

Company Name Woodside Petroleum
Industry Extractive
Overall Score (*) 19.4 out of 100

Theme Score	Out of	For Theme
2.6	10	A. Governance and Policies
1.6	25	B. Embedding Respect and Human Rights Due Diligence
2.9	15	C. Remedies and Grievance Mechanisms
4.4	20	D. Performance: Company Human Rights Practices
3.9	20	E. Performance: Responses to Serious Allegations
4.1	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note that Occidental Petroleum and Anadarko Petroleum merged as the assessment process was taking place and as such most of the assessment is based on pre-merger reporting by Occidental Petroleum.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: General HRs commitment: The Company states in its Human Rights Policy that it is committed to conducting business in a way that respects the human rights of all people, including its employees, the communities in which it is active, and those working within its supply chains. [Human Rights Policy, 10/2017: files.woodside] Not met: UNGC principles 1 & 2 Not met: UDHR <p>Score 2</p> <ul style="list-style-type: none"> Not met: UNGPs: The Company indicates that its business conducts is "informed by the UN Guiding Principles on Business and Human Rights". However, "informed by" is not considered a formal commitment following CHRB wording criteria. [Human Rights Policy, 10/2017: files.woodside] Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: UNGC principles 3-6: The Company supports the ten principles of the UNGC. [UNGC Commitment Letter, 11/04/2018: s3-us-west-2.amazonaws.com] Not met: Explicitly list All four ILO apply to EX BPs: The Company's inclusion and diversity policy is committed to diversity and 'ensuring that there are clear

