



## Responsible Minerals Program Report 2025

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Bringing people and  
resources together to  
build a better world





## Contents

|          |                                                              |          |
|----------|--------------------------------------------------------------|----------|
| <b>1</b> | <b>Introduction</b>                                          | <b>3</b> |
|          | Responsible Minerals and Metals in our Supply Chain          | 3        |
|          | Responsible Standards and Certifications                     | 3        |
| <b>2</b> | <b>Due diligence in our minerals and metals supply chain</b> | <b>4</b> |
|          | Objectives                                                   | 4        |
|          | Governance and responsibilities                              | 4        |
| <b>3</b> | <b>Risk methodology process</b>                              | <b>5</b> |
| <b>4</b> | <b>Risk in our metals and minerals supply chain</b>          | <b>6</b> |
| <b>5</b> | <b>Achievements and challenges</b>                           | <b>7</b> |
|          | Internal engagement and development                          | 7        |
|          | External engagement and development                          | 7        |
|          | Key focus areas looking ahead                                | 7        |
| <b>6</b> | <b>Appendix 1</b>                                            | <b>8</b> |



BHP's Annual  
Reporting Suite 2025



Cover photo  
Goonyella, Queensland

## Our Purpose

To bring **people** and  
resources together to  
build a better world.

## Our strategy

We will responsibly manage the most resilient long-term portfolio of assets, in highly attractive commodities, and will 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 will be a trusted partner who creates value for all stakeholders.

# 1 Introduction

BHP plays an important role in the production of some of the essential resources needed to support today's global challenges such as decarbonisation and population growth and we strive to produce them through sustainable<sup>1</sup>, ethical and transparent supply chains. Our role in minerals and metals supply chains for the resources we produce is key to our purpose of building a better world.

Through our Responsible Minerals Policy we publicly commit to the responsible sourcing and production of minerals and metals in our supply chains, embedding sustainability-related considerations and due diligence in our way of working with minerals and metals markets.

In FY2023, we established a 5-step due diligence framework (**Responsible Minerals Program**) in alignment with the OECD's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (**OECD Guidance**). In FY2025 as part of our continuous improvement we identified prioritised environmental risks to enhance the due diligence undertaken within the Responsible Minerals Program guided by the OECD's Handbook on Environmental Due Diligence in Mineral Supply Chains that was published on 19 September 2023 (**OECD Environmental Handbook**).

This is our third annual report and covers all minerals and metals purchased by BHP in FY2025 and describes due diligence undertaken under the Responsible Minerals Program. This report aligns with Step 5 of the OECD Guidance which specifically refers to public reporting on minerals and metals supply chain due diligence.

## Our Values

Set the tone for our culture, a unique part of our competitive advantage. They are a declaration of what we stand for. They guide our decision-making, reinforce our culture and ensure our people deliver on our purpose.

### Do what's right

A sustainable future starts with safety and integrity, building trust with those around us.

### Seek better ways

Listening to learn and inspiring challenge is how we drive progress.

### Make a difference

The accountability to act, create value and have impact is on each of us, every day.

Our Values help our people move quickly and deliberately when we encounter challenges and opportunities.

## Responsible Minerals and Metals in our Supply Chain

The mining and trading of minerals and metals has the potential to contribute to sustainable development and prosperity, support livelihoods and foster local advancement. However, we acknowledge that, particularly from conflict-affected and high-risk areas (**CAHRA**), companies may be at risk of being associated with actual or potential adverse impacts, such as serious human rights abuses, conflict, and financial crimes.

Conflict-affected areas are identified by the presence of armed conflict, widespread violence, or other risk of harm to people. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. Our CAHRA determination is based on TDI Sustainability's published CAHRA list (**TDI CAHRA** | **TDI Sustainability**) which incorporates up to 11 indexes as a guide to support company risk assessments.

With respect to our minerals and metals production, in FY2025, our BHP-operated assets included iron ore, nickel, copper, steelmaking coal and thermal coal assets located in Australia, and copper assets located in Chile. Therefore our BHP-operated assets are not located within a CAHRA. We also source certain minerals and metals from external parties, which falls within the scope of the Responsible Minerals Program. In FY2025, our Sales and Marketing teams purchased minerals and metals from external parties for two purposes:

- Supply into certain operated assets<sup>2</sup>
- Third-party trading, where supply is traded directly into the market (and does not form part of our own equity production nor pass through any of our operated assets).

