo Horizonte**  
Minerals Americas office, Brazil

**Brisbane**  
Minerals Australia office, Australia

**Gurgaon**  
Corporate office, India

**Iquique**  
Minerals Americas office, Chile

**Kuala Lumpur**  
Global Business Services, Malaysia

**Lima**  
Metals exploration office, Peru

**London**  
Corporate office, United Kingdom

**Manila**  
Global Business Services, The Philippines

**Melbourne**  
Global headquarters, Australia

**Perth**  
Minerals Australia office, Australia

**Quito**  
Metals exploration office, Ecuador

**Santiago**  
Minerals Americas office, Chile

**Saskatoon**  
Minerals Americas office, Canada

**Shanghai**  
Corporate office, China

**Singapore**  
Marketing and corporate office

**Tokyo**  
Corporate office, Japan

**Toronto**  
Metals exploration office, Canada

**Tucson**  
Metals exploration office, United States

**Washington DC**  
Corporate office, United States

\*Non-operated asset.



## Resource mix



## People

Our people are the foundation of our business. BHP has around 90,000 employees and contractors globally, primarily in Australia and the Americas.<sup>1</sup>

### Facts at a glance FY2024

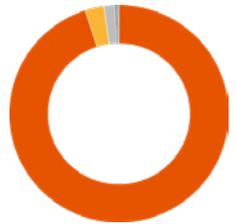
#### No. of employees and contractors

Australia	49,892
Chile	33,213
Canada	2,022
Rest of the world	6,460

Global total  
**91,587**

#### Employees by contract type

Full-time	95.3%
Part-time	2.8%
Fixed-term full-time	1.6%
Casual	0.2%



**599**

Apprentices and trainees trained by FutureFit Academy, with 228 graduating<sup>2</sup>

**46.4%**

Employees covered by collective bargaining agreements

**53.6%**

Employees on non-collective agreements

**37.1%**

Female employee representation

1. Based on a 'point-in-time' snapshot of employees as at 30 June 2024, including employees on extended absence. Contractor data is collected from internal organisation systems and averaged for a 10-month period, July 2023 to April 2024. Figures reported do not include employees and contractors of BHP Billiton Mitsubishi Alliance Blackwater and Daunia operations, sold to Whitehaven Coal during FY2024, and employees and contractors of the operations in Brazil that were acquired as part of the OZ Minerals acquisition completed during FY2023. Percentages may not total 100 due to rounding.

2. 384 apprentices and trainees commenced during FY2024 and were still with FutureFit Academy at 30 June 2024 and the remainder commenced prior to FY2024 and have not yet graduated.

## Our structure, business and supply chains continued

### Supply chains

BHP's suppliers are integral partners in achieving our purpose to bring people and resources together to build a better world. Our supply network largely reflects our operational footprint, meaning most of our direct supplier spend in FY2024 continued to be in the countries where we have operated assets.

The precise form of our supplier relationships varies according to the nature, term and value of each engagement, including for example, a long-form contract with tailored terms and conditions, a short-form contract or a purchase order. We seek to use BHP's standard contractual terms and conditions where practicable.

**Figure 1: Top 10 sourcing countries for non-traded goods and services spend**



1. Inbound refers to the movement of goods/provision of services to BHP's functions and operated assets.

2. Includes payments to suppliers for operating costs on an accruals basis and payments to suppliers for capital expenditure on a cash basis.

## Non-traded goods and services

Figure 2 shows the sourcing country breakdown of BHP's total spend on non-traded goods and services for FY2024.<sup>1</sup>

Figure 1 shows our top 10 sourcing countries for non-traded goods and services during FY2024, along with our major taxonomies in each country.<sup>2</sup> Taxonomy refers to the products and services classifications under the United Nations Standard Products and Services Code (UNSPSC).<sup>3</sup> For the top five sourcing countries (i.e. Australia, Chile, Canada, United States and Singapore) we have identified the top three Level 1 (i.e. broader) and Level 2 (i.e. narrower) UNSPSC information or where our spend exceeded US\$1 million on a particular category with a supplier incorporated in that country. For other countries, we have identified the top Level 1 and Level 2 UNSPSC information or where our spend exceeded US\$1 million on a particular category with a supplier incorporated in that country. The combined spend for our top 10 sourcing countries represents more than 99 per cent of BHP's total Procurement-managed purchases for FY2024.

Figure 2: Total non-traded goods and services spend in FY2024



## 6. United Kingdom

### Professional services

- Legal services
- Financial services
- Human resources services

### Technology

- Applications
- Infrastructure and security

### Indirect services

- Facilities management

## 7. India

### Technology

- Infrastructure and security
- Applications
- Technology consulting

### Engineering and construction

- Engineering consulting

## 8. China

### Rail goods and services

- Rolling stock

### Conveyor belting and parts

- Conveyor belting
- Conveyor parts (excluding belting)

### Maintenance, repair and operations (MRO)

- MRO hardware
- Electrical MRO
- Drive and transportation systems

## 9. United Arab Emirates

### Bulk materials

- Construction materials

## 10. Brazil

### Professional services

- Legal services
- Management consulting

### Maintenance, repair and operations (MRO)

- Heat transfer

1. Based on supplier country of incorporation and invoice posting date (i.e. date on which the supplier invoice is posted into BHP's system). Exclusive of GST/VAT. All percentage figures are rounded to the nearest whole number. 'Others' includes all other countries which BHP buys from, as well as BHP's spend with one-time vendors, who are not assigned to a country.  
2. Based on supplier country of incorporation and invoice posting date.  
3. The United Nations Standard Products and Services Code, managed by GS1 US for the UN Development Programme, is an open, global, multi-sector standard for classification of products and services.

## Our structure, business and supply chains continued

### Supply chains continued

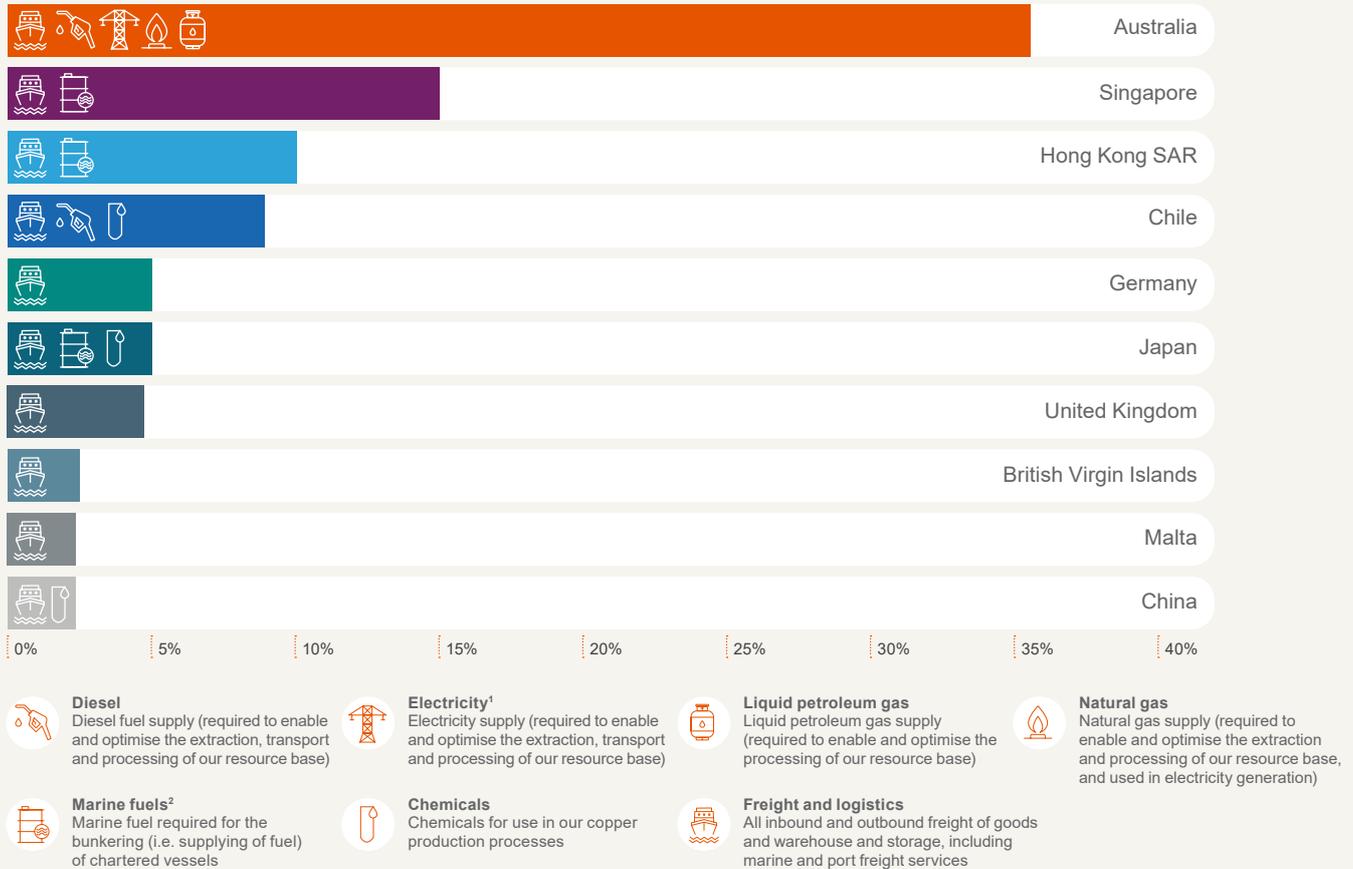
#### Country of manufacture

In Q3 FY2024, we updated our direct supplier onboarding form to improve our collection of country of manufacture data for new suppliers of trade-related inputs and non-traded goods and services. During onboarding new suppliers are required to indicate the countries or regions where products they provide to BHP are manufactured or assembled by the organisation or a third party. The early trends emerging from the initial data (representing suppliers onboarded since January 2024) indicate that China, Vietnam, Indonesia, Brazil, India, Turkey, Malaysia, Thailand, Mexico, Peru, South Africa, the Philippines and Israel are amongst our direct suppliers' manufacturing and outsourcing jurisdictions.

#### Local Buying Programs

As part of our efforts to support strong local supply chains and economic empowerment of Indigenous peoples, BHP engages with local and Indigenous businesses in the jurisdictions where we operate. This is either directly or through established Local Buying Programs. BHP's Local Buying Programs within Australia and Chile are delivered through strategic partnerships with non-profit and cost-neutral organisations that support small, local and Indigenous businesses to competitively bid for supply opportunities with BHP through a streamlined onboarding, procurement and payment process. The programs provide education and advice to build capacity and capability in local and Indigenous businesses to enter BHP's value chain, and positions those businesses to enter the value chains of other large companies. Refer to page 22 below for information on how we engaged with Local Buying Program participants in relation to modern slavery in FY2024.

Figure 3: Trade-related inputs



#### Trade-related inputs

Figure 3 shows the country (by total proportion of overall payments) and category breakdown for BHP's trade-related purchases (excluding purchases of minerals and metals and Australian Carbon Credit Units (ACCUs)) in FY2024.

In FY2024, we purchased nickel from non-BHP Australian mines for structural feed for our Nickel West operations.<sup>3</sup> We also purchased a small volume of copper raw materials from South America, North America, Southeast Asia, Australia and Africa as part of our third-party trading activity (which did not form part of BHP's products).

 For more information on our minerals and metals purchases refer to the [BHP Responsible Minerals Program Report 2024](#)<sup>4</sup>

In FY2024, we also purchased ACCUs to comply with the Australian Government's Safeguard Mechanism, under which facilities we operate are required to maintain greenhouse gas emissions at or below progressively declining legislated baselines (e.g. by surrendering carbon credits from eligible sources). The principles underpinning the Australian Carbon Credit Unit Scheme established under the Carbon Credits (Carbon Farming Initiative) Act 2011 and the Carbon Credits (Carbon Farming Initiative) Rule 2015 (ACCU Scheme) align to our own minimum standards for offsetting, including technical, legal and stakeholder criteria. The Australian Clean Energy Regulator is responsible for approving and issuing ACCUs to projects that meet those criteria. BHP's Compliance sub-function (including the Ethical Supply Chain and Transparency team) is involved and considers modern slavery risks on a case-by-case basis. Refer to page 16 below for more information on the Ethical Supply Chain and Transparency Framework.

1. Includes renewable sources of electricity.  
 2. The marine fuels category includes biofuels.  
 3. As stated in the BHP Annual Report 2024, on 11 July 2024, we announced Western Australia Nickel, comprising the Nickel West operations and West Musgrave project, would be temporarily suspended from October 2024. We intend to review this decision by February 2027. The decision to temporarily suspend Western Australia Nickel reflects oversupply in the global nickel market. Forward consensus nickel prices over the next half of the decade have fallen sharply reflecting strong growth of alternative low-cost nickel supply. During the temporary suspension, BHP will continue to support its workforce and local communities. BHP will invest approximately US\$300 million per annum following completion of a transition period to support a potential re-start of Western Australia Nickel. The transition period commenced in July 2024. Operations will be suspended in October 2024 and handover activities for temporary suspension are expected to be completed by December 2024.  
 4. The purpose of the Responsible Minerals Program Report is to describe our risks and controls relating to minerals and metals supply chain due diligence in accordance with the OECD's five-step risk-based framework.

## Modern slavery risks

BHP has committed to operating in a manner consistent with the United Nations Guiding Principles on Business and Human Rights (UNGPs) under our Human Rights Policy Statement. The UNGPs describe the corporate responsibility to respect human rights and the 'cause, contribute, direct linkage' continuum of corporate involvement in human rights impacts, which the guidance to the Australian Modern Slavery Act adopts.

In FY2024, the 'cause, contribute, direct linkage' continuum informed our supplier risk identification and Group-level human rights risk evaluation process. Our people in relevant roles also use the continuum (and the UNGPs more broadly) in raising human rights and modern slavery awareness, providing internal subject matter expertise and considering governance arrangements. Our emerging impact project workstream has also been designed to enhance BHP's integration of the UNGPs by enabling targeted engagement beyond our first-tier suppliers, increasing the effectiveness of our supply chain monitoring, and increasing access to grievance mechanisms and remedy for workers in our supply chain. Refer to page 23 for an overview of the impact project workstream.

In this Statement, unless stated otherwise, we describe our inherent modern slavery risks by reference to Verisk Maplecroft country scoring.<sup>1</sup> We also use this data in our supplier risk identification process. Refer to page 16 for more information on BHP's modern slavery risk methodology.