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>reporting processes and procedures in place to prevent and stop discrimination, bullying and harassment'. It also clarifies that 'this policy applies to all personnel, contractors and joint ventures in activities under Woodside's operational control'. Responsibility for the application of the Human Rights Policy 'rests with all Woodside employees, contractors and joint ventures engaged in activities under woodside's operational control'. In addition, the Company's human rights policy, covers all ILO core areas with the exception of discrimination. With respect freedom of association and collective bargaining, it states: 'Recognising the rights of our employees to freedom of association and to join representative organisations for the purpose of engaging in collective bargaining in a manner that is consistent with applicable laws, rules and regulations.' However, CHRB could not find alternative measures to support these rights where they are restricted by law. [Supplier Code of Business Conduct: files.woodside & Inclusion and Diversity Policy, 12/2018: files.woodside]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: The Company's Human Rights Policy cover all ILO Core, including freedom of association and collective bargaining, where it states: 'Recognising the rights of our employees to freedom of association and to join representative organisations for the purpose of engaging in collective bargaining in a manner that is consistent with applicable laws, rules and regulations.' However, It is not clear whether it is committed to respect these rights in all contexts and locations (i.e alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'consistent with applicable laws'. [Code of Conduct, 12/2018: files.woodside & Human Rights Policy, 10/2017: files.woodside] • Met: Respect H&S of workers: The Company states that it is committed to managing its activities to minimise adverse health, safety or environmental impacts, incorporating a right first time approach to quality. [Health, Safety, Environment and Quality Policy, 12/2018: files.woodside] • Met: H&S applies to EX BPs: The Company's health and safety policy states that "responsibility for the application of this policy rests with all Woodside employees, contractors and joint ventures engaged in activities under Woodside operational control. Woodside managers are also responsible for the promotion of this policy in non-operated joint ventures". [Health, Safety, Environment and Quality Policy, 12/2018: files.woodside]
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Based on UN Instruments • Met: Voluntary Principles (VPs) participant: The Company is committed to managing security in a way that respects human rights, as reflected by its membership to the Voluntary Principles on Security and Human Rights. [Human Rights Policy, 10/2017: files.woodside] • Not met: Uses only ICoCA members • Not met: Respecting indigenous rights: The Company states it builds long-lasting relationships with Indigenous communities in which it is active. It will achieve this through various methods including complying with laws relevant to Indigenous communities' rights, heritage and ongoing practices related to customs and traditions. However, no specific evidence found of commitment to respect indigenous rights in general, beyond compliance with laws relevant to indigenous' communities' rights. [Code of Conduct, 12/2018: files.woodside & Indigenous Communities Policy, 12/2016: files.woodside] • Not met: ILO 169 • Not met: UN Declaration on the Rights of Indigenous People (UNDRIP) • Not met: Expects BPs to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: FPIC commitment • Not met: Voluntary Guidelines on Tenure Rights • Not met: IFC performance standards • Not met: Zero tolerance for land grabs • Not met: Respecting the right to water • Not met: Expects BPs to commit to all these rights
A.1.4	Commitment to engage with stakeholders	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: The Company states that one of the principles to achieve the objectives of the Human rights policy is proactively engaging with stakeholders in the communities potentially impacted by its activities. [Human Rights Policy, 10/2017: files.woodside]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> Met: Commits to engage stakeholders in design: The Company states that it respects, considers and responds to the interests of its stakeholders. It is committed to open dialogue and consultation with local communities and their representatives, nongovernmental organisations and government at all levels to ensure that actual and potential impacts arising from its operations are identified and appropriately managed. [Code of Conduct, 12/2018: files.woodside]
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Commits to remedy Score 2 <ul style="list-style-type: none"> Not met: Not obstructing access to other remedies Not met: Collaborating with other remedy initiatives Not met: Work with EX BPs to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Zero tolerance attacks on HRs Defenders (HRDs) Score 2 <ul style="list-style-type: none"> Not met: Expects EX BPs to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: CEO or Board approves policy: The Company's code of conduct contains commitment to human rights and is prefaced and signed by the CEO. [Code of Conduct, 12/2018: files.woodside] Met: Board level responsibility for HRs: The duties of the Sustainability Committee include 'reviewing, and making recommendations to the Board on, the Company's policy and performance in relation to sustainability-related matters, including: [...] 'human rights', 'health and safety', 'heritage and land access', 'security and emergency management; and community relations'. Ann Pickard, a Board member, is the Chair of the Sustainability Committee. [Sustainability committee charter, 07/12/2018: files.woodside & Leadership on website, 05/08/2019: woodside.com.au] Score 2 <ul style="list-style-type: none"> Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Board/Committee review of salient HRs Not met: Examples or trends re HR discussion Score 2 <ul style="list-style-type: none"> Not met: Both examples and process
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Incentives for at least one board member Not met: At least one key EX RH risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Commits to ILO core conventions: See indicator A.1.2 [Human Rights Policy, 10/2017: files.woodside & Code of Conduct, 12/2018: files.woodside] Met: Senior responsibility for HR: The Company states in its website that 'Woodside's approach to human rights is overseen by our Executive Committee and the Board. Woodside's Human Rights Working Group (HRWG) meets on a regular basis to support an integrated approach to human rights across the business and consider opportunities to improve our performance. The HRWG consists of representatives from a range of functions including corporate affairs, contracting and procurement, legal and security and emergency management'. [Human Rights Policy, 10/2017: files.woodside]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Day-to-day responsibility: See above. However, it is not clear how human rights responsibilities are shared among the members of the Human Rights Working Group (HRWG). [Human Rights Policy, 10/2017: files.woodside] • Not met: Day-to-day responsibility for EX BRs: Same as above
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Senior manager incentives for human rights • Not met: At least one key EX HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: HR risks is integrated as part of enterprise risk system: No evidence found of human rights being included in risk management systems [Sustainable Development Report, 31/12/2018: files.woodside] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2 [Human Rights Policy, 10/2017: files.woodside & Code of Conduct, 12/2018: files.woodside] • Met: Communicates its policy to all workers in own operations: The Company states that the communication of the Human Rights Policy is via mandatory Code of Conduct annual training and 'Human rights principles and commitments are included in Woodside's Code of Conduct, which sets out the standard of behavior expected of all Woodside personnel. It is the responsibility of every director, employee and contractor to be familiar and comply with the Code. All employees, contractors and service providers undergo mandatory training on the Code when they join the company and annual compliance training thereafter. An external expert provided human rights and modern slavery awareness sessions to our Executive Committee and Board in late 2018 and an employee training module will be launched in early 2019'. Considering that all are trained, it is assumed that local languages are used. [Human Rights: woodside.com.au & Code of Conduct, 12/2018: files.woodside] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to all 4 ILO core conventions: See indicator A.1.2 • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2 • Met: Communicating policy to EX contractors and joint ventures: All employees, contractors and service providers undergo mandatory training on the Code when they join the company and annual compliance training thereafter. [Code of Conduct, 12/2018: files.woodside & Human Rights Policy, 10/2017: files.woodside] • Not met: Including to EX BPs (removed) <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: The company's Supplier code of Conduct states that "Woodside is committed to conducting business in a way that respects the human rights of all people. This commitment is detailed in our Human Rights Policy. We do not tolerate the occurrence of forced labour, child labour, bonded labour or human trafficking in our operations or supply chain. You [suppliers, contractors and their respective personnel]; must conduct your activities in a manner that reflects Woodside's commitment. You must take reasonable steps to identify, prevent and manage human rights impacts in your operations, controlled entities and supply chain and report any incidents to Woodside." [Code of Conduct, 12/2018: files.woodside & Human Rights Policy, 10/2017: files.woodside] • Met: Including on EX BPs: See above. In addition the company indicates that "Everyone who works for Woodside, including directors, officers, executives, managers, supervisors, employees and contractors (where they are under a contractual obligation to do so), must comply with the Code of Conduct together with policies and any standards, processes and procedures which relate to their daily business activities." [Human Rights Policy, 10/2017: files.woodside & Code of Conduct, 12/2018: files.woodside]

