



**Modern Slavery  
Statement 2025**

Bringing people and  
resources together to  
build a better world



# Contents

<b>1</b>	<b>Introduction</b>	<b>2</b>
	Key areas of action in FY2025	3
	A message from our Chief Executive Officer	3
<b>2</b>	<b>Our structure, business and supply chains</b>	<b>4</b>
	Structure	4
	Other business activities	4
	Our business model	5
	Our strategy	5
	Our Values	5
	Our locations	6
	Our people	6
	Supply chains	7
<b>3</b>	<b>Modern slavery risks</b>	<b>10</b>
	In our operations	10
	OZ Minerals Brazil	11
	In our supply chains	12
<b>4</b>	<b>Our actions to address modern slavery risks</b>	<b>14</b>
	Governance and responsibilities	14
	Values, policies and standards	14
	Due diligence and risk management in our business activities	15
	Due diligence and risk management in our non-operated joint ventures, the BHP Foundation, BHP Xplor and BHP Ventures	15
	Due diligence and risk management in our supply chains	16
	Building capacity and raising awareness	19
	Remediation	19
<b>5</b>	<b>Assessing effectiveness</b>	<b>21</b>
<b>6</b>	<b>Consultation and collaboration</b>	<b>22</b>
	Consultation	22
	Collaboration and engagement	22
<b>7</b>	<b>Appendices</b>	<b>23</b>

## BHP Modern Slavery Statement 2025

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) and BHP Canada Inc.'s Canadian Forced Labour and Child Labour Report (together, Statement) for the financial year ended 30 June 2025. This Statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 (**UK Act**), section 14(1) of the Australian Modern Slavery Act 2018 (Cth) (**Australian Act**) and section 11(2)(a) of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 (**Canadian Act**). This Statement was approved by the Board of BHP Group Limited on 19 August 2025.

For the purposes of the Australian Act and the Canadian 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 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 2025. 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 2024 to 30 June 2025.<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 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 Act and forced labour under the Canadian Act. We recognise that the definition of 'child labour' in the Canadian Act captures a wider range of practices than just the worst forms of child labour. In practice, the third-party risk data that feeds into the BHP Group's supplier due diligence system captures broader forms of child labour and BHP Canada Inc.'s recruitment process involves checks to ensure candidates and apprentices are at least 18 years of age. On-site contractors to the Jansen potash project, including those who provide labour, are contractually required to adhere to all site safety procedures and BHP's *Minimum requirements for suppliers*, which contain requirements relating to child labour, forced or compulsory labour, human trafficking and other labour issues. The Jansen potash project site procedures do not allow anyone under 18 years of age to work on site or be present on site without BHP's express approval.

On 2 May 2023, BHP completed a transaction to acquire 100 per cent of the shares in OZ Minerals. The operational data and content presented in this Statement includes former OZ Minerals Australia entities. However, because former OZ Minerals Australia entities were only integrated into BHP's vendor management system in October 2024, supply chain data presented in this Statement covers the former OZ Minerals Australia entities for the period 1 November 2024 to 30 June 2025.

On 20 December 2024, we completed the sale of some former OZ Minerals Brazil gold tenements. The remaining former OZ Minerals Brazil operations, projects and exploration tenements located in Brazil and acquired as part of the OZ Minerals acquisition completed on 2 May 2023 ('OZ Minerals Brazil assets') have not been integrated into the BHP Group. In FY2025, we considered strategic options for divestment of the remaining OZ Minerals Brazil assets anticipated to complete in early CY2026. We have presented specific data and content for OZ Minerals Brazil assets (including in relation to the already divested exploration tenements, up to the date of completion) on page 11. Where data for OZ Minerals Brazil is reported in this Statement, it has been prepared in accordance with OZ Minerals Brazil standards. Unless otherwise stated, the operational and supply chain data and content presented in the rest of the Statement does not include any of the OZ Minerals Brazil assets.

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 in this Statement. 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 2025 Operating and Financial Review 6 (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. Operated assets are our assets (including those under exploration, projects in development or execution phases, sites and operations that are closed or in the closure phase) that are wholly owned and operated by BHP or that are owned as a BHP-operated joint venture. 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 FY2025

### Responding to identified issues in our supply chains

We investigated two reports (received in FY2024 and disclosed in our previous Statement) relating to potential modern slavery concerns in our supply chains and identified potential forced labour indicators in one of our routine supplier audits in FY2025. While no modern slavery practices were ultimately found, these engagements highlighted areas for improvement, including in our own internal controls and processes. We are implementing improvements and working with our suppliers to address identified issues.



For more information see pages 17 and 20

### Uplifting human rights capabilities and cross-functional collaboration

Second line teams responsible for human rights policy, assurance and advocacy were merged within the newly formed Ethics, Compliance and Human Rights team. We also established a cross-functional Human Rights Working Group. In FY2025, the Working Group assessed our human rights due diligence approach against the International Council for Mining and Metals (ICMM) Human Rights Due Diligence Guidance Maturity Matrix with assistance from an external human rights specialist.

To strengthen internal human rights capability, we provided human rights-focused training for first line community, Indigenous engagement, and portfolio growth teams and improved our methodology for conducting human rights due diligence for our operations and portfolio growth activities.



For more information see page 15

### Tracking the impact of our Ethical Supply Chain and Transparency Framework

We developed a key performance indicator framework for our Ethical Supply Chain and Transparency Framework. The framework maps our key controls and activities for managing modern slavery risk in our supply chain to their intended impacts and tracks outcomes. We also conducted internal second line monitoring over certain controls.



For more information see page 21



**At BHP, we believe all businesses have a part to play in combatting modern slavery. As a global miner, we intersect with many industries and countries at varying stages of maturity in addressing modern slavery practices.**

In FY2025, we worked to lift our own human rights capability – embedding cross-functional collaboration on human rights issues and implementing new tools and frameworks to monitor and assess the effectiveness of our actions. To ensure our modern slavery program is informed by reliable and actionable insights, we also worked with our suppliers to improve visibility over our extended supply chains for higher-risk procurement categories and identified opportunities to promote worker voice and increase access to grievance mechanisms. Our work to combat modern slavery and build more resilient and ethical supply chains supports our purpose: to bring people and resources together to build a better world. That starts with respecting the human rights of our people, workers in our extended supply chain and the communities where we operate.”

**Mike Henry**  
Director and Chief Executive Officer

For and on behalf of  
BHP Group Limited  
19 August 2025



## Our structure, business and supply chains

BHP is a global natural resources company. We explore, extract and process metals and minerals, including copper, iron ore and steelmaking coal. We are also on track to be a major global producer of potash by the end of the decade. Copper is used in electrification. Iron ore and steelmaking coal are essential for making steel needed for construction, including renewables infrastructure. Potash is a fertiliser, which assists with food security for a growing global population and more sustainable land use. We also produce uranium and gold as by-products of our copper production.

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 that framework, we seek to create sustainable, ethical and transparent supply chains together with our partners.



For more information on BHP's approach to and definition of sustainability and our 2030 social value scorecard, refer to the **BHP Annual Report 2025 Operating and Financial Review 9 (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 FY2025, we operated our business under three main divisions:<sup>2</sup>

- Minerals Australia, comprising our iron ore assets in Western Australia, and coal assets in 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, Botswana, Canada, Chile, Finland, Norway, Peru, Serbia, Sweden, and the United States in FY2025.

These divisions are supported by our global functions, including:

- Commercial, which includes our Sales and Marketing, Maritime and Supply Chain Excellence, Procurement and Global Business Services teams
- External Affairs, which includes our Global Corporate Affairs and Communications; Sustainability and Social Value; Ethics, Compliance and Human Rights; Legal and Group Governance teams
- Finance, which includes our Risk and Internal Audit teams
- Human Resources
- Portfolio Strategy and Development
- Technical, which includes our Exploration team



Refer to pages 6–7 for our locations

Consistent with our strategy to grow in attractive commodities, in FY2025:

- We completed the integration of former OZ Minerals Australia operations and functions into our business. We also divested some former OZ Minerals Brazil gold tenements in December 2024 and considered strategic options for divestment of the remaining OZ Minerals Brazil assets.
- Our Jansen Stage 1 project was 68 per cent complete by the end of FY2025. In July 2025, we announced that we estimate first production to revert back to the original schedule of mid-CY2027. We have commenced execution of Jansen Stage 2 and at FY2025 year-end it was 11 per cent complete.
- We established the independently operated Vicuña Corp. joint venture, owned 50/50 with Canada's Lundin Mining, to develop the combined Josemaria and Filo del Sol copper prospects on the Argentina-Chile border.
- We entered an earn-in agreement with Cobre Limited, securing the right to acquire a 75 per cent stake in the Kitlanya East and West Copper Projects in Botswana.

### Other business activities

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

- **Non-operated joint ventures:** In FY2025, 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), Samarco in Brazil (50 per cent ownership, iron ore) and Vicuña in Argentina and Chile (50 per cent ownership, copper).
- **Social investment:** Guided by our social value framework, our social investment aims to address sustainable development challenges relevant to our business, partners and stakeholders. In FY2025, BHP's social investment activities included funding the BHP Foundation, a separate charitable entity headquartered in the United States with its own management and operations. During the reporting period, the BHP Foundation worked with partner organisations to address some of the root causes of sustainability challenges relevant to the resources industry.
- **Financial investments:** In FY2025, we continued to build our portfolio of options in commodities that can help the world develop, decarbonise and digitalise. BHP Ventures is BHP's dedicated venture capital unit. We invest in companies developing game-changing technologies with the potential to make BHP's global operations safer, more productive, and sustainable. BHP Xplor is our global accelerator program to invest in and support innovative, early-stage mineral exploration companies. It involves providing grants to qualifying companies to support the development of their exploration opportunities.



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

2. Western Australia Nickel (our Nickel West operations and West Musgrave project) transitioned into temporary suspension in the first half of FY2025. As previously announced, BHP intends to review the decision to temporarily suspend Western Australia Nickel by February 2027.



## Our Purpose

To bring **people** and **resources** together to build a better world.

## Our business model



### Exploration and acquisition

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



### 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 strategy

We will responsibly manage the most resilient long-term portfolio of assets, in 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.

## Our Values

Set the tone for our culture, a unique part of our competitive advantage. They are a declaration of what we stand for. They guide our decision-making, reinforce our culture and ensure our people deliver on our purpose.

### Do what's right

A sustainable future starts with safety and integrity, building trust with those around us.

### Seek better ways

Listening to learn and inspiring challenge is how we drive progress.

### Make a difference

The accountability to act, create value and have impact is on each of us, every day.

## Our structure, business and supply chains *continued*

### Our 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

- Copper South Australia**  
South Australia

#### Minerals Americas

- Escondida**  
Chile
- Pampa Norte**  
Chile
- Vicuña District\***  
Chile
- Antamina\***  
Peru
- Carajás**  
Brazil
- Samarco\***  
Brazil
- Jansen potash project**  
Canada
- Resolution Copper\***  
United States

\* Non-operated asset

#### 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
- 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

- Copper**
- Iron ore**
- Coal**
- Potash**
- Nickel**

### Our people

Our people are the foundation of our business. BHP has more than 90,000 employees and contractors globally, primarily in Australia and the Americas.<sup>3</sup>

**517**

Apprentices and trainees trained by FutureFit Academy, with 354 graduating<sup>4</sup>

**45.8%**

Employees covered by collective bargaining agreements

**54.2%**

Employees on non-collective agreements

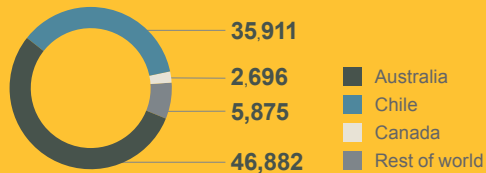
**41.3%**

Female employee representation

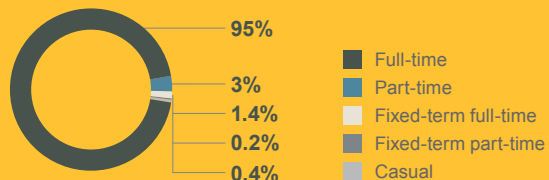
#### No. of employees and contractors

**91,304**

Global total



#### Employees by contract type



3. Based on a 'point-in-time' snapshot of employees as at 30 June 2025, including employees on extended absence. Contractor data is collected from internal organisation systems and averaged for a 10-month period, July 2024 to April 2025. Figures reported do not include employees and contractors of OZ Minerals Brazil assets.