### In our operations

#### Operated assets and projects, exploration and corporate offices

In FY2024, we operated mining assets or major projects in three countries (Australia, Chile and Canada) and corporate offices managed by our Property and Workplace and External Affairs teams in 14 countries (Australia, United Kingdom, United States, Singapore, India, the Philippines, Malaysia, China, Japan, Brazil, Chile, Peru, Ecuador and Canada). Our Human Rights Policy Statement identifies 'labour conditions' as one of our prioritised human rights themes for our operations and supply chain and outlines our commitment to operate in a manner consistent with the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. The ILO Declaration includes the four Core Labour Standards, including as related to the elimination of all forms of forced or compulsory labour (including slavery or slavery-like practices, debt bondage and human trafficking) and the effective abolition of child labour. Refer to page 14 for more information on our Human Rights Policy Statement.

According to Verisk Maplecroft, the inherent modern slavery risks in the global mining sector primarily stem from the sector's corruption susceptibility, presence of vulnerable groups in certain jurisdictions, presence of unskilled or low-skilled workers in some operations and potential exposure to health and safety risks. Verisk Maplecroft rates the countries where we had operated assets in FY2024 (Australia, Canada and Chile) as having low or medium risks of modern slavery, which is consistent with our view that we have a low risk of causing or contributing to modern slavery practices within our operated assets.<sup>2</sup>

In FY2024, all operated assets and certain exploration regions globally completed community and human rights impact and opportunity assessments. The community and human rights impact and opportunity assessment for exploration in South America identified modern slavery in local procurement and use of contracted services as a medium priority human rights risk in countries where we undertake metals exploration activity in the region. Refer to page 15 for a description of our new approach to community and human rights impact and opportunity assessments (previously referred to as human rights impact assessments).

Refer to page 10 for an update on the situation we disclosed in our previous Statement regarding one of the OZ Minerals exploration tenements in Brazil. In FY2024, we otherwise had no reported artisanal and small-scale mining<sup>3</sup> on or adjacent to any of our operated assets. Artisanal and small-scale mining is a practice considered to be higher risk for modern slavery practices, such as child labour.<sup>4</sup>

As BHP pursues growth in future-facing commodities, we may begin operating, exploring or entering agreements in new jurisdictions. Most of our growth activities are in countries rated low or medium risk for modern slavery according to Verisk Maplecroft (Argentina, Australia, Canada, Chile, Finland, Norway, Serbia, Sweden and the United States), however, we also have non-controlling interests in Botswana, Brazil, Peru and Tanzania, which receive high-risk scores for modern slavery in Verisk Maplecroft. The nature of our growth activities means we may sometimes

undertake exploration activities and have relationships with third parties in remote regions of higher-risk jurisdictions, such as local landowners. We recognise workers in remote communities in higher-risk jurisdictions may be more vulnerable to modern slavery practices due to potentially higher rates of poverty and corruption, and limited education and employment opportunities. Our approach is to identify and understand these risks and, where the arrangement is crucial to our activities, we seek to implement mitigating actions as appropriate depending upon the nature of our interest.

We appreciate our corporate offices are not immune to modern slavery risks – mainly due to supply chain touchpoints with higher-risk sectors, such as cleaning and information technology services. According to Verisk Maplecroft data, some of the countries where we have corporate offices attract higher modern slavery risk ratings.<sup>5</sup> However, we consider that in practice these office activities present a lower risk of causing or contributing to modern slavery practices than our operated assets given the nature of the activities conducted, which include legal, accounting, communications, human resources, risk management, administrative support and economic functions performed by trained professionals on individual employment agreements or contracting arrangements.

In addition to having measures in place to comply with applicable local laws relating to employment, we have in place a number of measures to manage labour and workforce-related risks, including:

- background checks to ensure our employees have appropriate rights to work
- our Risk Framework identifies material risks at a Group-level, which relate to attracting, retaining and developing capability in our workforce. We have a number of controls in place to manage this risk, including controls to ensure employees receive appropriate remuneration
- our *Minimum requirements for suppliers* are incorporated into the standard services contract and purchase order that we typically use to engage labour hire agencies and service contractors. We conduct modern slavery due diligence on all new suppliers of labour hire or service contractors via BHP's supplier risk assessment tool (3PR) at the point of onboarding

#### Non-operated joint ventures, the BHP Foundation, BHP Ventures and BHP Xplor

BHP holds interests in non-operated mining joint ventures in Peru, Brazil and the United States. While those sites have their own operating and management standards, we acknowledge for the purposes of this Statement that Peru and Brazil both attract high-risk scores from Verisk Maplecroft. In Peru, the prospect of modern slavery risks in the mining sector principally relates to the presence of child labour in certain supply chains and children working at artisanal and small-scale gold mines. In Brazil, the main source of the risk is debt bondage schemes in rural and urban areas and exploitation of vulnerable migrant groups.

Given its mission to address some of the world's most critical sustainable development challenges, the BHP Foundation is exposed from time to time, through the projects it funds, to jurisdictions that may pose higher modern slavery risks. The BHP Foundation funds projects delivered by partner organisations across a number of thematic areas. The Foundation's investments have a global footprint, with a particular focus on the main countries where BHP operates (Australia, Chile, Canada and the United States). Some of the Foundation's partners operate in or extend their work into countries that attract higher-risk scores for modern slavery according to Verisk Maplecroft, including Cambodia, Cameroon, Colombia, Ecuador, Ghana, Honduras, India, Indonesia, Malaysia, Mexico, Nigeria and the Philippines (among others).

All of the companies where we have invested through BHP Ventures are headquartered in low- or medium-risk jurisdictions for modern slavery practices, for example, Canada, Australia, the United Kingdom and the United States, and we partner with established co-investors. However, we recognise companies in which BHP Ventures have invested may in some instances be exposed to jurisdictions that carry higher modern slavery risks through their operations or supply chains.

Some companies in the FY2024 cohort of BHP Xplor undertake exploration for copper and other base and precious metals in countries that attract high modern slavery risk scores from Verisk Maplecroft, including Botswana and Kazakhstan.

1. Verisk Maplecroft is a data subscription service that utilises geospatial datasets, predictive models and third-party information to assess risk exposure. We use two of Verisk Maplecroft's risk indices in our supplier due diligence – the Modern Slavery Index and the Child Labour Index. Where there is a difference in country scores between the two indices, we adopt the riskier of the two.

2. Australia is rated as low risk, and Canada and Chile are rated as medium risk, on Verisk Maplecroft's Modern Slavery Index.

3. BHP uses the International Council for Mining and Metals (ICMM) conception of artisanal and small-scale mining as mining activities that are 'labour-intensive and capital-, mechanisation- and technology-poor'. More information can be found on the ICMM website.

4. US Department of Labor, 2022 List of Goods Produced by Child Labor or Forced Labor (2022), available online at [List of Goods Produced by Child Labor or Forced Labor | U.S. Department of Labor \(dol.gov\)](https://www.dol.gov/eis/2022/goods-produced-by-child-labor-or-forced-labor).

5. India, the Philippines, Malaysia, China, Brazil, Ecuador and Peru. Our other corporate office locations attract low (Australia) or medium (Singapore, United Kingdom, United States, Japan, Chile and Canada) risk scores.

## OZ Minerals

BHP acquired OZ Minerals on 2 May 2023 and we have made progress integrating former OZ Minerals Australia operations into our corporate structure. Integration is an ongoing process that will take time. We are currently undertaking a strategic review of OZ Minerals Brazil assets. Former OZ Minerals entities and BHP's financial reporting periods have been aligned to 30 June 2024. The supplier spend data presented in this section relates to the period 1 January 2023 to 30 June 2024 (to cover the period up to alignment of financial reporting periods for OZ Minerals).

### Addressing modern slavery risks in the operations of OZ Minerals assets

The former OZ Minerals operations in Australia are copper mines in South Australia at Carrapateena and Prominent Hill (forming part of our Copper South Australia asset), and a copper and nickel project in Western Australia at West Musgrave. In Brazil, the OZ Minerals locations include copper and gold mines and exploration tenements in the Carajás and Gurupi provinces in Pará and Maranhão states. While Australia attracts a low-risk score for modern slavery in Verisk Maplecroft, as noted above Brazil attracts a high-risk rating.

In our previous Statement, we disclosed the presence of artisanal and small-scale mining activity at exploration tenements in Brazil following BHP's acquisition of OZ Minerals in May 2023. As these are exploration tenements, we do not have a right to control access to the land and our own access is limited by an injunction which affects four of the exploration tenements and prohibits certain development activities and intervention with local settlements in the area. Access to these and other exploration tenements in the region is also constrained by various factors, such as security protocols and the need for government or other authorisations to access non-public land and roads. Our investigations during the current reporting period indicate the practices are illegal gold mining. We understand the practices ceased for a time following Federal Police intervention around September 2021 but have subsequently recommenced. In 2013, an injunction was issued in relation to an area that was subsequently acquired by OZ Minerals and which OZ Minerals previously proposed to develop. Artisanal mining was present in the area at the time of the injunction and this has since expanded as illegal mining. Due diligence we have undertaken in FY2024 indicates there are potentially high risks of modern slavery associated with the illegal mining activities which could include 'the worst forms of child labour' (as defined in Article 3(d) of the ILO Convention No. 182, which includes work likely to harm the health or safety of an underaged person). Recognising the gravity of these risks and also the complex environment, we are prioritising a human rights risk and preliminary impact assessment to identify and/or mitigate, as appropriate, risks of causing, contributing to or being directly linked to adverse human rights impacts in this area.

### Addressing modern slavery risks in the supply chains of our OZ Minerals assets

Prior to acquisition, OZ Minerals' supplier onboarding and due diligence processes differed between OZ Minerals assets in Brazil and Australia.

OZ Minerals Brazil's pre-acquisition supplier onboarding and due diligence processes have continued throughout FY2024. These processes include screening suppliers against the Brazilian Ministry of Labour's Register of Employers found by government inspectors to have subjected workers to slavery-like working conditions ('Lista Suja') prior to onboarding where the contract value exceeds a certain monetary threshold. Suppliers with active contracts are also screened against the Lista Suja every six months. OZ Minerals Brazil contract managers undertake in-person site inspections to assess modern slavery risks for select suppliers. In Q2 FY2024, the OZ Minerals Brazil team undertook in-person site inspections of 31 local suppliers located in Pará and Maranhão provinces that have been identified as higher-risk for modern slavery (this included suppliers that provide accommodation for workers).

During FY2024, OZ Minerals Brazil provided online human rights training to 90 local suppliers. The training discussed human rights issues covered by OZ Minerals Brazil's human rights procedure, including modern slavery practices.

Post-acquisition, BHP considered the OZ Minerals Brazil supplier onboarding processes and designed and implemented interim controls to supplement those processes to more closely align with BHP's compliance approach while OZ Minerals Brazil assets are under strategic review. These interim controls include screening for modern slavery risk via our third-party due diligence platform and a second-line review by BHP's Compliance team where the due diligence results indicate or confirm a screening finding for modern slavery risks or human rights impacts. These interim controls apply in addition to OZ Minerals Brazil's existing procedures described above.

As we continue to engage with OZ Minerals Brazil's supplier onboarding and due diligence processes, we will consider the effectiveness of existing and interim measures.

As mentioned in our previous Statement, following acquisition, we also conducted a one-off screening of all active suppliers to OZ Minerals Brazil assets. This exercise was undertaken in Q4 FY2023 and identified a small number of suppliers as being potentially exposed to risks of forced labour in the extended supply chain, and one instance of historical enforcement activity. Further investigation and engagement with the latter supplier confirmed the screening finding did not relate to our supplier directly and we were satisfied our supplier's modern slavery due diligence and risk management processes were adequate. During FY2024, BHP engaged with the suppliers identified as being potentially exposed to forced labour risks in the extended supply chain to understand the nature of those risks and the suppliers' due diligence processes. Following this engagement, we have maintained relationships with the majority of suppliers but did place a temporary 'block' on one supplier in the OZ Minerals Brazil vendor management system due to unsatisfactory engagement.

Prior to acquisition, OZ Minerals Australia had in place procedures to assess modern slavery risk for suppliers during contracting. During integration, we designed and implemented interim controls to supplement OZ Minerals Australia's supplier onboarding and due diligence procedures for alignment with BHP's own systems and processes relating to a range of compliance risks, including modern slavery. These interim controls included:

- incorporating mandatory questions regarding the nature of the products or services being supplied to former OZ Minerals Australia assets in the automated supplier onboarding form in OZ Minerals Australia's vendor management system
- due diligence screening via 3PR for new suppliers whose responses to the supplier onboarding form indicated they were incorporated in a high-risk country or supplying high-risk services to former OZ Minerals Australia assets. Suppliers identified as high risk through due diligence screening triggered a second-line Compliance review and approval prior to onboarding
- a contract pre-approval process that triggered review of new contract executions for existing OZ Minerals Australia suppliers where departures were proposed to BHP's modern slavery standard clause or where the contract related to the supply of renewable energy-related technology or materials

Since January 2024, all new suppliers to former OZ Minerals Australia assets are screened for modern slavery risk (along with corruption and sanctions) via 3PR during onboarding. A high-risk rating for modern slavery will trigger a second-line review by Compliance. All contracted former OZ Minerals Australia suppliers have been onboarded into BHP's Global Contract Management System (GCMS). New contract executions for existing former OZ Minerals Australia suppliers will trigger a Compliance review where there are departures proposed to the modern slavery standard clause or where the supplier is rated high risk in 3PR. We are continuing to integrate former OZ Minerals Australia operations and functions into BHP's compliance systems and processes. For more information on how we assess the effectiveness of those systems and processes refer to page 24.

In Q2 FY2024, a one-off review was undertaken for all active suppliers to former OZ Minerals Australia assets. This review again identified a group of suppliers as higher risk for modern slavery due to forced labour risks in the extended supply chain. Work to confirm the scope of services provided and products procured from these suppliers is ongoing.

## OZ Minerals supply chain

Tables 1 and 2 show the main sourcing countries for goods and services procured by former OZ Minerals Australia and OZ Minerals Brazil entities during FY2024, along with the main categories of goods and services sourced from each country.<sup>1</sup>

Due to the ongoing strategic review of OZ Minerals Brazil and the continuing integration of former OZ Minerals Australia operations into BHP's vendor management systems, the data contained in Tables 1 and 2 is reported in accordance with OZ Minerals' systems and classifications for FY2024.