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.5	Training on Human Rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2 • Met: Trains all workers on HR policy commitments: The company states that "All employees, contractors and service providers undergo mandatory training on the Code [which include the human Rights policy] when they join the company and annual compliance training thereafter. [Human Rights Policy, 10/2017: files.woodside & Human Rights: woodside.com.au] • Not met: Trains relevant EX managers including security personnel: Although the company indicates that "Managers are also responsible for promoting the Human Rights Policy in joint ventures where Woodside is non-operator", it is not clear if they have received any Human rights training relevant to their role. [Human Rights: woodside.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2 • Not met: Monitoring implementation of HR policy commitments: The Company states that it continues to take steps to identify, prevent and manage potential human rights impacts in its existing activities and new opportunities. However, it is not enough to award policy monitoring. [Human Rights Policy, 10/2017: files.woodside] • Not met: Monitoring EX BP's <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2 • Not met: Describes corrective action process • Not met: Example of corrective action • Not met: Discloses % of EX supply chain monitored
B.1.7	Engaging business relationships	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: HR affects selection EXs business partners • Not met: HR affects on-going EX business partner relationships: Although the company state that "seek to work with suppliers that work consistently with this Supplier Code of Business Conduct and who demonstrate similar values to Woodside, both in their dealings with us, and also in their dealings with others", it is not clear how the company review their suppliers before take them on or how supplier's review affect their relationship going forward. [Supplier Code of Business Conduct: files.woodside] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Working with EX business partners to improve performance
B.1.8	Approach to engagement with potentially affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Stakeholder process or systems: The Company states that "conduct SIAs for all major development activities and use five-yearly social scans to inform our management plans as appropriate". The company completed SIAs in Karratha and Roebourne in 2017, which identified housing, local employment and business opportunities as key community impacts of our operations on the Burrup and, in line with that, the company delivered a housing strategy to manage properties in the City of Karratha and introduced employment and contracting initiatives, including launching the online Karratha Jobs Portal'. However, not clear how stakeholders were identified. [Sustainable Development Report, 31/12/2018: files.woodside & Stakeholder Consultation, Information sheet, April/2019: files.woodside] • Not met: Frequency and triggers for engagement • Not met: Engagement includes EX business partners workers • Not met: Engagement includes EX business partners communities <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them: The Company provides an example about its operation in Myanmar and the analysis of stakeholders views. The consultation found that due to the distant offshore and short-term nature of the activities, any potential impacts as a result of project activities would be small in scale and of limited extent and duration. Stakeholder consultation found there is unlikely to be any interaction between local artisanal fishing vessels and project activities'. However, no information found on the