4. 492 apprentices and trainees commenced during FY2025 and were still with FutureFit Academy at 30 June 2025. The remainder commenced prior to FY2025 and have not yet graduated.

## Supply chains

We partner with our suppliers to work towards our purpose of bringing 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 FY2025 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 and the size of the counterparty. For example, we may use a long-form contract (with standard or 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.

Our inbound supply chain<sup>5</sup> is made up of two categories:

- **Non-traded goods and services**, comprising goods and services sourced by our Procurement team, which do not form part of BHP's finished product portfolio. Non-traded goods and services represented approximately 77 per cent of BHP's overall purchasing activity in FY2025.

- **Trade-related inputs**, comprising minerals and metals (which are predominantly used for supply into certain operated assets or on-sold as part of third-party trading activities), chemicals, natural gas, liquefied natural gas, power, fuels (including renewable fuels) and carbon credits sourced by specialist teams within our Commercial function.

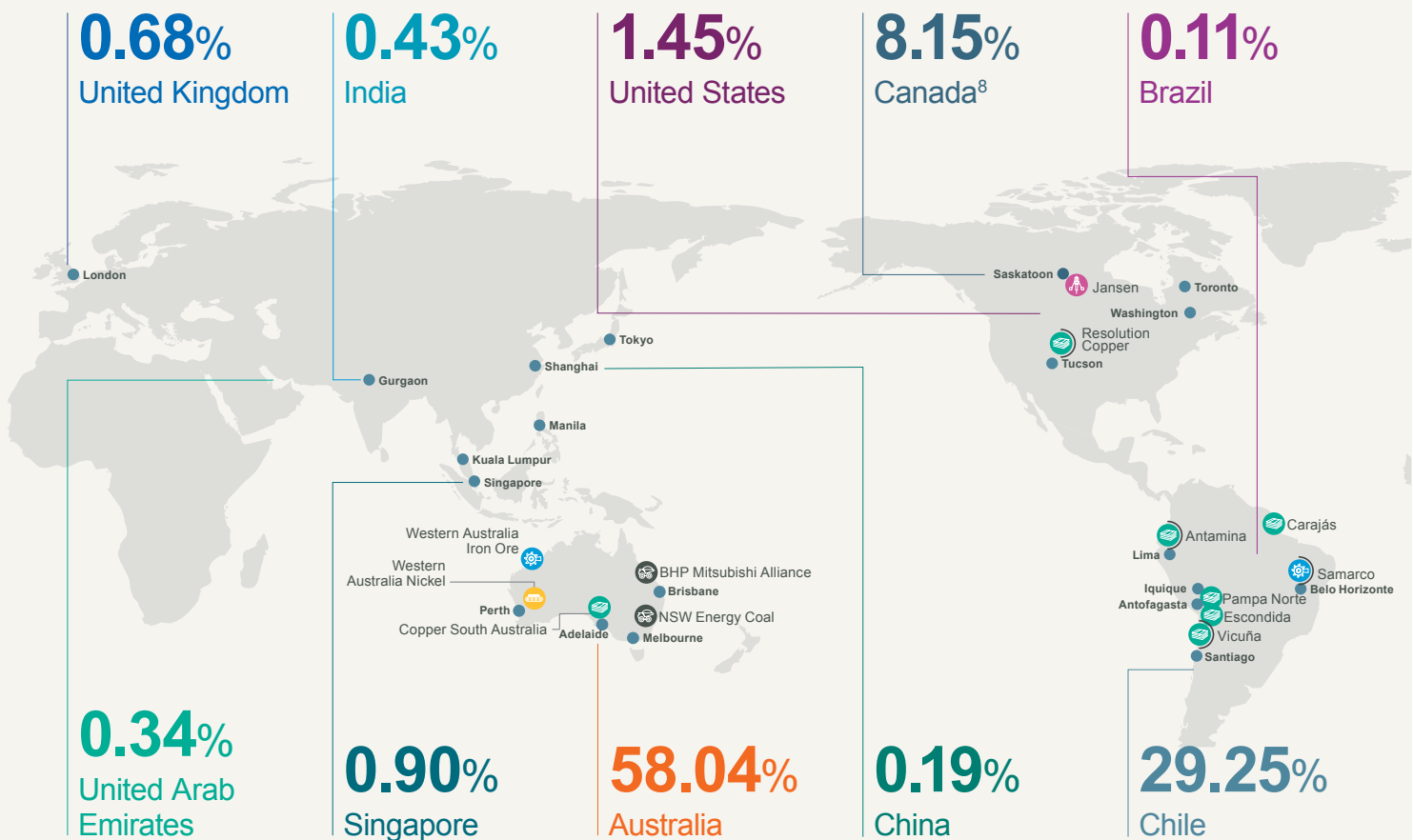
BHP's Procurement and Maritime functions also engage third parties to provide maritime, ground and air freight services to move products to and from our operated assets.

In FY2025, our payments to suppliers totalled US\$24.8 billion.<sup>6</sup>

### Non-traded goods and services

Figure 1 shows the breakdown of BHP's total spend on non-traded goods and services in FY2025 by country.<sup>7</sup>

Figure 1: Total non-traded goods and services spend in FY2025



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

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

7. 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 two decimals.

8. In FY2025, BHP Canada Inc.'s top five sourcing countries for non-traded goods and services (by supplier country of incorporation) were: Canada, the United States, the United Arab Emirates, Australia and Singapore. BHP Canada Inc.'s top five categories of non-traded goods and services spend in FY2025 were: engineering and construction, major equipment purchase, freight and logistics, bulk materials and indirect services.

9. 'Other' includes all other countries which BHP buys from.

## Our structure, business and supply chains continued

Figure 2 shows the top 10 categories of non-traded goods and services that we purchased during FY2025,<sup>10</sup> along with the key sourcing countries for each category.<sup>11</sup> Our top 10 categories account for approximately 85 per cent of BHP's spend on non-traded goods and services in FY2025.

### 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 countries where we operate. We do this either directly or through our established Local Buying Programs in Australia and Chile. The programs support small, local and Indigenous businesses to enter BHP's supply chain through a streamlined onboarding, procurement and payment process and provide access to education and advice (at no additional cost to the supplier).

### Trade-related inputs











Figure 3 shows the top 10 countries (by total proportion of overall spend) and categories for our purchases of trade-related inputs (excluding purchases of minerals and metals) in FY2025. The combined spend for our top 10 sourcing countries (i.e. countries where our suppliers are incorporated) represents approximately 93 per cent of BHP's total spend on trade-related inputs for FY2025.

In FY2025, we purchased nickel and copper from Australia, Europe, Southeast Asia and South America for supply into certain operated assets<sup>13</sup> and as part of our third-party trading.



For more information on our minerals and metals purchases refer to the **BHP Responsible Minerals Program Report 2025** (available at [bhp.com/RMPCR2025](https://bhp.com/RMPCR2025))<sup>14</sup>

Figure 2: Top 10 categories of non-traded goods and services spend in FY2025<sup>12</sup>

Level 1 category	Category description	Key sourcing countries
 1 Engineering and construction	Engineering services and construction, projects or engineer, procure and construct and engineer, procure, construct and manage contractors	Australia, Chile, Canada, United States, Germany, Singapore, China, United Kingdom, Japan, the Netherlands, India
 2 Maintenance, repair and operations (MRO)	Goods that are procured and changed out on a recurring basis for MRO at our production sites	Australia, Chile, Canada, China, United States, Mexico, Germany, Belgium
 3 Major equipment purchase	Purchase of all major equipment, infrastructure and large components	Australia, Chile, Canada, United States, Germany
 4 Professional services	Provision of services and resources of a technical or professional nature, excluding engineering services	Australia, United Kingdom, Chile, Canada, United States, Brazil, Singapore, Peru, Finland, Malaysia, South Africa, the Philippines
 5 Operational support services	All production-related labour and lease/hire services	Australia, Chile, Canada, United States
 6 Maintenance services	All services that cover maintenance, inspection, repair and testing of equipment and infrastructure	Australia, Chile, Canada, United States
 7 Indirect services	Supporting services not directly related to maintenance, production or operations, excluding professional labour services (for example, facilities management, vehicle leases and surveying services)	Australia, Chile, Canada, United States, Singapore, United Kingdom, the Philippines, China, Malaysia
 8 Technology	All software, hardware and services related to the provision of information technology and operational technology	Australia, Chile, Singapore, India, United States, United Kingdom, Canada, Ireland, the Netherlands
 9 Utilities	Electricity, gas and water, plus any other renewable/alternative utilities	Chile, Australia, Canada
 10 Bulk materials	Goods that are procured by weight or volume, typically batch produced by suppliers (for example, construction materials, fuels, explosive materials, chemicals and additives, among others)	Australia, Chile, United Arab Emirates, Canada, Singapore, Finland, United States, Hong Kong SAR, Switzerland, Austria

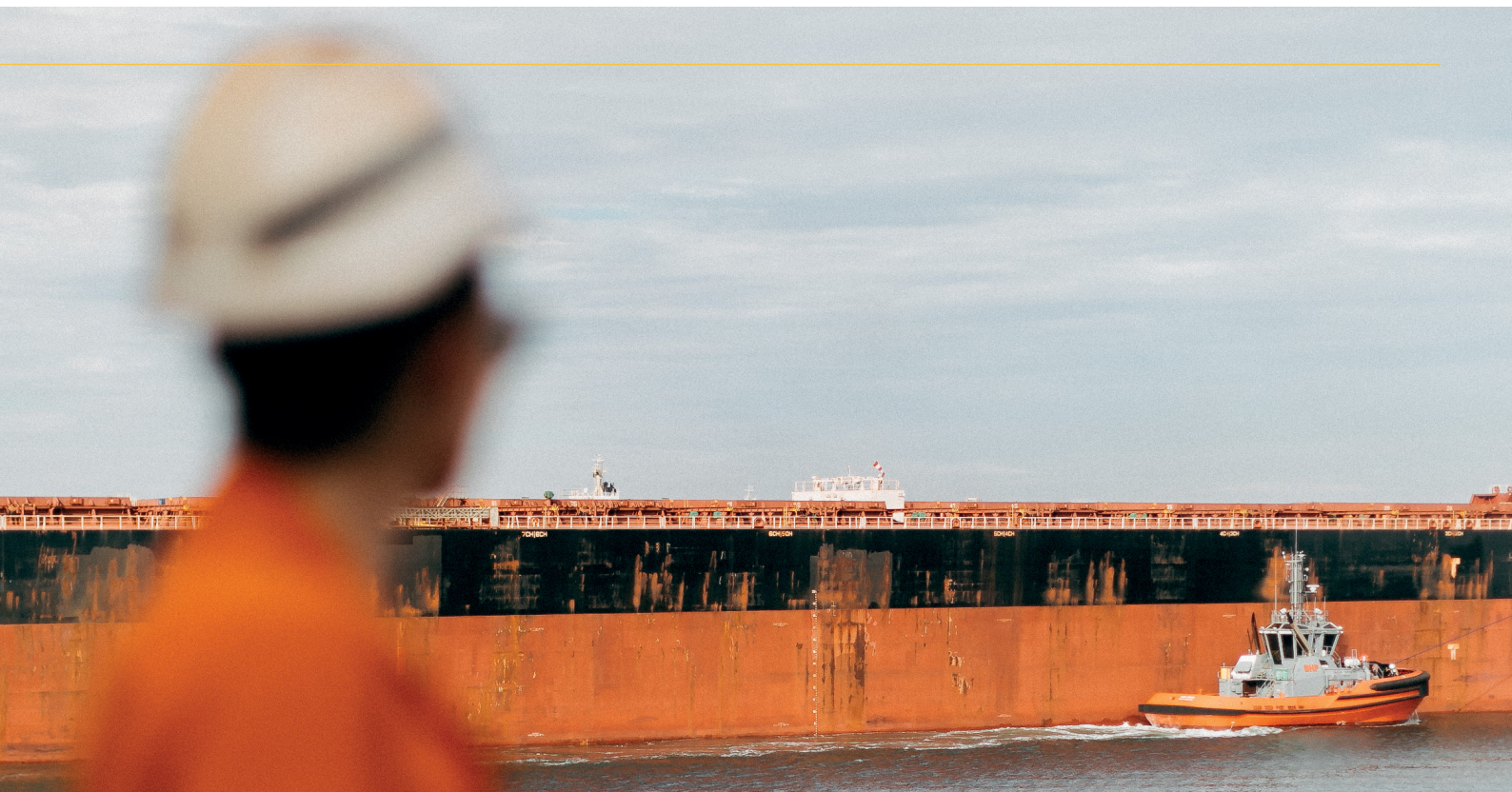
10. The 'category' of non-traded goods and services refers to the products and services classifications under the United Nations Standard Products and Services Code (UNSPSC), which is managed by GS1 US for the UN Development Programme, an open, global, multi-sector standard for classification of products and services.

