



BHP 2024 Voluntary Principles on Security and Human Rights Annual Report

23 April 2025



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Report to Plenary on Voluntary Principles on Security and Human Rights

Annual Progress Report 2024

1) Introduction

BHP is a leading global resources company that employs around 90,000 people worldwide. Our strategy is to responsibly manage the most resilient long-term portfolio of assets, in highly attractive commodities, and 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 aim to be a trusted partner who creates value for all stakeholders. Our purpose is to bring people and resources together to build a better world.

We produce copper, which is used in electrification. Iron ore, which is essential for making steel needed for construction, including renewables infrastructure. Our higher-quality steelmaking coal is used in the blast furnace process for making steel. We are on track to be a major global producer of potash by the end of the decade. Potash is used in fertilisers to assist with food security for a growing population and more sustainable land use. Among our by-products, we are a major producer of uranium and gold. Although a global company, with a presence in over 40 countries including marketing and administration offices, these are separate from the operations within the scope of this report, which are our operated assets in Canada, Chile and Australia.

This report describes BHP's commitment to, and implementation of, the Voluntary Principles on Security and Human Rights. Whilst there have been no material changes within this reporting period, BHP continues to invest in its Group Security function to support critical initiatives, including implementation of the Voluntary Principles. This function continues to support BHP in enhancing and evolving its approach to managing security-related human rights risks.

2) Commitment to the Voluntary Principles

We recognise we have the potential to cause, contribute to or be directly linked to human rights impacts through our operations and supply chain. Our Human Rights Policy Statement and relevant standards outline our commitment and approach to respecting human rights and the principles by which we conduct our human rights due diligence. This involves taking a risk-based approach for our own operations and for modern slavery related risks in our supply chain to identify and assess actual and potential impacts, considering how impacts may affect people, integrating and acting upon the findings, monitoring effectiveness, and communicating how actual and potential impacts are addressed. In conjunction with this, BHP is committed to aligning with the Voluntary Principles on Security and Human Rights and sets mandatory minimum performance requirements for our operated assets, to support implementation of these principles. We report annually on material human rights-related issues through the BHP Annual Report, and specifically on our commitment to the Voluntary Principles Initiative through the Annual Progress Report. BHP is also represented on working groups run by the Voluntary Principles Initiative.

3) Policies, Procedures and Related Activities

3.1 Policies and Procedures

In addition to our Code of Conduct, BHP requires all operated assets to comply with a set of minimum global standards. The Security and Business Resilience Global Standard (**Global Standard**) requires operated assets to implement the Voluntary Principles.

This Global Standard is mandatory and requires:

- The Voluntary Principles to be implemented by each operated asset.
- All contracted security providers to comply with the Voluntary Principles, as well as the International Code of Conduct for Private Security Providers.
- Where public security providers are providing security services or support to BHP, the relevant operated asset or business function must establish a Memorandum of Understanding or equivalent document, which includes a commitment by both parties to the VPSHR.

BHP's Group Security function has accountability for second line assurance of VPSHR alignment and is integrating this activity into its forward assurance planning.

In addition, our Escondida and Spence operations in Chile completed their self-assessments and obtained external assurance against The Copper Mark Criteria Guide (reference 24 February 2020) for FY2024. The Copper Mark is a voluntary assurance framework that independently assesses participants against 32 performance criteria across environmental, social and governance dimensions which includes VPSHR implementation as part of the scope. Our Escondida and Spence mines were both assessed to have fully met criteria twenty-seven, security and human rights, highlighting the effectiveness of those teams responsible for implementation in those locations.

3.2 Group Security, Crisis and Emergency Management (SCEM)

BHP operates in an increasingly volatile, uncertain world, where the physical security risks we face are evolving from local criminal activity and asset protection risks to more complex transnational threats, which transcend traditional asset and jurisdictional boundaries. Key emerging themes include international criminal enterprise, global terrorism, and war. We are also seeing the increasingly integrated nature of physical security with other risk areas, including the physical security threats that stem from cybersecurity risks or climate-related risks. These threats are developing against a backdrop of increasing anti-government sentiment, inequality, and political polarisation across the globe.

