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# Report to Plenary on Voluntary Principles on Security and Human Rights

Annual Progress Report – 2020

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## A. Commitment

### 1. Statement of commitment or endorsement of the Voluntary Principles

BHP is committed to aligning with the Voluntary Principles on Security and Human Rights (VPs). This commitment is referenced in our annual Sustainability Report, which is publicly available and can be found at:

[Sustainability | BHP](#)

In the 2020 report, specific reference is made to our commitment to the VPs:

*“We are committed to respecting internationally recognised human rights as set out in the Universal Declaration on Human Rights and the Voluntary Principles on Security and Human Rights, and operating in a manner consistent with the UN Guiding Principles on Business and Human Rights and the UNGC Ten Principles.”*

*Human Rights (page 70)*

## B. Policies, Procedures, and Related Activities

### 2. Relevant policies, procedures, and/or guidelines (or any changes thereof from the previous reporting year) to implement the Voluntary Principles

BHP develops performance requirements which outline the minimum standards to be met by our operating divisions. These are promulgated via standards which are titled, “Our Requirements”.

Requirements related to the VPs are implemented through Our Requirements for Security, Crisis and Emergency Management and Business Continuity Plans. These requirements include:

- Engage approved security specialists to conduct security risk assessments (including threat, criticality and vulnerability analysis) to identify all security risks annually and prior to or after any activity that could change the level of threat.
- Designate the individual with single point accountability for implementing the VPs.
- Do a gap analysis annually against the VPs Implementation Guidance Tool and implement an improvement plan to close identified gaps.
- Provide notification in writing to security providers of BHP’s commitment to the VPs, including the requirement for private security providers or request for public security providers to operate consistently with the VPs.

The effectiveness of these requirements are tested regularly through various means including internal governance audits and feedback via the Global Security and Emergency Management Team.

### 3. Company procedure to conduct security and human rights risk assessments

BHP’s processes to identify and manage risk are reported in our annual Sustainability Report. Additionally, Our Requirements for Security and Emergency Management require annual security risk assessments to be conducted.

The requirements to manage identified human rights related security risks are listed in Section B2 and include:

- Do a gap analysis annually against the VPs Implementation Guidance Tool and implement an improvement plan to close identified gaps.

Guidelines to assist operating divisions in conducting security and human rights risk assessments are included in the referenced IGT.

#### **4. Company procedure or mechanism to report security-related incidents with human rights implications by public / private security forces relating to the Company's activities**

BHP's Human Rights Policy Statement details our approach to remediation and reporting. It includes:

"BHP's Speaking up with Confidence guidance note, embedded in Our Code, explains how to protect people who speak up. It applies to everyone. We encourage our employees, everyone who works with us, and all those affected by our business globally to promptly raise a concern about anything that they reasonably believe may be illegal, improper or involve misconduct. This includes a concerns about a safety or environmental issue, a financial matter (including tax affairs), a breach of Our Charter Values or Our Code, including a human rights violation, or a concern about retaliation for speaking up.

A confidential, 24-hour, multilingual business conduct hotline (EthicsPoint) and local-level, complaints and grievance mechanisms are required to be in place and we acknowledge, investigate as appropriate and document all concerns raised through these mechanisms".

Our Human Rights Policy Statement can be found here:

[191202\\_human-rights-policy-statement\\_2019.pdf \(bhp.com\)](#)

#### **5. Company procedure to consider the Voluntary Principles in entering into relations with private security providers**

Our Requirements for Security and Emergency Management include provisions to consider the VPs when entering in to relations with private security providers. These include:

- Notify in writing private security providers (engaged by BHP) of BHP's commitment to the VPs and require them to confirm in writing their commitment to the VPs.
- Notify in writing public security providers (supporting BHP activities) of BHP's commitment to the VPs and request them to confirm in writing their commitment to the VP.

There are currently no BHP operated sites which have engaged armed private security forces or public security forces.

#### **6. Company procedure or mechanism to address security related incidents with human rights implications by public/private security forces relating to the company's activities**

BHP's incident reporting systems include processes to track corrective / preventative action through to completion. In certain cases, investigations are conducted by a team independent of the operation where the incident occurred. Incidents of a criminal nature are referred to the appropriate local authorities for appropriate action.

All reports made in to EthicsPoint are triaged by the BHP Central Investigations Team who will determine a case category of each report. The Central Investigations Team will investigate the most serious allegations of misconduct.

## **7. Examples of promoting awareness of the Voluntary Principles throughout the organisation**

Every year we conduct security-related human rights training to our engaged private security providers.

Our Requirements for Security and Emergency Management drives awareness and implementation of the VPs throughout the organisation by requiring operations to be actively engaged in managing the VPs. Specifically, this includes:

- Assigning single point accountability for coordinating VPSHR implementation.
- Conducting an annual gap analysis using the Implementation Guidance Tool, including developing plans to close identified gaps.

## **8. Examples of promoting and advancing implementation of the Voluntary Principles internationally**

Examples of where BHP has promoted the VPs include:

- Delivering a Verification Report in 2020.
- Representing the Corporate Pillar Steering Committee in 2020.
- Participating in the International Council of Mining and Metals (ICMM) Security and Human Rights sub-committee.
- Monthly discussions between Asset and private security providers include VPs in Chile.

## **C. Country Implementation**

### **9. Overview of country operations selected for reporting (include any notable changes from the previous reporting year if the same country is being reported this year)**

Each of our operating divisions is required to submit an annual report detailing the measures taken to implement and manage the VPs framework. There are no notable changes to previous reporting.

### **10. Engagements with stakeholders on country implementation**

Please refer to B9.

### **11. Voluntary Principles considerations in the selection of private security providers and formulation of contractual agreement with private security providers, as well as arrangement with public security forces**

Please refer Section B5.

**12. Examples of supporting outreach, education, and/or training of (i) relevant personnel, (ii) private security, (iii) public security, and/or (iv) civil society (e.g. local NGOs, community groups)**

Please refer to Sections B5, B7 and B8.

**13. Company procedure to review progress on implementing the Voluntary Principles at local facilities**

The general performance assessment against Our Requirements for Security and Emergency Management is undertaken through formal, internal, governance audits. The outcomes of these audits are provided to Group HSE, Regional Presidents, the Executive Leadership Team, the Risk and Audit Committee and the Sustainability Committee of the Board.

**D. Lessons and Issues**

**14. Lessons or issues from this reporting year, as well as plans or opportunities to advance the Voluntary Principles for the organisation**

There were no reported security incidents with possible human rights implications at our sites during the reporting period. Our review of annual VPs reports, as well as the required gap analyses against the Implementation Guidance Tool to be conducted by each of our operating divisions will provide improved granularity and may identify opportunities to improve the ways in which we implement the VPs within BHP.