11. Based on supplier country of incorporation and invoice posting date. For each level 1 (i.e. broader) category listed in Figure 2, we have identified the countries where our spend with a supplier incorporated in that country exceeded US\$1 million on at least one level 2 (i.e. narrower) category in FY2025. The countries listed in Figure 2 are shown in descending order of spend.

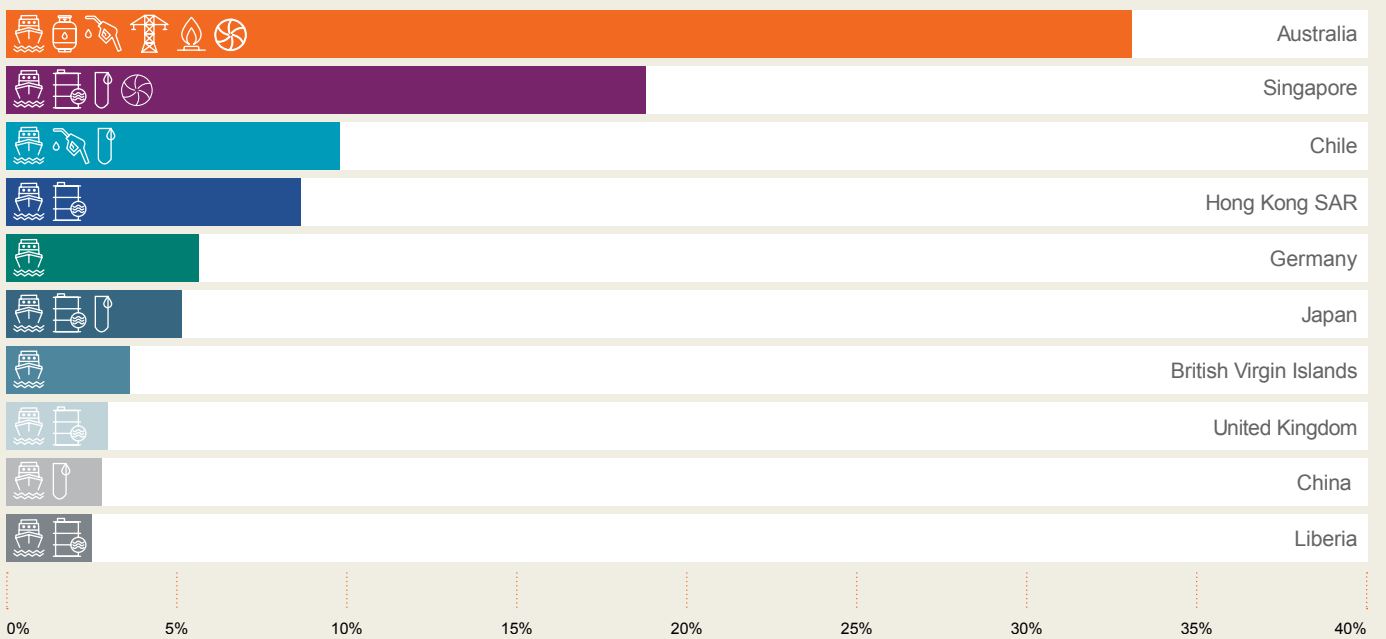
12. In our previous Statement, Figure 1 identified the top 10 sourcing countries for our non-traded goods and services spend, and the top taxonomies of goods and services we purchased in each of those countries. We have changed the way we present this data in FY2025 to provide a more complete picture of the key categories of non-traded goods and services we purchased and the countries where our suppliers of these goods and services are incorporated.

13. Western Australia Nickel (our Nickel West operations and West Musgrave project) transitioned into temporary suspension in the first half of FY2025. As previously announced, BHP intends to review the decision to temporarily suspend Western Australia Nickel by February 2027.

14. 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.



**Figure 3: Trade-related inputs**



- Diesel**  
Diesel fuel supply (required to enable and optimise the extraction, transport and processing of our resource base)
- Electricity<sup>15</sup>**  
Electricity supply (required to enable and optimise the extraction, transport and processing of our resource base)
- Liquid petroleum gas**  
Liquid petroleum gas supply (required to enable and optimise the processing of our resource base)
- Chemicals**  
Chemicals for use in our copper production processes
- Marine fuels<sup>16</sup>**  
Marine fuel required for the bunkering (i.e. supplying of fuel) of chartered vessels
- Natural gas**  
Natural gas supply (required to enable and optimise the extraction and processing of our resource base, and used in electricity generation)
- Freight and logistics<sup>17</sup>**  
All inbound and outbound freight of goods and warehouse and storage, including marine and port freight services
- Carbon credits**  
Australian Carbon Credit Units (ACCUs) issued under the Australian Commonwealth Carbon Credits (Carbon Farming Initiative) Act 2011

15. Includes renewable sources of electricity.


16. Includes biofuels.

17. In FY2025, BHP Canada Inc. purchased freight services from suppliers incorporated in Singapore and Germany to enable the delivery of goods to the Jansen potash project.

## Modern slavery risks

In this Statement, unless stated otherwise, we describe modern slavery risks by reference to Verisk Maplecroft country and industry scoring.<sup>18</sup> Risk ratings in Verisk Maplecroft's modern slavery indices reflect various process and outcome-based factors, including the adequacy of domestic regulation and law enforcement, corruption levels, as well as the extent and severity of reported modern slavery violations.

We also use Verisk Maplecroft data in our new country entry and supplier risk identification processes.

 Refer to page 17 for more information on BHP's modern slavery risk methodology for suppliers

### In our operations

#### Operated assets, exploration and corporate offices

In FY2025, we had operated assets in Australia, Canada and Chile, and had corporate offices in 13 countries (refer to page 6 for our locations).

According to Verisk Maplecroft, the inherent modern slavery risks in the global mining sector stem from the sector's corruption susceptibility, potential exposure to health and safety risks and the presence of vulnerable groups and low- or unskilled workers. We consider that we have a lower risk of causing or contributing to modern slavery practices at our operated assets as the countries where those operated assets are located are low or medium risk for modern slavery (Canada and Chile are rated as medium risk, and Australia is low risk, for modern slavery).

In our previous Statement we described illegal mining practices at some former OZ Minerals Brazil exploration tenements in Brazil (refer to page 11 for an update). Artisanal and small-scale mining is higher risk for modern slavery practices, such as child labour.<sup>19</sup> In FY2025, other than in relation to those former OZ Minerals Brazil tenements, we had no reported or identified artisanal and small-scale mining on or adjacent to any of our operated assets.<sup>20</sup>

In FY2025, most of our portfolio growth activities were in countries rated low or medium risk for modern slavery.<sup>21</sup> However, we also had non-controlling interests in Botswana, Ecuador, Peru and Tanzania, which receive higher risk scores for modern slavery (refer to page 15 for our approach to managing modern slavery risks in our growth activities).

Some of the countries where we have corporate offices attract higher modern slavery risk ratings.<sup>22</sup> In practice, our office activities (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) present a lower risk of causing or contributing to modern slavery practices than our operated assets. However, our offices do have supply chain touchpoints with higher-risk industries, such as cleaning and information technology services (refer to pages 12–13 which discuss modern slavery risks in our supply chain).

In addition to having measures in place to comply with applicable local laws relating to employment,<sup>23</sup> we have in place measures to manage labour and workforce-related risks, including:

- a requirement to undertake screening and background checks to ensure our employees meet the legal minimum working age in their country of employment and 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 controls in place to mitigate these risks, including controls to ensure employees receive appropriate remuneration.

 For more information on BHP's Risk Framework, refer to the **BHP Annual Report 2025 Operating and Financial Review 7 (How we manage risk)**

- our *Minimum requirements for suppliers*, which contain requirements relating to child labour, forced or compulsory labour, human trafficking and other labour issues, 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 risk assessments for all new suppliers of labour hire or service contractors via BHP's third-party 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 Argentina and Chile (Vicuña), Brazil (Samarco), Peru (Antamina) and the United States (Resolution Copper). While those sites have their own operating and management policies and standards, we recognise that Peru and Brazil both attract higher modern slavery risk scores at a country and mining industry level.<sup>24</sup> Elevated modern slavery risks in Peru and Brazil are due to the frequency of reported modern slavery practices across various sectors and risks associated with the mining industry in both countries, and poor enforcement of laws prohibiting modern slavery practices in Brazil.

Given its mission to contribute to addressing some of the root causes of sustainability challenges relevant to the resources industry, the BHP Foundation is sometimes exposed to countries that carry higher modern slavery risks through the projects it funds. In FY2025, the Foundation's investments had a particular focus on Australia, Chile and Canada (where BHP's operated assets are located) and the United States where it is registered. During the reporting period, some of the Foundation's partners operated in or extended their work into countries that attract higher-risk scores for modern slavery.<sup>25</sup>

All the companies in which BHP Ventures have invested are headquartered in low- or medium-risk jurisdictions for modern slavery practices (Australia, Canada, Singapore, the United Kingdom and the United States). We partner with established co-investors. However, investee companies may in some instances be exposed to countries rated higher risk for modern slavery risks through their operations or supply chains.

Some companies selected as participants in our FY2025 cohort of the BHP Xplor Program undertake exploration in countries that attract high modern slavery risk scores, including Peru and Saudi Arabia.

18. 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 higher risk score.

19. US Department of Labor, 2024 List of Goods Produced by Child Labor or Forced Labor (2024), 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/whistleblowers/child-labor/)

20. BHP uses the ICMM definition of artisanal and small-scale mining as mining activities that are 'labour-intensive and capital-, mechanisation- and technology-poor'. See the ICMM website for more information.

21. Australia, Finland, Norway and Sweden are rated low risk for modern slavery. Canada, Chile, Serbia and the United States are rated medium risk.

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

23. For more information on applicable local employment laws, refer to the BHP Annual Report 2025 Operating and Financial Review 9.5 (People) which summarises the impact of recent significant industrial relations legislative reforms in Australia.

