

Whistleblower Policy

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1 INTRODUCTION

1.1 Woodside's commitment

The Woodside Energy Group Ltd Board of Directors is committed to fostering a culture of corporate compliance, ethical behaviour and good corporate governance. Woodside will protect and not retaliate against those who report any breach of law or any violation of Woodside's policies, principles or values or any other legal or ethical concern, including by protecting their identity to the extent possible or otherwise required by law and protecting them from detrimental or retaliatory treatment as a result of their protected activity.

This Policy documents Woodside's commitment to maintaining an open and ethical working environment in which Woodside people (as defined below) are encouraged to report wrongdoing and are able to report instances of misconduct or suspicious activity or circumstances (collectively, "unacceptable conduct") without fear of intimidation or reprisal. Examples of **unacceptable conduct** are given in Section 2.3.

Given Woodside operates in multiple countries with differing legal, regulatory and governance regimes, what is required or appropriate can vary between jurisdictions. There may be circumstances in which some of the requirements set out in this Policy are not required or appropriate to be applied in a particular jurisdiction, or where additional legal requirements apply, in which case Woodside will apply the legally required standards in the relevant jurisdiction.

References in this Policy to **Woodside** include references to Woodside Energy Group Ltd, and all its subsidiaries.

2 ABOUT THIS POLICY

2.1 Purpose of this Policy

The purpose of this Policy is to:

- help detect and address unacceptable conduct;

- help provide employees and, to the extent required by law, contractors with a supportive working environment in which they feel able to raise issues of legitimate concern to them and to Woodside;
- provide information about the protections available to people who report unacceptable conduct;
- provide information about to whom reports of unacceptable conduct may be made, how they may be made, and how Woodside will investigate them where appropriate; and
- help support and protect people who report unacceptable conduct.

2.2 Who is covered by this Policy?

This Policy applies to reports of unacceptable conduct which are made by current or past:

- Woodside directors, officers and employees (including interns and secondees);
- to the extent required by applicable law, Woodside contractors and suppliers (whether paid or unpaid) and their employees;
- associates¹ of Woodside, for example, a director or secretary of a related company of Woodside.

It also applies to reports of unacceptable conduct which are made by any relatives, dependants or spouses (or that spouse's dependants) of individuals listed above to the extent required by law.

In this Policy each person in the categories listed above is referred to as a **Woodside person** (and collectively **Woodside people**).

A Woodside person may qualify for protection as a whistleblower under the Australian Corporations Act 2001 (Cth) (**Corporations Act**), *Taxation Administration Act 1953* (Cth), U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act, where applicable, if they make a relevant disclosure or report of unacceptable conduct directly to a Recipient or other external eligible recipient as set out in Section 3.1.

2.3 Conduct covered by this Policy

Unacceptable conduct covered by this Policy includes any conduct which:

- is dishonest, fraudulent or corrupt;
- is illegal, such as theft, drug sale or use, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law;
- is unethical, such as dishonestly altering company records or data or adopting questionable accounting practices;
- is potentially damaging to Woodside or a Woodside person, such as unsafe work practices or substantial wasting of company resources;
- may cause financial loss to Woodside, damage its reputation or otherwise be detrimental to Woodside's interests;
- poses a significant risk to public safety or the stability of, or confidence in, the financial system (whether or not it involves a breach of the law);
- involves engaging in or threatening to engage in detrimental conduct against a person who has made a report of unacceptable conduct, or is believed or suspected to have made, or be planning to make, a report of unacceptable conduct under this Policy;
- relates to potential misconduct or an improper state of affairs or suspicious circumstances in relation to Woodside's tax affairs; or
- involves any other kind of misconduct or an improper state of affairs or suspicious circumstances in relation to Woodside that is suspected to violate applicable law or Woodside policies.

¹ As defined in the *Corporations Act 2001* (Cth).

Woodside people must not deliberately make a false report.