The majority of former OZ Minerals Australia's spend with suppliers in FY2024 was with suppliers incorporated in countries scored as low or medium risk for modern slavery according to Verisk Maplecroft.<sup>2</sup> The majority of OZ Minerals Brazil's spend with suppliers in FY2024 was with local suppliers in Brazil, which is scored as high risk for modern slavery by Verisk Maplecroft.<sup>3</sup> We also recognise that some key sourcing jurisdictions for former OZ Minerals Australia and OZ Minerals Brazil entities (as shown below) attract higher risk modern slavery scores according to Verisk Maplecroft.<sup>4</sup>

**Table 1: OZ Minerals Australia key sourcing jurisdictions**

1. Australia	2. Germany	3. Singapore	4. United States	5. Canada
Mine services	Consulting services	Transportation, cargo handling and warehousing services	Machinery and equipment	Technology services
Civil engineering services	Transportation, cargo handling and warehousing services		Mine services	
Electricity				
6. China	7. United Kingdom	8. Sweden	9. Ireland	10. The Philippines
Machinery and equipment	Consulting services	Consulting services	Technology services	General supplies

**Table 2: OZ Minerals Brazil key sourcing jurisdictions**

1. Brazil	2. Australia	3. Finland	4. Chile	5. Canada
Drilling services	Safety and operational efficiency services	Technology	Machinery and equipment	Consulting services
Mine services	Consulting services	Machinery and equipment	MRO parts	
Maintenance, repair and operations (MRO)	Technology	Maintenance and technical services		
6. India	7. Germany	8. United States	9. Peru	
MRO parts	Machinery and equipment	Consulting services	Consulting services	
		Technology services and software		

Some of the goods and services procured by former OZ Minerals Australia and Brazil entities (as described above), such as civil engineering services, mine services, electricity, transportation, cargo handling and warehousing services, general supplies, drilling services, safety and operational efficiency services, and maintenance and technical services, attract higher global industry risk scores from Verisk Maplecroft due to the inherent risks associated with the activities of those taxonomies (i.e. sectors/industries) globally.

1. Tables for OZ Minerals Australia and OZ Minerals Brazil are based on invoicing for the period 1 January 2023 to 30 June 2024. Category headings were provided by OZ Minerals Brazil procurement staff with OZ Minerals Australia invoice and purchase order data then aligned to those using material group details cross-checked against the purchase order description text fields. Where vendors provided multiple goods or services, they were categorised based on the majority of spend. For the top five countries, the top three categories with spend over AUD\$1m have been included. For the remaining countries, the top category and any other categories where spend was over AUD\$1m have been included.

2. Australia and Germany both attract low risk scores and represented the majority of OZ Minerals Australia's spend in FY2024, while Singapore, the United States, Canada and the United Kingdom attract medium risk scores. Sweden and Ireland attract low risk scores.

3. OZ Minerals Brazil's FY2024 spend also includes countries which attract low (Australia, Finland and Germany) or medium (Chile, Canada and the United States) risk scores.

4. Brazil, China, India, Peru and the Philippines.

## Modern slavery risks continued

### In our supply chains

We consider the potential for BHP to be directly linked to modern slavery through our supply chain presents our greatest modern slavery-related risk. This is reflected in 'supply chain' being identified as one of our prioritised human rights themes in our Human Rights Policy Statement (refer to page 14 for more information on our Human Rights Policy Statement).

For our FY2024 suppliers of non-traded goods and services, 5 per cent are rated as high risk, 7 per cent are medium risk and 88 per cent are low risk.<sup>1</sup> The main sources of supply chain risks are purchases from higher-risk geographies and higher-risk sectors. In terms of specific modern slavery practices, our exposure potentially includes forced labour and some of the following practices, which the ILO defines as potential indicators of forced labour:



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While we appreciate modern slavery risks exist in our supply chain, our routine risk identification, due diligence and monitoring focuses on our tier one (i.e. direct) suppliers, including those suppliers' manufacturing or outsourcing in other countries. For an organisation with as many and varied suppliers as BHP, we believe this is the best use of our resources when issues, such as access to extended supply chain information and ability to drive tangible improvements, are considered. Acknowledging that our direct suppliers have greater oversight and influence over the practices of their own direct suppliers, our *Minimum requirements for suppliers* impose a requirement on our suppliers of non-traded goods and services to review their direct suppliers' compliance with applicable human rights standards and where they source inputs (refer to page 14 for more information on our *Minimum requirements for suppliers*). BHP supplements our routine tier one risk identification activity with targeted deeper-dive analysis of higher-risk sectors or categories.

### Country risks

As Figures 1 and 2 show, the majority of BHP's spend on non-traded goods and services in FY2024 was with suppliers incorporated in countries scored as low or medium risk for modern slavery by Verisk Maplecroft.<sup>2</sup> Less than 2 per cent of spend with our top 10 sourcing jurisdictions for non-traded goods and services was with suppliers incorporated in countries rated higher risk.<sup>3</sup>

Figure 3 and associated descriptions show a similar inherent risk profile for our trade-related inputs. However, some higher-risk source countries are present for the trade-related inputs captured in Figure 3.<sup>4</sup> We also acknowledge the presence of higher-risk countries<sup>5</sup> in the supply chains extending beyond the chemical volumes we purchase from commodity traders, who essentially occupy an intermediary position between buyers and producers.

We recognise a supplier's country of incorporation may not be the same as the country of manufacture. The initial data we have collected for suppliers onboarded in Q3 and Q4 FY2024 indicates that some of those suppliers' manufacturing and outsourcing jurisdictions<sup>6</sup> attract higher-risk scores for modern slavery according to Verisk Maplecroft due to various process and outcome-based factors, including those relating to the adequacy of domestic regulation and law enforcement, corruption levels, as well as the extent and severity of reported violations.

### Taxonomy risks

In addition to country risk, BHP's modern slavery risk identification process applies a taxonomy (i.e. sector/industry) lens. Table 3 provides an overview of higher-risk taxonomies within BHP's top 10 tier one sourcing countries for non-traded goods and services. Table 3 also identifies taxonomies that attract higher global industry scores for modern slavery due to the presence of one or more of the following indicators (according to Verisk Maplecroft):<sup>7</sup>

- reliance on workers from vulnerable groups
- lower worker skill levels required to undertake the industry's activities
- potential for the industry to be associated with corruption
- the extent to which an industry's activities involve potentially dangerous work

Table 3 overlays this industry risk analysis by indicating where taxonomy risks may be compounded by sourcing those goods and services from higher-risk countries (according to Verisk Maplecroft data).<sup>8</sup>

We predominantly procure maritime freight and port services from medium-risk jurisdictions.<sup>9</sup> However, we recognise the shipping industry globally is inherently high risk for some modern slavery practices (particularly forced labour). These risks mainly stem from industry-wide factors, such as reliance on vulnerable workers (which may include migrant workers), unavoidable restriction of movement at sea and labour conditions on board vessels. The wellbeing of seafarers working on board the vessels that transport our products remains an important human rights issue. For more information on our actions to address modern slavery risks in our maritime activities see page 21.

As noted above, BHP supplements our tier one risk identification activity with enhanced review, engagement and analysis beyond tier one in targeted areas of elevated risk. For example, in FY2024, we examined our current and prospective supply chains relating to certain renewable energy-related purchases for our operations. We are aware of the elevated forced and child labour risks associated with certain renewable energy technologies, such as photovoltaic solar panels, wind turbines and lithium-ion batteries, as detailed by international researchers. Given the potential for human rights impacts in renewable energy supply chains, we recognise the need to embed respect for human rights in the global transition to a low-carbon economy. The initial examination undertaken in FY2024 (which will be updated periodically) has provided us with a greater understanding of our extended renewable energy supply chain and enabled us to identify priority areas for further attention and due diligence. For example, we have incorporated ethical sourcing and transparency criteria into the tender process and bid evaluation for one of our renewable energy developments in Australia.

We also selected uniforms as the second category for deep-dive attention. This is due to the similarly elevated risks of modern slavery in the extended supply chain for the apparel sector, and in particular in relation to raw materials, such as cotton, which is used in our uniforms. In FY2024, BHP initiated engagement with our largest supplier of uniforms to gain greater visibility over the manufacturing locations and extended supply chain for the garments we procure from them.

1. Percentages have been rounded to the nearest whole number. Refer to page 16 for an overview of our supplier due diligence approach, including the methodology for the risk assessment.  
 2. Australia is rated as low risk and Chile, Canada, the United States, the United Kingdom and Singapore are rated as medium risk.  
 3. China, the United Arab Emirates, India and Brazil.  
 4. China and Hong Kong SAR.  
 5. Such as Peru, China, Mexico, the Philippines and Turkey.  
 6. China, Vietnam, Indonesia, Brazil, India, Turkey, Malaysia, Thailand, Mexico, Peru, South Africa, the Philippines, Israel, Egypt and Hong Kong SAR.  
 7. Verisk Maplecroft's global industry scores reflect the risks inherent to an industry's activities.  
 8. Based on supplier country of incorporation.  
 9. Singapore, Japan, United Kingdom, British Virgin Islands, Malta, Marshall Islands and South Korea.

**Table 3: Higher-risk taxonomies in BHP's top 10 sourcing countries for non-traded goods and services<sup>1</sup>**

Level 1 category and description	Level 2 category	Higher risk taxonomy indicators <sup>2</sup>	Higher-risk countries within BHP's top 10 tier one sourcing countries
 <b>Freight and logistics</b> All inbound and outbound freight of goods and warehouse and storage	Containers and storage Air freight	● ● ● ●	📍 China
 <b>Maintenance, repair and operations (MRO)</b> Goods that are procured and changed out on a recurring basis for MRO at our production sites	Drive and transportation systems Electrical MRO Heat transfer	● ● ● ●	📍📍 China, Brazil
 <b>Tyres, wheels and rims</b> All tyres, wheels and rims for off the road mobile equipment and all other mobile equipment and light vehicles	Earth moving tyres	● ● ● ●	📍 China
 <b>Major equipment purchase</b> Purchase of all major equipment, infrastructure and large components	Major power sources	● ● ●	📍📍 China, Brazil
 <b>Travel and accommodation</b> All air and ground transport services, plus accommodation	Ground transportation	●	📍📍 Brazil, India
 <b>Indirect services</b> Supporting services not directly related to maintenance, production or operations, excluding professional labour services	Facilities management	● ● ● ●	📍📍📍 Brazil, China, India
 <b>Engineering and construction</b> Engineering services and construction, projects or otherwise, including engineer, procure and construct and engineer, procure, construct and manage contractors	Structural components and basic shapes Civil works	● ● ● ●	📍📍 China, India
 <b>Bulk materials</b> Goods that are procured by weight or volume, typically batch produced by suppliers	Construction material	● ● ●	📍📍 United Arab Emirates, China
 <b>Technology</b> All software, hardware and services related to the provision of information technology and operational technology	End-user computing Infrastructure and security	● ● ● ●	📍📍📍 Brazil, India, China
 <b>Maintenance services</b> All services that cover maintenance, inspection, repair and testing of equipment and infrastructure	Trade maintenance services Specialist equipment maintenance services	● ● ● ●	📍📍📍 Brazil, India, China
 <b>Non-production consumables</b> Consumable goods procured on a recurring basis not directly related to production, maintenance, repairs or operation	Other non-production consumables	● ● ●	📍 China
 <b>Exploration and land services</b> Services, excluding drilling, related to the exploration of mining land, plus land management services outside of production	Mining exploration services	● ● ● ●	📍 Brazil
 <b>Utilities</b> Electricity, gas and water, plus any other renewable/alternative utilities	Utilities other Water and sewer utilities Electric utilities	● ● ● ●	📍📍 India, Brazil
 <b>Rail goods and services</b> All goods and services directly related to the construction and operation of rail systems and locomotives/ore cars	Rolling stock	● ●	📍 China

Inherent industry risk indicators: ● Corruption susceptibility ● Vulnerable groups ● Worker skill ● Occupational health and safety

1. Based on Verisk Maplecroft data.

2. Modern slavery indicators which Verisk Maplecroft assesses as higher risk globally for at least one of the Level 2 UNSPSC taxonomies listed.

# Our actions to address modern slavery risks

## Governance and responsibilities

BHP uses the ‘three lines model’ to define the role of different teams across the organisation in managing risk. The first line is provided by our frontline teams, operational management and certain personnel in functional roles and is responsible for identifying and managing associated risks. The second-line Risk and Compliance teams are responsible for defining minimum standards, designing controls and providing assurance. They also provide expertise, support, monitoring and challenge on risk-related matters, including modern slavery risks. Our Internal Audit team is the third line and is responsible for providing assurance on whether risk management, internal controls and governance processes are adequate and functioning.

BHP’s Board is ultimately accountable for overseeing the effectiveness of BHP’s risk management systems and internal controls. The Board’s Risk and Audit Committee and Sustainability Committee assist in that oversight by reviewing and considering BHP’s material risk profile on a biannual basis, as well as other subject matter specific management reports.

Below Board level, modern slavery responsibilities sit in different areas of the organisation:

- The **Ethical Supply Chain and Transparency (ESCT)** team within Compliance is a second-line function responsible for the Ethical Supply Chain and Transparency Framework. It is the primary team within BHP dedicated to defining minimum standards and providing assurance in relation to modern slavery risks across the non-traded and trade-related supply chains. The Compliance team, including the ESCT team, is led by the Chief Compliance Officer and has an independent reporting line from our assets. The Chief Compliance Officer maintains a reporting line to the Chief Legal, Governance and External Affairs Officer and dotted line reporting to the Risk and Audit Committee for certain compliance risks and the Sustainability Committee on ESCT-related risks. The Chief Compliance Officer meets at least annually with the Risk and Audit Committee Chair.
- The **Global Business Services Master Data and Insights (GBS MDI)** team within the Commercial function is responsible for onboarding new suppliers and conducting supplier due diligence checks, with oversight from the ESCT team.
- The **Maritime** team within the Commercial function manages modern slavery risks that may arise in our inbound (to the extent those engagements are not managed by our suppliers) and outbound maritime supply chains.<sup>1</sup>
- The **Marketing Sustainability** team within the Commercial function owns BHP’s Responsible Minerals Program, which covers the trade-related minerals and metals supply chains. These team members are also the subject matter experts on the Organisation for Economic Co-operation and Development (OECD)’s risk-based due diligence framework. The ESCT team provides modern slavery subject matter oversight, advice and monitoring to the Responsible Minerals Program for higher-risk minerals and metals transactions.
- The **Global Policy and Assurance – Human Rights, Community and Indigenous Peoples** team within the Global Corporate Affairs and Communications sub-function oversees human rights issues at an operated asset and corporate level.