24. Brazil and Peru attract higher risk scores according to Verisk Maplecroft, while Argentina and the United States score medium risk scores.

25. These countries include Belize, Brazil, Cameroon, Colombia, Ecuador, Ghana, Guinea, Guyana, India, Indonesia, Jordan, Liberia, Mexico, Mongolia, New Caledonia, Nicaragua, Nigeria, Palau, Peru, the Philippines, Senegal, Sierra Leone, South Africa, Tanzania, Ukraine and Zambia (among others).

## OZ Minerals Brazil assets

The OZ Minerals Brazil assets include copper and gold projects and exploration tenements in Pará and Maranhão states. Brazil attracts a higher risk rating for modern slavery. During FY2025, BHP divested certain former OZ Minerals Brazil assets and considered strategic options for divestment of the remaining OZ Minerals Brazil assets.

### Addressing modern slavery risks for OZ Minerals Brazil assets

Our previous Statement identified illegal gold mining occurring at some OZ Minerals Brazil exploration tenements. We divested our interest in those gold exploration tenements in Q2 FY2025. In FY2025, we also identified illegal copper mining occurring at a separate OZ Minerals Brazil exploration tenement, which BHP continues to own while we considered strategic options for this asset, together with all other remaining OZ Minerals Brazil assets (with divestment anticipated to complete in early CY2026). We do not (and did not) own the land where these exploration tenements are located or have a right to control access to, or activities occurring on, that land. Investigations conducted during the reporting period did not identify any evidence of modern slavery practices occurring in connection with the illegal mining.

As described in our previous Statement, we engaged an external human rights specialist to complete human rights risk assessments for certain OZ Minerals Brazil assets (including the divested tenements that were owned by BHP at the time). The assessments were completed in FY2025 and highlighted modern slavery-related risks inherent in the external operating environment in which OZ Minerals Brazil assets are located. These risks include sexual exploitation of adolescents in the local community and child and forced labour in supply chains. These risks stem from general contextual risk factors, including illegal mining in the region, poverty and socioeconomic vulnerability in local communities and likely increases in temporary worker populations should mine development activities take place.

The assessments identified measures already in place under OZ Minerals Brazil's procedures and applicable BHP processes to mitigate these risks, including providing human rights training to relevant employees and informing new employees and contracted workers of reporting channels to raise misconduct concerns (see also the measures described in the *Addressing modern slavery risks in OZ Minerals Brazil supply chains* section below). The assessments also recommended additional risk management actions to mitigate identified human rights risks now and, in the future, if mine development progresses. OZ Minerals Brazil has developed an action plan to address these recommendations.

### OZ Minerals Brazil supply chains

Table 1 shows the main sourcing countries for goods and services procured by former OZ Minerals Brazil entities during FY2025,<sup>26</sup> along with the key categories of goods and services sourced from each country.<sup>27</sup> Suppliers to former OZ Minerals Brazil entities are not integrated into BHP's vendor management system and the data is reported in accordance with OZ Minerals Brazil's systems and classifications.

The majority of OZ Minerals Brazil's spend with suppliers in FY2025 was with local suppliers in Brazil, which is scored as higher risk for modern slavery.<sup>28</sup> Former OZ Minerals Brazil entities also purchased goods and services from industries rated higher risk for modern slavery, including drilling services, equipment and machinery, explosives and accessories, maintenance, repair and operations (MRO) parts, technology services and software and transportation, cargo handling and warehousing services.

### Addressing modern slavery risks in OZ Minerals Brazil supply chains


During FY2025, OZ Minerals Brazil's supplier onboarding and due diligence processes continued to apply, which included:

- screening new 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') where the contract value exceeds a certain monetary threshold

- screening suppliers with active contracts against the Lista Suja annually
- 74 in-person site inspections to assess modern slavery risks for select higher-risk local suppliers (including suppliers that provide worker accommodation)
- delivering online human rights training on issues covered in OZ Minerals Brazil's human rights procedure (including modern slavery practices) to 150 suppliers. During FY2025, the training was mandatory for all new suppliers and existing suppliers that enter into new contracts

In FY2025, BHP continued to supplement OZ Minerals Brazil's due diligence processes with bespoke controls to align with BHP's compliance approach. These controls included screening for modern slavery risk via our third-party due diligence platform and second line review by BHP Compliance where the results indicate modern slavery risks or human rights impacts. BHP Compliance engages with OZ Minerals Brazil's supplier onboarding and due diligence processes and considers the effectiveness of existing and interim measures as appropriate.

**Table 1: FY2025 key sourcing countries for OZ Minerals Brazil**

	1	2	3	4	5	6	7	8	9	10
	Brazil	Singapore	Switzerland	Canada	India	Germany	Denmark	Chile	United Kingdom	Australia
 Transportation, cargo handling and warehousing services	●	●	●			●			●	
 Drilling services	●									
 Mine services	●									
 Equipment and machinery	●						●	●		
 Technology services and software	●			●				●		●
 MRO parts	●				●					
 Consulting services	●			●				●		●
 Insurance	●								●	
 General supplies <sup>29</sup>	●									

26. Table 1 includes supplier data relating to the former OZ Minerals Brazil assets that were divested during FY2025 for the period those entities were owned by BHP.

27. Based on invoicing for the period 1 July 2024 to 30 June 2025. Category headings were provided by OZ Minerals Brazil procurement staff.

28. In FY2025, the key sourcing countries for OZ Minerals Brazil also included India, which is rated higher risk for modern slavery, and countries which attract low (Australia, Denmark, Germany and Switzerland) or medium risk scores (Canada, Chile, Singapore and the United Kingdom).

29. Includes facilities services and labour.

## Modern slavery risks continued

### In our supply chains

Our most significant modern slavery-related risks arise in our supply chains where BHP could be directly linked to modern slavery practices through the goods and services we purchase. Consequently, 'supply chain' is identified as one of our prioritised human rights themes in our Human Rights Policy Statement (refer to page 14 for more information).

In FY2025, approximately 6 per cent of the suppliers that we purchased non-traded goods and services were rated as high risk, 7 per cent were medium risk and 87 per cent were low risk for modern slavery.<sup>30</sup> The main sources of supply chain risks are purchases from higher-risk countries and industries.

In terms of specific modern slavery practices, our exposure potentially includes forced labour and some of the following practices, which the International Labour Organization (ILO) defines as potential indicators of forced labour:



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We recognise that modern slavery risks exist throughout our extended supply chains (i.e. our indirect suppliers beyond tier one). However, given the scale, complexity and dynamism of BHP's supply chains, we focus our routine risk identification, due diligence and monitoring on our tier one (i.e. direct) suppliers (including those suppliers' manufacturing or outsourcing in other countries). This approach recognises that our ability to identify and/or engage suppliers beyond tier one of our supply chains, and influence their practices, is limited.

### Beyond tier one

Our direct suppliers have greater oversight and influence over their own direct suppliers. Our *Minimum requirements for suppliers* require that our suppliers of non-traded goods and services consider their own 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*).<sup>31</sup>

30. Percentages have been rounded to the nearest whole number. Refer to page 17 for important information on the methodology and approach for assessing supplier risk.

31. Due to the long-term nature of some of BHP Canada Inc.'s contracts with suppliers, the latest version of the *Minimum requirements for suppliers* may not be the version incorporated into the contract. However, prior versions have all included core prohibitions on forced and child labour.

32. In FY2025, our spend exceeded US\$1 million with suppliers in Australia, Austria, Belgium, Finland, France, Germany, Ireland, the Netherlands and Switzerland, which are rated low risk, and Canada, Chile, Japan, Malta, New Zealand, Singapore, Slovakia, the United Kingdom and the United States, which are rated medium risk.

33. In FY2025, our spend with suppliers in the following countries rated higher risk for modern slavery exceeded US\$1 million: Brazil, China, Hong Kong SAR, India, Malaysia, Mexico, Peru, the Philippines, South Africa and the United Arab Emirates.

34. In FY2025, our spend exceeded US\$1 million with suppliers in the following countries rated low risk: Australia, Belgium, Denmark, France, Germany, the Netherlands, Norway and Switzerland.

We also supplement our routine risk identification activity with targeted deep dives on industries that are higher risk for modern slavery. This involves enhanced review, engagement and analysis beyond tier one. For example, international researchers have described elevated forced and child labour risks associated with certain renewable energy technologies, such as photovoltaic solar panels, wind turbines and lithium-ion batteries. In FY2025, we periodically reviewed modern slavery risks in our extended renewable energy supply chain and engaged with select partners involved in renewable energy-related purchases for some of our operated assets (including power purchase agreements). This included communicating expectations on supply chain transparency, understanding our partners' policies and processes, incorporating ethical sourcing and transparency criteria into the tender and bid evaluation process for renewable energy projects and undertaking enhanced due diligence where appropriate.

In FY2025, we also undertook a deep-dive analysis of our uniforms supply chain, which include protective clothing, gloves and safety footwear. Our engagement with one of BHP's largest suppliers of uniform products in Australia has increased our visibility over the manufacturing locations and extended supply chain for the garments we procure from them. Workers in the extended supply chain for the apparel sector are vulnerable to modern slavery practices, particularly in the sourcing and processing of raw materials, such as cotton. Our supplier confirmed the sourcing region for all cotton used to manufacture uniform products supplied to BHP, which enables us to better assess and manage modern slavery risks in our extended uniforms supply chain.

### Country risks

The majority of BHP's purchases of non-traded goods and services in FY2025 was with suppliers incorporated in countries scored low or medium risk for modern slavery.<sup>32</sup> Less than 1.5 per cent of spend on non-traded goods and services was with suppliers incorporated in countries attracting higher-risk modern slavery scores.<sup>33</sup> Similarly, the majority of our purchases of trade-related inputs in FY2025 were with suppliers incorporated in countries rated low<sup>34</sup> or medium<sup>35</sup> risk for modern slavery, and less than 15 per cent of spend on trade-related inputs was with suppliers incorporated in countries rated higher risk.<sup>36</sup>

Because a supplier's country of incorporation may not be the same as their manufacturing or outsourcing location, since January 2024, we have required all new suppliers of trade-related inputs and non-traded goods and services to indicate the countries or regions where products or services they provide to BHP are manufactured, assembled or performed (either by the supplier or a third-party).<sup>37</sup> In FY2025, the most common manufacturing and outsourcing locations identified by our suppliers were Australia, Chile, the United States, China, Canada, Germany, the United Kingdom, Italy and Malaysia.<sup>38</sup> Data collected to date indicates that our purchases of industrial machinery and goods, maintenance, repair and operations, maintenance services, and technology carry higher risks of modern slavery based on their manufacturing or outsourcing location.

We also acknowledge the presence of higher-risk countries<sup>39</sup> in our trade-related supply chains for chemicals, which are in some instances purchased from commodity traders who act as intermediaries between buyers and producers of chemicals.

### Industry risks

In addition to country risk, our risk identification process also considers industry risk. In our trade-related supply chains, the shipping industry is considered higher risk for modern slavery (particularly forced labour) due to industry-wide factors, such as reliance on vulnerable workers (including migrant workers). In FY2025, the majority of our spend on maritime freight and logistics services<sup>40</sup> was with suppliers incorporated in low and medium-risk countries,<sup>41</sup> however some of our suppliers are incorporated in higher-risk countries.<sup>42</sup>

35. In FY2025, our spend exceeded US\$1 million with suppliers in the following countries rated medium risk: Bermuda, the British Virgin Islands, the Cayman Islands, Chile, Cyprus, Japan, Marshall Islands, Singapore, South Korea, Taiwan, the United Kingdom and the United States.

36. In FY2025, our spend exceeded US\$1 million with suppliers in the following countries rated higher risk: China, Hong Kong SAR, India, Liberia, Panama, Peru, the Philippines and the United Arab Emirates.