To respond to this shifting external landscape, in 2022 we established a new Group Security function, to provide additional expertise and support to the business and conduct assurance over security risk management globally. Priorities for this function include revising our security framework, refreshing BHP's mandatory minimum global security requirements and developing a consistent taxonomy for defining and categorising security threats. Over calendar year 2024 Group Security provided further support to relevant business lines, with particular focus on factoring VPSHR issues into new opportunities and further integrating into risk assessments for in-scope operating assets. For 2025, this work will continue, with scheduled internal audit and assurance activities related to VPSHR implementation across the operated assets.

3.3 Company procedure to conduct security and human rights risk assessments

Through the Global Standard, Group Security Crisis Management and Aviation (SCMA) requires operated assets, functions where security-related risks exist and those accountable for security, crisis and emergency management to assess security-related risks in the relevant operating environment. Operated assets are also required to produce, and provide when requested, appropriate security governance documentation that supports the

management of such risks. Finally, the Global Standard requires the business to ensure that security resources have the required capabilities to support and enable positive security outcomes.

Working in this manner enables our site teams to conduct an appropriate security risk assessment, with potential human rights impacts being considered through the process. Moreover, ensuring the appropriate capability is in place can support a mitigation strategy that is fully compliant with both the Global Standard and VPSHR requirements.

We also require our operated assets to conduct regular impact and opportunity assessments for the communities that host our activities, evaluating how and to what extent our activities potentially or actually affect those people. Depending on the asset and community context, security-related risks may be further assessed with an additional community and human rights lens through this process. The outcomes of these assessments are integrated into our risk management framework and business planning.

During FY2024, an internal Human Rights Working Group was established, with a key focus on preparedness for company growth. Bringing together SMEs on human rights helps enable concerns to be noted and addressed by the right teams. This is particularly beneficial considering the overlap of broader human rights risks and those which are security-related and will assist in risk assessment for growth-related opportunities.

3.4 Company mechanisms to report security-related incidents with human rights implications by public/private security forces relating to the company's activities

Our Code of Conduct (Our Code) is designed to help us make the right decisions every day and deliver on our purpose to bring people and resources together to build a better world. It applies to everyone who works for us, with us or on our behalf. To assist our employees and contractors understand how Our Code applies, regular training is undertaken. Breaching Our Code can result in serious consequences and depending on the severity of the breach this could include counselling, warnings and even termination of employment. We encourage people to speak up where a decision or action is not in line with Our Code or Our Values. BHP requires reports of business conduct concerns to be treated with appropriate confidentiality and has policies in place intended to prohibit any kind of retaliation against people who make or may make a report, or who cooperate with an investigation. These may also include reports made to regulators. We consider all forms of retaliation to be misconduct and grounds for disciplinary action, up to and including termination. We have a number of key policy and process documents to support a safe to speak up culture, including our BHP Whistleblower Policy.

BHP has mechanisms in place for anyone to raise a query about Our Code or make a report if they feel Our Code of Conduct has been breached. BHP's reporting channels to raise misconduct concerns comprise an online portal and 24-hour multilingual call service. These channels are confidential and accessible to all employees, contractors and external partners and stakeholders, including members of the public, to raise concerns about misconduct that may be unethical, illegal or inconsistent with Our Code of Conduct.