## Values, policies and standards

In FY2024, BHP launched a renewed set of corporate values:

Do what’s right	Seek better ways	Make a difference
A sustainable future starts with safety and integrity, building trust with those around us	Listening to learn and inspiring challenge is how we drive progress	The accountability to act, create value and have impact is on each of us, every day

**Our Values** set the tone for our culture, guide our decision-making and are a declaration of what we stand for – including with respect to modern slavery and human rights.

During FY2024, we launched our new *Our Requirements Global Controlled Documents* suite following an improvement project to streamline the requirements set out in our Group-wide standards. These improvements seek to make our requirements and ways of working easier for our people to understand and apply.

The following documents provide minimum standards and guidance for our people, including on human rights and modern slavery, as follows:

- **Our Code of Conduct (Our Code)** is publicly available and sets out BHP’s conduct expectations for all employees and contractors. This includes the requirement to operate in a manner consistent with internationally recognised human rights and standards. *Our Code* also provides guidance on speaking up and our channels for reporting misconduct concerns (comprising an online portal and confidential 24-hour multilingual call service).
- BHP’s **Human Rights Policy Statement** is publicly available and provides detail on our human rights commitments and approach, including our prioritised human rights themes of labour conditions; host communities; Indigenous peoples; healthy environment; climate change; security providers; tailings storage facilities; supply chain; equitable change and transition; and civil society. Our Human Rights Policy Statement is reviewed annually and was updated in FY2024 to clarify our approach where differences exist between our standards and local customs, norms, rules or regulations.

 [Our Code is available at bhp.com/about/operating-ethically/our-code/](https://bhp.com/about/operating-ethically/our-code/)

 [Our Human Rights Policy Statement is available at bhp.com/humanrightspolicystatement](https://bhp.com/humanrightspolicystatement)

- BHP’s **Responsible Minerals Policy** was published in FY2023 and outlines our commitment and approach to the responsible sourcing of minerals and metals. Our Responsible Minerals Policy also sets out our expectations of suppliers of minerals and metals to implement due diligence to identify, assess and mitigate the risks described in Annex II to the OECD’s Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Third Edition (OECD Guidance) in their own supply chains.

 [Our Responsible Minerals Policy available at bhp.com/sustainability/valuechainsustainability](https://bhp.com/sustainability/valuechainsustainability)

- The **Supply Global Standard** (previously *Our Requirements for Supply*) outlines requirements relating to BHP’s *Minimum requirements for suppliers*. The *Minimum requirements for suppliers* set out procedural and substantive requirements relating to (among other things) supplier due diligence, child labour, forced labour, human trafficking and grievance mechanisms for our suppliers of non-traded goods and services. All of BHP’s standard contract templates for non-traded goods and services contain a clause requiring adherence to the *Minimum requirements for suppliers*.
- The **Business Conduct Global Standard** (previously *Our Requirements for Business Conduct*) sets out various processes for supporting *Our Code* and meeting BHP’s legal and ethical obligations. The Standard directs employees and contractors to contact Compliance if they are concerned that a supplier is engaging in human rights violations (including in relation to its own workforce).
- The **Entering a High-Risk Country Global Procedure** (previously *Our Requirements for Entering a High-Risk Country*) outlines the procedure BHP will follow before operating or establishing a legal or physical presence in a high-risk country. This Procedure categorises countries as red, orange or green, based on the countries’ ratings on indices relating to corruption, democratic governance, human rights, resource nationalism, rule of law, security, state instability and sanctions risks. The Procedure sets out the approval and operational requirements for entry activities in countries considered high risk (i.e. countries categorised as red or orange).

1. Inbound in this context refers to the movement of products supplied to BHP to our operated assets. Outbound refers to the movement of our products to our customers.

## Responsible production and sourcing standards

Aligned with the Responsible supply chains pillar of our social value framework, we have set a 2030 goal to create sustainable, ethical and transparent supply chains together with our partners. As part of this goal, we have voluntarily committed to adopting a range of international sustainability standards and being independently assessed against them.

In FY2023, we implemented our sustainability standards strategy, which defines our pathway for the implementation of responsible production and sourcing standards. The strategy is focused on the foundations needed to enable a more efficient adoption of international and industry-focused sustainability standards. The standards that form part of our strategy are:

- the Copper Mark Risk Readiness Assessment for key copper operations Spence, Escondida and Olympic Dam as an ESG performance expectation from downstream customers
- the London Metal Exchange (LME) Policy on Responsible Sourcing for our copper and nickel LME Brands (products) to remain registered on the London Metal Exchange
- the International Council for Mining and Metals (ICMM) Performance Expectations at a corporate and site level across our operated assets as a requirement of ICMM membership
- the Global Industry Standard for Tailings Management for all operated and closed tailings storage facilities to meet better practice tailings standards
- Towards Sustainable Mining for Australian and Canadian sites as a requirement under the Minerals Council of Australia and Mining Association of Canada

Independent assessment against these standards forms a key part of our sustainability standards strategy and enables us to transparently demonstrate our commitment to being a responsible actor within the mining and metals industry and within global value chains for our products.

## Due diligence and risk management in our business activities

BHP manages modern slavery risks arising from our operated assets as part of our broader efforts to identify, understand and manage potential human rights impacts.

## Community and human rights impact and opportunity assessments

In FY2023, we completed human rights baseline studies for all operated assets and certain exploration regions, which included a review of national and regional human rights policies, frameworks and issues, as well as analysis of priority human rights risks and issues for the communities where we operate.

In FY2024, building on the results of these studies, we developed and commenced implementation of a globally consistent methodology for community and human rights impact and opportunity assessments (previously referred to as human rights impact assessments) which identified and prioritised potential impacts, risks and opportunities related to the local communities where we operate. The approach was trialled at all of our operated assets (excluding the former OZ Minerals assets) and selected exploration regions and enabled assets to deep dive on the potential community and human rights impacts and opportunities most relevant to their regions while also supporting a global view of recurring themes which can help us identify opportunities for Group-wide action or collaboration. Following completion of the community and human rights impact and opportunity assessments, we reviewed our approach and identified strengths and areas for improvement. In FY2025, we will build on this approach, consulting with external stakeholders in the process.



Refer to page 9 for more information on the results of our FY2024 community and human rights impact and opportunity assessments

Towards the end of FY2024, we commenced work to evaluate and record a Group-level risk in BHP's Risk Framework relating to operational, Indigenous peoples and community human rights impacts.

## Exploration and new country entry

Our assessment of exploration activities and partnerships in new jurisdictions considers a range of relevant risks and mitigations, including human rights, modern slavery and corruption using relevant indices and analysis and with the input of experts with local insights.

Before establishing operations or a legal or physical presence in a high-risk country, we assess material country-level human rights risks in accordance with our *Entering a High-Risk Country Global Procedure* (refer to page 14 above for a description of this procedure). When investing in exploration projects that will be operated by a third-party for any period of time, we undertake due diligence that typically considers risks associated with the project's operating country and the project or company's approach to human rights risks and issues (among other things). Post-investment, we seek to engage with the operating company to share knowledge and good practice guidance in relation to managing non-technical risks, which may include human rights risks.

During FY2024, we enhanced our internal guidance on the steps that we take when investing in operated and non-operated interests and entering or expanding activities in new countries. Such interests include exploration financing, earn-in, option and joint venture agreements, acquisitions, equity interests and grants, including through the BHP Xplor program. The appropriate steps will vary in different circumstances proportionate to factors such as operatorship, type, country or countries involved, risks and the level of investment undertaken by BHP.

## Due diligence and risk management in our non-operated joint ventures, the BHP Foundation, BHP Xplor and BHP Ventures

### Our non-operated joint ventures and Renova Foundation

Non-operated joint ventures are independently managed and operated, and have their own governance frameworks, in accordance with each joint venture agreement. In FY2024, our Non-Operated Joint Ventures Asset team continued using the relevant governance frameworks to, when appropriate, engage on human rights and modern slavery risks with the operator of the non-operated joint venture assets in our portfolio (Antamina, Resolution and Samarco). The Non-Operated Joint Ventures Asset team also supports the work of the Renova Foundation, which is the not-for-profit private foundation implementing remediation and compensatory programs relating to the 2015 failure of the Fundão tailings dam operated by Samarco. While non-operated joint ventures have their own operating and management standards (including their own code of conduct and/or policy to manage modern slavery risks), we seek within the limits of the relevant joint venture agreements to enhance governance processes and encourage operator companies to adopt industry best practices and align with international standards. Through relevant governance processes, we may, where appropriate, also provide subject-matter specific input and support in relation to risk management, environmental and social impacts, and community engagement.

### The BHP Foundation

The BHP Foundation has confirmed that during FY2024, it adopted BHP's 3PR tool. As a result, new suppliers to the BHP Foundation undergo an automated modern slavery risk assessment at the point of onboarding. There are a small number of BHP Foundation suppliers that are engaged via service agreements and receive one-off payments for services. These suppliers are not onboarded via BHP's 3PR tool, however they predominantly provide low-risk services, including professional speaking engagements. The ESCT team also delivered tailored modern slavery training to the BHP Foundation team in Q4 FY2024. Work to update the BHP Foundation's due diligence and risk identification processes for prospective grantees to integrate human rights considerations, including modern slavery, was ongoing in FY2024 and will continue in FY2025. New grantees are required to declare any known human rights violations (including modern slavery issues) as part of their onboarding and grant agreements require grantees to undertake ongoing identification, management and any remediation required in relation to human rights risks, including modern slavery.

## Our actions to address modern slavery risks *continued*

The BHP Foundation has minimum requirements that set out the Foundation’s expectations in relation to freedom of association, wages, penalties and working hours and prohibit the use of modern slavery in connection with projects funded by the Foundation, or when using Foundation grant funds. The minimum requirements also require grantees to provide a grievance mechanism for workers engaged (whether by the grantee, a sub-grantee or a contractor) to work on the project, to raise complaints about issues related to the minimum requirements. In FY2024 the Foundation updated its website to improve the visibility and accessibility of information relating to its grievance mechanisms and reporting lines which are made available to members of the public to report concerns in relation to its projects or the minimum requirements. Grant agreements and all service contracts incorporate the minimum requirements.

### BHP Xplor

We undertake high-level due diligence on companies shortlisted to enter the BHP Xplor program, which typically considers risks associated with the company’s operating jurisdiction and any public commitments or policies relating to human rights and the presence of Indigenous peoples. We conduct further detailed due diligence and engagement with BHP Xplor participants, including in relation to the company’s approach to respecting human rights and managing non-technical risks.

### BHP Ventures

BHP Ventures conducts tailored compliance and legal due diligence on proposed investments, which may involve consideration of supply chain and ethical sourcing practices as applicable. It also undertakes risk-based monitoring and engagement on investments, which captures changes to operating jurisdictions.

### Due diligence and risk management in our supply chains

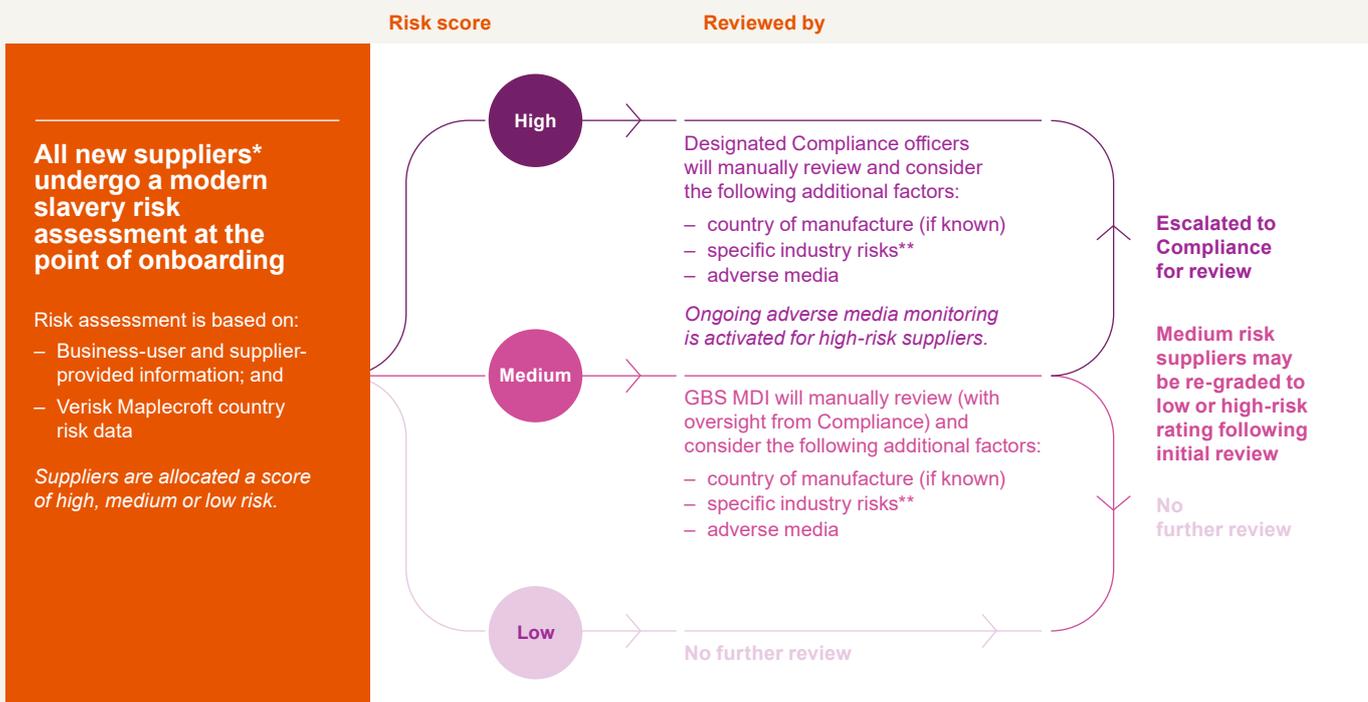
We take a collaborative and risk-based approach to managing modern slavery risks in our supply chains. We aim to achieve year-on-year improvements in our processes and systems to identify and respond to modern slavery risks.