## Responsible Standards and Certifications

During FY2025, we reviewed our sustainability standards strategy and determined that the five standards that make up our strategy remain the right focus for BHP. These standards include The Copper Mark's Criteria Guide (**The Copper Mark**), the International Council for Mining and Metals Principles and Performance Expectations (**ICMM**), Towards Sustainable Mining's Protocols and Frameworks (**TSM**), the London Metals Exchange Policy for Responsible Sourcing for LME Brands (**LME Policy**), and the Global Industry Standard for Tailings Management (**GISTM**).

The adoption of these standards is primarily aimed at ensuring we continuously improve against international standards. By being externally assessed against these standards, we can more transparently demonstrate to our stakeholders our intent to be a responsible actor within the mining and metals industry and for the global value chains we serve. This also allows us to align with ESG-related requirements set out by national mining associations, industry associations, commodity exchanges and emerging regulations.

As at the end of FY2025, external third-party verification of self-assessments against ICMM had been completed at WA Iron Ore, Nickel West<sup>3</sup>, BHP Mitsubishi Alliance (**BMA**) and Olympic Dam in Australia (**Minerals Australia**<sup>4</sup>), as well as at Escondida and Spence in Chile. In FY2025, Copper Mark reaccreditation through external assurance has been completed at BHP's operated copper assets at Escondida and Spence, with reaccreditation planned at Olympic Dam in FY2026.

BHP's Minerals Australia operated assets are assessing against and seeking external validation over the TSM's applicable Protocols and Frameworks as a condition of our membership of the Minerals Council of Australia (**MCA**). The MCA has set a deadline of the end of December 2025 for public disclosure of the results of the TSM assessments for its members and BHP is working towards this milestone.

Aligned with the due diligence requirements set out under the LME Policy, in FY2024, we achieved Track A compliance against the Joint Due Diligence Standard (**JDDS**) for all BHP LME metal brands, covering Escondida, Spence, Olympic Dam and Nickel West. The JDDS was established by The Copper Mark in collaboration with relevant metals associations to promote the responsible minerals and metals supply chain for copper, nickel, and other metals, aligned with the OECD Guidance.

The JDDS process also included external limited assurance against our first Step 5 Report from FY2023<sup>5</sup>.

1. We describe our approach to sustainability and its governance in our Annual Report 2025 including Operational Financial Review 8 and Operational Financial Review 9.
2. 'Operated assets' refers to our assets (including those under exploration, projects in developments or execution phases, sites and operations that are closed or in the closure phase) that are wholly owned and operated by BHP or that are owned as a BHP-operated joint venture.
3. On 11 July 2024 we announced the decision to temporarily suspend Western Australia Nickel, which was transitioned to temporary suspension at the end of H1 FY2025. Refer to Operational Financial Review 6.5 of our Annual Report 2025.
4. Excluding New South Wales Energy Coal, which is under a managed process to cease mining at the asset by the end of FY2030. For more information refer to Operating Financial Review 6.3 of the Annual Report 2025.
5. 2023 Responsible Minerals Program Report

## 2 Due diligence in our minerals and metals supply chain

### Objectives

Risk management helps us to protect and create value and is important to achieving our purpose and strategic objectives<sup>6</sup>.

We have developed a risk-based and fit-for-purpose due diligence management system (as described in Section 3) for our inbound minerals and metals supply chain under our Responsible Minerals Program, which also enables us to meet the due diligence performance criteria set out under the following intergovernmental guidance and voluntary standards:

- the OECD Guidance and other relevant standards that guide their implementation such as the JDDS as an OECD-aligned standard;
- Criteria 10 – Responsible Supply Chains<sup>7</sup>;
- Towards Sustainable Mining's Responsible Sourcing Supplement Criteria 11;
- ICMM's Performance Expectation 4.2; and
- the LME's Responsible Sourcing Policy.

During FY25 we enhanced our risk assessment procedure to enable us to comply with the obligations under Articles 964a et seqq of the Swiss Code of Obligations (CO) and the Ordinance on Due Diligence and Transparency with regard to Minerals and Metals from Conflict-Affected Areas and Child Labour (DDTrO).

