

Anti-Bribery and Corruption Policy

OBJECTIVES

Woodside is committed to conducting its business and activities with integrity and in compliance with all applicable anti-bribery and corruption laws (ABC Laws).

To achieve this objective:

- Woodside will not engage in corrupt business practices.
- Woodside will implement risk-proportionate measures to prevent Bribery and Corruption by any director, employee, contractor or third party representing or providing services for or on behalf of Woodside.
- Woodside will, at a minimum, comply with all applicable laws, regulations and standards (including ABC Laws) or, where internal policies require a higher standard, will apply and comply with such higher standard.
- Woodside maintains an Ethics and Compliance Program that seeks to prevent and manage Bribery and Corruption risks.

PRINCIPLES

Prohibition on Corruption

As set out in Woodside's [Code of Conduct](#) and [Supplier Code of Business Conduct](#), Woodside prohibits Bribery and Corruption, in any form, whether direct or indirect, whether in the private or public sector, anywhere in the world.

There are serious consequences (for Woodside and persons representing Woodside) for contraventions of ABC Laws. These consequences can include civil and criminal penalties for individuals and corporations, including substantial fines and imprisonment. Employees who engage in misconduct are subject to internal discipline, up to and including termination of employment, in addition to civil and criminal penalties.

To this end:

- You must not offer, pay, give, authorise, solicit or accept:
 - bribes or kickbacks in any form; or
 - anything of value to, or from, a Government Official or any other person to influence any decision or secure any improper advantage.
- You must not engage in any form of corrupt business practice, whether for the benefit of Woodside, yourself or another party.
- Facilitation Payments are prohibited.
- Requests for bribes or Facilitation Payments must be reported to the VP Ethics & Compliance.

Gifts and Entertainment

All gifts and entertainment (including meals, travel and hospitality) may only be provided, accepted or reimbursed in accordance with the [Code of Conduct](#) and the following principles.

If you are uncertain whether it is appropriate to offer or receive gifts or entertainment in any particular circumstance, you should speak with your line manager or a member of Woodside's Ethics & Compliance or Legal teams before doing so.

- *Bona fide business purpose* – Offering and receiving gifts or entertainment must always be for bona fide business purposes.
- *Appropriate nature and frequency* – Gifts and entertainment should only be provided or accepted if they are modest and occasional. You must consider the value and frequency of gifts or entertainment exchanged with the same party within any six-month period and determine if this is appropriate having regard to common courtesy, general commercial practice and local law and customs.
- *Avoiding perception of undue influence* – Gifts and entertainment must never be offered or received to unduly influence business or government decision making. In addition, you must not allow the offering or receiving of gifts or entertainment (including the timing of this) to create the perception that there has been an attempt to improperly influence decision making.
- *No cash or cash equivalents* – Giving or receiving gifts of cash or cash equivalents (i.e. gift cards) is not appropriate and is strictly prohibited by Woodside.
- *Nominal value* – While offering or accepting gifts of excessive value is never permitted, particular care must be exercised where the recipient of a gift is a Government Official. Where the recipient is a Government Official, any gifts given must be of only nominal value and wherever possible be company-branded.
- *Transparency* – Do not offer or receive gifts or entertainment which you would feel uncomfortable explaining to your work colleagues, your family or the media. Always ensure that the offering and receiving of any gifts or entertainment is accurately recorded and approved in accordance with the [Code of Conduct](#) and this Policy.
- *Complying with legal restrictions* - Some countries impose strict limits regarding the value of gifts or entertainment that can be provided to or received from Government Officials and private sector persons. It is your responsibility to ensure that you are familiar with any applicable legal restrictions before offering or receiving gifts or entertainment. If you are unclear on whether any legal restrictions apply, you should refer the matter to a member of the Ethics & Compliance team.
- *Accurate documentation* – Any gifts or entertainment provided or received by Woodside or on Woodside's behalf must be fairly and accurately recorded in the company's books and records, and in compliance with the applicable approval and registration requirements outlined in Woodside's Gift & Entertainment Rules.

Without limiting the above principles, you must not:

- Request gifts or entertainment of any kind from any organisation or person.
- Exchange gifts or entertainment with a Government Official during periods in which they are to make important decisions affecting Woodside's business (for example, during tender or bidding periods or during contract negotiation periods or approval processes).
- Provide or accept gifts in violation of the approval requirements set out in the [Code of Conduct](#). And in all cases you must not offer or receive gifts or entertainment where the cost or nature of the item exceeds either the level of common business courtesy (having regard to the country in which the item is offered or accepted, and what would be appropriate in light of your role and responsibilities within Woodside) or exceeds any applicable legal restrictions.
- Accept invitations to events involving activities over consecutive days, overnight accommodation or travel unless Woodside management determines that there are bona fide business reasons for you to attend. Where approval is given for you to attend, Woodside will meet any travel, accommodation and related expenses unless determined otherwise by the VP Ethics & Compliance (or their delegate).

Sponsored Travel for Government Officials

Woodside prohibits the payment of travel and travel-related expenses for Government Officials unless such payment has been approved by the VP Ethics & Compliance (or delegate) and reviewed by Compliance Legal.

Sponsored travel expenses must also comply with the requirements set out in the Ethics and Compliance Program Standard.

This prohibition does not apply to travel undertaken by a Government Official:

- to a Woodside offshore facility in connection with the execution or performance of their regulatory functions; or
- on a Woodside site-approved vehicle,

in both cases where, for health and safety reasons, Woodside organises and facilitates the travel arrangements to such offshore facility or on such site-approved vehicle.

