

- 1 Woodside's Commitment**

The Woodside Petroleum Ltd Board of Directors is committed to fostering a culture of corporate compliance, ethical behaviour and good corporate governance. In this regard Woodside will not act to the detriment of any employee as a consequence of them raising with management in good faith any breach of law or any violation of Woodside's principles or values or any other legal or ethical concerns.

This policy documents Woodside's commitment to maintaining an open working environment in which employees and contractors are able to report instances of unethical, unlawful or undesirable conduct without fear of intimidation or reprisal.

Unethical, unlawful or undesirable conduct is referred to in this policy as **unacceptable conduct**.
- 2 Purpose of policy**

The purpose of this policy is to:

  - help detect and address unacceptable conduct;
  - help provide employees and contractors with a supportive working environment in which they feel able to raise issues of legitimate concern to them and to Woodside;
  - provide a Helpline which can be used for reporting unacceptable conduct; and
  - help protect people who report unacceptable conduct in good faith.
- 3 Unacceptable conduct**

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, adopting questionable accounting practices or wilfully breaching Woodside's Code of Conduct;
  - 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 or damage its reputation or be otherwise detrimental to Woodside's interests; or
  - involves any other kind of serious impropriety.
- 4 Woodside processes and Helpline**

It is expected that a Woodside person will be able to resolve most concerns or queries relating to their employment with, or the operations of, Woodside by discussing them with:

  - the Manager Anti-Fraud & Corruption;
  - their immediate supervisor or another senior member of their Business or Functional Unit;
  - their or any human resources manager;
  - a member of the Legal team;
  - the head of Internal Audit; or
  - the Chief Executive Officer.

However, Woodside recognises that there may be issues of such sensitivity that a Woodside person does not feel able to use these options. Alternatively, there may be occasions where the Woodside person in question does not feel the concern they have raised has been adequately addressed or where they feel the parties above may not be impartial. In these cases, the Helpline is available.

The Helpline is operated by **The STOPline**. A Woodside person may use the Helpline to report, or receive guidance in respect of, suspected unacceptable conduct.

- 5 What happens when Helpline is contacted?** Where a Woodside person contacts the Helpline to discuss suspected unacceptable conduct, Helpline will make a record of all of the relevant data provided by the Woodside person. The Woodside person will have the option of either identifying themselves or remaining anonymous.
- 6 Who investigates?** The policy sets out procedures for the investigation and reporting of suspected unacceptable conduct.
- 7 Specific Policies** The Whistleblower Policy outlines the privacy obligations where reports of unacceptable conduct are made as well as the procedures and protocols that will be applied to investigations, reports and consequential actions.

*Revised December 2017*

*Whistleblower Policy updated December 2017*