

Team Member Speak Up Policy

Purpose

Our team is a top priority at Woolworths Group. This is why we strive to create a supportive environment that ensures everyone can feel valued, respected and have the opportunity to thrive.

As part of this commitment, our Team Member Speak Up service offers an independent avenue (external to Woolworths Group) where you can confidentially raise matters if you ever feel that a concern you have can't be dealt with internally.

Who can use Team Member Speak Up?

Our Team Member Speak Up Policy applies to current and former team members who work for, or are contracted to a Woolworths Group company, as well as their associates and families, both in Australia and overseas. This group is referred to as 'you' in this policy.

When should you use Team Member Speak Up?

If you believe that a law or Woolworths Group policy has been breached or you have information about a matter listed below, but you don't feel comfortable raising it directly with your leaders or the Culture & People team, you should consider using the Speak Up service.

We recognise that reasons for not raising the matter internally may include:

- you feel that raising the issue internally could result in adverse consequences
- you have good reason to believe that, if you raised the matter internally, it may not be dealt with objectively
- you feel the matter has already been raised internally, but has not been addressed appropriately.

Matters which you can raise with the Team Member Speak Up service include:

- Fraud, bribery, money laundering, corruption, secret commissions, or behaviour that threatens others
- Risk to people or product safety
- Breach of law, including employment, labour, discrimination, or safety laws
- Breach of Group policies including the Code of Conduct
- Theft
- Conflict of interest
- An improper state of affairs or circumstances, or misconduct, in relation to Woolworths Group or one of its related entities
- Conduct which represents a danger to the public or the financial system
- Improper disclosure of confidential information
- Bullying, harassment (including sexual harassment), discrimination
- Violation of human rights

The concerns you raise should be legitimate and ideally supported by evidence. Before contacting the Speak Up service, you should have reasonable grounds to suspect that the information you will provide indicates that one of the above matters is occurring or has occurred.

The independent external Speak Up service provider will assess the report, make it anonymous or confidential if requested, and provide it to the relevant people within the business for review.

Confidentiality and Anonymity

You can choose whether to remain anonymous or reveal your identity. Please note that in some cases, anonymity may limit the ability to investigate the concern.

If you do reveal your identity, it will be treated confidentially by the Speak Up service provider and the Woolworths Group. Your identity (and any information which is likely to lead to your identification) will not be disclosed to anyone other than for the reasons set out below.

Information you provide to the Speak Up service will be treated confidentially. It will not be disclosed to anyone other than:

- where the disclosure is reasonably necessary for the purpose of investigating the matter
- where the disclosure is required or provided for by law (for example to certain regulators) or to obtain legal advice)
- otherwise, where the disclosure is with your consent. The Speak Up provider or Woolworths Group may seek your consent for example to help us appropriately manage the matter and protect you from victimisation.

Where confidentiality cannot be maintained, such as for investigation purposes, you may choose to waive confidentiality or withdraw the complaint altogether.

What protections do you have?

We're committed to protecting those who use the Speak Up service, including against adverse consequences as a result of raising a matter and by protecting their identity and maintaining confidentiality. Any team member who discloses your identity inappropriately, or causes detriment to you, may face disciplinary action including termination.

If you raise a matter via the Speak Up service, you may also have certain protections under law including the *Corporations Act 2001 (Cth)* and *Fair Work Act 2009* including in relation to confidentiality and victimisation.

Investigation and remediation

We will investigate matters where sufficient information is provided to warrant an investigation. Investigations will follow due process, including allowing alleged persons involved an opportunity to respond. Investigations will follow a fair process, without bias, and will typically be conducted by an investigator independent of the relevant business involved, and in some cases by an investigator external to the Woolworths Group.

Woolworths Group, or the Speak Up provider, will acknowledge receipt of your report. Where appropriate a progress update may be provided, but this may not occur in all cases in order to avoid compromising of the investigation or the disclosure revealing of confidential information.

Anyone involved in an investigation, whether as an investigator, witness or decision maker, must treat information related to the investigation as confidential.

Governance

- The Chief Legal Officer (CLO) and Chief People Officer (CPO) oversee the Team Member Speak Up program. Group Compliance supports CLO and CPO by providing advice and reports on the status and nature of issues being raised.
- The CLO, CPO, and other senior leaders including representatives from Group Compliance comprise the Speak Up Committee, which meets at least every six months to review the effectiveness of the service, ensure consistency in process and outcomes, and make recommendations on broader improvement opportunities for the service.
- This policy will be published on the Woolworths Group website, and will be reviewed regularly in line with the Group Policy schedule.

Where to get more information

1. Speak to your team leader
2. Contact Culture & People via the "Get Help" link on wowpeople.woolworths.com.au or call **1800 008 584**

How to make a report

- **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

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