


# OUR APPROACH TO HUMAN RIGHTS



Woodside  
Energy





**Woodside is committed to conducting business in a way that respects the human rights of all people, including our employees, the communities where we are active, and those working within our supply chains.**

### **Embedding human rights into our approach**

Woodside's commitment to human rights is set out in our [Human Rights Policy](#), which provides the basis of Woodside's human rights approach and is informed by the UN Guiding Principles on Business and Human Rights. Our Human Rights Policy was approved by the Board and introduced in 2017. It guides our global activities as we take steps to identify, prevent and manage potential human rights impacts in all phases of our value chain.

Human rights principles and commitments are included in our Code of Conduct, which sets out the standard of behaviour expected of all Woodside personnel. It is the responsibility of every director, employee and contractor to be familiar and comply with the Code of Conduct.

Woodside's approach to human rights is overseen by our Board and the Executive Committee. The Board's Sustainability Committee is responsible for reviewing and making recommendations to the Board on Woodside's human rights policy and performance. The Sustainability Committee meets at least four times per year and receives relevant human rights updates annually. Human rights issues are discussed by the Sustainability Committee including performance against human rights commitments and updates to the Human Rights Policy, our salient human rights risks and our modern slavery risk management activities and reporting.

Our Executive Vice President Strategy and Climate is responsible for overall management of our human rights approach and has deliverables relating to human rights as part of their performance agreement. Day-to-day responsibility for Woodside's human rights performance is managed by the Head of Sustainability Strategy and

Governance, who also oversees the Human Rights Working Group (HRWG). The HRWG consists of representatives from a range of functions across the business such as supply chain, environment, First Nations and communities, human resources and business integrity. The HRWG meets monthly to ensure that human rights risks are identified and effectively managed, throughout business operations in line with our commitment to respect human rights.

In joint ventures where we are non-operator, we seek to influence our joint venture participants so that the joint operation adopts similar human rights commitments to Woodside.

### **Human rights due diligence**

Human rights are considered across our activities including in risk assessments and supplier selection. Human rights due diligence is mandatory for all operations and activities under our operational control in countries determined to have high human rights risk. Country risk is determined by a biannual desktop country human rights risk assessment.

For non-operated activities and interests in high-risk countries, we request the operator provide the relevant human rights due diligence documentation or, if this is not available, we may undertake our own due diligence if necessary.

We also undertake human rights due diligence in the assessment of new and various existing business opportunities. This involves identifying and evaluating actual or potential human rights risks to inform investment decisions and prevent or mitigate adverse impacts.

## Grievance mechanisms and remedy

We take concerns about our activities seriously and we encourage all stakeholders to speak up about misconduct. Stakeholders can lodge a grievance with us using a variety of channels as detailed on our [website](#) including telephone, mail and email.

We have localised community grievance mechanisms across our operations which are accessible on our website. These provide a framework for receiving and responding to grievances in a consistent and timely way but are adapted where necessary in consideration of local communities.

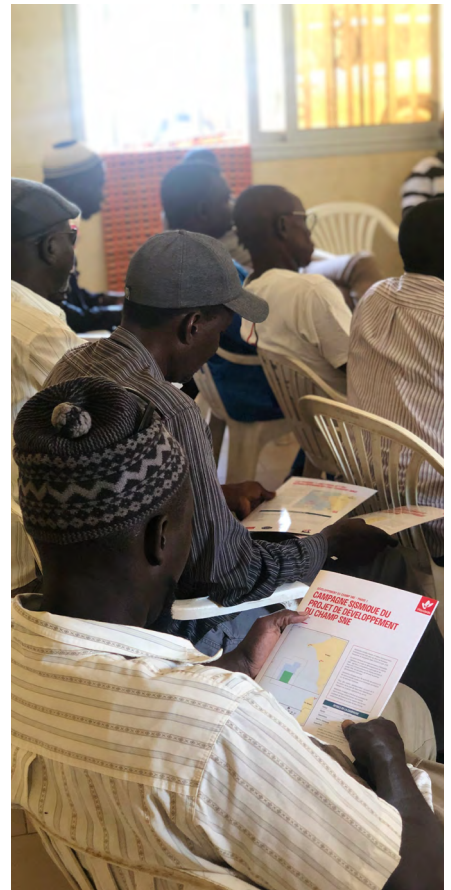
Our perception surveys and social impact and opportunity assessments also take stakeholder views into account.