### Ethical Supply Chain and Transparency Framework

BHP’s Compliance sub-function maintains the Ethical Supply Chain and Transparency Framework, which covers BHP’s inbound supply chain and defines our approach, standards and controls relating to modern slavery. In FY2024, we took the following actions within the Ethical Supply Chain and Transparency Framework:

- We progressed various internal **system and process developments** designed to improve the way in which BHP identifies and manages modern slavery risks. These developments build on progress made in previous reporting periods to implement our Group-wide supplier risk assessment tool (3PR) and include:
  - updating the supplier onboarding questionnaire to support improved country of manufacture data collection
  - updating the risk intelligence sources that feed into 3PR to ensure it captures relevant research and reporting, regulatory data and indices
  - updating the contractual approval process for non-traded goods and services to include automatic triggers for Compliance review of proposed contracts based on modern slavery risk and where departures to BHP’s standard modern slavery clause are sought
  - developing a supplier risk dashboard to improve real-time visibility and reporting of supplier risk information
- We continued to refine and enhance our **modern slavery due diligence program**. This included implementing a new daily routine to identify any new purchase orders involving high risk procurement categories with existing BHP suppliers that have not been assessed for modern slavery risk in accordance with the 3PR risk methodology adopted in FY2023. This routine relates only to new transactions on purchase order, as a review process for new high-risk transactions on contract was already in place. As part of the design and data analysis of this routine, we identified 213 medium- and high-risk suppliers on purchase order in FY2024 that had not completed onboarding into GCMS and therefore had not undergone any modern slavery due diligence. These suppliers are currently being onboarded into GCMS, including the completion of the required compliance due diligence.

### Overview of our supplier due diligence approach



\* This process is followed for new suppliers of non-traded goods and services and trade-related inputs  
 \*\* using Verisk Maplecroft data

- We conducted **enhanced engagement** with key internal and external stakeholders on modern slavery risk awareness and management. This included ongoing engagement with a supplier delivering renewable energy-related projects in Chile, and presenting to BHP's Procurement Leadership Team and leaders responsible for BHP's energy purchases and strategy.
- We arranged 28 **audits** of select higher-risk suppliers:<sup>1</sup>
  - Compliance and Procurement select suppliers to be audited based on considerations including the supplier's 3PR rating, geographic location and relationship factors. The number of audits conducted varies from year to year according to those factors, as well as the availability of our third-party audit provider. We also accept and review certification or audit material that suppliers may have arranged through separate processes. Audits conducted at BHP's request are conducted by a third-party audit provider and use the Sedex Members Ethical Trade Audit (SMETA) methodology. Members of our ESCT team accompanied our third-party audit provider at two audits in FY2024.
  - ESCT reviews audit reports prepared by our third-party audit provider and, consistent with the Responsible supply chains pillar of BHP's social value scorecard, monitors corrective action taken by suppliers in response to audit findings (refer to Table 4 below for more detail on our monitoring of corrective actions).
  - In Q4 FY2023 and Q1 FY2024, a small number of audits undertaken on suppliers in medium- and high-risk jurisdictions returned zero findings. ESCT engaged with our third-party supplier audit provider to investigate and verify the 'zero-finding' results. In one instance, our third-party audit provider reviewed the conduct of the audit and audit report and identified that findings relating to management systems for safe and hygienic working conditions had been omitted from the initial audit report. ESCT reviewed these findings and determined that they did not indicate modern slavery. The individual auditor received feedback regarding the omissions and our third-party audit provider confirmed training materials would be updated. In Q1 FY2024, members of our ESCT and GBS MDI teams participated in our third-party audit provider's auditor training program to gain a greater understanding of the audit methodology and reporting process.

1. One additional audit took place in June 2024 but the report was not received by the end of the reporting period. Any relevant findings will be reported in FY2025.

- In our previous Statement, we reported that an audit of one of our supplier's manufacturing plants in Southeast Asia found the supplier had retained workers' passports and used recruitment agents who charged recruitment fees. These practices are recognised by the ILO as potential indicators of forced labour. Following our engagement with the relevant supplier, we confirmed that they have implemented a passport policy and foreign workers recruitment guideline and procedure. The passport policy provides that workers have 24-hour access to private lockers to securely store their identity documents and requires that consent letters are provided and signed in workers' native language. The foreign workers recruitment guideline and procedure prohibits recruitment fees (including where those fees are imposed by contractors, agents or sub-agents in sending and receiving countries).

### Summary of FY2024 audits

The summary of audit findings in Table 4 is classified by reference to the audit topics defined in the Sedex SMETA 4 Pillar audit methodology, which incorporates the standards set out in the Ethical Trading Initiative (ETI) Base Code:

- Freely chosen employment
- Freedom of association and right to collective bargaining
- Child labour
- Living wages
- Working hours
- Discrimination
- Regular employment
- Harsh or inhumane treatment
- Safe and hygienic working conditions
- Management systems and ETI Base Code implementation
- Entitlement to work
- Subcontracting and homeworking
- Universal rights covering UNGPs
- Environment
- Business ethics

These findings relate to the sample of material reviewed or personnel interviewed by the relevant auditors.

Where the findings relate to supplier-provided audit material, the summary in Table 4 reflects the methodology used for the relevant certification or audit.



## Our actions to address modern slavery risks *continued*

**Table 4: Summary of FY2024 audits**

Audit location and Number of audits	Nature of findings	Responsive action
<b>Taxonomy: Maintenance, repair and operations<sup>1</sup></b>		
<b>Audit location:</b> Chile <b>Number of audits:</b> 2	<ul style="list-style-type: none"> <li>– Environment – inadequate systems to measure environmental impacts</li> <li>– Management systems and ETI Base Code implementation – inadequate systems to manage compliance</li> </ul>	Corrective action plan agreed between suppliers and auditors. BHP reviewed supporting evidence provided by one supplier and confirmed corrective actions were closed out. BHP is engaging with one supplier to confirm corrective actions are closed out and request and review supporting evidence.
<b>Audit location:</b> China <b>Number of audits:</b> 1 (supplier-provided audit material)	<ul style="list-style-type: none"> <li>– Living wages – inadequate systems to ensure social insurances are paid</li> <li>– Working hours – instances of overtime exceeding legal requirements</li> </ul>	Corrective action plan agreed between supplier and auditor. BHP reviewed supporting evidence provided by the supplier and confirmed corrective actions were closed out.
<b>Audit location:</b> Mexico <b>Number of audits:</b> 1	<ul style="list-style-type: none"> <li>– Safe and hygienic working conditions – inadequate systems to manage compliance</li> <li>– Working hours – lack of rest days; inadequate record keeping to verify hours; instances of overtime exceeding ETI Base Code requirements</li> <li>– Living wages – inadequate record keeping to verify wages</li> <li>– Child labour – absence of policy</li> <li>– Regular employment – inadequate systems and record keeping to monitor labour providers</li> <li>– Harsh or inhumane treatment – absence of policies</li> <li>– Universal rights covering UNGPs – absence of policies</li> </ul>	Corrective action plan agreed between supplier and auditor. BHP will seek to engage with supplier to confirm corrective actions are closed out and request and review supporting evidence.
<b>Audit location:</b> Thailand <b>Number of audits:</b> 1 (supplier-provided audit material)	<ul style="list-style-type: none"> <li>– Safe and hygienic working conditions – inadequate systems to manage compliance</li> <li>– Regular employment – work rules not provided in language spoken by workers</li> </ul>	Corrective action plan agreed between supplier and auditor. BHP reviewed supporting evidence provided by the supplier and confirmed corrective actions were closed out.
<b>Audit location:</b> United States <b>Number of audits:</b> 1 (supplier-provided audit material)	<ul style="list-style-type: none"> <li>– Occupational safety – no policy or procedure to conduct risk assessments to ensure safe working conditions</li> <li>– Working hours – lack of rest days</li> </ul>	Corrective action plan agreed between supplier and auditor. BHP reviewed supporting evidence provided by the supplier and confirmed corrective actions were closed out.
<b>Taxonomy: Bulk materials<sup>2</sup></b>		
<b>Audit location:</b> Australia <b>Nature of findings:</b> 2 (supplier-provided audit materials)	<ul style="list-style-type: none"> <li>– Safe and hygienic working conditions – inadequate systems to manage compliance</li> <li>– Environment – inadequate systems to manage compliance</li> <li>– Management systems and ETI Base Code implementation – inadequate systems to manage compliance</li> <li>– Entitlement to work – inadequate systems to manage compliance</li> </ul>	Corrective action plan agreed between supplier and auditor. BHP reviewed supporting evidence provided by the supplier and confirmed corrective actions were closed out.
<b>Audit location:</b> India <b>Number of audits:</b> 1 (supplier-provided audit material)	<ul style="list-style-type: none"> <li>– Safe and hygienic working conditions – inadequate systems to manage compliance</li> </ul>	Corrective action plan agreed between supplier and auditor. BHP reviewed supporting evidence provided by the supplier and confirmed corrective actions were closed out.
<b>Audit location:</b> United Arab Emirates <b>Number of audits:</b> 1 (supplier-provided audit material)	<ul style="list-style-type: none"> <li>– Instances of employees not receiving a copy of their employment contract as required by law</li> <li>– No workers' representative or committee to facilitate direct reporting to management</li> </ul>	Corrective action plan agreed between supplier and auditor. BHP reviewed supporting evidence provided by the supplier and confirmed corrective actions were closed out.

Audit location and Number of audits	Nature of findings	Responsive action
<b>Taxonomy: Port services<sup>3</sup></b>		
<b>Audit location:</b> Australia <b>Number of audits:</b> 3	<ul style="list-style-type: none"> <li>– Freely chosen employment – absence of policies</li> <li>– Harsh or inhumane treatment – inadequate communication of grievance procedure</li> <li>– Child labour – inadequate systems and record keeping to verify age of workers</li> <li>– Entitlement to work – inadequate systems to manage compliance</li> <li>– Safe and hygienic working conditions – inadequate systems to manage compliance</li> </ul>	Corrective action plan agreed between suppliers and auditor. BHP reviewed supporting evidence provided by the suppliers and confirmed corrective actions were closed out.
<b>Audit location:</b> India <b>Number of audits:</b> 1	<ul style="list-style-type: none"> <li>– Safe and hygienic working conditions – inadequate systems to manage compliance</li> <li>– Living wages and working hours – inadequate record keeping to verify wages and hours</li> <li>– Management systems and ETI Base Code implementation – inadequate systems to manage compliance</li> <li>– Universal rights covering UNGPs – absence of policies</li> </ul>	Corrective action plan agreed between suppliers and auditor. BHP is engaging with supplier to confirm corrective actions are closed out and request and review supporting evidence.
<b>Audit location:</b> Netherlands <b>Number of audits:</b> 1	<ul style="list-style-type: none"> <li>– Safe and hygienic working conditions – inadequate systems to manage compliance processes and record keeping</li> <li>– Management systems and ETI Base Code implementation – inadequate systems to manage compliance</li> <li>– Working hours – instances of overtime exceeding legal requirements; inadequate record keeping to verify hours</li> <li>– Living wages – instance of unpaid overtime</li> <li>– Freedom of association and right to collective bargaining – inadequate systems to manage compliance</li> <li>– Business ethics – inadequate systems to manage compliance</li> <li>– Environment – inadequate systems to manage compliance</li> </ul>	Corrective action plan agreed between suppliers and auditor. BHP will engage with supplier to confirm corrective actions are closed out and request and review supporting evidence.
<b>Audit location:</b> Chile <b>Number of audits:</b> 1	<ul style="list-style-type: none"> <li>– Management systems and ETI Base Code implementation – inadequate systems to manage compliance</li> <li>– Safe and hygienic working conditions – inadequate systems to manage compliance</li> </ul>	Corrective action plan agreed between suppliers and auditor. BHP will engage with supplier to confirm corrective actions are closed out and request and review supporting evidence.
<b>Audit location:</b> South Korea <b>Number of audits:</b> 1	<ul style="list-style-type: none"> <li>– Management systems and ETI Base Code implementation – inadequate systems to manage compliance</li> <li>– Universal rights covering UNGPs – inadequate systems to measure human rights impacts</li> <li>– Subcontracting and homeworking – inadequate systems to manage subcontractors</li> </ul>	Corrective action plan agreed between suppliers and auditor. BHP will engage with supplier to confirm corrective actions are closed out and request and review supporting evidence.
<b>Audit location:</b> United Arab Emirates <b>Number of audits:</b> 1	<ul style="list-style-type: none"> <li>– Working hours – inadequate record keeping to verify hours</li> <li>– Living wages – inadequate record keeping to verify wages and hours</li> </ul>	Corrective action plan agreed between suppliers and auditor. BHP is engaging with supplier to confirm corrective actions are closed out and request and review supporting evidence.
<b>Audit location:</b> Vietnam <b>Number of audits:</b> 1	<ul style="list-style-type: none"> <li>– Safe and hygienic working conditions – inadequate systems to manage compliance</li> <li>– Regular employment – inadequate systems to inform workers of internal rules and regulations</li> </ul>	Corrective action plan agreed between suppliers and auditors. BHP will engage with supplier to confirm corrective actions are closed out and request and review supporting evidence.
<b>Audit location:</b> Japan <b>Number of audits:</b> 1	<ul style="list-style-type: none"> <li>– Living wages – policy permits wage deductions as a disciplinary measure</li> </ul>	Corrective action plan agreed between suppliers and auditors. BHP will engage with supplier to confirm corrective actions are closed out and request and review supporting evidence.
<b>Taxonomy: Major equipment purchase<sup>4</sup></b>		
<b>Audit location:</b> Brazil <b>Number of audits:</b> 1	<ul style="list-style-type: none"> <li>– Safe and hygienic working conditions – inadequate systems to manage compliance</li> <li>– Discrimination – non-conformance with local law</li> </ul>	Corrective action plan agreed between suppliers and auditors. BHP will engage with supplier to confirm corrective actions have been closed out and request and review supporting evidence.
<b>Audit location:</b> China <b>Number of audits:</b> 1	<ul style="list-style-type: none"> <li>– Working hours – instances of lack of rest days; instances of exceeded overtime</li> <li>– Regular employment – inadequate systems and record keeping to monitor labour providers</li> <li>– Safe and hygienic working conditions – inadequate systems to manage compliance</li> </ul>	Corrective action plan agreed between supplier and auditor. BHP will engage with supplier to confirm corrective actions are closed out and request and review supporting evidence.