37. Includes suppliers of trade-related inputs and non-traded goods and services.

38. Based on data collected since January 2024 for suppliers that we purchased from in FY2025.

39. Such as Peru, China, Mexico, the Philippines and Turkey.

40. Includes transportation and storage via marine logistics, including freight services, port handling and warehousing.

41. In FY2025, our spend exceeded US\$1 million with suppliers in the following countries rated low risk: Australia, Belgium, Denmark, France, Germany, the Netherlands, Norway and Switzerland, and medium risk: Bermuda, the British Virgin Islands, the Cayman Islands, Cyprus, Japan, Malta, Marshall Islands, the United Kingdom, Singapore, South Korea and Taiwan.















42. In FY2025, our spend exceeded US\$1 million with suppliers in the following countries rated higher risk: China, Hong Kong SAR, Liberia, Panama and the United Arab Emirates.

Table 2 depicts our higher-risk categories for non-traded goods and services purchased in FY2025.<sup>43</sup> Table 2 highlights the categories of goods and services we purchased in FY2025 where both the industry<sup>44</sup> and one or more sourcing countries<sup>45</sup> attract higher risk scores for modern slavery.<sup>46</sup>

According to Verisk Maplecroft, higher risks of modern slavery associated with the categories listed in Table 2 are linked to the presence of one or more of the following factors in the relevant industry:

- reliance on workers from vulnerable groups
- lower worker skill levels
- corruption susceptibility
- potential exposure to health and safety risks in the industry's activities

**Table 2: Higher-risk categories of non-traded goods and services<sup>47</sup>**

Level 1 category	Level 2 category	BHP's higher-risk sourcing countries <sup>48</sup>
 Bulk materials	<ul style="list-style-type: none"> <li>– Construction material</li> <li>– Chemicals and additives</li> </ul>	United Arab Emirates, Hong Kong SAR, China, Bolivia
 Maintenance, repair and operations (MRO)	<ul style="list-style-type: none"> <li>– Electrical MRO</li> <li>– Drive and transportation systems</li> <li>– Heat transfer</li> <li>– Pipes and fittings</li> </ul>	Mexico, China, South Africa, Hong Kong SAR, Peru, Thailand
 Engineering and construction	<ul style="list-style-type: none"> <li>– Engineering consulting</li> <li>– Structural components and basic shapes</li> <li>– Pipeline construction and installation services</li> <li>– Civil works</li> <li>– Pipeline construction materials</li> <li>– Industrial plant construction services</li> </ul>	China, South Africa, India, Malaysia, the Philippines, Israel, Tanzania, Colombia, Thailand, United Arab Emirates, Indonesia
 Indirect services	<ul style="list-style-type: none"> <li>– Facilities management</li> </ul>	The Philippines, China, Malaysia, India, Peru, Brazil, South Africa
 Exploration and land services	<ul style="list-style-type: none"> <li>– Mining exploration services</li> </ul>	Peru, the Seychelles, Brazil, Colombia
 Utilities	<ul style="list-style-type: none"> <li>– Utilities other</li> <li>– Electric utilities</li> <li>– Water and sewer utilities</li> </ul>	The Philippines, Thailand, South Africa, Malaysia, Peru, Brazil, India, Israel, China
 Maintenance services	<ul style="list-style-type: none"> <li>– Trade maintenance services</li> <li>– Specialist equipment maintenance services</li> <li>– Lab services</li> </ul>	China, Mexico, Malaysia, Ecuador, Peru
 Non-production consumables	<ul style="list-style-type: none"> <li>– Other non-production consumables</li> <li>– Food and beverage</li> <li>– Medical supplies</li> <li>– Personal protective equipment</li> <li>– Office consumables</li> </ul>	India, South Africa, China, Malaysia, Peru, Tanzania, Hong Kong SAR, the Philippines
 Tyres, wheels and rims	<ul style="list-style-type: none"> <li>– Earth moving tyres</li> </ul>	China
 Operational support services	<ul style="list-style-type: none"> <li>– Operational support equipment hire</li> </ul>	Brazil
 Freight and logistics	<ul style="list-style-type: none"> <li>– Containers and storage</li> <li>– Road cargo transport</li> <li>– Marine and port freight services</li> <li>– Air freight</li> </ul>	Hong Kong SAR, China
 Technology	<ul style="list-style-type: none"> <li>– End-user computing</li> </ul>	India, Malaysia, China
 Travel and accommodation	<ul style="list-style-type: none"> <li>– Travel facilitation</li> <li>– Accommodation</li> </ul>	Brazil, Malaysia, South Africa
 Major equipment purchase	<ul style="list-style-type: none"> <li>– Water treatment equipment</li> </ul>	The Philippines

43. For each category, we identify the level 1 (i.e. broader) and level 2 (i.e. narrower) UNSPSC information.

44. To identify higher-risk industries, we have mapped the level 2 categories recorded in BHP's vendor management system to the relevant Verisk Maplecroft industries. Verisk Maplecroft scores the relevant industries as higher risk globally. Verisk Maplecroft's global industry risk scores reflect risks inherent to an industry's activities.

45. Based on supplier country of incorporation.

46. In our previous Statement, Table 3 identified categories of non-traded goods and services purchased from our top 10 tier one sourcing countries where Verisk Maplecroft rated both the industry and sourcing country as higher risk (based on supplier country of incorporation). In this Statement, Table 2 provides an expanded description of modern slavery risks in our supply chain by capturing all purchases of non-traded goods and services where Verisk Maplecroft rates both the industry and sourcing country higher risk, regardless of whether that country was one of our top 10 sourcing countries for non-traded goods and services in FY2025.

47. Categories and countries shown in Table 2 are listed in descending order of spend.

48. According to Verisk Maplecroft data.

## Our actions to address modern slavery risks

BHP operates and is managed as an integrated group with overarching policies, systems and processes, overseen by the Board of BHP Group Limited, that are required to be applied consistently across the Group and all of our operated assets. This section describes our governance arrangements, policies, standards and processes for managing modern slavery risks in our business and our supply chains.

In our Human Rights Policy Statement we:

- identify 'labour conditions' and 'supply chains' as prioritised human rights themes for our business
- commit to operating in a manner consistent with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and taking steps to operate in a manner consistent with the ILO's Declaration on Fundamental Principles and Rights at Work

The UNGPs describe the corporate responsibility to respect human rights and establish the 'cause, contribute, direct linkage' continuum to determine businesses' involvement in human rights impacts. The UNGPs inform both our risk identification and control measures in our supply chains and our operations (through our Group-level human rights risk identification and evaluation process). Relevant teams are guided by the UNGPs in raising awareness of modern slavery and other human rights issues and supporting the business and our suppliers with human rights subject matter expertise.

 Refer below for more information on our **Human Rights Policy Statement**, available at [bhp.com/humanrightspolicystatement](https://bhp.com/humanrightspolicystatement)

### 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 staff, operational management and people in functional roles – anyone who makes decisions, deploys resources or contributes to an outcome is responsible for identifying and managing the associated risks.
- **Second line** teams, which include our Risk, Legal and Ethics, Compliance and Human Rights teams, are responsible for providing expertise, support, monitoring and challenge on risk-related matters (including human rights risk-related matters such as modern slavery risks), including by defining Group-wide minimum standards.
- The **third line**, our Internal Audit team, is responsible for providing independent and objective assurance over the control environment (governance, risk management and internal controls) to the Board (including applicable Board Committees) and Executive Leadership Team. Additional assurance may also be provided by external providers, such as our External Auditor.

The Board of BHP Group Limited 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:

- In FY2025, we established the Ethics, Compliance and Human Rights sub-function which consolidated the existing Ethics & Investigations and Compliance sub-functions and the Global Policy and Assurance – Human Rights, Community and Indigenous Peoples team (formerly part of the Global Corporate Affairs and Communications sub-function). This sub-function is led by the Chief Ethics, Compliance and Human Rights Officer who reports to BHP's Chief Legal, Governance and External Affairs Officer. The Chief Ethics, Compliance and Human Rights Officer maintains a dotted reporting line to the Risk and Audit Committee for certain risks and meets at least annually with the Risk and Audit Committee Chair. This sub-function is independent of our assets and Commercial function.
- The **Ethical Supply Chain and Transparency (ESCT)** team within the Ethics, Compliance and Human Rights sub-function is a second line team responsible for the Ethical Supply Chain and Transparency Framework. It is the primary team within BHP dedicated to defining minimum standards and providing second line assurance in relation to modern slavery risks in our supply chains.
- The **Global Policy and Assurance – Human Rights, Community and Indigenous Peoples** team within the Ethics, Compliance and Human Rights sub-function is a second line team responsible for human rights issues at an operated asset and corporate level.

- The **Global Business Services Master Data (GBS MD)** team within the Commercial function was responsible for onboarding new suppliers and conducting supplier due diligence checks in FY2025, with oversight from the Compliance team.
- The **Maritime and Supply Chain Excellence** team within the Commercial function manages modern slavery risks that may arise in our maritime supply chain through our vessel vetting process.
- 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 subject matter experts on the Organisation for Economic Co-operation and Development (OECD)'s risk-based due diligence framework. The ESCT team provides second line oversight, including modern slavery subject matter expertise, advice and monitoring to the Responsible Minerals Program for higher-risk minerals and metals transactions.

### Values, policies and standards

Our Values: *Do what's right; Seek better ways and Make a difference* set the tone for our culture, guide our decision-making and reflect what we stand for. We seek to apply Our Values in all our actions to address modern slavery. The following documents provide minimum standards and guidance for our people, including on human rights and modern slavery:

- **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). *Our Code* was revised and updated in FY2025.

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

- 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, which are 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. No substantive changes were made in FY2025.

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

- BHP's **Responsible Minerals Policy** outlines our commitment and approach to the responsible sourcing of minerals and metals and our expectations of suppliers of minerals and metals to implement due diligence over their own supply chains 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). The Policy was updated in FY2025 to include prioritised environmental risks within the scope of due diligence as guided by the OECD Environment Handbook.

 Our **Responsible Minerals Policy** is available at [bhp.com/sustainability/value-chain-sustainability](https://bhp.com/sustainability/value-chain-sustainability)

- The **Supply Global Standard** 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 **Contractor Management Global Standard** requires each of our assets to verify that contractors and sub-contractors working at our sites comply with the *Minimum requirements for suppliers*.
- The **Business Conduct Global Standard** 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** outlines the procedure BHP will follow before operating or establishing a legal or physical presence in a higher-risk country. This Procedure categorises countries based on subject matter expert insights and Verisk Maplecroft 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 new activities in countries considered higher risk.

## Responsible production and sourcing standards

Aligned with the *Responsible supply chains* pillar of our social value framework, we have an aspirational 2030 goal to create sustainable, ethical and transparent supply chains together with our partners. As part of this goal, we voluntarily commit to being independently assessed against a set of responsible production and sourcing standards. During FY2025, we reviewed our sustainability standards strategy and determined that the following standards currently remain the focus for BHP:

- ICMM's Mining Principles and Performance Expectations
- Copper Mark's Criteria Guide
- Towards Sustainable Mining's Protocols and Frameworks as defined by the Minerals Council of Australia and Mining Association of Canada
- Global Industry Standard for Tailings Management
- LME's Policy for Responsible Sourcing for Listed Brands

Each of these standards include performance expectations or requirements related to respecting human rights and/or managing modern slavery risks. In FY2025, we continued work to implement and be assured against these standards for applicable producing BHP operated assets.