The Responsible Minerals Program focuses on identifying and managing risks as set out in Annex II of the OECD Guidance and our prioritised environmental risks based on their potential significance for our minerals and metals supply chain as set out in the OECD Environment Handbook (see infographic 1).

In our effort to continually improve the way we conduct due diligence for our inbound metals and minerals supply chains, we are currently undertaking a project to develop and integrate an expanded scope of environmental risks, which will seek to align the due diligence undertaken within the Responsible Minerals Program with the OECD Environment Handbook that was published on 19 September 2023.

6. For more information on our mandatory minimum performance requirements for risk management visit our Annual Report "How we manage risk" section.

7. Audits to date have been carried out under the Risk Readiness Assessment 2.0. Copper Mark have since realised the version 3.0, which audits will be carried out against in the future.

### Governance and responsibilities

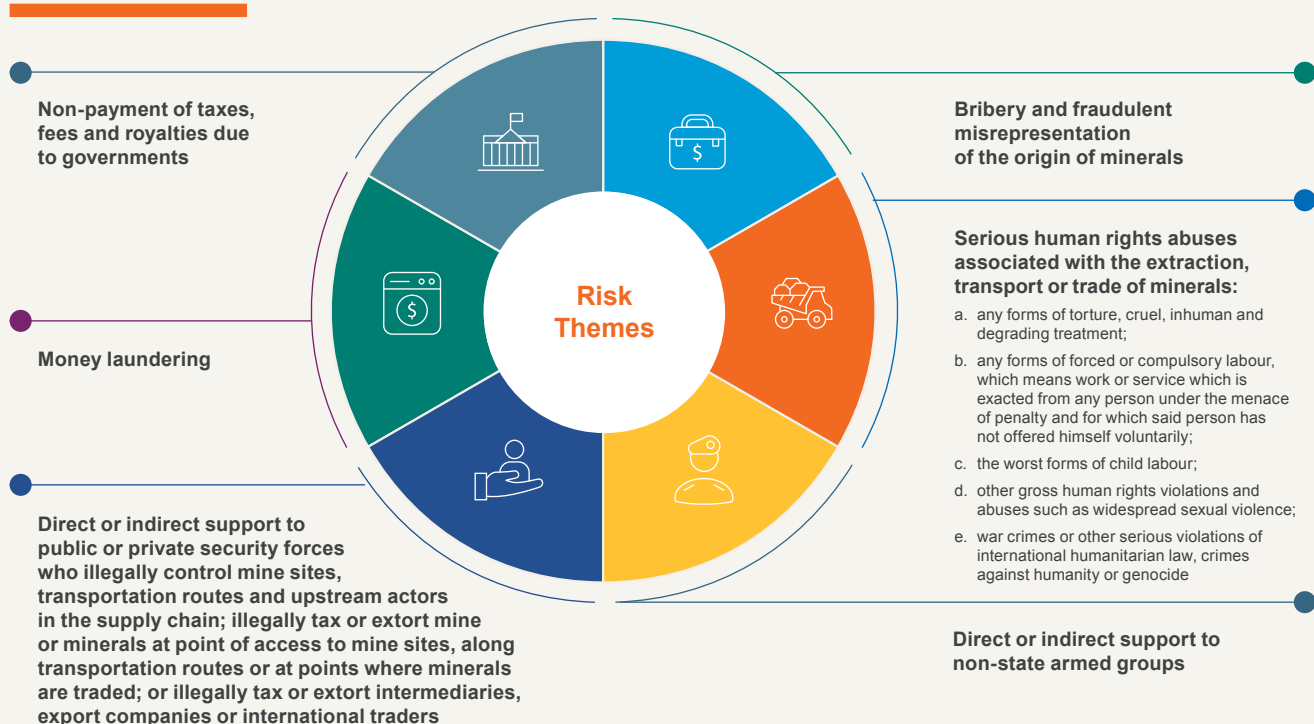
As the primary interface with minerals and metals suppliers, the Responsible Minerals Program is led by Sales and Marketing within the Commercial Function, with the Group Sales & Marketing Officer as the executive sponsor.

