

## EITI International Secretariat's Final Assessment

### Company progress in meeting the Expectations for EITI supporting companies

<b>Company name</b>	BHP
<b>Sector</b>	Mining
<b>Headquarters</b>	Melbourne, Australia
<b>Type</b>	Public
<b>Date of submission to company (month/year)</b>	June 2023
Pursuant to the Guidance on the Expectations for EITI supporting companies, companies are encouraged to participate in national EITI multi-stakeholder groups (MSGs). For information purposes.	
<b>Does the company, directly or through a subsidiary (including joint-ventures) participate in a multi-stakeholder group?</b>	No
<b>If yes, indicate in which countries your company is participating in MSGs?</b>	N/A
<b>Secretariat comment</b>	The Secretariat notes and thanks the many companies directly and indirectly participating in MSGs in EITI implementing countries.
<b>EXPECTATION 1</b>	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.	
<b>Does the company publish a statement of support for the EITI and the objective of the EITI Association?</b>	Yes
<b>URL for Statement Support</b>	<a href="https://www.bhp.com/sustainability/ethics-business-conduct">https://www.bhp.com/sustainability/ethics-business-conduct</a>
<b>Secretariat's assessment on Expectation 1</b>	Expectation met
<b>Secretariat comment</b>	Statement of support published on website. See URL.
<b>EXPECTATION 2</b>	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.
<b>Does the company publish a list of controlled subsidiaries?</b>	Yes
<b>URL for controlled list of subsidiaries</b>	<a href="https://www.bhp.com/investors/annual-reporting/annual-report-2022">https://www.bhp.com/investors/annual-reporting/annual-report-2022</a>
<b>EITI implementing countries where the company operates. The countries visible here are based on desk research of EITI Reports.</b>	ECUADOR, PERU



<b>Does the company make disclosures with EITI Standard in or in relation to EITI implementing countries? Please see attachment on subsidiaries and complete the information, as requested.</b>	Yes
<b>Secretariat's assessment on Expectation 2</b>	Expectation met
<b>Secretariat comment</b>	List of controlled subsidiaries published. See URL. p. 179. Company assessed as making disclosures in accordance with EITI Standard.
<b>EXPECTATION 3</b>	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.
<b>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?</b>	Yes
<b>URL to disclosures of taxes and payments to governments in non-EITI implementing countries</b>	BHP Economic Contribution Report 2022: <a href="https://www.bhp.com/-/media/documents/investors/annual-reports/2022/220906_bhpeconomiccontributionreport2022.pdf">https://www.bhp.com/-/media/documents/investors/annual-reports/2022/220906_bhpeconomiccontributionreport2022.pdf</a>
<b>Are the disclosures disaggregated by project?</b>	Yes

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<b>Secretariat's assessment on Expectation 3</b>	Expectation met
<b>Secretariat comment</b>	<p>BHP discloses taxes and payments to governments in non-EITI implementing countries. See URL 2022 Economic Contribution Report, pp.20-25.</p> <p>The company discloses taxes and payments to governments disaggregated by project. See URL pp.20-25.</p> <p>The Secretariat did not assess if the project-level disaggregation in non-EITI implementing countries was adequate or not.</p>
<b>EXPECTATION 4</b>	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.
<b>Does the company buy oil, gas, and/or mineral resources from the state in EITI-implementing countries?</b>	No
<b>If yes, which countries?</b>	N/A
<b>Does the company make disclosures in line with the</b>	Not applicable



<b>EITI Standard/reporting guidelines?</b>	
<b>URL for disclosure</b>	N/A
<b>Secretariat's assessment on Expectation 4</b>	Expectation not applicable
<b>Secretariat comment</b>	BHP does not buy oil, gas and/or mineral resources from the state in EITI implementing countries.
<b>EXPECTATION 5</b>	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.
<b>Does the company disclose its audited financial statements?</b>	Yes
<b>URL audited financial statements</b>	<a href="https://www.bhp.com/investors/annual-reporting">https://www.bhp.com/investors/annual-reporting</a>
<b>Secretariat's assessment on Expectation 5</b>	Expectation met
<b>Secretariat comment</b>	BHP discloses audited financial statements. See URL p. 125.