## Our actions to address modern slavery risks *continued*

Audit location and Number of audits	Nature of findings	Responsive action
<b>Taxonomy: Indirect services<sup>5</sup></b>		
<b>Audit location:</b> Brazil <b>Number of audits:</b> 1	– Working hours – identified instances of lack of rest days	Corrective action plan agreed between suppliers and auditor. BHP will engage with supplier to confirm corrective actions are closed out and request and review supporting evidence.
<b>Taxonomy: Professional services<sup>6</sup></b>		
<b>Audit location:</b> Malaysia <b>Number of audits:</b> 1	– Management systems and ETI Base Code implementation – inadequate systems to manage compliance – Freely chosen employment, child labour, discrimination, freedom of association and right to collective bargaining, and harsh or inhumane treatment – absence of policies – Business ethics – inadequate systems to manage compliance – Safe and hygienic working conditions – inadequate systems to manage compliance	Corrective action plan agreed between suppliers and auditor. BHP is engaging with supplier to confirm corrective actions are closed out and request and review supporting evidence.
<b>Taxonomy: Conveyor belting<sup>7</sup></b>		
<b>Audit location:</b> Chile <b>Number of audits:</b> 1	– Safe and hygienic working conditions – inadequate systems to manage compliance – Environment – inadequate systems to manage compliance – Management systems and ETI Base Code implementation – inadequate systems to manage compliance – Harsh or inhumane treatment – absence of grievance procedure – Regular employment – inadequate systems to monitor agency workers – Business ethics – inadequate systems to manage compliance	Corrective action plan agreed between suppliers and auditor. BHP reviewed supporting evidence provided by the supplier and confirmed corrective actions were closed out.
<b>Taxonomy: Energy and construction<sup>8</sup></b>		
<b>Audit location:</b> Chile <b>Number of audits:</b> 1	– Management systems and ETI Base Code implementation – inadequate systems to manage compliance – Safe and hygienic working conditions – inadequate systems to manage compliance – Environment – absence of permits for disposal of waste – Universal rights covering UNGPs – inadequate systems to measure human rights impacts	Corrective action plan agreed between suppliers and auditors. BHP will engage with supplier to confirm corrective actions are closed out and request and review supporting evidence.
<b>Taxonomy: Technology<sup>9</sup></b>		
<b>Audit location:</b> China <b>Number of audits:</b> 2 (supplier-provided audit materials)	– Supplier provided certificates confirming their audited sites achieved the highest possible score (platinum) against the Responsible Business Alliance's Validated Assessment Program (RBA VAP) – The RBA VAP aligns to the SMETA four-pillar audit criteria	In order to obtain a platinum RBA VAP certificate, the supplier is required to close all findings, and if there are priority findings relating to forced or child labour, the site will be subject to an unannounced audit within 12 months.

1. This category includes goods that are procured and changed out on a recurring basis for maintenance, repair and operations at our production sites (for example, bearings, drive and transportation systems, pipes and fittings, igniters, pumps and compressors and valves).

2. This category includes goods that are procured by weight or volume, typically batch produced by suppliers (for example, coolant, lubricants, solvents and fuels).

3. This category includes port freight services (for example, terminal services, port access charges, customs services and tug hire and services).

4. This category includes purchases of all major equipment, infrastructure and large components (for example, minerals processing equipment, rail equipment, conveyor system and transfer equipment and explosives loading machinery).

5. This category includes supporting services not directly related to maintenance, production or operations, excluding professional labour services (for example, facilities management, vehicle leases and surveying services).

6. This category includes services and resources of a technical or professional nature, excluding engineering services (for example, accounting, assurance and tax, advertising and marketing, contingent commercial labour and legal services).

7. This category includes all belting and parts related to conveyor systems.

8. This category includes engineering services and construction, projects or otherwise (for example, civil works, engineering consulting, structural components and basic shapes and industrial plant construction services).

9. This category includes software, hardware and services related to the provision of information technology and operational technology (for example, applications, automation and control systems, end-user computing, infrastructure and security, service desk and technology consulting).

## Maritime

BHP chartered vessels completed 1,486 voyages in FY2024. The safety and welfare of seafarers on board these vessels remain important considerations when vetting vessels that may be chartered by BHP.

We work in collaboration with reputable vessel owners and operators to charter vessels to support our shipping requirements. The operators are selected based on factors including their maritime operational and safety records. We continued to work with RightShip in FY2024 to vet and inspect vessels with respect to seafarers' rights and welfare protections. BHP's Standard Vetting Criteria, which RightShip's Dry Bulk Standard Vetting Criteria is largely based on, provides our customers with guidance on how we review, assess and seek to mitigate supply chain risk. We also provide all ships berthing at our ports with complimentary access to the internet to enable seafarers to stay connected with their family and friends while on the vessel.

Through our vetting process, we seek to ensure all vessels comply with the International Labour Organization's Maritime Labour Convention (2006), which sets standards for seafarers' living and working conditions, including the fundamental rights and principles relating to forced or compulsory labour and child labour. We do this by checking the validity of the relevant vessel's Maritime Labour Convention certificate (issued by competent authorities) as part of the Class Status Survey report before accepting the vessel into our supply chain.

Additional actions in FY2024 included:

- developing standard modern slavery clauses for our port agency agreements. Port agents organise, oversee and coordinate vessels' port calls, including by booking berth allocations and services and finalising necessary paperwork
- completing 10 SMETA audits of our port agents. The audits involved site visits and interviews with port agency employees by BHP's third-party audit provider. Compliance has reviewed the audit reports and determined that they did not indicate modern slavery. Audits found instances of lack of processes or records to verify that working hours are not excessive, workers are paid living wages and receive benefits including legally recognised leave entitlements. These issues will be followed up with the relevant suppliers by our Maritime team, with support from Compliance
- supporting Mission to Seafarers' seafarer wellbeing event in Singapore in March 2024
- joining as a member of the International Seafarers' Welfare and Assistance Network (ISWAN), an international maritime charity which delivers initiatives aimed at improving health and wellbeing of seafarers
- updating the voyage instructions document for BHP's time-chartered vessels to include expectations regarding seafarers' access to independent grievance mechanisms, such as ISWAN's SeafarerHelp – a free, 24-hour helpline for seafarers and their families worldwide

## Responsible Minerals Program

In line with our Responsible Minerals Policy published in October 2022, we continue to undertake responsible sourcing of minerals and metals from third parties through our Responsible Minerals Program.

The program is aligned to the OECD Guidance, including the five-step risk-based due diligence framework set out in Annex I and risks set out in Annex II to the OECD Guidance. The OECD's five-step framework provides international best practice guidance for identifying, assessing and mitigating risks in minerals and metals supply chains, and Annex II risks under the OECD Guidance relate primarily to serious human rights abuses, conflict and financial crimes.

The Responsible Minerals Program covers all minerals and metals purchased from third parties for the purpose of either feed for our operated assets (where the input forms a physical part of our product) or third-party trading (selling that sourced material directly into the market). The program prioritises risk-based due diligence of suppliers of minerals and metals associated with Conflict-Affected and High-Risk Areas (CAHRAs) as we acknowledge that companies purchasing minerals or metals from those areas may be at higher risk of directly or indirectly contributing to or being associated with actual or potential adverse human rights impacts.

In October 2023, we published our first Responsible Minerals Program Report covering minerals and metals supply chain due diligence for FY2023, which was assured by our external auditor against the Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel and Zinc (JDDS) for Olympic Dam, Spence, Escondida and Nickel West.

In FY2024, all of our suppliers of minerals and metals have undergone due diligence with the following outcomes:

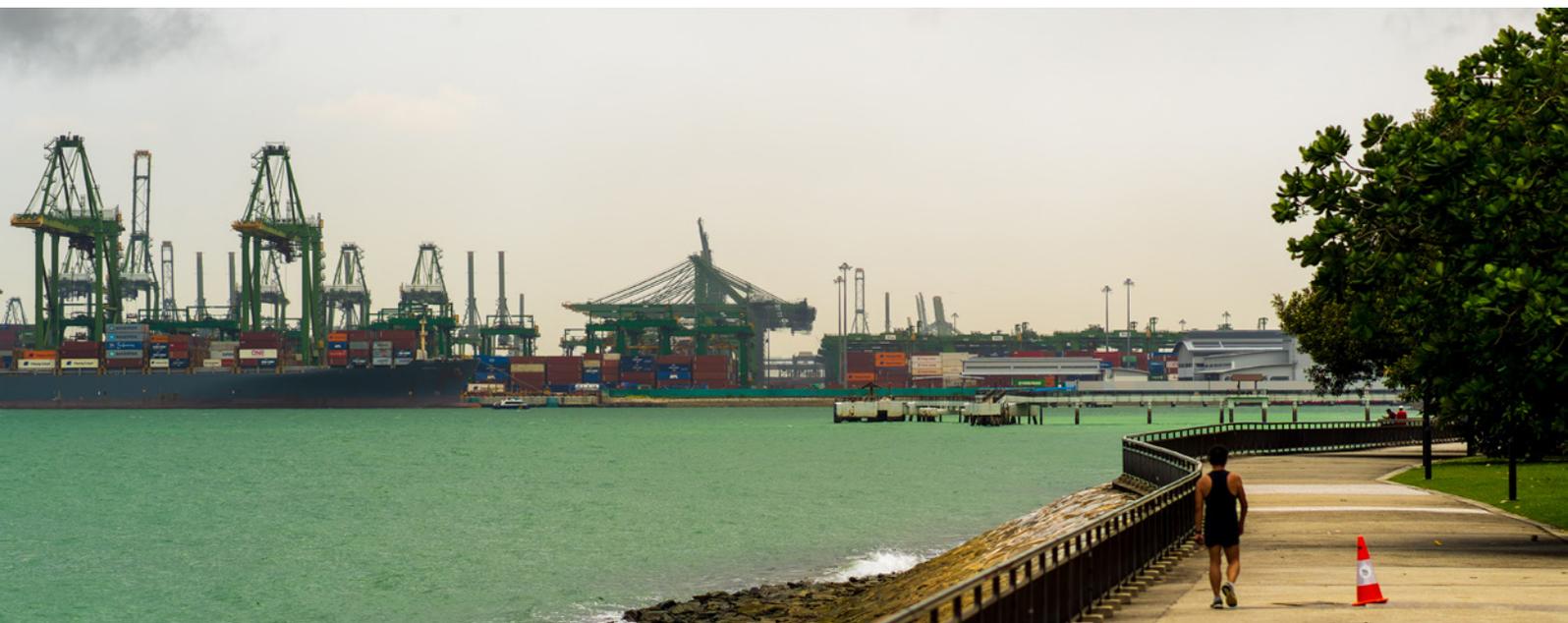
- **Suppliers of minerals or metals used to feed our assets** – structural feed was only required for Nickel West and Olympic Dam, all of which was sourced from Australian mines. These suppliers were assessed as low risk.
- **Third-party trading** – we purchased copper for third-party trading purposes from mines in South America, North America, Southeast Asia, Australia and Africa. We assessed 20 per cent of these suppliers as medium risk and 6.7 per cent were assessed as high risk. The remaining 73.3 per cent of suppliers were all categorised as low risk. During FY2024, shipments and an improvement plan remained in progress with one supplier assessed as high risk in FY2023. Detail relating to our ongoing engagement with this supplier is provided in our Responsible Minerals Program Report.

In FY2024, we were externally assessed against and achieved compliance with the JDDS for Escondida, Spence, Olympic Dam and Nickel West (relating to the FY2023 period). Following the JDDS assessment and completion of ISO14001 and ISO45001 (or equivalent) certifications at these assets, we achieved Track A compliance against the LME Policy for Responsible Sourcing for all BHP LME metal brands in production.

We also commenced a risk assessment under BHP's Risk Framework specific to the minerals and metals supply chain standards relevant to the Responsible Minerals Program during FY2024.



For more information on our minerals and metals supply chain due diligence refer to BHP's **Responsible Minerals Program Report 2024**



## Our actions to address modern slavery risks *continued*

### Building capacity and raising awareness

We pursued several initiatives in FY2024 designed to raise modern slavery awareness and build capacity amongst internal teams and suppliers, including:

- conducting a half-day, face-to-face human rights and modern slavery workshop for the Global Business Services Master Data and Insights (GBS MDI) team members responsible for supplier onboarding and due diligence screening. This training was designed to give those team members a deeper understanding of modern slavery, including how it fits into the broader international human rights framework, red flags that the team may encounter in their due diligence work (such as the ILO indicators of forced labour) and links to BHP’s human rights commitments under our Human Rights Policy Statement
- seconding a member of the GBS MDI team to the Ethical Supply Chain and Transparency team within Compliance, which enabled that team member to have enhanced exposure to subject matter expertise
- conducting in-person modern slavery education sessions for key Procurement teams in our Minerals Americas business. These sessions were abridged versions of the training described above and were designed as introductions to the topic and to help enable our procurement specialists to spot potential issues in the supply chains they manage
- preparing an internal quick reference guide on modern slavery risk for the Procurement function
- presenting to participants in our Australian Local Buying Program on modern slavery
- hosting a guest speaker from the Mekong Club in our Singapore office. BHP is a member of the Mekong Club, which is a not-for-profit organisation that partners with organisations in the private sector to address modern slavery and human trafficking. The presentation considered modern slavery practices in the private sector, with a focus on the supply chain. The event was attended virtually and in person by over 200 BHP employees and contractors across our global offices
- connecting suppliers with the Mekong Club and facilitating their access to the Mekong Club’s resources, tools and support (at no cost to the suppliers)



The insights and stories from the frontline of combatting modern slavery were horrific but also hopeful. The reality of how few modern slavery cases are prosecuted despite the amazing work within non-governmental organisations and the private sector makes me wonder how we can do more to prevent modern slavery in the supply chain and allow for greater transparency.”

### Risk team member Mekong Club speaker event

The above activities were in addition to BHP’s established learning program, with over 400 employees and contractors (and business and community partners) completing our voluntary online human rights training in FY2024. Our online Our Code training continued to be mandatory for all employees and contractors.

### Remediation

In our Human Rights Policy Statement, BHP commits to seek to provide for or cooperate in providing access to remedy where we have caused or contributed to adverse human rights impacts through our operations, including modern slavery.

Our reporting channels to raise misconduct concerns, which comprise an online portal and 24-hour multilingual call service (also referred to as EthicsPoint) and the local-level community complaints and grievance mechanisms remain the primary avenues for concerns to be raised. Our reporting channels continue to be made available to third parties via our website and through the information provided in *Our Code*, which is provided to new suppliers when they are onboarded to GCMS.

 For more information on how to speak up refer to *Our Code* or visit [How to Speak Up](#)

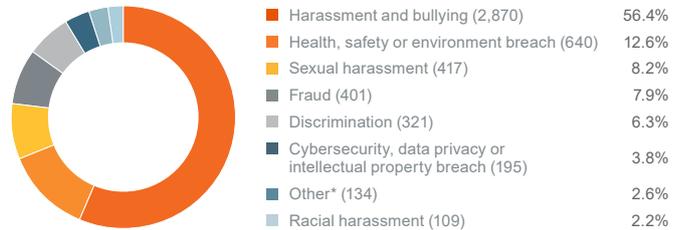
*Our Business Conduct Global Standard* provides that reports made concerning modern slavery in the supply chain must be referred to Compliance for investigation. The *Response Options to Reported Misconduct Global Process* classifies reports concerning modern slavery as one of the most serious report types, and sets out the process Compliance must follow in investigating and responding to those reports.