For further information on our sustainability standards implementation, refer to the **BHP Annual Report 2025 Operating and Financial Review 9 (Sustainability; Value Chain Sustainability)** and the Value Chain Sustainability page at [bhp.com/sustainability/value-chain-sustainability](https://bhp.com/sustainability/value-chain-sustainability)

## 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.

In FY2025, several initiatives were progressed to strengthen our human rights approach for our operated assets:

- Personnel responsible for human rights policy, assurance and advocacy were merged with the newly formed Ethics, Compliance and Human Rights team. This consolidation intends to strengthen second line human rights governance and assurance.
- We established a cross-functional Human Rights Working Group, including subject matter experts covering our prioritised human rights themes. The Working Group collaborates to share insights and consider action on a range of human rights-related priorities. In FY2025, the Working Group assessed our human rights approach against the ICMM Human Rights Due Diligence Guidance Maturity Matrix with assistance from an external human rights specialist.
- Several human rights-focused training sessions were made available for targeted personnel, particularly those supporting BHP's growth activities, to strengthen internal human rights capability.
- We progressed the design of a revised methodology for community and human rights impact and opportunity assessments to incorporate external expert feedback. Once completed, the redesigned assessments are expected to be implemented across each of our operating assets from FY2026.

As reported in our previous Statement, our community and human rights impact and opportunity assessment for metals exploration in South America identified the risk of modern slavery in local procurement and the use of contracted services as a medium priority human rights risk. In FY2025, we had in place controls to mitigate this risk, including:

- conducting due diligence and onboarding for all new suppliers
- communicating how to access BHP's reporting channels to raise misconduct concerns to local communities, workers and contractors, including during onboarding and via signage installed in areas where we conduct metals exploration activities
- providing training on human rights (including supply chain human rights issues) to the teams responsible for metals explorations in South America

## Growth activities

Our portfolio growth activities include transactions, exploration and new country entry activities.

Before establishing operations or a legal or physical presence in a higher risk country, we assess material country-level human rights risks in accordance with our Entering a High-Risk Country Global Procedure (refer above for a description of this Procedure).

We have a dedicated team responsible for due diligence on our portfolio growth activities. In FY2025, we reviewed our procedures and human rights due diligence tools (with the support of an external human rights specialist) to support these growth-related activities. We also continued to refine and develop our internal guidance on the steps that we take when investing in operated and non-operated interests (including exploration commercial agreements, joint venture agreements and acquisitions) and entering or expanding activities in new countries. Our internal guidance covers a range of compliance risks, including operational and supply chain human rights issues, in addition to bribery, corruption and sanctions. 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.

When investing in exploration projects that will be operated by a third party for any period, 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.

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

### Our non-operated joint ventures

Non-operated joint ventures are independently managed and operated, and have their own governance frameworks, in accordance with each joint venture agreement. Our teams overseeing our investments in non-operated joint ventures use the relevant governance frameworks to, when appropriate, share our expectations and engage with the operator companies for the joint ventures in our portfolio (Antamina, Resolution, Samarco and Vicuña) in relation to human rights and modern slavery risks. These engagements are typically made through board and/or shareholder governance bodies, including board committees (such as sustainability committees and risk, audit and compliance committees of the operating company) in which our representatives participate along with our joint venture partners. 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 to influence operator companies to adopt industry best practices and align with international standards. We may also provide subject matter specific input and support in relation to risk management, environmental and social impacts, and community engagement, when appropriate.

In relation to the independently operated Vicuña joint venture, owned 50/50 with Lundin Mining and which was formed in January 2025, subject matter experts within BHP engaged with the operating company on the development of the Vicuña human rights policy. In accordance with its human rights policy the operating company has committed to undertake risk-based supply chain due diligence focused on modern slavery and other key human rights risks.

### The BHP Foundation


The BHP Foundation continued to apply BHP's 3PR tool in FY2025, which included automated modern slavery risk assessment for suppliers at the point of onboarding. A small number of BHP Foundation suppliers received one-off payments for services in FY2025. Those suppliers were not onboarded via 3PR, however they provided low-risk services, including professional speaking engagements.

During FY2025, the BHP Foundation took steps to revise and improve its approach to due diligence for new investments, which included consideration of prospective grantees' exposure to human rights risks, including modern slavery, and maturity of controls in place to manage such risks. New grantees were required to declare any known human rights violations (including modern slavery issues) as part of their onboarding and grant agreements required grantees to undertake ongoing identification, management and any remediation required in relation to human rights risks, including modern slavery. In Q2 FY2025, BHP's ESCT team delivered tailored modern slavery training to the teams responsible for conducting supplier due diligence on the BHP Foundation's grant partners.

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

## Our actions to address modern slavery risks continued

in connection with projects funded by the Foundation, or when using Foundation grant funds. In FY2025, all service agreements paid for by the Foundation incorporated these minimum requirements. The minimum requirements also require grantees to provide a grievance mechanism for workers engaged (whether by the grantee, a sub-grantee or a contractor) on the project to raise complaints about that project. During the reporting period, the BHP Foundation continued to maintain a grievance mechanism for members of the public to report concerns in relation to its projects.

 Refer to the BHP Foundation website for more information: [BHP Foundation Finance and Governance](#) | [BHP Foundation](#)

### BHP Xplor

During the reporting period, we conducted due diligence for all companies shortlisted to enter the 2025 BHP Xplor program prior to selection. This due diligence considered human rights risks (including modern slavery risks) relevant to the company, country and project.

### BHP Ventures

BHP Ventures conducts tailored compliance and legal due diligence on proposed investments, which may consider supply chain and ethical sourcing practices as applicable.

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

In FY2025, we continued to take a risk-based approach to managing modern slavery risks in our supply chains. We prioritise our efforts to the areas of highest risk, which is informed by various risk datapoints.



### Ethical Supply Chain and Transparency Framework

BHP's Ethics, Compliance and Human Rights 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. Figure 4 details the key controls and activities defined in the Framework and key developments in FY2025. Refer to the page numbers listed for more information on how these controls and activities were implemented in FY2025.

#### Figure 4: Key ESCT controls and activities

##### Supplier due diligence via 3PR (refer to page 17 for more information)

- Active suppliers to former OZ Minerals Australia assets were transitioned to BHP's Global Contract Management System (GCMS) in October 2024 and assessed in 3PR
- Our 3PR risk methodology was updated to reflect modern slavery risks associated with suppliers' country of service

##### Standard modern slavery clauses in non-traded goods and services contracts

ESCT review and approval of non-traded goods and services contracts where supplier is high risk for modern slavery or where BHP's standard modern slavery clause is modified

##### Review of new purchases involving high-risk procurement categories with existing BHP suppliers

Audits of higher-risk suppliers conducted by our third-party audit provider using the Sedex Members Ethical Trade Audit (SMETA) four pillar audit methodology.<sup>49</sup> The ESCT team also reviews alternative audit or assessment material provided by suppliers

- Arranged audits or reviewed supplier-provided audit and assessment materials relating to 32<sup>50</sup> supplier sites in FY2025<sup>51</sup> (see pages 17–18 for more information)
- Compliance team members accompanied our third-party audit provider at two audits in FY2025

BHP's reporting channels to raise misconduct concerns are communicated and accessible to suppliers. The ESCT team investigates reports concerning modern slavery in our supply chains (see pages 19–20 for more information)

Concerns raised through BHP's community complaints mechanisms are reviewed monthly to identify potential modern slavery-related issues (see page 20 for more information)

##### Targeted deep-dive analyses of higher-risk procurement categories

- Completed a deep-dive review of our largest supplier of uniforms to Minerals Australia in FY2025 (see page 12 for more information)

Ad hoc subject matter expertise and support for the business on modern slavery issues, including engagement, training and communications (see page 19 for more information)

Partnering with BHP's Procurement and Marketing teams to work toward our aspirational 2030 goal and achieve associated milestones under the **Responsible supply chains** pillar of BHP's social value scorecard

- Continued engagement with suppliers through our audit program to monitor their implementation of corrective actions (see page 17 for more information)
- Through our audit program, we provided suppliers with access to educational resources on modern slavery developed by our NGO partner the Mekong Club (see page 19 for more information)
- Targeted opportunities for supplier participation in a pilot of the Issara Institute's labour monitoring and ethical recruitment programs

Reporting to the Board's Sustainability Committee on the Ethical Supply Chain and Transparency Framework and associated issues

49. The Sedex SMETA 4 Pillar audit methodology incorporates the standards set out in the Ethical Trading Initiative (ETI) Base Code.

50. This included arranging or reviewing SMETA audits relating to 17 supplier sites and reviewing assessment materials for 11 suppliers relating to 15 supplier sites (some assessments were undertaken at a group level and covered multiple supplier sites).

51. This included two suppliers to BHP Canada Inc.

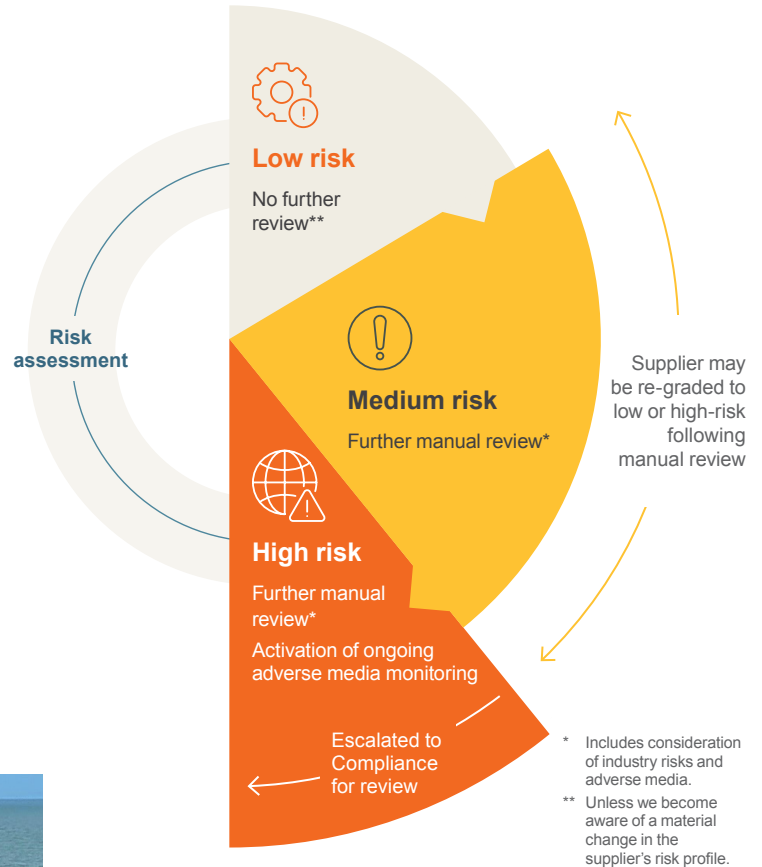
## Overview of our supplier due diligence approach

All new suppliers undergo automated modern slavery risk assessments in 3PR at onboarding. Suppliers receive an initial risk rating of high, low or medium based on:

- Verisk Maplecroft scoring for country of incorporation and/or country of manufacture or services
- Business-user and supplier-provided information

Our previous Statement indicated that in FY2024 we identified that 213 medium- and high-risk suppliers on purchase orders had not been onboarded into GCMS or screened for modern slavery risk. As at the date of this Statement, we have completed modern slavery due diligence and onboarding for these suppliers, which resulted in a change to the modern slavery risk rating for some of these suppliers, or placed a temporary block on suppliers in GCMS where we did not receive the information required to complete due diligence and onboarding.

In FY2025, there were delays in finalising supplier onboarding and modern slavery due diligence for some suppliers. This was due to suppliers providing incomplete profile information and some instances of internal delay and identified shortfalls in initial due diligence screening of some suppliers requiring further review. Work is underway to resolve these issues. Our Compliance team also implemented actions to enhance our oversight of our supplier due diligence program in FY2025.