In order to qualify for protection under applicable whistleblower laws, a Woodside person making a report of unacceptable conduct must have reasonable grounds to suspect the unacceptable conduct and must make a report in line with the requirements under those laws. Wherever possible, they should include supporting information and evidence when making a report.

2.4 Conduct not covered by this Policy

Conduct that is not covered by this Policy includes:

- breaches of Woodside's Code of Conduct that do not also fall within the categories of conduct described in Section 2.3 of this Policy; or
- personal work-related grievances that are excluded from the whistleblower protections under the Corporations Act; or
- any activity that is not protected by applicable law providing whistleblower or other anti-retaliation protections.

These matters may be raised and reported in accordance with Woodside's Code of Conduct or Grievance Resolution Process, as applicable. Woodside people can speak to a Human Resources business partner for guidance on Woodside's Grievance Resolution Process.

2.5 Availability of this Policy and further information

This Policy is made available on Woodside's intranet website to Woodside employees, officers and other parties having such access. It is also made publicly available on the Woodside internet website.

Woodside people can contact Woodside's General Counsel, VP Ethics & Compliance, or a member of Woodside's Legal or Ethics & Compliance teams, for further information and guidance on this Policy.

3 REPORTING UNACCEPTABLE CONDUCT

3.1 How to make a report under this Policy

Woodside encourages all Woodside people to speak to their Line Manager or a Human Resources business partner in the first instance.

If a Woodside person would like to make a report to an eligible recipient under applicable whistleblower laws (and receive the protections under those laws), they can make a report of unacceptable conduct to:

- the VP Ethics & Compliance or Head of Ethics & Compliance Australia;
- Regional Head of HR Australia or Regional Head of HR International;
- the General Counsel (or delegate);
- the VP of Audit;
- any Woodside officer, senior manager (EVP level and above), auditor or actuary; or
- if the report relates to Woodside's tax affairs, the VP of Tax.

Reports (including anonymous reports) can be made confidentially to any of the above Recipients. Recipients may be contacted by phone (08 9348 4000), email, or by post to the following addresses: Mia Yellagonga, 11 Mount Street, Perth, Western Australia 6000 or 1500 Post Oak Boulevard, Houston, Texas 77056.

In addition, reports can be made to the EthicsPoint hotline service either by phone or online at woodside.ethicspoint.com. Additional details regarding the EthicsPoint hotline service are provided in Section 6.3.

Reports may also be made under the Australian whistleblower laws, where applicable, to the following external eligible recipients:

- a lawyer (but not a lawyer employed by Woodside) for the purposes of obtaining legal advice or representation;
- the Australian Securities and Investments Commission (**ASIC**), the Australian Prudential Regulation Authority (**APRA**), the Commissioner of Taxation, or another Commonwealth body prescribed by regulation, as appropriate;
- under certain circumstances, to a journalist or member of Commonwealth, state or territory parliaments in accordance with the requirements set out in the Corporations Act for making an “emergency disclosure” or a “public interest disclosure”; and
- if the report relates to Woodside’s tax affairs, a registered tax agent or BAS agent of Woodside.

Reports may also be made according to the U.S. Securities and Exchange Commission’s (“SEC”) whistleblower protections, available at <https://www.sec.gov/whistleblower/frequently-asked-questions>.

3.2 How to make an anonymous report

Woodside recognises that there may be issues of such sensitivity that a Woodside person may wish to make an anonymous report.

Anonymous reports of unacceptable conduct can be made to any of the Recipients identified in Section 3.1 of this Policy by contacting them via phone, email or by post.

Anonymous reports can also be made to Woodside’s external whistleblower hotline which is operated by EthicsPoint. Any Woodside person may use the whistleblower hotline to report, or receive guidance in respect of reporting, suspected unacceptable conduct under this Policy. Contact details for the whistleblower hotline are set out in Section 6.3.

3.3 What happens when I make a report?

Where a Woodside person contacts EthicsPoint to report suspected unacceptable conduct, they will have the option of either identifying themselves or remaining anonymous. Reports can be made either by phone or online.

