

Supplier Speak Up Policy

Purpose

At Woolworths we are committed to open and positive relationships with all of our suppliers.

We recognise, however, that a situation may arise where a supplier feels an important issue can't be dealt with directly with us, and where the supplier would prefer to use an independent and confidential avenue for raising the issue. We have created the Supplier Speak Up Service for this purpose.

Who can use Supplier Speak Up?

Any supplier, contractor¹, or consultant, as well as their relatives and dependants, which provides goods or services to the Woolworths Group in Australia or overseas can use the service. This supplier group is referred to as 'you' in this policy.

When should you use Supplier Speak Up?

If you believe that you have a concern about, or information regarding a matter you don't feel comfortable raising directly with Woolworths Group through normal business channels, then you should consider using the service.

Reasons for using the Speak Up Service may include:

- you feel raising the issue directly could harm your relationship with Woolworths Group
- you have good reason to believe that, if raised directly, the issue might not be dealt with objectively
- the matter has already been raised, but you feel it has not been addressed appropriately.

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

- Breach of the Food and Grocery Code of Conduct (a separate Grocery Code complaints and resolution process is also available)
- Fraud, bribery, money laundering, corruption, secret commissions, or behaviour that threatens others
- Risk to people or product safety
- Breach of law, including theft, restrictive, unconscionable, or anti-competitive trade practices
- Breach of Woolworths Group Responsible Sourcing Policy
- Conflicts of interest
- An improper state of affairs or circumstances, or misconduct, in relation to Woolworths Group or one of its related entities
- Improper use of confidential information
- Violation of human rights, such as the issues outlined in the Responsible Sourcing Policy

¹ including farm workers, trolley collectors, and cleaners

Confidentiality and anonymity

You can choose whether to remain anonymous or reveal your identity when you contact the Speak Up service. If you reveal your identity to the Speak Up service provider, you can choose whether or not your identity is shared with Woolworths Group. 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, if you decide to share your identity with us, by Woolworths Group.

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

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

Where you are advised confidentiality cannot be maintained, such as for investigation purposes, you may choose to waive confidentiality or not proceed with the complaint if you wish.

What protections do you have?

We are committed to protecting users of the Speak Up service against adverse consequences resulting from raising a matter. Any Woolworths team member who discloses an identity inappropriately, or causes detriment to any Speak Up user will face disciplinary action including possible termination.

Note: 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, also in relation to confidentiality and victimisation.

Investigation and remediation

Investigations will be carried out where sufficient information is provided and an investigation is required. Investigations will follow a fair process, without bias, and will typically be conducted by an investigator independent of the relevant Woolworths Group business, and in appropriate cases by an investigator external to Woolworths Group.

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

Governance

The Chief Legal Officer (CLO) oversees the Supplier Speak Up program to ensure objectivity and independent review. Group Compliance reports and advises on the status and nature of issues being raised.

The CLO, Chief People Officer (CPO) and other senior leaders including representatives from Group Compliance comprise a Speak Up Governance Committee. The Committee 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 is published on the Woolworths Group website.

Where to get more information or make a report

For more information on Speak Up visit the ‘dispute resolution’ section on our supplier portal wowlink.com.au.

To make a report, use one of the following channels:

- **Telephone**
 - Australia 1800 772 173
 - New Zealand 0800 393 76736
 - Hong Kong 852 2852 6506 (in local language)
 - China 400 966 9822 (in local language)

- **EMail** vendorspeakup@deloittedigital.com

- **Online** www.vendorspeakup.deloittedigital.com

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