Reports received are assessed by the Ethics and Investigations team to determine an appropriate response, which may include an investigation or other resolution. In assessing the appropriate response, BHP applies a proportionate and person-centred approach to the report considering all participants. People impacted by reports of sexual harassment and racism are offered specialised support by the Ethics Support Service, which enables people impacted to have input into BHP's response. The impacted person's preferences as well as the type and severity of the alleged misconduct are considered in determining the appropriate response, which may include an investigation, training, facilitated conversations and line leader intervention. Quarterly reporting on the most serious reports is provided to senior leaders and the Risk and Audit Committee, which has representation of Board members, and includes reported case metrics, outcomes and insights. The reporting supports leadership awareness and informs priorities for ongoing improvement. Feedback is obtained regularly from stakeholders, including case participants, external experts and management, to continually improve our response to reports.

We also require our operated assets and capital projects to maintain local grievance mechanisms, where community members can submit and seek remedy for complaints or disputes. We aim to acknowledge, review, and document all issues raised through these mechanisms. Where issues are investigated and substantiated, we will provide for or cooperate in their remediation and will work with partners and stakeholders to communicate how they have been addressed.

In FY2024, there were 600 community concerns and complaints received across our operated assets globally. These concerns and complaints primarily related to operational issues such as dust, environmental impacts, road and rail impacts, lighting, and noise. No complaints related to security were submitted.

Throughout FY24, we continued to evaluate feedback from our stakeholders, external experts, and internal teams on how to make our local mechanisms more accessible and our internal culture and processes more effective. This has resulted in updates to our guidance procedures, new training and capability programs, and improvements to our data management systems, including the implementation of a new enterprise-wide stakeholder management system.

Additionally, since the formation of Group SCMA, there is now a structurally independent second line function for security. This provides an additional avenue (outside of operational business reporting lines) for individuals to raise a concern.

3.5 Company procedure to consider the Voluntary Principles in entering into relations with private security providers

The Global Standard for Security and Business Resilience requires the business to integrate the VPSHR into any engagement with private security providers. The minimum global requirement relating to managing security-related human rights risks states that where contractors (whether on or off-contract) are providing security services to BHP, they are required to comply with the VPSHR and comply with the International Code of Conduct for Private Security Providers.

All security providers used must be vetted and pass the BHP requirements for contract management. Although all security providers globally are required to undertake VPSHR training, there are no BHP operated sites with armed security in place.

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

As described in Section 3.3, employees, contractors, and external people can raise their concerns through several channels and these are investigated by our internal teams.

Where an issue has been reported through one of the aforementioned channels or observed through regular work or assurance activities, our Event Management, Reporting, and Investigation Global Standard provides instruction for documenting, assessing the severity, investigating, and seeking leadership approval for events that potentially or actually impacted people or the environment.

Where issues are investigated and substantiated, we will provide for or cooperate in their remediation and will work with partners and stakeholders to communicate how the issues have been addressed.

3.7 Examples of promoting awareness of the Voluntary Principles throughout the organisation

Every year assets engage with their security providers to confirm that VPSHR training is provided and completed. Although considered standard practice for operating assets, this continual engagement process helps leaders and security personnel at sites to retain knowledge of the Voluntary Principles and their importance during normal activity.

Group SCEM are the security lead for any new company growth opportunities that the company is considering. Consequently, human rights concerns are tabled at the earliest point in the process, reiterating their importance for

leaders throughout BHP and integrating consideration of security-related risks into assessment of growth opportunities.

3.8 Examples of promoting and advancing implementation of the Voluntary Principles internationally

In Chile, the local team has created and now implemented an online training module that forms part of staff training. The content covers Voluntary Principles on Security and Human Rights and its applicability to BHP, as well as more general, country-specific areas. BHP is also represented on the VPI Steering Committee, through which we can help contribute to setting strategy for the broader VPI and supporting development of appropriate changes in ways of working.

4) Country Implementation

4.1 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)

BHP Operations covered in this report are those operated assets within the portfolio. This covers three countries – Australia, Chile, and Canada. The operated asset portfolio remains the same as in previous reporting years, and the operations within each country contain multiple mine sites, namely copper, metallurgical coal and iron ore assets in Australia, copper assets in Chile, and we are developing our potash project in Canada. In July 2024, we made a decision to transition our nickel assets (located in Western Australia) into a period of temporary suspension. This reflected significant global oversupply of nickel, which we expect will continue until the end of the decade. Brazilian assets obtained via the OZ Minerals transaction remain out of scope due to an ongoing strategic review, and completion of the divestment of one such asset in December 2024.

