

# Team Member Speak Up and Protected Disclosure Policy

## Purpose

Woolworths Group is committed to fostering an inclusive environment where team members feel heard, valued and respected whilst at work. It's important that team members ('you') feel encouraged to speak up about conduct that you feel is not in line with any laws, the expected behaviours of our team and/or leaders, or our values as outlined in the Code of Conduct and Policies. For that purpose, Woolworths has a Speak Up Program, externally hosted by a third-party provider.

## Who does this policy apply to?

The Woolworths team member Speak Up Program is available to current and former team members (both employees and contractors) who work for, or are contracted to, Woolworths Group Limited (and its wholly and majority owned and controlled entities) (**Woolworths Group**) anywhere in the world, as well as their associates and families.

## 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?
- Support available to team members
- How we manage Speak Up matters
  - Confidentiality and anonymity
  - Report handling, assessment and investigation
  - No victimisation
- Speak Up Governance
- Annexures A & B - more detailed information about protected disclosures (in Australia and New Zealand).

## Making a Speak Up report

### What can you use Speak Up for?

The Speak Up Program is a dedicated alternative channel for Woolworths team members to raise concerns about conduct that does not comply with our group policies, values or applicable laws. Some examples of such conduct include:

- Breach of the law, including employment, workplace, discrimination, or safety laws
- Bullying, harassment (including sexual harassment)
- 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 or Policies
- 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 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 disciplinary action.

### What should you NOT use Speak Up for?

Typically, **interpersonal workplace conflicts or grievances** should be raised:

- if you feel comfortable doing so, with the person who you feel is behaving inappropriately; or
- with your line manager, team leader or your People / Team Experience partner; or
- People Advisory

If you have concerns raising a complaint through these channels, you can raise it via Speak Up.

Examples of when you might report a personal workplace grievance via Speak Up include where:

- your concerns involve systemic issues or an improper state of affairs at Woolworths;
- you have concerns about victimisation or wish to remain anonymous, and selecting an option from the list above will not address those concerns; or
- you have concerns that the person receiving your complaint will have a conflict of interest and selecting an option from the list above will not address those concerns.

**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 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 all 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.

Please note there are other channels, beyond the Speak Up program, to other eligible recipients for 'protected disclosures'. Please see Annexure A (for Australia) and Annexure B (for New Zealand) for further information in this regard.

## How to make a Speak Up report

|   |   |  |   |
|---|---|--|---|
|  | <b>Australia</b> - 1800 334 319   | <b>International:</b> +61 2 8522 9508<br><i>(Note: international call charges apply)</i> | <b>New Zealand</b> - 0800 393 76736   |
|   | <b>Malaysia</b> - 1800 81 0010  | <b>Bangladesh</b> - 0800-0000333   | <b>Thailand</b> - 1800 012 655  |
|   | <b>India</b> - 000 800 0501 474   | <b>Philippines</b> - 1800 1 322 0463   | <b>Hong Kong</b> - 800 969 643  |
|   | <b>NRS - Team Members with hearing or speech difficulties</b> can contact Speak Up through the Australian National Relay Service (NRS) or New Zealand Relay |  |   |
|  | <a href="https://WoolworthsGroup.com.au/SpeakUp">WoolworthsGroup.com.au/SpeakUp</a>   |  |   |

### Additional support available to team members

For free, confidential 24/7 personal safety, health and wellbeing support for Woolworths team members and their families, call Sonder on 1800 234 561 (Aus) or scan the QR code, or call 13 YARN (13 92 76) an Aboriginal & Torres Strait Islander crisis support line.

Support is also available via Lifeline on 13 11 14 (Aus) or 0800 LIFELINE / 0800 543 354 (or text HELP to 4357) (NZ) or the Mental Health Crisis Team on 1800 011 511 (Aus).



