



BHP 2025 Voluntary Principles on Security and Human Rights Annual Report

23 April 2026



Ore leaving South Flank's Primary Crusher 2, one of two at South Flank that are the largest in BHP.

Contents

Report to Plenary on Voluntary Principles on Security and Human Rights 1

Annual Progress Report 2025 1

1) Introduction 1

2) Commitment to the Voluntary Principles 1

3) Policies, Procedures and Related Activities 2

4) Country Implementation 5

5) Lessons and Issues 7

Report to Plenary on Voluntary Principles on Security and Human Rights

Annual Progress Report 2025

1) Introduction

BHP is a leading global resources company with a total workforce of around 90,000 people worldwide, including contractors and employees. Our strategy is to responsibly manage the most resilient long-term portfolio of assets, in highly attractive commodities and to grow value through being excellent at operations, discovering and developing resources, acquiring the right assets and options, and capital allocation. Our purpose is to bring people and resources together to build a better world.

We produce copper, which is used in electrification and renewable power infrastructure and is essential for digitalisation. We produce iron ore, which is essential for making steel needed for construction, including renewables infrastructure and our higher-quality steelmaking coal is used in the blast furnace process for making steel. We are developing a world-class potash asset. Potash is used in fertilisers to assist with food security for a growing population and more sustainable land use. We also produce uranium and gold as by-products of our copper production.

These are building blocks for a better world. BHP is proud to play a part in supplying some of the commodities needed to meet demand as the population grows, continues to urbanise and seeks higher living standards.

Although a global company, with a presence in over 40 countries including marketing and administration offices, the scope of this report is focussed on our operated assets which are located 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 maintains 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 our responsibility to respect human rights, which includes avoiding infringing on the human rights of others, addressing our adverse impacts and contributing to the fuller enjoyment of human rights as part of our commitment to social value. The areas of highest potential impact on human rights primarily relate to workplace health and safety, labour rights, activities of security providers, land access and use, water and sanitation, community wellbeing, and Indigenous peoples' rights relating to culture, identity, traditions and customs. Our Human Rights Policy Statement and relevant Global Standards outline our commitment and approach to respecting human rights and the principles by which we conduct our human rights due diligence. We report annually on material human rights-related issues through the BHP Annual Report, Modern Slavery Statement, Responsible Minerals Program 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 and Human Rights Policy Statement, BHP requires all operated assets to comply with a set of minimum global standards. The Security and Business Resilience Global Standard (**Global Standard**) require each operated asset 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 who provide security service to BHP to comply with the Voluntary Principles and 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.

More broadly within BHP, during FY2025, several initiatives were progressed to further strengthen our human rights approach:

- Personnel responsible for human rights policy, assurance and advocacy were restructured within a newly merged Ethics, Compliance and Human Rights team under the leadership of a new Chief Ethics, Compliance and Human Rights Officer. This consolidation is intended to strengthen second line human rights governance and assurance.
- The team completed an internal assurance activity in late FY2025 focused on community grievance mechanisms at our operated assets. Findings focused on opportunities to enhance accessibility and improve our internal data and reporting evaluation practices.
- A cross-functional Human Rights Working Group was established, which includes Group Security to ensure integration of Voluntary Principles on Security and Human Rights into the broader Human Rights work in BHP. In FY2025, the working group completed an annual review of our Human Rights Policy Statement, in which no substantive changes were made and assessed our human rights approach against the ICMM Human Rights Due Diligence Guidance Maturity Matrix with assistance from an external human rights specialist.
- With the support of a human rights expert, we reviewed and updated our procedures and human rights due diligence tools for our growth context.
- 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 to incorporate expert feedback on our community and human rights impact and opportunity assessments. This follows the FY2023 pilot of the globally consistent methodology for these assessments and external expert review of the methodology in FY2024. Once completed, the redesigned assessments are expected to be implemented across each of our operated assets from FY2026

3.2 Group Security, Crisis Management and Aviation (SCMA)

It is widely acknowledged that we have entered a period of global geopolitical instability, and the international institutions designed to enable peace and stability are under strain. Security conditions have continued to deteriorate globally, with impacts felt more broadly across BHP's area of operations.

Given this, the role of Group Security becomes even more important, and includes a focus on key threats to our people and operations, and to our strategic direction. Group Security acts a Centre of Excellence for all security matters, including those related to the Voluntary Principles on Security and Human rights.

The Head of Security represents BHP on the Voluntary Principles Initiative and serves on the Board of Directors. This is reflective of the importance of the Voluntary Principles to BHP, and the view of Group Security that the Voluntary Principles are a key enabler to the protection and creation of social value across our operations.

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 exists and those accountable for security, crisis and emergency management to assess and monitor 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 meets both the Global Standard and VPSHR requirements.

We also require our operated assets to conduct regular human rights impact and opportunity assessments under our Communities and Indigenous Peoples Global Standard 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.