Key roles and responsibilities are as follows:

- The **Marketing Sustainability** team is accountable for the Responsible Minerals Program including strategy, implementation, governance, and reporting. The team is responsible for developing and promoting responsible minerals and metals supply chains. The team has subject matter expertise on the OECD Guidance, responsible production and sourcing standards, chain of custody, product transparency and product traceability.
- The **Sales & Marketing** team, through its trading and marketing units, are responsible for the purchasing of minerals and metals and leads engagements with suppliers. They are responsible for engaging with minerals and metals suppliers in the due diligence process, including communicating risk management plans and actions where required.
- The **Ethical Supply Chain & Transparency (ESCT)** team, within the Ethics, Compliance and Human Rights sub-function is a second-line team responsible for the Ethical Supply Chain and Transparency Framework. It is the primary team within BHP dedicated to defining minimum standards and providing assurance in relation to modern slavery risks across the non-traded and trade-related supply chains. Subject matter experts within the ESCT team provide advice and monitoring for medium and high-risk minerals and metals transactions.
- The **Group Environment** team is a second-line team that manages and governs BHP's position on environment and nature. It is the primary team within BHP dedicated to setting and governing minimum standards for environment. Subject matter experts within Group Environment provide advice and monitoring for medium and high-risk minerals and metals transactions.

The Responsible Minerals Program includes regular governance through the **Responsible Minerals Governance Group**, which includes representatives across Marketing Sustainability, Sales & Marketing and the ESCT and Group Environment teams. The primary purpose of this Governance Group is to co-review any medium or high-risk sourcing of minerals and metals, and monitor the effectiveness of the program. Continuous improvement is at the centre of program implementation and includes engagement with other key internal stakeholders such as teams from Sustainability & ESG Legal, Global Policy and Assurance – Human Rights, Communities and Indigenous People and the International Relations & Portfolio Growth team.

### OECD Guidance Annex II risk themes



### 3 Risk methodology process

The OECD Guidance recommends a 5-step framework for conducting due diligence and managing risks. In addition to applying our mandatory minimum performance requirements for risk management, BHP's Responsible Minerals Program follows the 5-step guidance as outlined in this report.

#### Step 1

##### Establishment of effective company management systems

BHP's Our Charter and Our Code of Business Conduct set out the standards of behaviour for those who work for us, with us or on our behalf, including with respect to BHP's human rights commitments as set out in our [Human Rights Policy Statement](#).

- To ensure that our commitment to responsible sourcing is acknowledged by our metals and minerals suppliers, BHP has set out minimum expectations in a Responsible Minerals Policy, aligned with the OECD Guidance's Annex II risks. To strive for continuous improvement in responsible sourcing in our minerals and metals supply chains, BHP aims to foster long-term relationships with regular suppliers. As part of the relationship building efforts and to help suppliers better understand BHP's requirements pertaining to due diligence, BHP may engage minerals and metals suppliers in reasonable training and capacity building on where appropriate.
- BHP has management structures in place to implement our due diligence management system, including systems of control and transparency over the supply chain. As part of this commitment, BHP trains relevant staff on due diligence, and associated risks in our supply chains.
- BHP has a mechanism for internal and external stakeholders, including suppliers, to report complaints and grievances, including those relating to BHP's responsible sourcing practices, in a confidential, or if chosen, anonymous manner ([Integrity@BHP](#) or the [BHP Protected Disclosure Reporting Channel](#)). BHP will not tolerate retaliation or allow any form of punishment, discipline or retaliatory action to be taken against anyone for speaking up.

#### Step 2

##### Identifying and assessing risks in the supply chain

BHP collects, reviews and assesses relevant information on minerals and metals suppliers. This may include any of the following tools and sources:

- Know Your Supplier Questionnaire;
- Responsible Minerals Policy or equivalent policy document from the supplier;
- Factual circumstances of the extraction, trade, handling, processing and export within the relevant supply chain;
- Review of audit reports;
- Desk-based research of publicly available information on the supplier (e.g. reports, media coverage);
- Additional information provided by relevant internal and external stakeholders (e.g. sustainability teams of our suppliers or third party traders).

