

# **EITI International Secretariat's Final Assessment**

Company progress in meeting the Expectations for EITI supporting companies

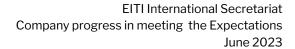
Company name	ВНР
Sector	Mining
Headquarters	Melbourne, Australia
Туре	Public
Date of submission to company (month/year)	June 2023
	Expectations for EITI supporting companies, companies are nal EITI multi-stakeholder groups (MSGs). For information
Does the company, directly or through a subsidiary (including joint- ventures) participate in a multi-stakeholder group?	No
If yes, indicate in which countries your company is participating in MSGs?	N/A
Secretariat comment	The Secretariat notes and thanks the many companies directly and indirectly participating in MSGs in EITI implementing countries.
EXPECTATION 1	Publicly declare and publish support for the EITI and the objective of the EITI Association to make the EITI Principles

**EITI International Secretariat** 

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	and the EITI Standard the internationally accepted standard for transparency in the oil, gas and mining sectors.
Does the company publish a statement of support for the EITI and the objective of the EITI Association?	Yes
URL for Statement Support	https://www.bhp.com/sustainability/ethics-business-conduct
Secretariat's assessment on Expectation 1	Expectation met
Secretariat comment	Statement of support published on website. See URL.
EXPECTATION 2	Make comprehensive disclosures in accordance with the EITI Standard in all EITI implementing countries where the company or its controlled subsidiaries operate. Where not disclosed in other company reporting, publicly disclose a list of controlled subsidiaries operating in the oil, gas or mining sectors in EITI implementing countries.
Does the company publish a list of controlled subsidiaries?	Yes
URL for controlled list of subsidiaries	https://www.bhp.com/investors/annual-reporting/annual-report-2022
EITI implementing countries where the company operates. The countries visible here are based on desk research of EITI Reports.	ECUADOR, PERU





Does the company make	Yes
disclosures with EITI Standard in or in relation to EITI implementing countries? Please see attachment on subsidiaries and complete the information, as requested.	les
Secretariat's assessment on Expectation 2	Expectation met
Secretariat comment	List of controlled subsidiaries published. See URL. p. 179. Company assessed as making disclosures in accordance with EITI Standard.
EXPECTATION 3	Publicly disclose taxes and payments to governments at a project level in line with the EITI Standard in all non-EITI implementing countries where the company operates unless disclosure is not feasible. Where not feasible, the country-specific legal or practical barriers to disclosure should be publicly explained.
Does the company publicly disclose taxes and payments to governments in non- EITI implementing countries where the company operates in the oil, gas and mining sectors?	Yes
URL to disclosures of taxes and payments to governments in non-EITI implementing countries	BHP Economic Contribution Report 2022: https://www.bhp.com/-/media/documents/investors/an nual-reports/2022/220906_bhpeconomiccontributionrep ort2022.pdf
Are the disclosures disaggregated by project?	Yes

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Secretariat's assessment on Expectation 3	Expectation met
Secretariat comment	BHP discloses taxes and payments to governments in non-EITI implementing countries. See URL 2022 Economic Contribution Report, pp.20-25.
	The company discloses taxes and payments to governments disaggregated by project. See URL pp.20-25.
	The Secretariat did not assess if the project-level disaggregation in non-EITI implementing countries was adequate or not.
EXPECTATION 4	Companies buying oil, gas and/or mineral resources from the state in EITI implementing countries, disclose volumes received and payments made in line with the EITI Standard and the EITI reporting guidelines for companies buying oil, gas and minerals from governments unless disclosure is not feasible.
Does the company buy oil, gas, and/or mineral resources from the state in EITI-implementing countries?	No
If yes, which countries?	N/A
Does the company make disclosures in line with the	Not applicable

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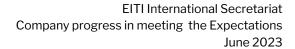
EITI Standard/reporting	
guidelines?	
URL for disclosure	N/A
Secretariat's assessment on Expectation 4	Expectation not applicable
Secretariat comment	BHP does not buy oil, gas and/or mineral resources from
	the state in EITI implementing countries.
EXPECTATION 5	In line with the EITI Standard, publicly disclose audited financial statements, or the main items (i.e., balance sheet, profit/loss statement, cash flows) where financial statement are not available.
Does the company disclose its audited financial statements?	Yes
URL audited financial statements	https://www.bhp.com/investors/annual-reporting
Secretariat's assessment on Expectation 5	Expectation met
Secretariat comment	BHP discloses audited financial statements. See URL p. 125.



