

PURPOSE

This commitment guides respectful and project-appropriate engagement where Valhalla's activities may involve First Nations peoples, Country, cultural heritage, knowledge or data.

PUBLIC COMMITMENT

- Valhalla seeks to engage respectfully and early where a project may affect First Nations interests.
- Cultural heritage, Indigenous data and knowledge should be handled under applicable law, permissions and agreements.
- Valhalla will not imply endorsement, consent or a relationship that has not been established.

STATUS	Published
POLICY OWNER	Managing Director
PROPOSED APPROVER	Valhalla Board
PUBLICATION	Published v1.0

1. Project-specific approach

Valhalla is an Australian-based private company. This document is applied in a practical and adaptable manner, with controls suited to the nature and risk of the activity. The Managing Director may set or adjust implementation arrangements, subject to law, contracts and matters reserved to the Valhalla Board. Ordinary operations may proceed within approved budgets and delegations. A significant departure from ordinary operations, material change, unusual commitment, new jurisdiction or matter outside approved authority must be documented and approved before implementation, including by the Valhalla Board where required.

The appropriate approach depends on the location, activity, legal framework, communities, rights holders and nature of the information involved. Valhalla may seek advice from relevant Traditional Owners, Indigenous organisations, land councils, specialist advisers or project partners where needed.

2. Early consideration and engagement

Potential First Nations interests should be considered during project scoping rather than after key decisions have been fixed. Where engagement is appropriate, Valhalla seeks to provide clear information about purpose, timing, potential impacts, data use, decision points and who has authority to speak for the relevant interests.

3. Cultural heritage and Country

Fieldwork, data acquisition, sampling and site access must comply with applicable heritage, land access and project requirements. Work should pause and be escalated if previously unidentified heritage or a serious cultural concern is encountered.

4. Indigenous data, knowledge and ICIP

Indigenous data, knowledge and Indigenous Cultural and Intellectual Property should not be collected, disclosed, commercialised or used for AI training without an appropriate basis, which may include permission,

agreement, law or established cultural protocol. Access and attribution arrangements should reflect the context and agreed authority.

5. Agreements and benefits

Where a project involves material participation, knowledge, data or impacts, agreements may address roles, permissions, confidentiality, attribution, benefit sharing, employment, procurement, publication, data governance and grievance arrangements. The form and detail should reflect the project.

6. Communications and concerns

Public statements should not overstate consultation, support, consent or benefits. Concerns may be raised through the project lead, Managing Director or the reporting details current on Valhalla's website. Valhalla will seek a respectful and practical response, including correction or changed project arrangements where appropriate.

Related documents

- Research Data Governance Principles
- Environment, Sustainability and Community Policy
- University and Research Collaboration Principles
- Technical Claims, Methodology and Corrections Statement

Document control and approval

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Policy owner	Managing Director	Proposed approver	Valhalla Board
Approved by	C.Dubieniecki	Approved date	August 12th 2026
Review cycle	Bi-Annually or as board requires	Review date	August 12th 2028
Internal source	First Nations Engagement, Indigenous Data and Cultural Heritage Policy		

PUBLICATION CONTROL Published v1.0. This is the current website publication. Procedures may be adapted proportionately, but any substantive amendment to the published commitments requires controlled review, approval and versioning.