This allows us to identify potential red flags as outlined in the OECD Guidance. Our current red flags are (**Current Red Flags**):

- whether the material to be supplied is extracted from, transported through, or traded in a conflict affected or high-risk area (CAHRA);
- whether artisanal mining could be involved in, or within the proximity of the area of the production of the material;
- recent convictions of unlawful activity;
- adverse commentary in publicly available media<sup>8</sup>;
- if the supplier is located in an Extractive Industries Transparency Initiative (EITI) member country, whether the supplier is undertaking EITI aligned reporting<sup>9</sup>;

In May 2025 we introduced additional red flags into our procedures, that we will commence implementing in future deals from FY2026 (**New Red Flags**):

- Regulatory non compliances or third party actions in key risk areas relating to human rights, governance and the environment;
- Operations are in a country whose due diligence response is classified as 'enhanced' or 'heightened' on the UNICEF Children's Rights in the Workplace Index;
- Supplier use of child labour as defined by the International Labour Organization's Minimum Age Convention (No. 138) or Worst Forms of Child Labour Convention (No. 182)
- Operations are within or in the proximity of a protected or key biodiversity area;

8. Adverse media screening is a review of negative information and data sources about a supplier. These include cyanide, mercury, lead, uranium.

9. The Extractive Industry Transparency Initiative set principles to disclose payments of taxes, fees and royalties to mineral extraction, trade and exports from conflict affected and high risk areas

10. These include cyanide, mercury, lead, uranium.

- Operations deal with prioritised hazardous materials;<sup>10</sup>
- Operations have had material occurrences of land instability that have resulted in material impact to water, biodiversity, property, community or worker safety
- Operations are in a water scarce area

In our risk assessment process, all red flags are treated equally. The process is focused on when a deal is conducted. However, risk identification remains an ongoing process throughout the life of a transaction.

BHP conducts further risk identification and assessment (enhanced due diligence) for suppliers where red flags have been identified to determine risks of potential or actual adverse impacts.

#### Step 3

##### Designing and implementing a strategy to respond to identified risks

BHP rates all our minerals and metals suppliers according to the risk framework developed for the Responsible Minerals Program, aligned with the OECD Guidance. We define the risk levels according to the OECD Guidance Annex II categories, as well as an overarching summary for the relevant transaction. Our risk levels are:

- **Very high:** An adverse impact is occurring, or has occurred, within supplier operations. The actual adverse impact was confirmed by the supplier or through an on-the-ground assessment.
- **High:** There is a potential risk of adverse impacts occurring within supplier operations, based on our assessment, and/or due to absence of supplier policies, procedures or practices to prevent such adverse impacts and/or provision of inaccurate, incomplete or manipulated risk-related information by the supplier.
- **Moderate:** There is a possibility of actual adverse impacts occurring within supplier operations due to ineffective or incomplete supplier policies, procedures or practices to prevent such adverse impacts, and/or lack of commitment to or participation in relevant frameworks and multi-stakeholder initiatives.
- **Low:** No information was identified or provided to suggest the presence of relevant risks.

Where any high or very high risks are identified, we aim to develop measurable risk mitigation plans in consultation with the supplier. These include risk mitigation measures which take into account the type and severity of risks identified and agreed tracking of the implementation of measures set out in the action plans.

We monitor implementation of the risk mitigation plan (and mitigation actions) within an agreed timeframe and continue to engage with suppliers to support them in seeking to prevent and mitigate adverse impacts identified in the supply chain.

#### Step 4

##### Ensure suppliers and BHP operated assets are identified points in the supply chain for assessment

The Responsible Minerals Program has been subjected to limited assurance by external auditors against the JDDS for our operated assets that produce LME-approved Brand products: Olympic Dam, Spence, Escondida and Nickel West. Certificates against this standard were issued by Copper Mark in November 2023 are available on our website [Value chain sustainability | BHP](#).

The Responsible Minerals Program was also subject to audit with the below components of responsible production standards:

- Copper Mark Criteria 31 of the Risk Readiness Assessment to implement the OECD Guidance; and
- ICMM Performance Expectation 4.2 to undertake risk-based due diligence on conflict and human rights that aligns with the OECD Guidance, when operating in, or sourcing from, a conflict affected or high-risk area.

Within the last three years, the Responsible Minerals Program was found to:

- fully meet Copper Mark Criteria 31 at Escondida and Spence. Copper Mark reaccreditation through external assurance is planned at Olympic Dam in FY2026; and
- fully meet the ICMM Performance Expectation 4.2 at Nickel West, Olympic Dam, BMA and WA Iron Ore.