Our whistleblower hotline (EthicsPoint) has multi-language and multi-jurisdiction capability and online functionality. All matters reported through EthicsPoint are assessed and investigated in accordance with the internal investigations process, overseen by a multi-discipline Investigations Steering Group.

Woodside will not tolerate any form of adverse action being taken against an individual or community that raises a concern or complaint in good faith.

Woodside does not make retaliatory suits against persons who have brought or tried to bring a case against it involving credible allegation of adverse human rights impacts or against the lawyers representing them. We also will not terminate employment of any workers who have brought or tried to bring a case against us involving an allegation of human rights abuse or engaged in violent acts or threats to the livelihoods, careers or reputation of claimants or their lawyers. We also expect our business partners to not retaliate against people raising complaints.

Woodside is committed to remedying any adverse human rights impacts on individuals, workers and communities that we identify we have caused or contributed to. If we are directly linked to an adverse impact through our supply chain or other business relationship, we will consider whether we play a role in remediation. This process is outlined in our Human Rights Due Diligence and Remediation Guideline.



## Understanding our impacts

We seek to understand whether our operations may impact the social and cultural wellbeing of the communities where we are active. Across the business we have integrated our approach with respect to the environment and human rights recognising that adverse impacts associated with our activities may need active management. We endeavour to understand and minimise any negative impacts and enhance positive impacts through meaningful engagement. We emphasise open and transparent communication and feedback on all our activities.

We conduct social impact assessments for all major development activities to identify community impacts and opportunities, including those related to human rights.

Woodside continues to review and monitor our internal processes associated with social and human rights impact assessment and management to ensure alignment with good industry practice.

We seek external advice from independent human rights consultants to inform our approach to company-wide salient human rights risk assessments.

Our stakeholders are identified through an iterative process that is continuously revisited. This process involves consideration of geography, legality, and nature of impacts in relation to our activities.

Special attention is given to groups which may be considered vulnerable or disadvantaged.

If you would like to read more about how we take the views of our communities into account, please refer to our most recent [Sustainable Development Report](#).

## Human rights salience assessment

We periodically update our salient human rights risk assessment with the support of independent external business and human rights expert to identify the potential human rights at risk of the most severe negative impact through the company's activities and business relationships. Importantly, this advice focuses on our potential impacts on people and their human rights, from the perspective of rightsholders rather than impacts on our businesses (although they are often aligned). The identification of our salient human rights risks guides our human rights approach across our activities. The scope of the assessment typically includes:

- + Identification and assessment of the severity of the potential adverse human rights impacts that Woodside could cause, contribute or be directly linked through our activities or business relationships
- + A review of the effectiveness of relevant management frameworks and controls
- + Recommended actions to continuously improve our human rights approach including existing systems and controls.

Perspectives from a range of internal stakeholders from across the business and a number of external stakeholders (investors academics and civil society stakeholders) help to inform the assessment.

## Human rights in our supply chain

Our Supplier Code of Business Conduct sets out our expectations from suppliers in relation to human rights including modern slavery. We oppose the occurrence of modern slavery in our operations or supply chains and expect our suppliers to adopt the same commitment.

Our supply chain human rights framework helps us to prioritise our due diligence activities. We focus our efforts on existing and potential suppliers that are considered high-risk, based on the category of product or service they provide which is informed by four main areas:

- + Vulnerable populations
- + High-risk sectors
- + High-risk business models
- + High-risk geographies.