### Supplier audit program

The ESCT team works with Procurement to select suppliers for audits,<sup>52</sup> and engages with our suppliers to ensure audit findings are addressed and to monitor corrective action plans as required. Figure 5 shows the countries where BHP arranged or accepted supplier-provided audit materials for 17<sup>53</sup> supplier sites in FY2025 and the type of audit findings that were identified in those countries (according to the audit topics defined in the SMETA 4 pillar audit methodology).<sup>54</sup>

In FY2025, one audit arranged by BHP and conducted by our third-party audit provider as part of our supplier audit program used the Workplace Conditions Assessment audit methodology instead of the SMETA methodology and is therefore not captured in Figure 5.<sup>55</sup> This audit related to a supplier of non-production consumables in Chile and returned zero findings. A member of the Compliance team accompanied our third-party audit provider at this audit.

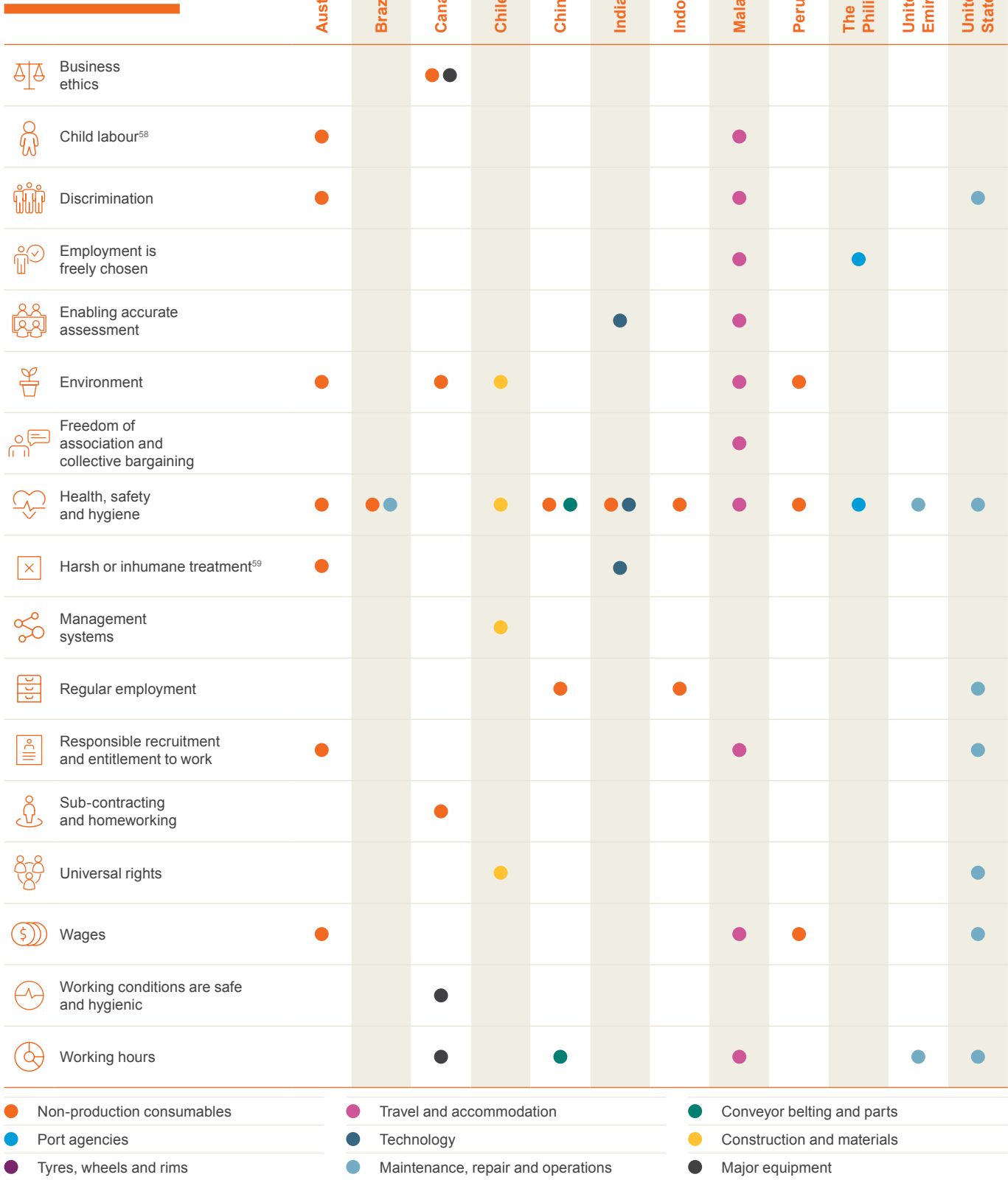
In FY2025, we also accepted and reviewed supplier-provided audit and assessment materials for 11 suppliers (covering 15 supplier sites) which used alternative audit methodologies.<sup>56</sup> The ESCT team reviews alternative methodologies used for supplier-provided audit or assessment materials to ensure those methodologies cover substantially equivalent topics.<sup>57</sup> The ESCT team also reviews any findings and engages with the supplier to confirm corrective actions are closed out. Due to the different audit topics defined in the alternative audit methodologies, Figure 5 does not include findings identified in supplier-provided audit or assessment materials that did not use the SMETA methodology.

In Q3 FY2025, a SMETA audit arranged by BHP identified instances of invalid work permits, passport retention and recruitment fees amongst the workforce of one of our approved hotel's outsourced cleaning contractors in Malaysia. While these findings are not modern slavery practices in themselves, they include potential indicators of forced labour defined by the ILO and trends in our audit data indicate migrant workers in our extended supply chains are potentially vulnerable to these practices. The hotel operator has confirmed that it is not currently engaging outsourced cleaning contractors due to a temporary change in operational needs. However, BHP is engaging with the operator and our corporate travel management provider to communicate our expectations regarding corrective actions and ongoing monitoring.

52. Suppliers are selected based on considerations including the supplier's 3PR rating, geographic location and relationship factors.
53. Figure 5 summarises findings from 17 SMETA audits that were arranged by BHP and took place in FY2025 (and one audit that was arranged by BHP in FY2024 for which the report was received in FY2025) or reviewed and accepted by BHP during FY2025 (relating to audits that occurred within the last two years). The number of sites audited in each country during FY2025 is shown in brackets next to the country in Figure 5.
54. The findings summarised in Figure 5 relate to the sample of material reviewed or personnel interviewed by the relevant auditor.
55. The Workplace Conditions Assessment methodology covers similar topics to the SMETA four pillar audit methodology – these topics are labour, wages and hours, health and safety, management systems and environment.
56. Supplier-provided audit and assessment materials related to 15 supplier sites in Australia, Brazil, Chile, China, Italy, Malaysia, Mexico, Spain and the United States.
57. In FY2025, alternative methodologies for the supplier-provided audit and assessment materials we accepted included the EcoVadis Sustainability Scorecard assessment, the Responsible Business Alliance's Validated Assessment Program, Asia Quality Focus and Amfori Business Social Compliance Initiative.

## Our actions to address modern slavery risks continued

**Figure 5**  
Summary of SMETA audit findings in our FY2025 supplier audit program



58. No findings related to the use of child labour in our supply chain. Findings related to the absence of a written policy outlining how child labour would be remediated if identified.

59. No findings related to instances of harsh or inhumane treatment in our supply chain. Findings related to non-compliance with requirements to report on disciplinary cases under local law, lack of confidentiality in processes for reporting grievances, and instances of issues raised via grievance process not being investigated and outcomes not being communicated to workers.

## Maritime

BHP chartered vessels completed 1,595 voyages in FY2025. The safety and welfare of seafarers on board these vessels remain important considerations in determining which vessels are chartered by BHP.

The operators we work with are selected based on factors including their maritime operational and safety records. We continued to engage RightShip, an external vetting service provider, in FY2025 to vet and inspect vessels with respect to seafarers' rights and welfare protections. RightShip assesses vessels based on its global vessel vetting criteria and BHP's bespoke vessel vetting criteria to manage specific risk factors in relation to the terminal, commercial contracts and nature of the cargo loaded on those vessels.

Through our vetting process, we seek to ensure all vessels we charter comply with the ILO'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 continue to work closely with organisations such as Mission to Seafarers to better understand seafarers' challenges and support their efforts as a Founding Gold Sponsor at the annual Seafarer Awards ceremony. We know that shore leave is critical for seafarer welfare. In Port Hedland we will continue to support shore leave alongside Pilbara Ports and other port users, by contributing to the upgrade of the Port Hedland Seafarers Centre, with construction expected to start in late CY2025.

## Responsible Minerals Program

In line with our Responsible Minerals Policy, we continue to undertake due diligence for sourcing of minerals and metals from third parties through our Responsible Minerals Program. The program is aligned to the OECD Guidance,<sup>60</sup> 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).

In FY2025, all our suppliers of minerals and metals have undergone due diligence conducted through our Responsible Minerals Program. Our FY2025 due diligence related to purchases of:

- minerals or metals for supply into certain of our operated assets, all of which was sourced from Australian mines.
- copper and nickel for third-party trading purposes purchased from mines in South America, Southeast Asia, Europe and Australia.

We assessed 16.7 per cent of these purchases as medium risk and 8.3 per cent as high risk. The remaining purchases were categorised as low risk.



For more information on our minerals and metals supply chain due diligence refer to **BHP's Responsible Minerals Program Report 2025** available at [bhp.com/RMPR2025](https://bhp.com/RMPR2025)

## Building capacity and raising awareness

The ESCT team's core accountabilities and key activities build capacity and raise awareness of modern slavery risks with Marketing and Procurement teams who engage directly with our suppliers. This occurs on both a routine, process-driven basis (e.g. formal approval routes) and on an ad hoc basis (e.g. business-initiated requests for support and formal and informal knowledge sharing events and engagements).

In addition, we pursued the following education and capacity-building initiatives in FY2025:

- Engaging an external consultant to map our modern slavery learning requirements, develop standard modern slavery training materials for internal audiences, refresh our internal webpage and develop alternative learning modalities (including phishing-style email nudges).
- Presenting a modern slavery deep-dive session for personnel across the business who support BHP's growth activities (which included personnel from the Compliance, International Relations and Portfolio Growth and Global Policy and Assurance – Human Rights, Community and Indigenous Peoples teams).
- Hosting in-person ethical supply chain events at our Melbourne, Perth and Singapore offices to raise awareness on modern slavery risks in global supply chains.
- Presenting targeted modern slavery risk awareness and red flags training sessions to members of the Minerals Australia Compliance team who conduct third-party screening and due diligence and members of the Ethics, Compliance and Human Rights team responsible for triaging reports received through BHP's reporting channels to raise misconduct concerns.
- Connecting suppliers with the Mekong Club, a not-for-profit organisation focused on addressing modern slavery and human trafficking risks in the private sector, of which BHP is a member, and facilitating our suppliers' access to the Mekong Club's resources, tools and support (at no cost to the suppliers). We also promoted access to the Mekong Club's resources internally for all BHP personnel.
- Partnering with the Mekong Club to develop a webinar on modern slavery in global supply chains which will be made available to BHP personnel supporting our Minerals Americas procurement activities and suppliers to our Jansen Potash Project.
- Sharing BHP's FY2024 Modern Slavery Statement with suppliers participating in BHP's Local Buying Programs to ensure they are aware of BHP's commitments and actions to address modern slavery.

The above activities were in addition to BHP's established learning program, under which over 500 employees and contractors (and business and community partners) completed our voluntary online human rights training in FY2025.<sup>61</sup> Our online *Our Code* training (refreshed in FY2025) continued to be mandatory for all employees and contractors.