BHP expects our suppliers of minerals and metals to carry out similar due diligence on their minerals and metals supply. In doing so, we adopt a risk-based approach that includes education and support to suppliers where appropriate and embedding responsible supply chain commitments in contractual clauses where appropriate and possible.

#### Step 5

##### Publicly report on supply chain due diligence

Since the creation of the Responsible Minerals Program, and in supporting transparency of minerals supply chain due diligence, we have published our Responsible Minerals Program Report (also known as a Step 5 Report) to the public on an annual basis since FY2023.

## 4 Risk in our metals and minerals supply chain

According to TDI’s CAHRA index, the origin of our externally sourced material was predominantly from low and moderate risk countries.

A summary of the origins of our externally sourced material can be found in infographic 1<sup>11</sup>.

Red flag risk assessments highlighted the following risk themes in our inbound minerals and metals supply chains:

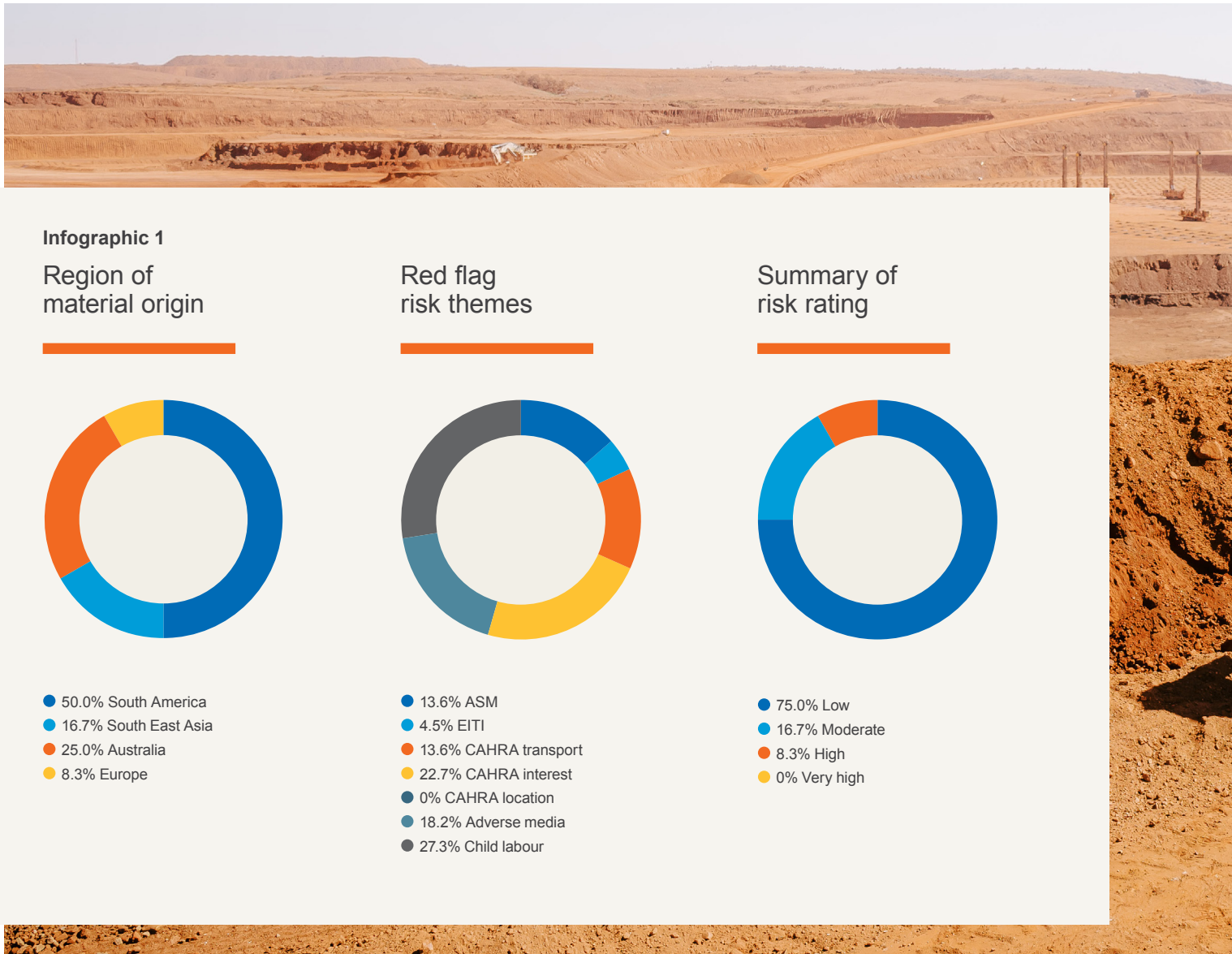
- Our Current Red Flag Themes from FY2025 did not include our New Red Flag themes identified in section 3 above, which were added during the financial year, with the exception of the UNICEF Child Labour Index. We incorporated the UNICEF Child Labour Index for all assessments FY2025 as a retrospective desktop exercise for all suppliers.

