

mechanisms, and a commitment to shared decision-making. Woodside's HRDD helps ensure FPIC is respected by integrating it into project planning, legal agreements, and operational protocols.

Our HRDD approach is operationalised through a structured process that includes:

- Identification of Risks
 - Woodside conducts regular salient human rights risk assessments. These assessments are designed to identify the most severe potential impacts across its value chain, including those affecting Indigenous Peoples.
 - Country-level risk ratings are maintained in a dedicated Human Rights Due Diligence Register, which informs decisions on where full or light due diligence is required.
- Prevention and Mitigation
 - HRDD is mandatory for all operations under Woodside's control in high-risk countries.
 - Mitigation strategies include stakeholder mapping, social impact assessments, and contractual clauses that embed human rights expectations into partner agreements.
- Tracking and Accountability
 - Corporate Affairs and the Indigenous Affairs and Human Rights teams monitor actions taken to address human rights impacts and maintain a register of due diligence activities and accountabilities.
 - Reviews are conducted biannually or when significant changes occur, with updates reported to the Human Rights Working Group and summarised for the Board's Sustainability Committee.
- Communication and Remedy
 - Woodside engages with affected groups to communicate how impacts are being addressed and provides various grievance mechanisms, including culturally appropriate channels for Indigenous communities. Consultation is structured through authorised representative bodies and guided by their internal procedures to ensure cultural appropriateness.
 - Remedy is considered on a case-by-case basis, including where Woodside has leverage to influence third-party practices.

3. FPIC IN PRACTICE

Woodside Energy always aims to ensure that all engagements with Indigenous Peoples are culturally appropriate, inclusive, and conducted in good faith by embedding the principles of FPIC into our operational practices. These practices are guided by our [Indigenous Communities Policy](#), [Reconciliation Action Plan \(2021–2025\)](#), [Human Rights Policy](#) and Cultural Heritage Management Procedure.

We acknowledge that FPIC has its basis in UNDRIP, however this frames FPIC within the scope of State responsibilities. Additionally, there is a lack of consensus globally on how FPIC is to be interpreted or implemented. The absence of formal FPIC regulation within Australia presents challenges and nuances that make consistent application complex and requires Woodside to infer how State obligations may apply to its corporate activities. Woodside understands that FPIC is a distinct right under UNDRIP, reserved exclusively for Indigenous Peoples, and is not a one-size-fits-all concept. We are committed to understanding and respecting the differences in how Indigenous communities interpret FPIC, and to evolving our approach in engaging with those communities to ensure meaningful, respectful, and enduring relationships can be formed.

Woodside engages with affected communities of Indigenous Peoples in ways that are consistent with the principles of seeking FPIC by:

- Engaging through representative institutions with cultural authority to represent Indigenous communities.
- Being guided by Indigenous communities on their preferred methods of consultation, including the format, attendees, cultural protocols, location, and timing.
- Providing relevant information through accessible communications including fact sheets and face-to-face engagements, including at our Roebourne town office and through the establishment of our Indigenous Ambassador role. The role allows for an Indigenous representative to directly and meaningfully engage and represent Woodside in the Roebourne community to further strengthen relationships and reciprocal understanding.
- Supporting representative institutions so that they are resourced to access credible, independent expert advice where required.
- Listening to the voices, views and aspirations of Indigenous communities and leaders so that they are heard within Woodside and factored into decision making processes.
- Adherence to our [Anti-Bribery and Corruption Policy](#).

4. COMMITMENT TO ETHICAL ENGAGEMENT

Woodside Energy is committed to ethical and transparent engagement with Indigenous communities. Our [Anti-Bribery and Corruption Policy](#) prohibits offering, giving, soliciting, or accepting anything of value to influence decisions, including those involving Indigenous Elders or authorised representatives. Facilitation payments are banned, and any requests must be reported to Ethics & Compliance. Indigenous Elders and representatives are captured by the definition of Government Officials under the policy, ensuring the highest anti-bribery standards apply. All payments to Indigenous groups or individuals in positions of influence require approval by the Vice President, Ethics and Compliance, and a member of the Executive Leadership Team.

