

Supplier Speak Up and Protected Disclosure Policy

Purpose

Woolworths Group is committed to fostering an inclusive environment where our suppliers are a top priority. This is why we strive to create a supportive environment that ensures everyone can feel valued, respected and feel encouraged to speak up. One of our core values is that we 'always do the right thing' - by acting with integrity, honesty and trust at all times. Woolworths and its suppliers should act lawfully and ethically and in the best interests of the organisation, so if you see or experience something that's not right, it's important that you speak up.

We encourage you to raise concerns you have with your Woolworths contact (e.g. buyer or category manager). However, we understand you may not always want to raise matters that way for reasons including:

- suspected adverse consequences;
- an expectation your report may not be dealt with objectively;
- the matter has already been raised, but you think it has not been addressed appropriately; or
- you wish to remain anonymous.

For that purpose, Woolworths has a Speak Up Program, externally hosted by a third party provider.

Who does this policy apply to?

The Woolworths supplier Speak Up Program is available to any current or former supplier, contractor (including workers, trolley collectors, and cleaners), or consultant, as well as their relatives and dependants, which provides goods or services to the Woolworths Group Limited (and its wholly and majority owned and controlled entities) (**Woolworths Group**) anywhere in the world (referred to as 'you' and 'your'). In addition, affected community members can also raise concerns regarding human rights issues in our supply chain.

Overview

This Policy contains important information about how to make a Speak Up report (including a 'protected disclosure'), how these reports will be handled and the support and protections available. It covers:

- Making a Speak Up report
 - What can you use Speak Up for?
 - What should you NOT use Speak Up for?
 - What is a 'protected disclosure'?
- How to make a Speak Up report?
- How we manage Speak Up matters
 - Confidentiality and anonymity
 - Report handling, assessment and investigation
 - No victimisation
- Speak Up Governance

Making a Speak Up report

What can you use Speak Up for?

The Speak Up Program is a dedicated alternative channel for Woolworths suppliers (as defined above) to raise concerns about conduct that does not meet Woolworths' values or applicable laws. Some examples of such conduct include:

- Breach of the Food and Grocery Code of Conduct
- Breach of the law, including employment, workplace, discrimination, or safety laws
- Bullying, harassment (including sexual harassment), discrimination, or human rights and modern slavery issues
- Sanctioned activities, such as importing and exporting goods or dealing with sanctioned individuals and companies
- Improper use or disclosure of confidential information
- Dishonest or unethical behaviour, including conflict of interest
- A breach of Woolworths' Code of Conduct
- Fraud, theft, bribery, 'kickbacks', money laundering, corruption, secret commissions
- Conduct that may cause harm to the public or the financial system (even if it does not involve a breach of a particular law)
- Misconduct, in relation to Woolworths or one of its related entities.

To enable us to investigate reports in a fair and comprehensive manner, it's important that you have reasonable grounds for your concern. Making knowingly false reports may lead to regulatory action.

What should you NOT use Speak Up for?

Where appropriate, you are encouraged to raise concerns in the first instance with your internal Woolworths contact (such as your buyer, category manager or store manager) if you have one and feel comfortable doing so. This includes any interpersonal conflicts or grievances.

Speak Up is available for situations where you may not feel comfortable raising a concern directly. Examples of when you might report via Speak Up include where:

- your concerns involve systemic issues or an improper state of affairs at Woolworths;
- you wish to remain anonymous;
- you think that speaking to your Woolworths contact would be a conflict of interest.

Speak Up should never be used in emergency situations. If you or someone you know require emergency assistance, please contact your local emergency authorities, including police and ambulance services.





What is a protected disclosure?

Speak Up reports on serious matters involving a breach of some laws, misconduct or an improper state of affairs which may be a 'protected disclosure' and receive 'whistleblower' protections under the law, including a statutory right to anonymity and protection from victimisation.

Woolworths has appointed the Speak Up Program (made available via a third party provider) as an eligible recipient for receiving protected disclosures, as well as other Speak Up reports. Matters reported to the Speak Up Program are referred to Woolworths for assessment, triage and management in accordance with this Policy and applicable whistleblower legislation.

How to make a Speak Up report

Reports can be made via phone or in writing in 130 commonly spoken languages. (Note: phone reporting in some languages is subject to interpreter availability)

	Australia - 1800 772 173	International: +61 2 8522 9508 <i>(Note: international call charges apply)</i>	New Zealand - 0800 393 76736
	Malaysia - 1800 81 0010	Bangladesh - 9610 998444	Thailand - 1800 012 655
	India - 000 800 0501 474	Philippines - 1800 1 322 0463	Hong Kong - 800 969 643
	NRS - Suppliers with hearing or speech difficulties can contact Speak Up through the Australian National Relay Service (NRS) or New Zealand Relay		
Grocery Code reporting line Australia - 1800 4GROCERY (1800 447623)			
	WoolworthsGroup.com.au/SpeakUp		 

How to make a Protected Disclosure

Protected Disclosures can be made through the Woolworths' **Speak Up Program** as per directions above.