In Tanzania, an MoU has been signed between the Tanzanian Police and the majority joint venture partner of a project in which we have invested as a minority, non-operating joint venture partner. BHP staff involved in this project have been actively supporting this activity by helping to influence the joint venture partner to implement the MoU correctly, and by providing training for the joint venture partner's security company and the police assisting with security on the project. Whilst the location is non-operated, it is an important step for both the asset team and local police in supporting the management of security issues in the appropriate manner.

4.2 Engagements with stakeholders on country implementation

All operated assets are required to comply with the Global Standard as it relates to VPSHR, as covered in [this section](#). All risk assessments that are produced will consider security-related human rights risks and integrate VPSHR concerns into the outputs. At a country level, Group SCEM requires documentation to be provided that confirms training of security providers has taken place and that the Voluntary Principles are implemented.

As conditions change within any particular country or region, Group SCEM also advises on any potential changes in risk profile and the consequences of such changes for our operated assets or functions. Where security conditions have changed, requiring new controls which could engage VPSHR issues, country/project leads are made aware of these issues and of the requirements of the control, so that the appropriate standard can be maintained during the project.

4.3 Voluntary Principles considerations in the selection of private security providers and formulation of contractual agreement with private security providers, as well as arrangements with public security forces

Please refer to section 3.4 and 3.5 and note that the BHP Contractor Management Global Standard requires a BHP Responsible Person to continually monitor compliance to the contract and performance, as well as a process to verify that Contractors and sub-Contractors are complying with BHP's Minimum Requirements for Suppliers, and applicable Asset level requirements, from pre-mobilisation to offboarding. This ensures mechanisms are in place for selection of providers and monitoring of performance.

Where public security providers are to be used, alongside conventional security-related risk assessments related to the country of operations and the history of the security forces, BHP will establish a Memorandum of Understanding or equivalent document which includes a commitment by both parties to the VPSHR. Within the MOU, grievance mechanisms and independence of investigations will also be clearly articulated.

4.4 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)

Security-related human rights training is conducted regularly within BHP for relevant members of the workforce. As employees are onboarded at operated asset sites, their training includes VPSHR and Use of Force modules. Local asset teams are also encouraged to develop their own outreach programs, particularly to government/law enforcement so they can better understand the trajectory of security conditions in the region where they operate. This approach supports our operated sites to implement suitable controls through private security when the security risk exposure changes, and provide the training to such contractors as required.

Additionally, BHP's Group Security representatives attended both the Annual Plenary in Washington in 2024, and the Steering Committee Strategic Retreat in New York, to enhance awareness of issues and developments which can be filtered back into the organisation. Alongside corporate colleagues from three other extractives companies, BHP also now represents the Corporate Pillar on the Steering Committee.

4.5 Company procedure to review progress on implementing the Voluntary Principles at local facilities

Further assessments of our implementation and understanding of human rights related security risks are captured through the formal risk assessment process that our operated sites undertake. Group SCEM conducts governance and assurance activities to ensure that local understanding of risks is achieved, and that the Voluntary Principles are implemented appropriately. This information is also referenced within the [Country Implementation](#) section.

5) Lessons and Issues

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

There have been no reported incidents with security-related human rights implications this year. The intent for 2025 is to build upon the current foundation for VPSHR implementation, using a current state assessment to identify opportunities for improvement and build those into forward plans. Establishment of Group SCMA as a second line function has helped to provide an enhanced ability to coordinate VPSHR requirements and oversight at a global level, to enhance country and asset level understanding, and further integration of security and human rights considerations into growth plans.