- In FY2025, 25% per cent of minerals and metals sourced required enhanced due diligence.
- A high-level summary of the risk rating for BHP’s minerals and metals inbound supply chain is shown below<sup>12</sup>.
- Across our FY2025 deals that were assessed as either moderate or high risk, a total of four (4) risk mitigation actions remain active. An improvement plan remains in progress with the relevant supplier of this material.

We continued to work together with our suppliers to build a common understanding, improve communications and promote greater transparency.

Whilst red flags relating to the UNICEF Child Labour Index were identified, at enhanced due diligence no reasonable suspicions<sup>13</sup> of child labour were identified.

11. This includes copper concentrate purchases from OZ Minerals to Olympic Dam.  
12. Note this is based on the amount of deals or transactions.  
13. Very high risks of child labour.



## 5 Achievements and challenges

We continue to see broad-based multi-stakeholder engagement as critical to embracing risk-based due diligence as a catalyst for change, including supporting capacity building in BHP, our minerals and metals supply chains, and our broader industry.

### Internal engagement and development

Key activities undertaken internally in FY2025 included:

- Expanding the scope of representatives in our Responsible Minerals Governance Group to include environmental subject matter experts, bringing in more diverse perspectives on risks and opportunities;
- Raising internal cross-company awareness of the Responsible Minerals Program's objectives, scope, successes to-date and improvement opportunities;
- Continuing periodic internal training of our Trading and Marketing Units and other relevant teams, focusing not just on the due diligence process but on connecting employees to 'why' due diligence is critical and how it connects back to BHP's purpose and social value goals;
- We completed our risk assessment under BHP's Risk Framework and created a monitoring program specific to the minerals and metals supply chain standards, to ensure further risk governance of the Responsible Minerals Program.

### External engagement and development

In FY2025, we continued our active participation in the development of responsible sourcing and production standards and guidance through industry, cross-industry and multi-stakeholder forums and working groups. These engagements included the ICMM, OECD, The Copper Mark, Towards Sustainable Mining and the Consolidated Mining Standard Initiative (CMSI).

We continue to see harmonisation of the standards landscape as important to driving clarity and the scale of adoption of consistent, credible sustainability standards across the industry. We see the CMSI, as the initiative to consolidate major standards and assurance processes, as key multi-stakeholder program. For further information on the CMSI initiative, please refer to [miningstandardinitiative.org](https://miningstandardinitiative.org).

### Key focus areas looking ahead

We recognise that improving the effectiveness of our Responsible Minerals Program is a long-term continuous improvement journey. We intend to maintain our continuous improvement philosophy to continue to build our maturity in minerals and metals supply chain due diligence.

Over the next financial year, our planned improvement focus areas include:

- Continuing to assess relevant emerging due diligence expectations set out under intergovernmental guidance, standards and regulations such as the OECD's Handbook on Environmental Due Diligence in Mineral Supply Chains, the Responsible Minerals Initiative (RMI) and Copper Mark's Risk Readiness Assessment 3.0, the EU Battery Regulation and EU Corporate Sustainability Due Diligence Directive (CSDDD); and
- Continuing to enhance engagements with key minerals and metals actors in our supply chains, with the intention of building longer term relationships and enhanced education about responsible minerals programs and supply chain risk.



## 6 Appendix 1

### Independent Limited Assurance Report to the Management and Directors of BHP Group Limited



#### Our Conclusion:

Ernst & Young ('EY', 'we') was engaged by BHP Group Limited ('BHP') to undertake a Limited Assurance engagement as defined by International Auditing Standards, hereafter referred to as a 'review', over the BHP Responsible Minerals Program 2025 report (defined below) for the year ended 30 June 2025. Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe the BHP Responsible Minerals Program 2025 report has not been prepared, in all material respects, in accordance with the Criteria defined below.