## 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 it is 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 confidentiality 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 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 or has adverse impacts on you in 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](mailto: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 to make relevant recommendations.
- This Team Member Speak Up and Protected Disclosure Policy and the Supplier 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.

|                          |   |
|--------------------------|---|
| <b>Policy Changes</b>    | This policy may be changed at any time, and does not form part of any team member's contract of employment. |
| <b>Date approved:</b>    | 01/04/2026  |
| <b>Date effective:</b>   | April 2026  |
| <b>Accountable:</b>      | Chief Legal Officer (CLO) and Chief People Officer (CPO)  |
| <b>Contact:</b>          | wpofficer@woolworths.com.au   |
| <b>Related policies:</b> | Supplier Speak Up and Protected Disclosure Policy; Code of Conduct  |
| <b>Publishing</b>        | This policy will be made available through the Woolworths Group Internet site as well as the People portal. |

## Annexure A - Legal protections under the Australian Corporations Act 2001 (Cth) and Tax legislation

### Whistleblower protections for 'protected disclosures' - key facts

- Under Australian law, whistleblowers can identify and call out particular misconduct and improper affairs at Woolworths, and are provided special protections under legislation, including a right to anonymity and protection from victimisation
- These Australian whistleblower protections apply when an **'eligible whistleblower'** discloses a **'disclosable matter'** to someone who is **'authorised'** to receive the disclosure. The information in this annexure provides further detail about these important concepts.
- If you wish to make a disclosure as a whistleblower, you can direct your disclosure to the Speak Up Program, a Protected Disclosure Officer (the Chief People Officer, Chief Legal Officer or Chief Financial Officer at Woolworths) or a senior manager (as defined in applicable legislation). More information about how you can make a protected disclosure and how to contact our Protected Disclosure Officers is set out in this annexure.
- If you make a protected disclosure that attracts whistleblower protections, we will manage the matter in accordance with the legal requirements.
- In addition to the notes below, you can find out more information about whistleblower protections on ASIC's website [here](#).

### Introduction

In Australia, you can make a "protected disclosure" if:

1. you are an "eligible whistleblower" (this is explained in Part A, paragraph 1. below);
2. you make a disclosure directly to a person or entity who is eligible to receive a protected disclosure (this is explained in Part A, paragraph 2 below); and
3. you have reasonable grounds to suspect your disclosure is about a "disclosable matter" (this is explained in Part A, paragraph 3 below).

Making a "protected disclosure" means that you will qualify for relevant legal protections under the Corporations Act or Tax Act (where applicable) from the time you make the disclosure, in addition to the protections that you would receive under this policy if you use team member Speak Up. The protections apply even if you make your disclosure anonymously, and even if you or the recipient do not recognise that the disclosure qualifies for protection. The protections also apply if your disclosure turns out to be unsubstantiated, as long as you had reasonable grounds to suspect the subject of the disclosure at the time you made it.

Note that the protections do not grant immunity for any misconduct you have engaged in that is revealed in your disclosure or subsequently discovered.

### A. How do I make a protected disclosure?

The requirements for making a protected disclosure on or after 1 July 2019 under the Corporations Act or Tax Act are set out below:

#### 1. You must be an "eligible whistleblower"

An "eligible whistleblower" making a protected disclosure under the Australian whistleblower laws is anyone who is or has been in respect of an Australian Woolworths Group company:

- a. an officer;
- b. an employee;
- c. an individual who supplies goods or services, and employees of suppliers (whether paid or unpaid);
- d. an individual who is an associate of the company;
- e. either:

- in relation to the Corporations Act, a spouse or relative, dependent, or dependent of a spouse of any of the above individuals; or
- in relation to the Tax Act, a spouse, child, dependent, or spouse of a dependent, of any of the above individuals.

**2. You must make the disclosure to someone authorised to receive a protected disclosure**

Protected Disclosures can be made through the Woolworths’ **Speak Up Program**.

Alternatively, Woolworths has appointed the following Protected Disclosure Officers:

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

Additional eligible recipients include:

- an officer or senior manager of an Australian Woolworths Group company;  
*Note: ‘officers’ include a Woolworths director or company secretary; A ‘senior manager’ is a person whose decisions affect at least a substantial part of Woolworths, or have the capacity to significantly affect Woolworths’ financial standing.*
- an auditor, or a member of an audit team conducting an audit, of a Woolworths Group company; or
- an actuary of a Woolworths Group company.

For disclosures under the Tax Act:

- any other employee or officer of a Woolworths Group company who has functions or duties that relate to the tax affairs of the Woolworths Group company; or
- a registered tax agent or BAS agent who provides tax agent services or BAS services to a Woolworths Group company.