Third Parties and Due Diligence

Woodside engages in a variety of commercial and social investment relationships and transactions across its operations, such as with product customers, joint venture partners, suppliers and social investment partners. We require those business partners to conduct themselves in accordance with all laws, this Policy, the provisions of the applicable contract, Woodside's Supplier [Code of Conduct](#), and with integrity in engaging with Woodside or when acting on our behalf.

Woodside adopts a risk-proportionate approach to the performance of third-party due diligence on business partners, customers and suppliers prior to contracting, and in monitoring and management of those relationships once they are in place. More information is contained in Woodside's Ethics and Compliance Program Standard.

Local Agents and Representatives

It may, in certain circumstances, be necessary for Woodside to engage a third party person or entity that will act for or on behalf of or otherwise represent Woodside (either in its capacity as operator for a Woodside-operated joint venture, or in its corporate capacity) in Woodside's business dealings with public sector and/or private sector third parties, in countries or markets outside Australia (a 'local agent or representative').

Local agents and representatives must only be engaged after the completion of risk-based due diligence as required by the Ethics and Compliance Program Standard.

The prior approval of Woodside's VP Ethics & Compliance (or delegate) is required for the appointment or engagement of any local agent or representative.

Woodside remains responsible for the acts of its local agents and representatives. Therefore, any local agents or representatives must be chosen with care following the process set out in the Ethics & Compliance Program Standard.

If you are unsure whether, through its scope of activities, a third party would be acting as a local agent or representative for Woodside, please contact a member of Woodside's Ethics & Compliance team.

Record Keeping

An accurate and auditable record of all gifts, entertainment and payments to Government Officials, employees and others must be maintained in accordance with generally accepted accounting principles. No entry should be made in Woodside's records that distorts or disguises the true nature of any transaction.

Reporting Violations

You must immediately report any suspected or actual violation of this Policy. The report may be made to any of the people listed in Woodside's [Code of Conduct](#) or via the external confidential whistleblower hotline [EthicsPoint](#) in accordance with Woodside's [Whistleblower Policy](#).

Non-retaliation

You will not suffer any form of retaliation, reprisal or detriment from Woodside for raising a concern or reporting a violation of this Policy (nor will you suffer any form of reprisal from Woodside for refusing to make a corrupt payment).

Training

Woodside maintains an anti-bribery and corruption training program that includes mandatory [Code of Conduct](#) training for all staff, and annual Advanced Anti-Bribery and Corruption training for personnel in high risk roles.

APPLICABILITY

Everyone who works for or on behalf of Woodside, including directors, officers, executives, managers, supervisors, employees, contractors and service providers, wherever they are located, must comply with this Policy.

We apply this Policy in all joint operations where Woodside is the operator. Where Woodside is not the operator, we encourage the adoption of a similar policy requirement.

This Policy will be reviewed regularly and updated as required.

DEFINITIONS

For the purpose of this Policy, the following definitions apply:

| Term | Meaning |
|------------|--|
| ABC Laws | Includes: <ul style="list-style-type: none">• the <i>Criminal Code Act 1995</i> (Cth);• the <i>Foreign Corrupt Practices Act 1977</i> (US);• the <i>Bribery Act 2010</i> (UK);• any other anti-corruption laws of the Commonwealth of Australia or any State or Territory of Australia (including any applicable common law, law of equity, any written law, statute, regulation or other instrument made under statute or by any government agency);• any anti-corruption law of a country other than Australia which applies to Woodside, its business partners or third parties operating on Woodside's behalf. |
| Bribery | The offering, authorising, promising, giving, receiving, soliciting, or attempted offering, authorising, promising, giving, receiving, soliciting, of anything of value, directly or indirectly, to improperly influence the execution of an individual or organisation's public, commercial or legal duties. |
| Corruption | Means dishonest activity in which a director, executive, manager, employee or contractor of an entity acts contrary to the interests of the entity and abuses his/her position of trust in order to receive some |

| Term | Meaning |
|----------------------|--|
| | personal gain or advantage for him or herself or for another person or entity. |
| Facilitation Payment | Means a small payment or other inducement provided to a Government Official to secure or expedite a routine function that the Government Official is ordinarily obliged to perform. |
| Government Official | <p>Means:</p> <ul style="list-style-type: none"> • any politician, political party, party official or candidate of political office; • any official, employee or representative of a domestic, foreign or supranational government, government body or agency (e.g. an employee of the EU or a state or federal regulator or government department, etc.); • any official, employee or representative of a government-owned or controlled entity (e.g. state-owned energy companies, state-owned universities, etc.); • any official, employee or representative of a public international organisation (e.g. United Nations, International Monetary Fund, World Bank, etc.); • any person who holds or performs the duties of any appointment created by custom or convention (e.g. Indigenous Elders or representatives authorised to act on behalf of an Indigenous group or community). <p><i>Please note:</i></p> <ul style="list-style-type: none"> • The definition of 'Government Official' is relatively broad and extends beyond the common understanding of Government Official or government employee. • If you are unsure as to whether an individual is a Government Official, please contact a member of Woodside's Compliance Legal team. |
| Kickback | Means the return of a sum already paid or due to be paid as a reward for awarding or fostering business. |

Reviewed by the Woodside Energy Group Ltd Board in December 2025.