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			process, the comments raised, which stakeholders were present. [Stakeholder Consultation, Information sheet, April/2019: files.woodside]

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Identifying risks in own operations: The Company indicates that it commenced a human rights risk assessment in exploration, development and production activities. The risk assessment will be finalised in early 2019. We found no evidence of a description of the process to identify human rights risks and impacts. [Sustainable Development Report, 31/12/2018: files.woodside] • Not met: identifying risks in EX business partners Score 2 <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context) • Not met: Public disclosure of salient risks Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks • Not met: Including amongst EX BPs • Not met: Example of Actions decided Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including EX business partners Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company states in its Human Rights Policy that it provides accessible grievance mechanisms for individuals or communities to raise complaints or concerns, and processes for their resolution. The Company also has a helpline for employees to report any unacceptable conduct. [Human Rights Policy, 10/2017: files.woodside & Whistleblower Policy, 06/2019: files.woodside] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved: The company indicates that "there were 120 allegations of improper behaviour or breaches of the Code investigated in 2018. Sixty four allegations were substantiated and 56 were unsubstantiated. A further 11 allegations remain under or pending investigation. Outcomes for the employees and contractors responsible for the substantiated breaches include 11 contracts being terminated or not renewed, 11 written warnings and 23 verbal warnings. Three terminations were fraud-related." However, it is not clear whether there was report on human rights issues [Sustainable Development Report, 31/12/2018: files.woodside] • Not met: Channel is available in all appropriate languages: The company state that Employees and our stakeholders have access to a confidential, externally-managed helpline for reporting misconduct. However, it is not clear in which language the channel is available. [Sustainable Development Report, 31/12/2018: files.woodside] • Not met: Expect EX BPs to have equivalent grievance system • Not met: Opens own system to EX BPs workers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Company states in its Human Rights Policy that it provides accessible grievance mechanisms for individuals or communities to raise complaints or concerns, and processes for their resolution. [Human Rights Policy, 10/2017: files.woodside] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages • Not met: Expects EX BPs to have community grievance systems • Not met: EX BPs communities use global system
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages users to create or assess system • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: EX BPs consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Response timescales: The company's Whistleblower Policy describe the process taken by the company when a complaint is raised. However, no information found on the timescale to process each complaint. [Whistleblower Policy, 06/2019: files.woodside] • Not met: How complainants will be informed: The company indicates that "once the matter is finalised, a verbal report will be made to the Woodside person who disclosed the matter and if the report was made anonymously, alternative arrangements may be made for providing a verbal report of the outcome of the investigation to that person, where possible. However, it is not clear if the complainant is kept informed throughout the process and if so, how this communication occurs. [Whistleblower Policy, 06/2019: files.woodside] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Escalation to senior/independent level: The Helpline will refer the matter, along with the information provided by the Woodside person, to Woodside's Chief Executive Officer and/or his/her delegate 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. In certain circumstances (for example where the report involves allegations of fraud) the Chief Executive Officer or his/her delegate may decide to appoint external investigators. [Whistleblower Policy, 06/2019: files.woodside]