**Reporting outside of the Woolworths Group**

While Woolworths encourages eligible whistleblowers to make disclosures internally, an eligible whistleblower may also make a protected disclosure under the Corporations Act to the Australian Securities and Investments Commission (ASIC), the Australian Prudential Regulation Authority (APRA) or a prescribed Commonwealth authority. An eligible whistleblower may also make a protected disclosure under the Tax Administration Act to the Commissioner of Taxation.

**Disclosures to legal practitioners**

Under the Corporations Act and Tax Act, disclosures of information to legal practitioners in order to obtain legal advice or legal representation in relation to the whistleblower provisions in that legislation may also be protected disclosures.

### **Public interest disclosures**

There is an additional category of disclosures called 'public interest disclosures' that qualify for protection under the Corporations Act only. These can be made to journalists and members of Parliament, but only if the eligible whistleblower complies with the following strict requirements:

- a. the eligible whistleblower must have first made a qualifying disclosure under the Corporations Act to ASIC, APRA, or a prescribed Commonwealth authority;
- b. at least 90 days has passed since the qualifying disclosure was made;
- c. the eligible whistleblower does not have reasonable grounds to believe that action is being, or has been, taken to address the matters to which the qualifying disclosure related;
- d. the eligible whistleblower has reasonable grounds to believe that making a public interest disclosure would be in the public interest;
- e. after 90 days has passed, the eligible whistleblower must give the body to which the qualifying disclosure was originally made, a written notification that:
  - i. includes sufficient information to identify the qualifying disclosure; and
  - ii. states that the eligible whistleblower intends to make a public interest disclosure; and
- f. the extent of the information disclosed in the public interest disclosure is no greater than to inform the journalist or member of Parliament of the misconduct or improper state of affairs or circumstances, or other conduct falling within the scope of the Whistleblower Protection Scheme.

### **Emergency disclosures**

There is an additional category of disclosures called 'emergency disclosures' that qualify for protection under the Corporations Act only. These can be made to journalists and members of Parliament, but only if the eligible whistleblower complies with the following strict requirements:

- a. the eligible whistleblower must have first made a protected disclosure under the Corporations Act to ASIC, APRA or a prescribed Commonwealth authority;
- b. the eligible whistleblower has reasonable grounds to believe that information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
- c. the eligible whistleblower gave notice to the body to which the qualifying disclosure was made that states:
  - i. that they intend to make an emergency disclosure; and
  - ii. includes sufficient information to identify the qualifying disclosure; and
- d. the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or member of Parliament of the substantial and imminent danger.

Before making a public interest or emergency disclosure, it is important that an eligible whistleblower understands the criteria for protection under the relevant legislation.

### **3. Your disclosure must be about a "disclosable matter"**

Only disclosures of certain types of information will qualify for protection under the Australian whistleblower laws.

Information is a "disclosable matter" under the Corporations Act if the eligible whistleblower has reasonable grounds to suspect that the information disclosed:

- a. concerns misconduct or an improper state of affairs or circumstances in relation to a Woolworths Group company, in circumstances where misconduct may include
  - a. illegal conduct by Woolworths Group, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property;
  - b. fraud, money laundering or misappropriation of funds;
  - c. offering or accepting a bribe;
  - d. financial misstatement or irregularities;
  - e. failure to comply with, or breach of, legal or regulatory requirements;

- f. engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or be planning to make, a disclosure;
- g. negligence;
- h. breach of trust and breach of duty (not just the personal conduct of an individual); or
- b. indicates that a Woolworths Group company or any employee or officer has engaged in conduct that:
  - i. constitutes an offence against, or a contravention of, a provision of any of the following:
    - the Corporations Act;
    - the Australian Securities and Investments Commission Act 2001;
    - the Banking Act 1959;
    - the Financial Sector (Collection of Data) Act 2001;
    - the Insurance Act 1973;
    - the Life Insurance Act 1995;
    - the National Consumer Credit Protection Act 2009;
    - the Superannuation Industry (Supervision) Act 1993;
  - ii. constitutes an offence against any other law of the Commonwealth that is punishable by at least 12 months' imprisonment;
  - iii. represents a danger to the public or the financial system; or
  - iv. is prescribed by any regulations made under the Corporations Act.