In FY2024, Compliance began a refresh of our internal guidance for responding to incidents or credible allegations of modern slavery in BHP’s supply chain. The refresh seeks to incorporate a rights-holder focus in setting out key process steps relating to triage, investigation, remediation and post-investigation reflection.

We also progressed the implementation of a new enterprise-wide stakeholder management system that enables us to maintain improved records of community engagements and our commitments.

We received two concerns classified as relating to modern slavery through these channels at the end of the FY2024 reporting period. The investigations into these matters are ongoing. The graphic below shows the type of business conduct concerns raised through our reporting channels to raise misconduct concerns in FY2024.

Business conduct concerns raised in FY2024<sup>1,2</sup>



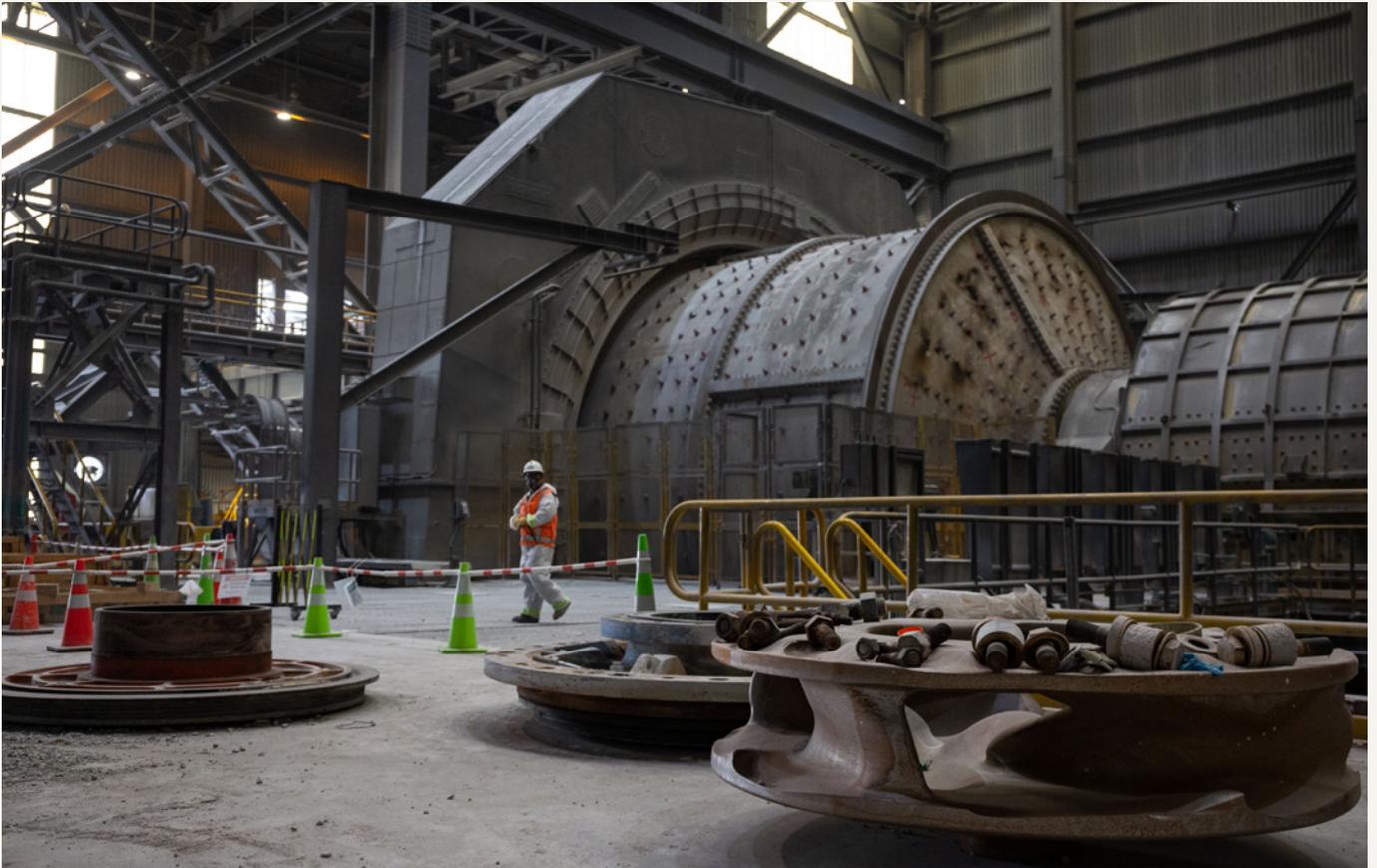
\* Other: This includes issues such as retaliation for speaking up; deficiencies in a business conduct investigation; failure to report code of conduct breach; attempting to identify an anonymous reporter; improper political or governmental conduct; human rights or modern slavery; ask a question; trade control breach; inappropriate investigator conduct in business conduct investigation; consensual relationship with power imbalance.

1. This excludes reports not containing a business conduct concern and excludes reports logged by leaders on behalf of others.  
2. FY2024 data includes all former OZ Minerals assets in Australia and Brazil.



## Case study

### Partnering to deliver impact to migrant workers in our supply chain



In our previous Statement, we reported that in FY2023 we began targeted engagement with global experts to identify opportunities for BHP to make proactive contributions to modern slavery initiatives outside our due diligence program.

The 'impact project' workstream is led by the Ethical Supply Chain and Transparency team and its focus in FY2024 was informed by issues identified through our supplier audit program over the past two years. Our audit findings highlighted that migrant workers in Southeast Asia are disproportionately affected by potential indicators of forced labour (as defined by the ILO) such as deception, debt bondage, abuse of vulnerability and retention of identity documents. These practices often manifest through the imposition of recruitment fees and contracts in non-native languages.

As described on page 8, in FY2024 we updated our supplier onboarding form to collect clearer country of manufacture data on new suppliers to BHP. While that dataset is not complete, the picture that is emerging supports our focus on Southeast Asia.

Our reflection on this data, as well as the broader research available in this area, has led us to identify migrant workers in our Southeast Asian sourcing jurisdictions as vulnerable to modern slavery and a specific modern slavery risk for BHP. The impact project workstream is intended to improve our risk identification, knowledge and – consistent with Principle 29 of the UNGPs – support for access to effective grievance mechanisms.

Building on the ongoing work of our supplier audit program, and mindful of the limitations of social audits, we determined that improving access to grievance mechanisms for workers in our supply chains is an important intervention to help manage modern slavery risks faced by migrant workers. The commentary to Principle 18 of the UNGPs emphasises the importance of specificity in actions to identify and manage human rights risks, and we consider that worker voice initiatives and improving access to grievance mechanisms will enable us to target the specific risks we have identified as relevant to migrant workers in Southeast Asia.

The outcome of the targeted engagement referred to in our previous Statement was establishing a three-year partnership between BHP and the Issara Institute. The Issara Institute is an independent non-government organisation (U.S. 501 (c) (3) not-for-profit corporation) based in Asia and the United States, which uses worker voice, partnership with the private sector and technological innovations to tackle issues of human trafficking and forced labour. The Issara Institute's goal is to eliminate labour exploitation, including forced labour and human trafficking, within global supply chains, starting with those connected to Asia.

Our early work with the Issara Institute has focused on understanding its Inclusive Labour Monitoring system (ILM), which is a worker voice-centred cloud-based technology system and multi-stakeholder collaboration for the real-time monitoring of worker-validated labour recruitment and working conditions, spanning origin and destination countries. ILM is designed to equip global brands, retailers, suppliers, recruitment agencies and governments with the tools to drive more ethical supply chains and engage meaningfully with workers and civil society. By capturing and analysing ongoing worker feedback using high- and low-tech tools, ILM's collaborative case management system supports identification of and worker-focused responses to reported issues.

We have engaged with some of our suppliers in Southeast Asia with a view to piloting the Issara Institute's worker voice channels and ILM at their factory sites. While our initial engagement has not resulted in a commitment to implement ILM, we are continuing to work with the Issara Institute to develop an engagement plan to promote our suppliers' access to the Issara Institute's tools and services (including ILM, training and other support). We are also exploring opportunities to leverage the Issara Institute's existing ethical recruitment network, worker voice initiative and community outreach programs in our Southeast Asian sourcing jurisdictions.

## Assessing effectiveness

We are committed to continuously maturing our program to identify, assess and manage modern slavery risks and advance the human rights of workers in our global operations and supply chains.

For organisations like ours that have large and complex supply chains, it is often difficult to measure the ultimate impact of our actions on modern slavery practices. Acknowledging these challenges, our impact project reflects our desire to build on our existing supplier audit program and enables us to improve the effectiveness of our collaboration with suppliers and external partners to address modern slavery risks for workers in the lower tiers of our global supply chain. In particular, we are hopeful that promoting worker voice mechanisms, such as those made available by the Issara Institute, will provide a credible feedback loop on the effectiveness of our mitigation measures with key suppliers in Southeast Asia.

When assessing the immediate effectiveness of our modern slavery program, we focus on reviewing the operation of existing processes and systems, identifying gaps or opportunities to mature our approach, and designing and implementing improvements to address identified issues. In FY2024, we took various steps to evaluate and improve the effectiveness of our actions to assess and address modern slavery risks, including:

- reviewing the output of our supplier due diligence screening and risk rating, the results of which fed into training for our GBS MDI team members
- conducting a post-training survey of our GBS MDI team members, which gathered feedback on the content and form of the training, as well as preferences for ongoing education activities
- reviewing risk data feeding into our 3PR tool to ensure its fitness for application in the BHP context
- conducting an annual review of the Ethical Supply Chain and Transparency Framework to ensure it accurately documents our approach, standards and controls for assessing and addressing modern slavery risks in our supply chains
- reporting to and seeking feedback from the Board's Sustainability Committee on the Ethical Supply Chain and Transparency Framework and associated issues
- developing an internal review process, whereby failures, gaps or process breakdowns in internal Compliance-related controls are examined by way of a root-cause analysis and improvement actions put in place. A review was conducted in FY2024 in relation to some of our supplier due diligence outcomes and escalation processes, which has resulted in actions to improve the supplier due diligence program such as further training and structured process flows and tracking
- identifying opportunities to further develop the scope and depth of our community and human rights impact and opportunity assessment methodology, clarify and strengthen in-country governance of human rights risks, enhance our due diligence processes for exploration projects and entry into new countries, improve our processes to evaluate material and emerging Group-level human rights risks, and leverage existing risk management processes to progressively integrate the outcomes of the community and human rights impact and opportunity assessments
- tracking and monitoring internal performance metrics such as contracts with enhanced modern slavery-related requirements and number of supplier audits completed
- engaging with specialist external advisors and considering civil society benchmarking and guidance material

## Consultation and collaboration

### Consultation

BHP operates and is managed as an integrated group with overarching policies, systems and processes that are designed to be consistently applied across our operated assets and functions. Consultation between BHP entities in relation to this Statement occurred as described below. By virtue of BHP's centralised management structure and shared resources, the consultation process included the Australian reporting entities and their owned or controlled entities. Due to the ongoing strategic review of former OZ Minerals Brazil assets, BHP also engaged with relevant former OZ Minerals Brazil personnel in relation to OZ Minerals Brazil's modern slavery risks and actions to address those risks.

BHP continues to take an interdisciplinary approach to modern slavery reporting. In FY2024, we reviewed our process for preparing the FY2023 Modern Slavery Statement, which resulted in a more streamlined approach to gathering supplier spend data. As a result, it was not necessary to re-convene the previous Modern Slavery Statement Working Group but relevant cross-functional stakeholders continued to be consulted and involved throughout the drafting process.

The Statement was also prepared as part of BHP's broader annual reporting suite and, as part of that process, was reviewed by a range of internal and external stakeholders – including members of the BHP Ventures, BHP Xplor, BHP Foundation, Sustainability and Social Value, Global Policy and Assurance – Human Rights, Community and Indigenous Peoples, Procurement, Marketing Sustainability, Maritime, Portfolio Strategy and Development, Sustainability and ESG Legal, Group Governance, Communications, Human Resources, Compliance, Risk and former OZ Minerals Brazil teams. Members of our Executive Leadership Team, including the Chief Legal, Governance and External Affairs Officer and the Chief Commercial Officer, also reviewed and provided feedback on the Statement during the drafting process.

The Board's Sustainability Committee was provided with an early outline of the Statement and reviewed the Statement before it was put to the Board for final review and approval.

### Collaboration and engagement

Modern slavery cannot be tackled alone. We are committed to working with and learning from peer companies, suppliers, customers and civil society to continuously improve our understanding of modern slavery risks, controls and the evolving regulatory environment.

In FY2024, we benefitted from engagement with industry peers and businesses exposed to similar risks to BHP. We participated in expert and industry forums, including the UN Global Compact Network of Australia's Modern Slavery Community of Practice, the practitioner-led Human Rights Resources and Energy Collaborative and the Global Business Initiative on Human Rights. As described elsewhere in this Statement, we also joined or partnered with organisations, including the Issara Institute, ISWAN and the Mekong Club, which bring local context and global expertise to our programs.

We continue to respond to due diligence enquiries and requests from our customers and investors.