The EthicsPoint service records all of the relevant information provided by the Woodside person. Whether anonymous or not, to allow Woodside to evaluate and investigate the issue, it is important that reports include sufficient information in relation to the alleged unacceptable conduct.

All EthicsPoint reports are referred, along with the information provided by the Woodside person, to Woodside’s Head of Ethics & Compliance Australia, Regional Head of HR Australia and Regional Head of HR International, who will determine whether it is appropriate to commence an investigation, which will be conducted in accordance with the confidentiality requirements and protections set out below.

Where a Woodside person makes a report to a Recipient, the report will be recorded in Woodside’s investigations case management system.

The report will be assessed to determine whether the report qualifies for protections under applicable whistleblower laws, whether it is appropriate to commence an investigation into the report, and whether that investigation should be conducted in accordance with the confidentiality requirements and protections set out in this Policy.

4 INVESTIGATING REPORTS OF UNACCEPTABLE CONDUCT

4.1 Who investigates a report?

Where it is appropriate and practicable to investigate a report, an appropriate internal or external investigator (or investigators) will be appointed to assess and investigate the report. A person will only be asked to investigate a matter if they can do so in an impartial manner.

In certain circumstances (for example where the report involves allegations of fraud or is otherwise not appropriate to be investigated internally) Woodside may decide to appoint external investigators.

Where a report of suspected unacceptable conduct relates to a significant matter involving the Chief Executive Officer or a senior executive that reports directly to the Chief Executive Officer, the matter will be referred by the VP Ethics & Compliance directly to the Chair of the Board Audit & Risk Committee.

Reports may not be able to be investigated if insufficient information has been provided to warrant an investigation, and the Woodside person who has made the report cannot provide additional requested information. Woodside's VP Ethics & Compliance and/or his/her delegate will determine if a report cannot be investigated.

4.2 How is an investigation carried out?

The person appointed to investigate the report will follow normal Woodside procedures for handling a complaint or disciplinary issue. This would generally involve, where appropriate:

- undertaking a fair, independent and discreet investigation into the substance of the report to determine whether there is evidence to support the matters raised;
- respecting individual confidentiality to the extent possible or as required by applicable law and, attempting to protect the identity of the reporter (see Section 5 for further information);
- collecting available data and verifying the reported information;
- in order to observe the rules of procedural fairness, interviewing relevant persons including, if appropriate, those accused or implicated by the report to understand their perspective;
- proceeding with due care and appropriate speed; and/or
- consulting or informing employee representative bodies when and as required.

Whenever a report of suspected unacceptable conduct mentions or relates to any Woodside person, Woodside is committed to treating those persons fairly, as appropriate in the circumstances, including by following the processes set out in this Policy as appropriate or otherwise required by law.

4.3 What happens after an investigation?

At the end of the investigation, the investigator(s) will prepare an investigation report which includes all relevant findings of the investigation. A summary of outcomes of all investigations are reported to the CEO.

In so far as possible or to the extent required by law, the identity of the Woodside person who reported the unacceptable conduct will be redacted from any written investigation reports unless they have consented to disclosure of their identity.

Where issues of discipline arise, the disciplinary process will also be in line with Woodside's procedures for disciplinary matters. Where allegations of unacceptable conduct made against a person cannot be substantiated, that person will be advised accordingly and will be entitled to continue in their role as if the allegations had not been made.

4.4 What if I have been involved?

A person who has committed or been involved in unacceptable conduct will not be immune from disciplinary action merely because they have reported the unacceptable conduct in accordance with this Policy. However, the person's conduct in making the report is likely to be taken into account in determining what disciplinary action is appropriate.

4.5 Will I be kept informed?

Once the matter is finalised, a verbal report will be made to the Woodside person who disclosed the matter. This report will explain the findings and actions taken to the fullest extent possible within commercial, legal and confidentiality constraints. Where the Woodside person who initiated the matter chooses to remain anonymous, alternative arrangements may be made for providing a verbal report of the outcome of the investigation to that person, where possible. There may be circumstances where it is not appropriate to provide details of the outcome of the investigation to the Woodside person who disclosed the matter.