Except in certain circumstances, personal work-related grievances will not be protected under the Corporations Act unless they relate to victimisation (see section 3 of part B below). A disclosure is a 'personal work-related grievance' if:

- a. it concerns the whistleblower's employment and has implications for them personally; and
- b. the information:
  - i. does not have significant implications for an Australian Woolworths Group company, or another regulated entity, that do not relate to the eligible whistleblower; and
  - ii. does not concern conduct, or alleged conduct, referred to at 3(b) above of this Annexure.

Examples of personal work-related grievances that do not qualify for protection may include:

- the eligible whistleblower having an interpersonal conflict within the workplace;
- the eligible whistleblower being bullied;
- the eligible whistleblower being inadvertently underpaid once;
- the eligible whistleblower being subjected to discipline or not receiving a promotion; or
- any matters that don't have significant implications for Woolworths Group as a whole, unless they relate to the eligible whistleblower being victimised for making a previous protected disclosure.

A personal work-related grievance may still qualify for protection if:

- it relates to a disclosable matter and a personal work related grievance (ie, it is a mixed disclosure); or
- the eligible whistleblower seeks legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act.

We still take personal work-related grievances seriously. However, they should generally be raised with a team member's line manager, People Advisory or People Partner.

Information is a "disclosable matter" under the Tax Act if:

- a. the eligible whistleblower has reasonable grounds to suspect that the information concerns misconduct or an improper state of affairs or circumstances in relation to tax affairs of a Woolworths Group company or an associate of a Woolworths Group company; or
- b. the eligible whistleblower considers that the information may assist the eligible recipient to perform functions or duties in relation to the tax affairs of a Woolworths Group company or an associate of a Woolworths Group company.

## B. What are the legal protections that apply if I make a protected disclosure?

If you have made a protected disclosure under the Australian whistleblower laws, the protections outlined in this policy will apply including the following additional legal protections:

### 1. Protection from Legal Action

Eligible whistleblowers who make a protected disclosure under the Australian whistleblower laws are protected from certain action in relation to having made the disclosure, including:

- any civil, criminal, and administrative (including disciplinary) action against the whistleblower; and
- contractual action, including termination of a contract on the basis that making a disclosure is a breach of that contract.

Any information that is disclosed as part of a protected disclosure to either:

- ASIC, APRA or a prescribed Commonwealth authority, under the Corporations Act; or
- The Commissioner of Taxation, under the Tax Administration Act,

will not be admissible in evidence against the whistleblower in criminal proceedings or in proceedings for the imposition of a penalty, except for proceedings in respect of the falsity of the information.

### 2. Protection of your identity

If you make a protected disclosure, and in doing so, reveal your identity (or information by which you may be identified), it is a legal offence for a person to disclose your identity or identifying information without your consent (subject to the exceptions set out below).

If an eligible whistleblower makes a protected disclosure, it is likely that the eligible whistleblower will be asked to provide consent to the disclosure of their identity. This would be to facilitate any investigation and/or resolution of the matter. If consent is withheld, it may not be possible to adequately investigate and respond (if at all) to the disclosure.

If an eligible whistleblower does not consent to their identity being disclosed, it will still be lawful to disclose their identity to:

- ASIC, APRA, the AFP or the Commissioner of Taxation (in relation to protected disclosures under the Tax Act);
- a legal practitioner for the purposes of obtaining legal advice or legal representation about the disclosure; or
- a body prescribed by the Corporations Regulations.

It will also be lawful to disclose information (other than your identity) which you share that may lead to your identity becoming known if it is reasonably necessary in order to investigate the issues raised, in which case Woolworths will take all reasonable steps to protect your identity.

ASIC, APRA or the AFP can disclose the identity of an eligible whistleblower, or information that is likely to lead to the identification of the eligible whistleblower, to a Commonwealth, State or Territory authority to help the authority in the performance of its functions or duties.

As set out in the body of the Policy, disclosures can be made anonymously. Such disclosures are still capable of being protected under the Corporations Act and Tax Act.

Woolworths Group seeks to protect the confidentiality of an eligible whistleblower's identity, including by:

- storing information about a disclosure securely;
- redacting the whistleblower's identity from relevant documents; and
- only sharing the whistleblower's identity with those who have a legitimate need to know, subject to the consent provided by the whistleblower.