EXPECTATION 6	Publicly declare and publish support for beneficial ownership transparency and publicly disclose beneficial owners in line with EITI Standard, recognising that listed companies will disclose the name of the stock exchange, include a link(s) to stock exchange filings where they are listed and otherwise do what is required by applicable regulations and listing requirements.
Does the company publish a statement of support for beneficial ownership transparency?	Yes
URL statement of support for beneficial ownership	https://www.bhp.com/sustainability/ethics-business-conduct
Does the company disclose beneficial owners, either directly or according to stock exchange regulations and listing requirements?	Yes
Where disclosures are made according to stock exchange regulations, please provide the name of the stock exchange	BHP Group Limited has a primary listing on the Australian Securities Exchange (ASX) (ticker BHP) in Australia, a standard listing on the London Stock Exchange (LSE) (ticker BHP), a secondary listing on the Johannesburg Stock Exchange (ticker BHG) and is listed on the New York Stock Exchange (NYSE) in the United States.
URL to stock exchange	Australian Securities Exchange (ASX):  https://www2.asx.com.au/markets/trade-our-cash-ma rket/historical-announcements; London Stock Exchange (LSE): https://www.londonstockexchange.com/news?tab=ne ws-explorer; Johannesburg Stock Exchange (JSE): https://clientportal.jse.co.za/communication/sens-an



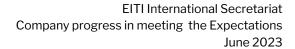
	,
	nouncements; New York Stock Exchange (NYSE): https://www.sec.gov/edgar/searchedgar/companysea rch
URL for recent beneficial ownership disclosures	https://www.bhp.com/sustainability/ethics-business-conduct
Secretariat's assessment on Expectation 6	Expectation met
Secretariat comment	BHP publishes a statement of support for beneficial ownership transparency. See URL, section "our approach to beneficial ownership transparency". The company discloses beneficial owners in line with applicable regulations and listing requirements.
EXPECTATION 7	All EITI supporting companies are expected to engage in rigorous due diligence processes and publish an anti-corruption policy setting out how the company manages corruption risk, including how the company collects and takes risk-based steps to use beneficial ownership data regarding joint venture partners, contractors, and suppliers in its processes.
Does the company publish an anti-corruption policy?	Yes
URL to the policy	Ethics and business conduct webpage:  https://www.bhp.com/sustainability/ethics-business-conduct BHP "Our Code" webpage: https://www.bhp.com/about/operating-ethically/our-code BHP "Our Code" PDF: https://www.bhp.com/-/media/project/bhp1ip/bhp-com-en/documents/about/operating-ethically/our-code/bhp our code english.pdf





Does the company's anti-corruption policy describe how the company manages corruption risk with regards to identification and use of beneficial ownership data?	Yes
Secretariat's assessment on Expectation 7	Expectation met
Secretariat comment	The company publishes an anti-corruption policy. See URLs.
	BHP's anti-corruption policy sets out how the company manages corruption risk, including through the use of beneficial ownership data.
	The International Secretariat notes that "BHP Our Code" addresses beneficial ownership information and corruption management risks in its "Manage corruption risks" chapter. Accordingly, actors working for, with or on behalf of BHP must always "Understand the identity, role and interests of the person or business who [they] are dealing with (including the beneficial ownership of companies)" (PDF p. 22). They should never "Deal with a party that refuses to disclose its true identity (including details of company beneficial ownership) (ibid). The "Value supplier relationships" chapter also references the collection and use of beneficial ownership data (See PDF p. 23).
EXPECTATION 8	Publicly declare and publish support for governments' efforts to publicly disclose contracts and licenses that govern the exploration and exploitation of oil, gas and minerals in line with the EITI Standard, and contribute to public disclosure of contracts and licenses in EITI implementing countries consistent with government procedures.

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Does the company publish a statement of support for contract transparency?	Yes
URL for statement of support for contract transparency	https://www.bhp.com/investors/annual-reporting  https://www.bhp.com/-/media/documents/media/rep orts-and-presentations/2022/220816 appendix4e.pd
	https://www.icmm.com/en-gb/news/2021/new-commitment-contract-transparency
Does the company contribute to public disclosure of contracts and licenses in EITI-implementing countries consistent with government procedures?	Yes
Secretariat's assessment on Expectation 8	Expectation met
Secretariat comment	BHP publishes statement of support for government's efforts to publicly disclose contracts and licenses. See URLs for 2022 Annual Report, p. 40, BHP Operating and Financial Review 7, Sustainability, p.37, ICMM Member Statement.  Company assessed to contribute to disclosure of licenses and contracts in EITI implementing countries.
EXPECTATION 9	Publish a commitment and/or policy on gender diversity in the oil, gas or mining sectors and support reporting by EITI implementing countries under the EITI Standard by disclosing employment in the sectors disaggregated by gender.

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Does the company publish a commitment/policy on gender diversity?	Yes
Does the company disclose employment data disaggregated by gender?	Yes
URL for relevant information	https://www.bhp.com/-/media/documents/investors/annual-reports/2022/220906 bhpannualreport2022.pdf
Secretariat's assessment on Expectation 9	Expectation met
Secretariat comment	BHP publishes commitment and/or policy on gender diversity. See URL for annual report p. 29. The company discloses employment data disaggregated by gender. See URL for annual report p. 226.