5 PROTECTING PERSONS WHO REPORT UNACCEPTABLE CONDUCT

The protections listed in this section apply to reports of unacceptable conduct made to Recipients set out in Section 3.1 of this Policy to the extent possible or as required by applicable law.

5.1 Will my identity be treated confidentially?

If a Woodside person makes a report of unacceptable conduct under this Policy, Woodside will take steps to ensure that person's identity is protected from disclosure.

A Woodside person who intends to make a report under this Policy may make a request via the whistleblower hotline for special protection measures if their identity is likely to be readily inferred from the nature of the information in the report.

Recipients, EthicsPoint, or any other person with knowledge of the report must not disclose the Woodside person's identity (e.g. name, staff ID or email address) unless:

- the Woodside person making the report consents to the disclosure;
- the disclosure is required by law;
- the disclosure is made to ASIC, APRA, the Commissioner of Taxation (if the report relates to Woodside's tax affairs) or the Australian Federal Police, or at the request of another Government Body, as defined below; or
- it is disclosed confidentially and under privilege to a lawyer for the purpose of receiving advice in relation to legal obligations of protection and confidentiality.

Recipients may only disclose information that is likely to lead to identification of the Woodside person who has made a report (such as their role and responsibilities, if these are unique) where disclosure does not violate applicable law and either one of the exceptions above apply or it is reasonably necessary for Woodside to investigate a report and reasonable steps are taken to reduce the risk that the person's identity is disclosed.

Woodside will ensure that any records relating to a report of unacceptable conduct are stored securely and confidentially and are able to be accessed only by Woodside staff who are authorised to access the information for the purposes of assessing or investigating the report.

It is illegal under Australian law for a person to disclose the identity of a Woodside person who has made a report of unacceptable conduct to a Recipient or other external eligible recipient as set out in Section 3.1 of this Policy, or to disclose information which is likely to lead to their identification, outside of the above circumstances.

Such unauthorised disclosure will also be an offence under Australian law, will be regarded as a disciplinary matter and will be dealt with in accordance with Woodside's disciplinary procedures.

If a Woodside person believes there has been an unauthorised disclosure of their identity or information which is likely to lead to their identity being disclosed, in breach of Australian law, they should report this to the whistleblower hotline or a Recipient. Reports of unauthorised disclosure may also be made to ASIC, APRA or the Commissioner of Taxation (if the original report related to Woodside's tax matters) for investigation.

5.2 Will I be protected from retaliation if I make a report?

Woodside is committed to protecting and respecting the rights of any Woodside person who reports unacceptable conduct in accordance with this Policy.

Woodside will not tolerate any actual or threatened (whether express or implied and whether or not there is any intention to carry out the threat or the Woodside person who receives the threat fears that the threat will be carried out) reprisals (including dismissal or demotion), discrimination, bias, harassment, intimidation, victimisation or any other injury or damage to any person suspected of making a report of unacceptable conduct, or, to the extent required by applicable law, against that person's colleagues, employer (if a contractor), relatives, or any other person where the reason for the detrimental conduct relates to the suspicion that a person has made, may make, or could make a report of unacceptable conduct.

Any such retaliatory action may be an offence under Australian law, will be treated as serious misconduct and will be dealt with in accordance with Woodside's disciplinary procedures.

Reasonable administrative action to protect a Woodside person from detriment where they have made a report, and performance managing a Woodside person where such action is in line with Woodside's performance management framework, is not detrimental conduct. If such actions are undertaken, Woodside will explain to the Woodside person the reason for the action.

If a Woodside person believes that they have been subject to detrimental conduct they should report this to the whistleblower hotline or a Recipient set out in Section 3.1 of this Policy. In Australia, reports of detrimental conduct may also be made to ASIC, APRA, or the Commissioner of Taxation (if the original report related to Woodside's tax affairs).