Suppliers identified as high-risk are required to complete a modern slavery questionnaire and develop and implement a modern slavery management plan.

Our contractual terms and conditions include modern slavery provisions that provide warranties from suppliers and give us the right to audit and terminate supplier contract.

In line with best practice, if we identify adverse human rights impacts in our supply chain, we would not immediately terminate the relationship, we will consider whether we play a role in remediation. If the supplier was not receptive to remedying the impact and improving their practices, then we may terminate the relationship.

If you would like to know more about our approach to human rights risk in our supply chain please see our most up to date Modern Slavery Statement.

## Security and human rights

Woodside is committed to supporting the Voluntary Principles on Security and Human Rights (VPSHR) initiative and has been a signatory since 2015. We continue to incorporate the guidance provided by the Voluntary Principles Initiative (VPI) and associated organisations into our security and human rights framework.

Our security and human rights guideline outlines the company-wide requirements for protecting our people, communities, assets and the environment in line with the VPSHR and respecting the rights of those affected by our security arrangements.

We have standard contractual clauses that reflect our commitment to the VPSHR and our expectation that our contractors conform with the VPSHR. These standard contractual clauses contain requirements for training, personnel vetting, subcontractor management, compliance with relevant local, international and other security-related frameworks and reporting and investigations of allegations of security and human rights-related risks.

We respect human rights through our security arrangements by:

- + Regular, ongoing site visits
- + Engagement with Woodside operational sites and international project offices on security and human rights risks
- + Conducting security and human rights threat and risk assessments for our operations
- + Delivering and maintaining security and human rights training for Woodside personnel responsible for security and private security providers

- + Completing due diligence checks and assurance activities on our security contractors.

## Collaborating with others

We work with our peers and key stakeholders to improve our approach to managing human rights risks in our operations and supply chains.

### Voluntary Principles on Security and Human Rights

We engage with our VPSHR peers through the annual Voluntary Principles plenary, regular corporate pillar meetings and the VPSHR Australia Working Group. See the section on security and human rights for more information.

### International Petroleum Industry Environmental Conservation Association (Ipieca)

We work in collaboration with Ipieca, the global oil and gas industry association for environmental and social performance, on joint initiatives to share good practice and develop tools to enhance human rights performance.

Ipieca's Business and Human Rights Project builds on the collective experience and practical know-how of the association's members to understand best practice and demonstrate strong industry support for the UN Guiding Principles on Business and Human Rights.

### The Extractive Industries Transparency Initiative (EITI)

EITI is a global standard to promote the open and accountable management of extractive resources which aligns with supporting improved human rights outcomes. Woodside joined the EITI in 2005 and became an EITI Supporting Company in 2008. We actively participate in the implementation of country level EITI work plans, as our host countries work towards the implementation of the EITI Standard.

Woodside also supports decisions by our host countries to publish contracts and licences, in line with the EITI Standard and to the extent that these contracts are not subject to confidentiality restrictions. Woodside recognises the interests of its stakeholders in transparency and commends tax transparency initiatives that increase public confidence in the contributions and compliance of corporate taxpayers.

### Industry and government collaboration

Through Ipieca, oil and gas operators worked together to develop an industry common supplier assessment questionnaire. Woodside joined this collaboration group and was an early reviewer and adopter of the questionnaire.

We engage with our peers in the resources and energy sectors through the Human Rights Resources and Energy Collaborative. The group provides a forum for sharing human rights experiences including in relation to supply chain issues and remedy.

### Training

All employees, contractors and service providers undergo mandatory training on the Code of Conduct when they join the company and annual compliance training thereafter. The Code of Conduct includes information about Woodside and its employees' responsibilities to respect human rights.

Woodside also has an online Human Rights Awareness training module for our employees in high-risk areas of the business. The training covers our approach and human rights responsibility, the risk of modern slavery in our operations and supply chains, Australia's modern slavery legislation, and human rights in the global oil and gas sector.

## **Our Approach to Human Rights**

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