### 3. Prohibition against victimisation

It is a legal offence for a person or a company to:

- engage in any conduct that causes, or will cause, any detriment; or
- make a threat to cause any detriment (whether express, implied, conditional or unconditional),

to an eligible whistleblower or another person because the person engaging in the conduct believes or suspects that the other person or a third person made, may have made, proposes to make, or could make, a protected disclosure. This includes where such belief/suspicion was only part of the reason why the action is taken.

"Detriment" includes dismissal, disciplinary action, harassment, discrimination, property damage, reputational damage and other types of damage to a person. "Detriment" does not include administrative action that is reasonable to protect you from detriment (e.g. when the disclosure relates to wrongdoing in your immediate work area). Protecting you from detriment also does not prevent Woolworths Group from managing unsatisfactory work performance.

Each protected disclosure is assessed upon receipt to determine the risk of detriment against you and other persons mentioned in the report. Appropriate actions are taken to reduce this risk, and to support fair treatment of those mentioned in the disclosure, including respondents.

To protect you from the risk of detriment, eligible recipients have been trained to be aware of their responsibilities to seek to protect your confidentiality and that you are not victimised for making the disclosure. Additionally, Woolworths Group may, on a case-by-case basis, allow you to perform your duties from another location or in another role at the same level, or make other modifications to your workplace or the way you perform your work duties, or reassign or relocate other staff involved in the matter.

Woolworths Group will investigate allegations of such behaviour, and penalties and/or disciplinary action may apply for engaging in any of the conduct referred to above. Any person involved in the contravention may be found liable. If detriment is found to have occurred, Woolworths Group may, on a case-by-case basis, allow you to take extended leave, develop an alternative career development plan, or offer compensation or other remedies.

If you believe you suffer, or are threatened with, detriment in contravention of the Australian whistleblower laws, you may

- raise a further protected disclosure by following the steps set out above
- raise a Speak Up report for this purpose,
- contact Woolworths' Whistleblower Protection Officer (WPO) on [WPOfficer@Woolworths.com.au](mailto:WPOfficer@Woolworths.com.au). The WPO is independent of the investigation process, and equipped to review or escalate your concern.

#### **Court Orders**

Courts are given broad scope to make orders remedying a detriment or threatened detriment. These include injunctions, compensation orders (including against individual employees and their employer), reinstatement, exemplary damages and the making of apologies. Civil and criminal sanctions also apply to breaches of the Corporations Act and Tax Act.

### C. Handling and investigating a disclosure

Subject to the requirements of the Corporations Act and the Tax Act, protected disclosures will be investigated in the same way as other reports made under this Policy. The timeframe for investigations of protected disclosures will be different depending on the nature and scope required. However, Woolworths Group's intent is to complete an investigation as soon as practicable.

Where appropriate, Woolworths Group will report findings of an investigation to the Chief Legal Officer. The method for documenting and reporting the findings of an investigation will depend on the nature of the disclosure and the circumstances. Reporting of findings will have regard to applicable confidentiality requirements.

## Annexure B – Legal Protections in New Zealand

New Zealand has its own whistleblower legislation, the *Protected Disclosures (Protection of Whistleblowers) Act 2022 (PDA)*, which outlines how your disclosure of information may qualify as a ‘protected disclosure’ and what additional legislative protections you will receive if you make a protected disclosure in New Zealand.

### Can I make a protected disclosure?

You can make a protected disclosure about Woolworths under the PDA if you are (or were formerly):

- an employee of Woolworths;
  - a person seconded to Woolworths;
  - an individual engaged by or contracted under a contract for services to do work for Woolworths;
  - an individual who is concerned in the management of Woolworths; or
  - a volunteer working for Woolworths;
- each being a “Discloser”.

### Will my disclosure be protected under the NZ Legislation?

A disclosure of information is a “protected disclosure” under the PDA if the Discloser:

- believes on reasonable grounds that there is, or has been, serious wrongdoing in or by Woolworths; and
- discloses information about that in accordance with the PDA; and
- does not disclose it in bad faith.

“Serious Wrongdoing” includes any act, omission or course of conduct in or by Woolworths that is one or more of the following:

- an offence;
- a serious risk to public health, public safety, the health or safety of any individual or the environment;
- a serious risk to the maintenance of law, including the prevention, investigation and detection of offences and the right to a fair trial;
- an unlawful, corrupt, or an irregular use of public funds or public resources.