## Looking back and forward

BHP seeks to continuously improve how we operationalise our responsibility to respect human rights. We have reflected on the forward-looking intentions stated in our previous Statement and provide the following updates:

FY2023 intentions in our previous Statement	FY2024 progress
Continue to embed the Ethical Supply Chain and Transparency Framework as a second-line function and raise modern slavery risk awareness among our frontline teams <span style="float: right;">✔</span>	<ul style="list-style-type: none"> <li>– The Ethical Supply Chain and Transparency team worked with Commercial to define its second-line oversight and approval role in certain areas</li> <li>– We developed an internal review process to identify failures, gaps or process breakdowns in Compliance-related controls</li> <li>– We conducted a review of the Ethical Supply Chain and Transparency Framework</li> <li>– We delivered targeted modern slavery training, engagement and communications for our GBS MDI team and key Procurement and Marketing teams</li> </ul>
Further refine our supplier modern slavery risk assessment process using the 3PR tool <span style="float: right;">✔</span>	<ul style="list-style-type: none"> <li>– We deployed updates to our supplier onboarding form to support collection of better modern slavery risk information</li> <li>– We continued to work with our third-party risk data providers to ensure the risk intelligence feeding into the 3PR tool is up-to-date and fit for purpose</li> <li>– We improved internal visibility and reporting by developing a supplier risk dashboard</li> </ul>
Progress integration of OZ Minerals into BHP's compliance framework <span style="float: right;">⊖</span>	<ul style="list-style-type: none"> <li>– We engaged with suppliers to former OZ Minerals Brazil assets in relation to modern slavery risks</li> <li>– We transitioned former OZ Minerals Australia's contracted suppliers into GCMS</li> <li>– We reviewed former OZ Minerals Australia's suppliers for modern slavery and other compliance risks</li> <li>– We developed internal contract approval routes and processes to ensure adequate oversight of purchases by former OZ Minerals Australia assets</li> </ul>
Publish our first Responsible Minerals Program Report as part of our Responsible Minerals Program in accordance with the OECD Guidance and undertake independent assurance of the program <span style="float: right;">✔</span>	<ul style="list-style-type: none"> <li>– BHP's first Responsible Minerals Program Report was published in October 2023</li> <li>– The Responsible Minerals Program has been audited by our external auditors against the Joint Due Diligence Standard (JDDS) for Olympic Dam, Spence, Escondida and Nickel West</li> </ul>
Complete the human rights impact assessments for operated assets and certain exploration regions globally <span style="float: right;">✔</span>	<ul style="list-style-type: none"> <li>– Community and human rights impact and opportunity assessments were completed for all operated assets (excluding former OZ Minerals assets) and some exploration regions.</li> </ul>

✔ Considered complete    ⊖ Ongoing

In FY2025, we intend to:

1. implement and build on partnerships with expert non-government organisations, including partnerships established in FY2024 with the Issara Institute, Mekong Club and ISWAN, to build increased reach and capabilities in BHP's Ethical Supply Chain and Transparency program
2. engage with suppliers through our audit program to monitor implementation of corrective actions plans, where required, consistent with the Responsible supply chains pillar of our social value framework
3. continue the deep-dive review of our uniform procurement category
4. action feedback on the community and human rights impact and opportunity assessment approach and methodology



**Mike Henry**

Director and Chief Executive Officer  
For and on behalf of BHP Group Limited

27 August 2024

## Appendix 1

### List of Australian reporting entities

The following companies qualify as reporting entities for the purposes of the Australian Modern Slavery Act.

There are an additional 20 reporting entities covered by the FY2024 Statement. This is due to BHP's acquisition of OZ Minerals on 2 May 2023, which resulted in BHP acquiring an additional eight reporting entities, and a change in our approach to identifying Group entities that meet the consolidated revenue threshold for reporting under the Australian Modern Slavery Act in FY2024, which identified an additional 12 reporting entities.

Name	Description
BHP Group Limited	BHP Group Limited is the ultimate parent entity of the BHP Group and substantially all of its operations are carried on through its subsidiaries
BHP Billiton Finance Limited	Treasury entity for the BHP Group
BHP Billiton Finance (USA) Limited	Treasury entity for the BHP Group
BHP Titanium Minerals Pty Ltd	Manages funds for the rehabilitation of the Beenup Titanium Minerals mine
The Broken Hill Proprietary Company Pty Ltd	Holding company
BHP Minerals Holdings Proprietary Limited	Holding company
OZ Minerals Pty Ltd	Holding company for the entities and assets acquired from OZ Minerals Ltd
BHP Lonsdale Investments Pty Ltd	Holding company
OZ Minerals Prominent Hill Pty Ltd	Holding company
Minotaur Resources Holdings Pty Ltd	Holding company
OZ Minerals Prominent Hill Operations Pty Ltd	Owns and operates the BHP Group's Prominent Hill mining operations in South Australia
OZ Minerals Carrapateena Pty Ltd	Owns and operates the BHP Group's Carrapateena mining operations in South Australia
Carrapateena Pty Ltd	Holding company
OZ Minerals Brazil (Holdings) Pty Ltd	Holding company
Avanco Resources Pty Ltd	Holding company for the BHP Group's OZ Minerals Brazil interests
BHP MetCoal Holdings Pty Ltd	Provides services to Minerals Australia assets
BHP Queensland Coal Investments Pty Ltd	Participant in the BHP Group's BHP Mitsubishi Alliance joint venture that owns steelmaking coal assets in central Queensland
UMAL Consolidated Pty Ltd	Participant in the BHP Group's BHP Mitsubishi Alliance joint venture that owns steelmaking coal assets in central Queensland
BHP Coal Pty Ltd	Participant in the BHP Group's BHP Mitsubishi Alliance joint venture that owns steelmaking coal assets in central Queensland
BHP Queensland Coal Limited	Holding company
BHP Minerals Pty Ltd	Holds the BHP Group's interests in the joint ventures with Mitsui, ITOCHU and POS-Ore that own the BHP Group's Western Australia Iron Ore (WAIO) assets
BHP (Towage Services) Pty Ltd	Provides towage services to the BHP Group's Western Australia Iron Ore (WAIO) joint ventures
BHP Iron Ore (Jimblebar) Pty Ltd	Incorporated joint venture with Mitsui and ITOCHU that owns the Jimblebar Iron Ore Mine
BHP Iron Ore Pty Ltd	Operates the BHP Group's Western Australia Iron Ore (WAIO) assets
BHP Energy Coal Australia Pty Ltd	Holding company for the BHP Group's New South Wales Coal asset
Hunter Valley Energy Coal Pty Ltd	Operates the BHP Group's New South Wales Coal asset
BHP Nickel West Pty Ltd	Owns and operates the BHP Group's Nickel West asset in Western Australia
BHP Olympic Dam Corporation Pty Ltd	Owns and operates the BHP Group's Olympic Dam asset in South Australia

## Appendix 2

### How we have addressed reporting criteria

The table below sets out where in this Statement we have addressed the mandatory reporting criteria under the Australian Modern Slavery Act and the recommended reporting criteria under the UK Modern Slavery Act.

UK Modern Slavery Act recommended reporting criteria	Australian Modern Slavery Act mandatory reporting criteria	Addressed in this Statement	
		Section, page	Summary
Organisation's structure, its business and its supply chains	Identify each reporting entity covered by the joint statement	Appendix 1, page 26	<ul style="list-style-type: none"> <li>– List of 'reporting entities'</li> </ul>
	Describe the structure, operations and supply chains of each reporting entity covered by the joint statement	Our structure, business and supply chains, pages 2-8 and 10-11	<ul style="list-style-type: none"> <li>– Major business activities in FY2024</li> <li>– Business model</li> <li>– Non-operated joint ventures, social investment and financial investments</li> <li>– People</li> <li>– Locations map</li> <li>– Supplier spend and payments data</li> <li>– OZ Minerals Brazil operations</li> </ul>
Parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk	Describe the risks of modern slavery practices in the operations and supply chains of each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or controls	Modern slavery risks, pages 9-13	<ul style="list-style-type: none"> <li>– Operated assets and projects, exploration and corporate offices</li> <li>– Non-operated joint ventures, the BHP Foundation, BHP Ventures and BHP Xplor</li> <li>– OZ Minerals Brazil operations</li> <li>– Higher-risk taxonomy table</li> <li>– Governance structure</li> <li>– Human Rights Policy Statement</li> <li>– Responsible production and sourcing standards</li> <li>– Community and human rights impact and opportunity assessments</li> <li>– Entering a High-Risk Country Global Procedure</li> <li>– Due diligence for our non-operated joint ventures, the BHP Foundation, BHP Xplor and BHP Ventures</li> <li>– ESCT Framework</li> <li>– Supplier due diligence and audit program</li> <li>– Responsible Minerals Program</li> <li>– Training and engagement with suppliers and internal stakeholders</li> <li>– Reporting channels to raise misconduct concerns and community complaints mechanisms</li> </ul>
		Our actions to address modern slavery risks, pages 14-23	
Organisation's policies in relation to slavery and human trafficking; its due diligence processes in relation to slavery and human trafficking in its business and supply chains	Describe the actions taken by each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or controls to assess and address these risks, including due diligence and remediation processes	Modern slavery risks, page 10	<ul style="list-style-type: none"> <li>– OZ Minerals onboarding and due diligence processes</li> <li>– Governance structure</li> <li>– Human Rights Policy Statement</li> <li>– Group-wide values, standards and procedures</li> <li>– Responsible production and sourcing standards</li> <li>– Community and human rights impact and opportunity assessments</li> <li>– Entering a High-Risk Country Global Procedure</li> <li>– Due diligence for our non-operated joint ventures, the BHP Foundation, BHP Xplor and BHP Ventures</li> <li>– ESCT Framework</li> <li>– Supplier due diligence and audit program</li> <li>– Maritime vessel vetting and voyage instructions</li> <li>– Responsible Minerals Program</li> <li>– Training and engagement with suppliers and internal stakeholders</li> <li>– Reporting channels to raise misconduct concerns and community complaints mechanisms</li> <li>– Impact project workstream</li> </ul>
Training about slavery and human trafficking available to the organisation's staff		Our actions to address modern slavery risks, pages 14-23	

UK Modern Slavery Act recommended reporting criteria	Australian Modern Slavery Act mandatory reporting criteria	Addressed in this Statement	
		Section, page	Summary
Organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	Describe how each reporting entity covered by the joint statement assesses the effectiveness of actions being taken to assess and address modern slavery risks	Assessing effectiveness, page 24	<ul style="list-style-type: none"> <li>– ESCT Framework</li> <li>– Supplier audits</li> <li>– Review of Compliance-related controls</li> <li>– Tracking and monitoring internal performance</li> </ul>
	Describe the process of consultation with each reporting entity covered by the joint statement and with any entities that each of those reporting entities own or control	Consultation and collaboration, page 24	<ul style="list-style-type: none"> <li>– Centralised management structure</li> <li>– Engagement with key former OZ Minerals Brazil personnel</li> <li>– Integration of OZ Minerals Australia into BHP's compliance framework</li> <li>– External engagement and partnerships with expert non-government organisations</li> </ul>
	Any other relevant information	Looking back and forward, page 25	<ul style="list-style-type: none"> <li>– Progress against FY2023 intentions</li> <li>– FY2025 intentions</li> </ul>

## Appendix 3

### Independent Limited Assurance Report to the Management and Directors of BHP Group Limited



#### Our Conclusion:

Ernst & Young ('EY', 'we') were engaged by BHP Group Limited ('BHP') to undertake a limited assurance engagement as defined by International Auditing Standards, hereafter referred to as a 'review', over the BHP Modern Slavery Statement 2024 for the year ended 30 June 2024. Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe the BHP Modern Slavery Statement 2024 has not been prepared, in all material respects, in accordance with the Criteria (as defined below).

#### What our review covered

Ernst & Young ('EY') was engaged by BHP to provide limited assurance over BHP's Modern Slavery Statement for the year ended 30 June 2024 (the 'Statement') in accordance with the Criteria (as defined below).

#### Criteria

In preparing the Statement, BHP applied:

- The requirements in the United Kingdom's *Modern Slavery Act 2015* and the *Australian Modern Slavery Act 2018* (collectively, 'the Acts'); and
- BHP management's own publicly disclosed criteria relating to quantitative disclosures as articulated within footnotes throughout the Statement.

The legislative requirements and BHP management's criteria in the footnotes in the Statement referenced above in this Criteria section together constitute the 'Criteria', which is what we assured the Statement against.

#### Key responsibilities

##### BHP's responsibility

BHP's management is responsible for selecting the Criteria, and for ensuring the Statement is prepared in accordance with that Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant to the preparation of the Statement, such that it is free from material misstatement, whether due to fraud or error.

##### EY's responsibility and independence

Our responsibility is to express a conclusion on the Statement based on our review.

We have complied with the independence and relevant ethical requirements, which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

EY applies Auditing Standard ASQM 1 *Quality Management for Firms that Perform Audits or Reviews of Financial Reports and Other Financial Information, or Other Assurance or Related Services Engagements*, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

#### Our approach to conducting the review

We conducted this review in accordance with the International Auditing and Assurance Standards Board's *International Standard on Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* ('ISAE 3000') and the terms of reference for this engagement as agreed with BHP on 22 March 2024. That standard requires that we plan and perform our engagement to express a conclusion on whether anything has come to our attention that causes us to believe that the Statement is not prepared, in all material respects, in accordance with the Criteria, and to issue a report.

#### Summary of review procedures performed

A limited assurance engagement consists of making enquiries, primarily of persons responsible for preparing the Statement and related information and applying analytical and other review procedures.

The nature, timing, and extent of the procedures selected depend on our professional judgement, including an assessment of the risk of material misstatement, whether due to fraud or error. The procedures we performed included, but were not limited to:

- Conducting interviews with personnel to understand the reporting process for complying with the Acts; the disclosures on governance structure; and internal activities as presented in the Statement
- Evaluating the suitability of the Criteria (other than with respect to the Acts) and that the Criteria have been applied appropriately to the Statement

- Reviewing disclosures made in the Statement relating to third party information to check accuracy
- Undertaking analytical procedures of the quantitative disclosures in the Statement to determine the reasonableness of the information presented
- On a sample basis, for qualitative and quantitative statements within the Statement, based on our professional judgement, reviewing underlying data to source information and data to assess completeness of claims; re-performing calculations to check accuracy; and reviewing explanations about the performance data and statements
- Undertaking a process walkthrough of and reviewing evidence related to BHP's relevant processes for consistency with disclosures made in the Statement
- Reviewing evidence of BHP's supplier risk assessment and audits to confirm consistency with disclosures made in the Statement
- Reviewing referenced policies and documents for consistency with disclosures made in the Statement
- Assessing the Statement against requirements as defined in the Acts
- Assessing whether the information disclosed in the Statement is consistent with our understanding and knowledge of BHP's supply chain management, governance accountability and other sustainability matters
- Reviewing BHP media coverage relating to modern slavery and human rights to identify material events that may require disclosure.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusion.

#### Inherent limitations

Procedures performed in a review (i.e., a limited assurance engagement) vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

While we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

#### Other matters

We have not performed assurance procedures in respect of any information relating to prior reporting periods, including those presented in the Statement. Our report does not extend to any disclosures or assertions made by BHP relating to future performance plans and/or strategies disclosed in the Statement.

#### Use of our Assurance Report

We disclaim any assumption of responsibility for any reliance on this assurance report to any persons other than the management and the directors of BHP, or for any purpose other than that for which it was prepared.

Our assurance procedures were performed over certain web-based information that was available via web links as of the date of this assurance report. We provide no assurance over changes to the content of this web-based information after the date of this assurance report.

Ernst & Young  
Melbourne, Australia  
27 August 2024

Mathew Nelson  
Partner

**BHP**