5.3 Are there any other protections available if I make a report?

In addition to the above, under Australian law a Woodside person who has reasonable grounds for suspecting that unacceptable conduct has taken place, and who reports the matter to a Recipient, may be entitled to additional legal protections in certain circumstances, including:

- they may be protected from civil, criminal or administrative legal action for making the report;
- they may be protected from contractual or other remedies being sought against them on the basis of the report;
- the information they provide may not be admissible in evidence against them in legal proceedings (unless they have provided false information); and
- in some circumstances they may be entitled to compensation or another remedy through the courts if:
 - they suffer loss, damage or injury because of a report of unacceptable conduct; and
 - Woodside failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

Under Australian law, these protections may not apply to reports made to Recipients that concern a personal work-related grievance of the person making the report or breaches of Woodside's Code of Conduct that do not fall within the categories of conduct described in Section 2.3 of this Policy.

Additionally, the US SEC provides protections for whistleblowers who report a possible securities law violation to the Commission, including prohibiting employers from retaliation and providing a

private right of action in certain circumstances for whistleblowers who faced retaliation. More information is available at <https://www.sec.gov/whistleblower/retaliation>.

Woodside encourages Woodside people wishing to make a report to seek independent legal advice in relation to the protections available to them.

Nothing in this Policy will be interpreted or applied in any way that prohibits, restricts, or interferes with an individual's (a) exercise of rights provided under, or participation in, "whistleblower" programs of any applicable regulatory agency or governmental entity (each, a "Government Body"), or (b) reporting of possible violations of applicable law to any Government Body, including cooperating with a Government Body in any governmental investigation regarding possible violations of applicable law.

5.4 Can I make a report anonymously?

As set out above, anonymous reports of unacceptable conduct can be made to the Recipients identified in Section 3.1 of this Policy, or via EthicsPoint.

A Woodside person who makes an anonymous report of unacceptable conduct may refuse to answer questions they feel could reveal their identity at any time. If, however, insufficient information is provided, Woodside may not be able to investigate the anonymous reporter's claims.

5.5 Protecting privacy

To the extent that any of the information recorded by Woodside, or the whistleblower hotline on Woodside's behalf, constitutes "personal information" about the caller under applicable privacy law, it should be noted that:

- the purpose of the collection of that information is to assist the whistleblower hotline and Woodside to respond to issues raised by the caller and to protect or enforce Woodside's legal rights or interests or to defend any claims;
- personal information may be used for the primary purpose for which it was collected or for any related secondary purpose that could reasonably be expected; and
- personal information may be disclosed as described under Section 5.1.

Woodside only collects, uses or discloses personal information, including sensitive information, as allowed by law. Further details are available in Woodside's Privacy Procedure.

6 POLICY REVIEW, TRAINING AND CONTACT DETAILS

6.1 Review of this Policy

Woodside will regularly monitor and review the effectiveness of the protections described in this Policy.

6.2 Training

Recipients, potential investigators and all relevant Woodside personnel will receive regular training in relation to their rights and obligations under this Policy and under applicable whistleblower laws.

6.3 Contacting Woodside's Whistleblower Hotline

Reports to the EthicsPoint hotline service can be made either by phone or online, and can be made at woodside.ethicspoint.com or by calling the relevant local country phone number outlined on the Woodside EthicsPoint website.

If you are located in a country where a local phone number for EthicsPoint is not available, then you may also use the below QR code to submit your concerns.

Through EthicsPoint you have the option of submitting an anonymous report and responding to any clarifying questions while remaining anonymous.



7 APPLICABILITY

Responsibility for the application of this Policy rests with all Woodside employees, contractors and joint venturers engaged in activities under Woodside operational control. Woodside managers are also responsible for promotion of this Policy in non-operated joint ventures.

This Policy will be reviewed regularly and updated as required.

Revised by the Woodside Energy Group Ltd Board in December 2023.