### How can I make a protected disclosure?

To make a protected disclosure within Woolworths, you must disclose information in the manner outlined by Woolworths in this Team Member Speak Up and Protected Disclosure Policy.

Protected Disclosures can be made through the Woolworths’ **Speak Up Program**.

Alternatively, the following individuals have been appointed as protected disclosure recipients for Woolworths New Zealand for the purposes of the PDA:

| Title  | Name            | Email  | Telephone                     |
|--|-----------------|--|-------------------------------|
| General Counsel<br>Woolworths New Zealand    | James Radcliffe | <a href="mailto:PD4GENC@countdown.co.nz">PD4GENC@countdown.co.nz</a> | 0800 PD4GENC<br>(0800 734436) |
| Director of People<br>Woolworths New Zealand | Ella McInerney  | <a href="mailto:PD4GMHR@countdown.co.nz">PD4GMHR@countdown.co.nz</a> | 0800 PD4GMHR<br>(0800 734464) |

A Discloser can also make a protected disclosure to an appropriate authority at any time, including in circumstances where the Discloser has also made a protected disclosure to Woolworths or another appropriate authority.

## Protections

If you have made a protected disclosure in New Zealand, then you will be afforded the protections under this policy and in the PDA:

### 1. General protections

A Discloser is entitled to protection under the PDA for a protected disclosure made to their organisation or to an appropriate authority even if:

- they are mistaken and there is no Serious Wrongdoing; or
- they do not indicate that the disclosure is being made under the PDA;
- they technically fail to comply with sections 11 or 14 of the PDA (as long as they have substantially complied); or
- they also make the disclosure to another person, so long as they do so on a confidential basis and for the purposes of seeking advice about whether or how to make a protected disclosure in accordance with the PDA.

Protected disclosures must not contain information that is known to be untrue. Deliberate false reports of information that a team member knows to be untrue will not qualify for protections under this policy or the PDA.

### 2. Protections against retaliation, less favourable treatment and victimisation

Disclosers are not to be subject to retaliation, less favourable treatment or victimisation because the Discloser intends to make or has made a protected disclosure under the PDA. Where a Discloser experiences retaliation or victimisation upon disclosing a protected disclosure, they may have grounds to raise a personal grievance under the Employment Relations Act 2000 or bring an action under the Human Rights Act 1993 (as applicable). In addition, a Discloser may seek recourse under privacy laws, depending on the circumstances.

Retaliation includes (in relation to an employee) dismissal, refusing or omitting to offer or afford the employee the same terms of employment, conditions of work, fringe benefits, or opportunities for training, promotion, and transfer as are available to other employees of the same or substantially similar qualifications, experience, or skills employed in the same or substantially similar circumstances, being subject to detriment or disadvantage in circumstances which other employees employed in work of that description are not or would not be subjected to detriment or disadvantage, or retiring an employee (including requiring or causing the employee to retire or resign), or organising to do any of these things.

Victimisation is where a person (or a relative or associate of that person) receives actual or threatened unfavourable treatment (compared to other persons in the same or substantially similar circumstances) connected with making, intending to make, encouraging, giving information in support of, declining to do an act that would contravene the PSA or otherwise doing anything under or by reference to the PDA a protected disclosure (provided that disclosure is not a knowingly false allegation or otherwise made in bad faith).

### 3. Immunity from civil, criminal and disciplinary proceedings

Where you have made or referred a protected disclosure, the PDA prevents civil, criminal or disciplinary proceedings being taken against you for the reason that you made or referred a Protected Disclosure.

#### 4. Confidentiality

The PDA requires protected disclosures to be kept confidential. Every receiver of a protected disclosure must use their best endeavours to keep confidential information that might identify the Discloser, unless:

- the Discloser consents to the disclosure of the identifying information; or
- there are reasonable grounds to believe that disclosure of that identifying information is essential:
  - o for the effective investigation of the Protected Disclosure;
  - o to prevent a serious risk to public health, public safety, the health or safety of any individual or the environment;
  - o to comply with the principles of natural justice; or
  - o for an investigation by a law enforcement or regulatory agency for the purpose of law enforcement.

Any disclosure of identifying information will be managed in accordance with Woolworths' obligations under law, including the PDA and Privacy Act 2020.