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C.5	Commitment to non-retaliation over complaints or concerns made	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: The Company states that anyone who reports through its whistle-blowing channel will not suffer any form of retaliation, reprisal or detriment for raising a concern or reporting in good faith a possible contravention of the Code of Conduct. [Code of Conduct, 12/2018: files.woodside] • Met: Practical measures to prevent retaliation: Woodside states that 'will not tolerate any form of adverse action being taken against an individual or community that raises a concern or complaint in good faith'. Also, 'any Woodside person who unlawfully or improperly discloses your identity or information from which you can be identified may be subject to disciplinary action'. The Company indicates that complaints could be made anonymously. [Community Concerns: woodside.com.au & Code of Conduct, 12/2018: files.woodside] Score 2 <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects EX BPs to prohibit retaliation
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights Score 2 <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage target timeframe or achieved • Not met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> • Not met: Pays living wages • Not met: Reviews living wages definition with unions
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Member of EITI: The Company reports that it joined the EITI in 2005 and became an EITI Supporting Company in 2008. [Sustainable Development Report, 31/12/2018: files.woodside] • Not met: Reports of taxes and revenues beyond legal minimums: The Company is committed to reporting its petroleum tax and fee payments in respect of operations in implementing countries where it has an interest. However, it is not clear whether the reporting is beyond legal requirements. [Sustainable Development Report, 31/12/2018: files.woodside] Score 2 <ul style="list-style-type: none"> • Not met: Reports taxes and revenue by country • Not met: Steps taken re non EITI countries • Not met: Disclosures contract terms where not a requirement
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: No specific commitment found to not interfere with workers exercising freedom of association and collective bargaining rights. [Human Rights Policy, 10/2017: files.woodside] • Not met: Discloses % covered by collective bargaining Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.4	Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Injury Rate disclosures: The Company reports that the total recordable injuries (TRI) and total recordable injury rate (TRIR) were 2 and 1.32 respectively in 2018. [Sustainable Development Report, 31/12/2018: files.woodside] • Met: Lost days or near miss disclosures: The Company reports that the lost time injuries (LTI) and lost time injury frequency (LTIF) for 2017 and 2018 were 0.61 and 0.29 respectively. [Sustainable Development Report, 31/12/2018: files.woodside] • Met: Fatalities disclosures: The Company discloses zero number of fatalities for 2018 as well as previous four years. [Sustainable Development Report, 31/12/2018: files.woodside] Score 2 <ul style="list-style-type: none"> • Met: Set targets for H&S performance: The Company had a target to achieve a total recordable injury rate (TRIR) of 1.30 in 2018. [Sustainable Development Report, 31/12/2018: files.woodside] • Met: Met targets or explains why not: The company states that "In 2018, we achieved a total recordable injury rate (TRIR) of 1.32, just over our target of 1.30." The company indicates that it has collaborated with contractors through a leadership forum to develop innovative solutions to the problem and that in 2019, it will continue to make progress on these solutions by including hosting an intensive two week safety activity with key contractors to identify ways to prevent injuries. In Addition, it developed a new framework to improve our HSE representatives' competencies, skills and awareness through structured collaboration. [Sustainable Development Report, 31/12/2018: files.woodside]
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Process to identify indigenous rights holders • Not met: How engages with communities in assessment Score 2 <ul style="list-style-type: none"> • Not met: Commits to FPIC (or ICMM) • Not met: Gives recent example FPIC or dropping deal
D.3.6	Land rights (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Approach to identification of land tenure rights holders • Not met: Describes approach to doing so if no recent deals Score 2 <ul style="list-style-type: none"> • Not met: How valuation and compensation works • Not met: Steps to meet IFC PS 5 in state deals • Not met: Describes approach if no recent deals
D.3.7	Security (in own extractive operations, which includes JVs)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: How implements security (inc VPs or ICOC): The Company states that it enhanced its security and human rights framework by developing standardised contractual requirements for security providers. It also conducted in-country assurance reviews, matured its risk assessment process and enhanced due diligence and conformity assessment processes for joint venture participants and security providers. [Sustainable Development Report, 31/12/2018: files.woodside] • Not met: Example of respecting HRs in security • Not met: Ensures Business Partners follow security approach Score 2 <ul style="list-style-type: none"> • Not met: Assesses and involves communities • Not met: Working with local community
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Action to prevent water and sanitation risks Score 2 <ul style="list-style-type: none"> • Not met: Water targets considering local factors • Not met: Reports progress in meeting targets and shows trends in progress made

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 15.51 out of 80 points scored in themes A-D & F has been applied to produce a score of 3.88 out of 20 points for theme E.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.68 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, Woodside Petroleum made data public that met one or more elements of the methodology in 16 cases, leading to a disclosure score of 1.68 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> • Met: Company reports on GRI: The Company reports its sustainable development report based on GRI. [Sustainable Development Report, 31/12/2018: files.woodside] • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0.4 out of 4	Woodside Petroleum met 1 of the 10 thresholds listed below and therefore gets 0.4 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs) • Met: Score 2 for D.3.4 : Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2019 Key Findings report and technical annex for more details of the research process.

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.