## Remediation

In our Human Rights Policy Statement, BHP commits to seek to provide 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 comprise an online portal and 24-hour multilingual call service. Our reporting channels are 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 and annually communicated to our suppliers of non-traded goods and services.



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

60. OECD's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Third Edition.

61. This module included content relating to forced and child labour and was available to employees of BHP Canada Inc. in FY2025.

## Our actions to address modern slavery risks continued

Our Human Rights Policy Statement requires local level community grievance mechanisms for our capital projects, operated sites and exploration regions.<sup>62</sup> Through these mechanisms, we acknowledge, address, track, and report instances of community concerns, complaints, and grievances. In FY2025 we completed a second line assurance review of the grievance mechanisms at our operated assets, which highlighted opportunities to enhance accessibility and improve our internal data and reporting evaluation practices. These opportunities are expected to be pursued throughout FY2026.

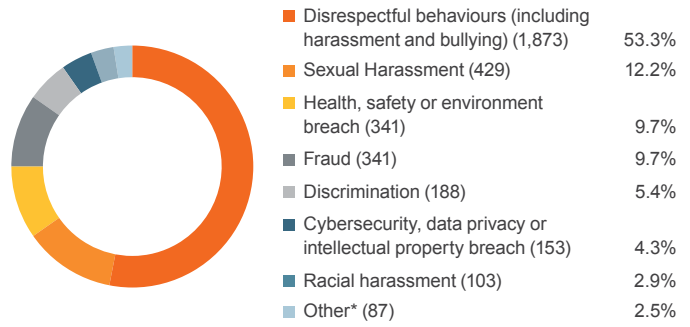
Our *Business Conduct Global Standard* provides that reports concerning potential human rights violations (including modern slavery in our supply chains) are referred to Compliance for investigation. In FY2025 we adopted refreshed internal guidance for investigating reports referred to Compliance (including incidents or credible allegations of modern slavery in our supply chains).

As reported in our previous statement, at the end of FY2024 we received two concerns classified as relating to modern slavery through our reporting channels. These concerns involved allegations of migrant worker mistreatment by service providers in Chile and Australia. We investigated these matters and did not find any evidence of actual modern slavery practices. These processes have highlighted opportunities for us to encourage better practices with our service providers. We are also developing a plan for targeted human rights and speak up training to improve risk awareness at the relevant BHP sites.

For the purposes of paragraphs 11(3)(d) and (e) of the Canadian Act, in FY2025 BHP Canada Inc. did not take, or have occasion to take, any measures to remediate any forced or child labour or the loss of income to the most vulnerable families.

The graphic below shows the type of business conduct concerns raised through our reporting channels in FY2025.

### Business conduct concerns raised in FY2025<sup>1,2</sup>



1. This excludes reports not containing a business conduct concern.
  2. FY2025 data includes all former OZ Minerals assets. Data for OZ Minerals Brazil assets that were divested in FY2025 is included up to the date of divestment.
- \* This includes issues such as Retaliation for speaking up; Consensual relationship with power imbalance; Failure to Report Code of Conduct Breach; Attempting to identify an anonymous reporter; Improper political or governmental conduct; Trade control breach; Inappropriate investigator conduct in business conduct investigation.



62. The local-level community concerns, complaints and grievance mechanism for the Jansen potash project is maintained by BHP Canada Inc.'s Corporate Affairs team and is accessible to community members via printed and online newsletters, posters and mail drops in local and Indigenous regional communities. It is also shared on community websites, in newspapers, at public engagements and is a standard agenda item during face-to-face meetings.

# Assessing effectiveness

In FY2025, the ESCT team began developing a key performance indicator (KPI) framework to better assess the effectiveness of the Ethical Supply Chain and Transparency Framework. It does this by developing KPIs based on their potential to:

- generate outcomes that would enable us to achieve our goal state, and/or
- drive continuous improvement by identifying challenges or threats to achieving or maintaining our goal state

The KPI Framework applies BHP Operating System (BOS) principles to cascade BHP's commitments and values through the ESCT team's strategic initiatives, day-to-day operational performance and improvement projects. BOS is BHP's overarching management system that enables culture, routines, behaviours and leadership to deliver operating excellence and continuous improvement.




In FY2025, the ESCT team mapped its existing work (including implementation of the forward-looking intentions described in the 'Looking backward and forward' section of our previous Statement) against aspirational goal states described in Figure 6 below.

Work to implement the KPI Framework will continue in FY2026.

In FY2025, we also took steps to evaluate and improve the effectiveness of our actions to assess and address human rights and modern slavery risks in our operations, including:

- reviewing and developing a revised community and human rights impact and opportunity assessment methodology to incorporate external expert feedback (see page 15 above) consistent with the FY2025 intentions in the 'Looking backward and forward' section of our previous Statement
- implementing improvements to our Group-level human rights material risk profile by embedding more mature human rights risks and developing improved controls, which is continuing into FY2026
- engaging with specialist external advisors and considering civil society benchmarking and guidance material

**Figure 6: Ethical Supply Chain and Transparency KPI Framework**

BHP aspiration		To operate in a manner consistent with the UNGPs in accordance with our Human Rights Policy Statement		
ESCT aspiration	Insights and systems	Promoting adherence	Workers and impact	
<b>FY2025 activities</b>				
 Strategic initiatives	Deep-dive analyses of our renewable energy and uniforms supply chains		Implementing and building on our NGO partnerships with the Issara Institute, Mekong Club and the International Seafarers' Welfare and Assistance Network (ISWAN) to build increased reach and capabilities in the ESCT program	
 Operational performance		<ul style="list-style-type: none"> <li>– Monitoring suppliers' implementation of corrective action plans following audits (where required)</li> <li>– Training delivered to members of the Ethics, Compliance and Human Rights team</li> <li>– Facilitating a modern slavery deep-dive session for internal teams supporting growth activities</li> <li>– Facilitating in-person events raising awareness of modern slavery in global supply chains at our corporate offices</li> </ul>	Investigating two reports relating to potential modern slavery concerns in our supply chains and working with the relevant internal teams to develop a plan for targeted human rights and speak up training to improve risk awareness at the relevant BHP sites	
 Improvement projects and actions	<ul style="list-style-type: none"> <li>– Establishing a second line monitoring program for key controls under the Ethical Supply Chain and Transparency Framework</li> <li>– Incorporating suppliers' country of service information into our 3PR modern slavery risk methodology</li> </ul>			

## 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. Under BHP's centralised management structure and shared resources, the consultation process included the reporting entities under the Canadian Act and Australian Act (including former OZ Minerals Australia entities which were integrated in FY2025), and their owned or controlled entities. OZ Minerals Brazil assets have not been integrated and therefore BHP also engaged with relevant former OZ Minerals Brazil personnel in relation to OZ Minerals Brazil's modern slavery risks and actions they have taken to address those risks.

The Statement was 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 and Supply Chain Excellence, Portfolio Strategy and Development, Sustainability and ESG Legal, Group Governance, Communications, Human Resources, Compliance and Risk 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

In FY2025, we benefited from engagement with industry peers and businesses exposed to similar modern slavery risks. 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. We also continued to collaborate and engage with expert non-government organisations in FY2025, including the Issara Institute, ISWAN and the Mekong Club. Our partnerships with these organisations enable us to draw on their local and subject-matter expertise when developing and implementing actions to identify and address modern slavery risks in our supply chains. We also continue to respond to due diligence enquiries and requests from our customers and investors.



## Appendix 1

### List of Australian and Canadian reporting entities

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

Name	Description
BHP Group Limited	BHP Group Limited is the ultimate parent entity of the BHP Group and substantially all its operations are carried on through its subsidiaries
BHP Billiton Finance Limited	Treasury entity for the BHP Group
BHP Capital No. 20 Pty Limited	Holding company
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
BHP Group Operations Pty Ltd	Provides infrastructure support and facilitates purchasing and supply services for the BHP Group
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	Owens and operates the BHP Group's Prominent Hill mining operations in South Australia
OZ Minerals Carrapateena Pty Ltd	Owens 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
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 Energy Coal asset
Hunter Valley Energy Coal Pty Ltd	Operates the BHP Group's New South Wales Energy Coal asset
BHP Nickel West Pty Ltd	Owens and operates the BHP Group's Nickel West asset in Western Australia (Nickel West is currently in temporary suspension)
BHP Olympic Dam Corporation Pty Ltd	Owens and operates the BHP Group's Olympic Dam asset in South Australia

## Appendix 1 continued

The following company qualifies as a reporting entity for the purposes of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act. This Statement was approved and attested by the Directors of BHP Canada Inc. in accordance with section 11(4)(a) of the Canadian Act.



**Karina Gistelink**  
Director, BHP Canada Inc.

19 August 2025  
I have the authority to bind BHP Canada Inc.

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BHP Canada Inc	<p>BHP Canada Inc. owns:</p> <ul style="list-style-type: none"> <li>– BHP Group's Jansen potash project</li> <li>– the closed Island Copper mine site, which is in long-term care and maintenance (located in Canada)</li> <li>– a Canadian company with branches engaged in copper exploration outside Canada</li> <li>– a non-operating minority interest in a Canadian mineral exploration company</li> <li>– an interest in a non-profit Canadian company engaged in carbon capture and storage knowledge sharing activities</li> </ul> <p>In FY2025, BHP Canada Inc.'s primary business activities related to the development of the Jansen potash project in Saskatchewan, Canada. The project is under construction and not currently 'producing goods' within the meaning of the Canadian Act. BHP Canada Inc. imports goods produced outside Canada into Canada as inputs into its primary activities (not for distribution or on sale), as well as freight services to enable the delivery of goods to the project.</p> <p>In FY2025, BHP Canada Inc. had 536 direct employees, and the Jansen potash project had a workforce of over 2,000 contractors (engaged through third-party contractors and not directly employed by BHP Canada Inc.).<sup>63</sup></p>
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63. Contractor data is collected from internal organisation systems and averaged for a 10-month period, July 2024 to April 2025.

## Appendix 2

### How we have addressed reporting criteria

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

UK Act recommended reporting criteria	Australian Act mandatory reporting criteria	Canadian Act mandatory reporting criteria	Addressed in this Statement
Organisation's structure, its business and its supply chains	Identify each reporting entity covered by the joint statement	Entity's structure, activities and supply chain	Appendix 1: List of Australian and Canadian reporting entities
	Describe the structure, operations and supply chains of each reporting entity covered by the joint statement		Our structure, business and supply chains
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	The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk	Modern slavery risks
			Our actions to address modern slavery risks
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	The entity's policies and due diligence processes in relation to forced labour and child labour	Modern slavery risks
		Any measures taken to remediate any forced labour or child labour	Our actions to address modern slavery risks
		Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains	
Training about slavery and human trafficking available to the organisation's staff		The training provided to employees on forced labour and child labour	
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	How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains	Assessing effectiveness
	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
	Any other relevant information	Steps taken during the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the organisation or of goods imported into Canada by the organisation.	Our actions to address modern slavery risks

## Appendix 3

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



#### Our Conclusion:

Ernst & Young ('EY', 'we') was 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 2025 for the year ended 30 June 2025. 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 2025 has not been prepared, in all material respects, in accordance with the Criteria (as defined below).

#### What our review covered

EY was engaged by BHP to provide Limited Assurance over BHP's Modern Slavery Statement for the year ended 30 June 2025 (the 'Statement') in accordance with the Criteria (as defined below).

#### Criteria

In preparing the Statement, BHP applied the following Criteria:

- The requirements in the United Kingdom's *Modern Slavery Act 2015*, the Australian *Modern Slavery Act 2018* and the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023* (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 all material respects, in accordance with that Criteria. 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 the evidence we have obtained.

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 23 January 2025. 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 were based on our professional judgement and 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 material 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 engagement (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 Assurance level 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  
19 August 2025

Mathew Nelson  
Partner

**BHP**