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) helps us deliver on our purpose and make better decisions every day. It applies to everyone who works for us, with us or on our behalf. In March 2025, we relaunched a simplified and streamlined version of Our Code designed to support clearer values-driven decision-making. To assist our employees and contractors to understand how Our Code applies, regular mandatory training is undertaken. Breaching Our Code can result in serious consequences, including counselling, warnings and 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 treats reports of business conduct concerns with appropriate confidentiality and prohibits any kind of retaliation against people who make or may make a report (including reports to regulators), or who cooperate with an investigation. All forms of retaliation are considered misconduct and grounds for disciplinary action, up to and including termination of employment. We have policy and process documents to support a 'safe to speak up' culture, including our BHP Whistleblower Policy.

Employees and contractors can raise their concerns through a number of channels (including anonymously) or through leaders. Anyone, including external partners, stakeholders and the public, can lodge a concern in the form of a report, either online in our channels to raise misconduct concerns or via the 24-hour, multilingual call service. Reports received are assessed by the Ethics and Investigations team, and where necessary the Legal or Compliance teams, to determine an appropriate response, which may include an investigation or other routes to resolution. In assessing this, BHP applies a proportionate and person-centred approach considering all participants. To continually improve our response to reports, feedback is regularly obtained from stakeholders,

including case participants, external experts and management. Senior leaders and the Risk and Audit Committee of the Board receive quarterly reports including case metrics, outcomes and insights.

In FY2025, 3,515 reports were received into BHP's channels for raising misconduct concerns.¹ Of the total reports:

- 37 per cent were raised by leaders on behalf of someone else.
- Of the cases raised directly, 40 per cent were made anonymously.²

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. Of the reports closed during FY2025, 33 per cent contained one or more established allegations.³

We internally track and report instances of community concerns, complaints and grievances received through our operational grievance mechanisms. In FY2025, there were 109 concerns and complaints, and one grievance received through our operated assets globally. The most frequent theme was conduct and behaviour, which refers to concerns over levels of communication or engagement, employment and procurement practices, and ethical behaviours. We also receive complaints related to operational impacts, such as road traffic, noise and dust. All operated assets seek to resolve and where appropriate, remedy adverse impacts to community members we have caused or contributed to through our operations.

We have seen a 35 per cent decrease of harassment and bullying reports received from 2,870 in FY2024 to 1,873 in FY2025.⁴ BHP continues with ongoing focus on awareness, training and early resolution, supported by the development of a centralised site for information and guidance, contributing to consistent and informed reporting

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 require 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. Similar to the Global Standard on Security and Business Resilience, there is a Global Standard on Contractor Management which outlines the standards required of contractors, and how they are managed within BHP to maintain compliance to BHP systems and standards. Additionally, although all security providers globally are required to undertake VPSHR training, there are no BHP operated sites with armed security in place as at the date of this report.

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 relevant internal teams, led by Ethics and Investigations.

¹ This excludes reports not containing a business conduct concern.

² This excludes reports logged by leaders on behalf of others.

³ This figures includes cases opened in FY2025 or earlier and closed in FY2025.

⁴ This excludes reports not containing a business conduct concern.

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 where we have caused or contributed to them, 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 our operated 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 SCMA are the security lead for any new company growth opportunities that the company is considering. Consequently, security-related human rights concerns are tabled at the earliest point in the investment process, reiterating their importance for leaders throughout BHP and integrating consideration of security risks into assessment of growth opportunities.

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

In Chile, BHP has participated in the In-Country Working Group, and BHP is also represented on the VPI Board of Directors, 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.

On 15 August 2025, the Group entered into a binding agreement for the divestment of the Carajás assets in Brazil to a wholly-owned subsidiary of CoreX Holding for total consideration of up to US\$465 million. This transaction was formally completed during the first half of 2026.

During FY2025, BHP and Lundin Mining completed the acquisition of Filo Corp., a Toronto Stock Exchange-listed company that owned 100 per cent of the Filo del Sol deposit. BHP and Lundin Mining have also formed the Canadian-incorporated joint venture company, Vicuña Corp. to hold the Josemaria and the Filo del Sol copper deposits. BHP Canada and Lundin Mining each hold a 50 per cent interest in the Vicuña joint venture. As a non-operated asset, it remains out of scope for VPSHR reporting, but it marks a significant step for BHP's growth prospects in Argentina.

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](#) of the report above. 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 SCMA 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 SCMA monitors and 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, potentially 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 sections 3.4 and 3.5 above and note that the BHP Contractor Management Global Standard requires a BHP Responsible Person to continually monitor compliance to the security contract and its performance, as well as a process to verify that Contractors and sub-Contractors are complying with BHP's Minimum Requirements for Suppliers, and any applicable asset level requirements, from pre-mobilisation to offboarding. This helps ensure mechanisms are in place for selection of suitable security providers and monitoring of their performance.

Where public security providers are providing security services or support to BHP, alongside conventional security-related risk assessments related to the country of operations and the history of the security forces, the relevant asset must 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 would 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 nature 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 VPI Annual Plenary in London in 2025, and the VPSHR Steering Committee/Board of Directors Strategic Retreat in Houston, 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 represents the Corporate Pillar on the VPI Board of Directors.

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 risk assessment processes 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 for BHP this year. The intent for 2026 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 provide oversight at a global level, to enhance country and asset level understanding of relevant risks, and further integrate of security and human rights considerations into growth plans.