Alternatively, Woolworths has appointed the following Protected Disclosure Officers:

Title	Name	Email	Telephone
Chief People Officer	Deborah Beegling	PD4CPO@woolworths.com.au	1800 PD4CPO (1800 734 276)
Chief Legal Officer	Peter Atkin	PD4CLO@woolworths.com.au	1800 PD4CLO (1800 734 256)
Chief Financial Officer	Stephen Harrison	PD4CFO@woolworths.com.au	1800 PD4CFO (1800 734 236)

How we manage Speak Up matters

Confidentiality and Anonymity

When making a Speak Up report you are provided with the option to remain anonymous. If you disclose your identity, you can also ask us to keep your identity confidential, or only disclose it for limited purposes.

If you do identify yourself, we are committed to protecting your identity and maintaining confidentiality in line with this policy and applicable legislation. Your identity will not be disclosed without your consent, unless we are required to do so by law, or need to do so in seeking confidential legal advice. We may disclose information about your report - but not your identity - if reasonably necessary for investigating a matter raised in your report or (in some circumstances) under applicable legislation.

The Speak Up Program allows anonymous communication with you. During such conversations, you can choose not to answer any follow-up questions, including if you feel it could reveal your identity.

In some cases, choosing to remain anonymous or to have your identity kept confidential may limit Woolworths' ability to investigate and deal with the matter. Once we have received the report, you may choose to change your mind about anonymity at any time, if that will assist in responding to and investigating the issues raised. It is your choice.

Report handling, assessment and investigation

- **Acknowledgement** - On receipt of a Speak Up report you will receive an acknowledgement. You will be able to set a password that will enable you to log into a confidential portal to communicate with us, anonymously if you would prefer, and will also be able to elect to receive email notifications.
- **Assessment** - The report will be assessed by Woolworths' Group Speak Up Manager or their delegate, to determine whether the report is a protected disclosure (and whether statutory protections apply), and to triage, review, and allocate the Speak Up report so that it is appropriately addressed and investigated.
- **Addressing your Speak Up report** - in the normal course, Speak Up reports will be investigated, as appropriate in the circumstances.
 - The purpose of an investigation is to determine what has happened, including whether an alleged incident has or has not occurred, and who was involved.
 - We may correspond with you if we have not received enough information from you in your report. If you do not provide the information requested, this may limit our ability to conduct an investigation and we may not be able to take any further steps.
 - Investigations will follow fair and due process, without bias. Our investigations will be conducted independently of the relevant matter disclosed, and will generally allow any persons against whom allegations are made an opportunity to respond. The duration of an investigation will depend on the circumstances, including the number of allegations and witnesses, amongst other factors.
- **Storing your information** - The information you provide (including your identity) will be stored confidentially and securely in access-controlled systems.
- **Communication with you** - Periodic progress updates will be provided to you, as appropriate. The nature of these updates will depend on the circumstances. For example, we will not provide information that may compromise the investigation or the disclosure of confidential information.
- **Outcome** - You will be informed when the action taken to address your report has been completed. You will receive information regarding the outcome as appropriate in the circumstances.

No Victimisation

Victimisation of a person because they have made a Speak Up report, protected disclosure or other complaint is **not permitted and will not be tolerated at Woolworths**. We take this issue very seriously. Any team member who takes any action which results in victimisation and/or has adverse impacts on you for making a Speak Up report, may face disciplinary action, up to and including termination.

If you feel that you have been victimised, you may raise a new Speak Up report for this purpose, or contact Woolworths Group's Whistleblower Protection Officer (WPO) at WPOfficer@Woolworths.com.au. The WPO is independent of the investigation process, and is equipped to review or escalate your concern.

Speak Up Governance

- Woolworths' *Chief Legal Officer (CLO)* and *Chief People Officer (CPO)* oversee the Speak Up Program.
- The CLO, CPO, and other Woolworths senior leaders including representatives from Group Compliance comprise a Speak Up Committee, which meets at least every six months to review the effectiveness of the Speak Up Program, to support achieving appropriate processes and outcomes, and make relevant recommendations.
- This Supplier Speak Up and Protected Disclosure Policy and the Team Member Speak Up and Protected Disclosure Policy (including Annexures), are Woolworths Group Limited's whistleblower policy for the purpose of the Corporations Act 2001 (Cth) (Aus) and the Protected Disclosures (Protection of Whistleblowers) Act 2022 (NZ). It also applies to all related bodies corporate as defined in the Corporations Act.

Policy Changes	This policy may be changed at any time
Date approved:	01/04/2026
Date effective:	April 2026
Accountable:	Chief Legal Officer (CLO) and Chief People Officer (CPO)
Contact:	wpofficer@woolworths.com.au
Related policies:	Team Member Speak Up and Protected Disclosure Policy; Code of Conduct
Publishing	This policy will be made available through the Woolworths Group Internet site as well as the supplier portal ' <i>Partnerhub</i> '