#### What our review covered

Ernst & Young ('EY') was engaged by BHP to undertake a Limited Assurance engagement over the BHP Responsible Minerals Program 2025 report for the year ended 30 June 2025 (the 'Report') in accordance with the Criteria (as defined below). Our Limited Assurance engagement also included a review of a selection of qualitative disclosures and BHP's reported performance in the Report.

#### Criteria

In applying its Responsible Minerals Program (BHP's responsible minerals due diligence management system) and preparing the Report, BHP applied the Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel and Zinc (JDDS') conformance criteria for Step 5: Reporting.<sup>1</sup>

The standard referenced above in this Criteria section constitutes the 'Criteria', which is what we assured the Report and its presentation of how BHP's Responsible Minerals Program adheres to the JDDS against.

#### Key responsibilities

##### BHP's responsibility

BHP's management is responsible for selecting the Criteria, and for ensuring the Report is prepared in accordance with that Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant to the preparation of the Report, such that it is free from material misstatement, whether due to fraud or error.

##### EY's responsibility and independence

Our responsibility is to express a conclusion on the Report based on our review.

We have complied with the independence and relevant ethical requirements, which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

EY applies Auditing Standard ASQM 1 *Quality Management for Firms that Perform Audits or Reviews of Financial Reports and Other Financial Information, or Other Assurance or Related Services Engagements*, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

#### Our approach to conducting the review

We conducted this review in accordance with the International Auditing and Assurance Standards Board's *International Standard on Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* ('ISAE 3000'), the Copper Mark Assurance process, and the terms of reference for this engagement as agreed with BHP on 23 January 2025. That standard requires that we plan and perform our engagement to express a conclusion on whether anything has come to our attention that causes us to believe that the Report is not prepared, in all material respects, in accordance with the Criteria, and to issue a report.

#### Summary of review procedures performed

A Limited Assurance engagement consists of making enquiries, primarily of persons responsible for applying BHP's Responsible Minerals Program and preparing the Report and related information and applying analytical and other review procedures.

The nature, timing, and extent of the procedures selected depend on our professional judgement, including an assessment of the risk of material misstatement, whether due to fraud or error. The procedures we performed were based on our professional judgement and included, but were not limited to:

- Conducting interviews with personnel to understand the business and reporting process
- Interviewing select BHP personnel to understand the reporting process at group, business, asset, and site level, including BHP's responsible minerals processes
- Assessing the Report against the requirements as defined in the JDDS
- Undertaking analytical procedures of the quantitative disclosures in the Report to determine the reasonableness of the information presented
- On a sample basis, based on our professional judgement, checking the adherence of BHP processes to the JDDS and any additional requirements outlined in its Responsible Minerals Program to support assessment of the accuracy of claims within the Report
- Assessing referenced policies and documents for consistency with the disclosures made in the Report
- Assessing whether the information disclosed in the Report is consistent with our understanding and knowledge of BHP's Responsible Minerals Program.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our Limited Assurance conclusion.

#### Inherent limitations

Procedures performed in a review engagement (i.e., a Limited Assurance engagement) vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a review engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a Limited Assurance level on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

While we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

#### Other matters

We have not performed assurance procedures in respect of any information relating to prior reporting periods, including those presented in the Report. Our assurance report does not extend to any disclosures or assertions made by BHP relating to future performance plans and/or strategies disclosed in the Report.

#### Use of our Assurance Report

We disclaim any assumption of responsibility for any reliance on this assurance report to any persons other than the management and the directors of BHP, or for any purpose other than that for which it was prepared.

Our assurance procedures were performed over certain web-based information that was available via web links as of the date of this assurance report. We provide no assurance over changes to the content of this web-based information after the date of this assurance report.

Ernst & Young  
Melbourne, Australia

19 August 2025

Mathew Nelson  
Partner

<sup>1</sup> JDDS criteria: [https://coppermark.org/wp-content/uploads/2023/01/Joint-Due-Diligence-Standard\\_v3\\_26AUG22-1.pdf](https://coppermark.org/wp-content/uploads/2023/01/Joint-Due-Diligence-Standard_v3_26AUG22-1.pdf)

**BHP**