These measures are consistent with the principles outlined in the UN Convention Against Corruption and the UN Guiding Principles on Business and Human Rights, reflecting our ongoing commitment to integrity and respect for Indigenous rights.

5. GRIEVANCES

Woodside has established comprehensive internal grievance mechanisms that address a wide range of issues, including those related to Indigenous rights and FPIC. These mechanisms are integrated across multiple operational levels and adapted to local contexts to ensure accessibility and effectiveness. Key mechanisms include:

- **Whistleblower Hotline (EthicsPoint)** - Provides multilingual and multi-jurisdictional support, guaranteeing anonymity and protection against retaliation.
- **Localised Community Grievance Systems** - Accessible through various channels—including telephone, mail, email, and online platforms—these systems are tailored to reflect the cultural and logistical realities of each community.
- **Community Grievance Procedures** - Developed in consultation with local communities, these procedures are location-specific and incorporate structured investigation protocols, privacy safeguards, and the involvement of the Indigenous Affairs and Human Rights team in managing complaints.

Mechanisms are designed to be culturally appropriate, inclusive, and transparent. Their effectiveness is monitored through perception surveys, Human Rights and/or Social Impact Assessments, and quarterly grievance summaries. Woodside remains committed to continuous improvement and is actively reviewing and enhancing the methods used to assess the effectiveness of these grievance processes. For example, in 2024 Woodside completed a cultural safety review which identified opportunities to improve the accessibility of our grievance mechanisms for Indigenous employees. This work is ongoing.

Woodside does not tolerate any form of retaliation or other detrimental treatment against a complainant who raises a grievance in good faith. One way in which we mitigate these risks is by working through representative institutions rather than individuals to reduce their exposure.

6. KEY CHALLENGES

Australian law recognises the inherent rights of Aboriginal and Torres Strait Islander peoples as Traditional Owners under their traditional laws and customs but lacks a clearly defined FPIC definition and framework. While many corporate entities in Australia have provided vocal support for FPIC, it is widely recognised that “there is no universally accepted definition of FPIC”.¹ Legal clarity on this matter would assist companies to understand and demonstrate compliance with their obligations under UNDRIP. Woodside has voiced its support for greater clarity in Australian law to support the implementation of the principles of UNDRIP and, in particular, FPIC in a submission made to the Joint Standing Committee on Aboriginal and Torres Strait Islander Affairs.² In the absence of guidance at a domestic level, we continue to approach FPIC in a way that we believe is consistent with international human rights law.


¹ International Finance Corporation IFC Performance Standard 7: Indigenous Peoples, January 2012, [12]. Available at: <https://www.ifc.org/content/dam/ifc/doc/2010/2012-ifc-performance-standard-7-en.pdf>

² *Submission to the Inquiry into the Application of the United Nations Declaration on the Rights of Indigenous Peoples in Australia*, 19 October 2022. Available at: [Woodside Submission to the Inquiry into the Application of the United Nations Declaration on the Rights of Indigenous Peoples in Australia \(PDF\)](#)

Another challenge is the interpretation and application of diverse, and at times conflicting, cultural governance protocols across Indigenous stakeholder groups. Businesses must navigate a complex landscape of varying community expectations and responsibilities and cultural obligations and protocols. This can result in delayed decision-making and confusion for those involved. These challenges are further compounded by leadership transitions within communities, limited abilities to understand and exercise FPIC, and resourcing restraints. In our view, businesses and Indigenous representatives would benefit from consistent training to support an aligned understanding of what is required and manage expectations. In addition, guidance regarding the identification and importance of working through representative organisations (as required by UNDRIP) would be invaluable.

Woodside would like to thank the UN Working Group on Business and Human Rights for the opportunity to present this submission and be happy to provide further information in relation to this submission if requested by the Working Group.

Yours faithfully

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Head of Indigenous Affairs and Human Rights