<b>EXPECTATION 6</b>	
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.	
<b>Does the company publish a statement of support for beneficial ownership transparency?</b>	Yes
<b>URL statement of support for beneficial ownership</b>	<a href="https://www.bhp.com/sustainability/ethics-business-conduct">https://www.bhp.com/sustainability/ethics-business-conduct</a>
<b>Does the company disclose beneficial owners, either directly or according to stock exchange regulations and listing requirements?</b>	Yes
<b>Where disclosures are made according to stock exchange regulations, please provide the name of the stock exchange</b>	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.
<b>URL to stock exchange</b>	Australian Securities Exchange (ASX): <a href="https://www2.asx.com.au/markets/trade-our-cash-market/historical-announcements">https://www2.asx.com.au/markets/trade-our-cash-market/historical-announcements</a> ; London Stock Exchange (LSE): <a href="https://www.londonstockexchange.com/news?tab=news-explorer">https://www.londonstockexchange.com/news?tab=news-explorer</a> ; Johannesburg Stock Exchange (JSE): <a href="https://clientportal.jse.co.za/communication/sens-an">https://clientportal.jse.co.za/communication/sens-an</a>

	<a href="https://www.sec.gov/edgar/searchedgar/companysearch">nouncements</a> ; New York Stock Exchange (NYSE): <a href="https://www.sec.gov/edgar/searchedgar/companysearch">https://www.sec.gov/edgar/searchedgar/companysearch</a>
<b>URL for recent beneficial ownership disclosures</b>	<a href="https://www.bhp.com/sustainability/ethics-business-conduct">https://www.bhp.com/sustainability/ethics-business-conduct</a>
<b>Secretariat's assessment on Expectation 6</b>	Expectation met
<b>Secretariat comment</b>	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.
<b>EXPECTATION 7</b>	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.
<b>Does the company publish an anti-corruption policy?</b>	Yes
<b>URL to the policy</b>	Ethics and business conduct webpage: <a href="https://www.bhp.com/sustainability/ethics-business-conduct">https://www.bhp.com/sustainability/ethics-business-conduct</a> BHP "Our Code" webpage: <a href="https://www.bhp.com/about/operating-ethically/our-code">https://www.bhp.com/about/operating-ethically/our-code</a> BHP "Our Code" PDF: <a href="https://www.bhp.com/-/media/project/bhp1ip/bhp-com-en/documents/about/operating-ethically/our-code/bhp_our_code_english.pdf">https://www.bhp.com/-/media/project/bhp1ip/bhp-com-en/documents/about/operating-ethically/our-code/bhp_our_code_english.pdf</a>

<p><b>Does the company's anti-corruption policy describe how the company manages corruption risk with regards to identification and use of beneficial ownership data?</b></p>	<p>Yes</p>
<p><b>Secretariat's assessment on Expectation 7</b></p>	<p>Expectation met</p>
<p><b>Secretariat comment</b></p>	<p>The company publishes an anti-corruption policy. See URLs.</p> <p>BHP's anti-corruption policy sets out how the company manages corruption risk, including through the use of beneficial ownership data.</p> <p>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).</p>
<p><b>EXPECTATION 8</b></p> <p>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.</p>	





<p><b>Does the company publish a statement of support for contract transparency?</b></p>	<p>Yes</p>
<p><b>URL for statement of support for contract transparency</b></p>	<p><a href="https://www.bhp.com/investors/annual-reporting">https://www.bhp.com/investors/annual-reporting</a></p> <p><a href="https://www.bhp.com/-/media/documents/media/reports-and-presentations/2022/220816_appendix4e.pdf">https://www.bhp.com/-/media/documents/media/reports-and-presentations/2022/220816_appendix4e.pdf</a></p> <p><a href="https://www.icmm.com/en-gb/news/2021/new-commitment-contract-transparency">https://www.icmm.com/en-gb/news/2021/new-commitment-contract-transparency</a></p>
<p><b>Does the company contribute to public disclosure of contracts and licenses in EITI-implementing countries consistent with government procedures?</b></p>	<p>Yes</p>
<p><b>Secretariat's assessment on Expectation 8</b></p>	<p>Expectation met</p>
<p><b>Secretariat comment</b></p>	<p>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.</p> <p>Company assessed to contribute to disclosure of licenses and contracts in EITI implementing countries.</p>
<p><b>EXPECTATION 9</b></p> <p>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.</p>	



<b>Does the company publish a commitment/policy on gender diversity?</b>	Yes
<b>Does the company disclose employment data disaggregated by gender?</b>	Yes
<b>URL for relevant information</b>	<a href="https://www.bhp.com/-/media/documents/investors/annual-reports/2022/220906_bhpannualreport2022.pdf">https://www.bhp.com/-/media/documents/investors/annual-reports/2022/220906_bhpannualreport2022.pdf</a>
<b>Secretariat's assessment on Expectation 9</b>	Expectation met
<b>Secretariat comment</b>	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.