



## Fraud, Anti-Bribery and Corruption Policy

### Purpose

As a business we pride ourselves on the quality of relationships we have with the organisations and people we do business with, and the difference we make together in creating better experiences for our customers. Our business is diverse and involves partners, suppliers and stakeholders inside and outside of Australia. One of our core values is 'We do the right thing'. Our Fraud, Anti Bribery and Corruption Policy (FABC Policy) addresses the key principles that must be adhered to in regard to Fraud, Bribery & Corruption, Facilitation Payments, Gifts & Entertainment and Political Donations.

### Scope

This Policy applies to all Directors, Team Members, Vendors, Contractors and Third Parties who work for or with Woolworths Group in all countries of operation. This policy sets out the expectations and standards required.

### Principles

- We want our relationships with partners (consisting of suppliers, service supplier agencies and consultants) to be a positive point of difference for Woolworths and to be a reflection of our core values.
- Fraud, bribery and corruption are serious criminal offences that can have a significant impact on our brand, reputation and profits.
- We are committed to complying with laws and regulations addressing fraud, bribery and corruption in each country in which we conduct business.
- Individuals must not knowingly commit, be party to, or be otherwise involved in fraud, bribery and corruption.
- We will not do business with any organisation that engages in fraudulent or corrupt activity.

### Fraud

- Fraud is dishonest activity that leads to obtaining a personal benefit through deception. It can be by an individual against the company, our customers or other external parties.
- Fraud includes forgery, money laundering, irregular payments or commissions, misuse of company or customer information, theft or misappropriation of cash or stock, company credit card or asset misuse and falsifying accounting records.
- Team members are expected to operate with integrity and comply with policies and procedures addressing the handling of goods, financial accounts, payments and information with respect to record keeping.



## **Bribery & Corruption**

- Bribery and corruption are serious offences and can include improper payments, benefits or gifts offered or given with the purpose of influencing a decision or outcome. The bribe or corrupt act may not always be of a large value. It could be a lunch or an invitation to a sporting event.
- Team members should never give or accept bribes to persuade someone to act in Woolworths' favour, their favour or for the benefit of a third party, including family or friends.
- Team members may engage with governments, regulators, NGOs and industry associations across the world in the ordinary course of business, however they should not offer or accept gifts, or entertainment to or from any government employee or public official.
- Organisations and individuals doing business with Woolworths (including third parties) should never offer a bribe, payment or gift to a Woolworths' team member or anyone working on behalf of Woolworths.
- If a team member is offered a bribe it is expected that they decline the offer and report the matter to their line manager, HR or through our whistleblower service Speak Up.

## **Facilitation Payments**

- Facilitation payments are low value payments to government officials designed to receive favourable treatment or speed up routine governmental actions.
- Team members must never make payments in cash or payments that are unofficial, improper or irregular directly or indirectly to government or public officials in order to secure a permit or licence or accelerate any other decision from a government agency.
- Team members are permitted to utilise legitimate fast-track processes in order to expedite routine actions.
- Third parties must never make payments on behalf of Woolworths in cash or payments that are unofficial, improper or irregular directly or indirectly to public officials or any government agency.

## **Political Donations**

- A political donation includes gifts or payments made to a political party, candidate, or elected parliamentarians at federal, state or local government.
- Woolworths may engage in the political process, provided it is in a manner that is open, transparent and compliant with all relevant federal, state and local laws.
- Our Political Donation Policy outlines team member responsibilities.



## Gifts and Entertainment

- Our Gifts and Entertainment Policy (G&E Policy) is to not accept or provide gifts and/or donations of any monetary value from a supplier or any other stakeholder. Attendance at supplier paid events and other entertainment is only acceptable if it is modest and in accordance with the G&E Policy.
- Team members must not offer or accept any form of gift or entertainment to or from Government officials.
- Our G&E Policy outlines team member responsibilities.

## Investigation and Reporting

- The Head of Group Security & Resilience is appointed as the Anti-Bribery & Corruption Officer. Their role is to provide oversight and advise the business so that fraud, bribery and corruption risks are identified, assessed and all instances of impropriety are investigated.
- We will always investigate and take action where fraud, bribery or corruption is identified, reporting matters to the appropriate authorities as required.
- We have established multiple channels to report suspected incidents of fraud, bribery or corruption.
- Team members are expected to promptly raise issues of suspected breaches to their line manager, HR or through our whistleblower service Speak Up.

### Telephone

- Australia 1800 334 319
- New Zealand 0800 393 76736
- Hong Kong 800-96-0016
- China 400-6-612-693
- India 000-117; at the prompt dial (844) 476-9151
- Thailand 1800-013-018

**Online:** [WoolworthsSpeakUp.ethicspoint.com](https://WoolworthsSpeakUp.ethicspoint.com)

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- The Speak Up service is an independent, confidential service for team members to report misconduct. Speak Up is extended to our vendors, contractors and members of the public to report fraudulent or corrupt activity.

## **Breach of policy**

- Compliance with this policy is mandatory. Team members dealing with suppliers, third parties, government, public officials and consultants are to emphasise and explain these requirements as a condition of our continued relationship with them.
- Any breach of this policy by a team member will result in disciplinary action, may lead to their termination or criminal prosecution and may have serious consequences for all parties involved.

<b>Policy Changes</b>	This policy may be rescinded, changed or replaced at any time at the absolute discretion of General Manager Risk and Assurance and authorised delegates. This policy does not form part of any team member's contract of employment.
<b>Date effective:</b>	17 July 2018
<b>Policy Owner:</b>	General Manager Risk and Assurance