

# Fraud, Bribery & Corruption Policy

## Policy Statement

Woolworths Group Limited (and its wholly owned and controlled entities) (**Woolworths Group**) is committed to conducting business in an honest and ethical manner, maintaining a high standard of integrity, and acting fairly and honestly in all dealings with our customers, teams, partners and communities.

## Purpose

We pride ourselves on the quality of relationships with the organisations and people we do business with, and the difference we make creating better experiences together for a better tomorrow.

One of our core values is 'we do the right thing', and this includes the way we interact with our Partners and other stakeholders. This *Fraud, Bribery and Corruption Policy* (**FBC Policy**) outlines the key principles, expectations, and standards required in regard to fraud, bribery and corruption.

## Scope

This policy applies to all Woolworths Group team members (which includes permanent, fixed-term or temporary, contractors and directors (whether executive and non-executive)), and partners (which includes vendors, suppliers, service supplier agencies, consultants, agents and third parties) who work for or with Woolworths Group and its related entities anywhere in the world.

If travelling or based outside of Australia, Woolworths Group team members are subject to the laws of the country they are in. This policy prevails where a country's fraud, anti-bribery or corruption laws are of a lesser standard than the one outlined in this policy.

## Principles

- Relationships with our partners should be a reflection of our core values.
- We are committed to complying with laws and regulations addressing fraud, bribery and corruption in each country in which we conduct business.
- Fraud, bribery and corruption are serious criminal offences that can have a significant impact on the individuals involved, our brand, reputation and financial performance..
- Individuals must not knowingly commit, be a party to, or be otherwise involved in fraud, bribery and/or corruption.
- We will not knowingly do business with any organisation that engages in fraudulent or corrupt activity.

## Fraud

### What is fraud?

*Fraud* is dishonest activity that leads to obtaining a personal benefit or causing a loss through deception. It can be committed by an individual against Woolworths Group, our customers, or other external parties. It can include 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 member obligations

If a team member becomes aware of potentially fraudulent activities, they should follow the reporting process outlined in this document.

Team Members and partners are expected to operate with integrity and comply with Woolworths Group's policies and procedures addressing the handling of goods, financial accounts, payments and information with respect to record keeping. Team members are also expected to undertake Licence to Operate (LTO) e-learning on fraud, bribery and corruption, and provide relevant attestations as required.

## Bribery and Corruption

### What is bribery and corruption?

*Bribery* is the offering, promising, authorising, giving, accepting or soliciting of a bribe to influence someone in government or business either in their personal or official capacity, to obtain or retain a business or personal advantage.

*Bribes* are benefits of any kind offered, promised or provided to gain any business, commercial, contractual, regulatory or personal advantage and can take the form of gifts, charitable or political donations, loans, fees, rewards, hospitality, offers of employment or other advantages. A bribe may not always be of a large value and is not limited to the payment of money. It could be a lunch or an invitation to a sporting event.

*Corruption* is the abuse of entrusted power for private gain.

Bribery and corruption are serious offences and can result in criminal and civil penalties

### Team member obligations

Team members and partners who work for or with Woolworths Group should never give, offer or accept bribes to persuade someone to act in Woolworths Group's favour, their own favour, or for the benefit of a third party, including business partners, family or friends.

Organisations and individuals doing business with Woolworths Group (including partners) should never offer a bribe, improper payment or gift to a Woolworths Group Team Member or anyone working for or on behalf of Woolworths Group.

Team members may engage with governments, regulators, non-government organisations (NGOs) and industry associations in the course of their work. If a team member suspects corrupt behaviour by a party they are dealing with, they should speak to their line leader, or contact the FABC Officer and/or relevant Group ExCo Member.

If a team member is offered a bribe they are expected to decline it and report the matter in accordance with the section 'Investigation and Reporting' below. If a team member is offered a gift or entertainment they must follow the process set out in the [Gifts and Entertainment Policy](#).

## Facilitation Payments

*Facilitation Payments* are low value payments to Government or Public Officials made via non-legitimate or unofficial channels to speed up or facilitate routine governmental actions of a minor nature. Such officials include employees or contractors of government bodies (including military and police) or government-controlled companies, agencies, members of the executive, legislature or judiciary, statutory officeholders, public international organisations employees and contractors, and politicians (including candidates for office).

Woolworths Group prohibits the payment of Facilitation Payments. Team members are permitted to utilise legitimate fast-track processes to expedite routine government action of a minor nature which are permitted by law in the relevant jurisdiction, such as for visas. Receipts for such payments (excluding payments to expedite visas) must be forwarded to the FABC Officer as soon as practicable.

Team members must never make payments in cash or payments that are unofficial, improper or irregular, either directly or indirectly to Government or Public Officials in order to secure a permit, licence or accelerate any other decision from any Australian or foreign government agency.

Partners must not make payments on behalf of Woolworths Group in cash, nor make payments that are unofficial, improper or irregular, either directly or indirectly to Government or Public officials, including any government agency.

If there is any doubt as to whether a payment is permissible, obtain prior written approval from the FABC Officer and/or relevant Group ExCo Member.

## Charitable Donations

*Charitable Donations* are contributions made to charitable organisations, whether in-kind services, knowledge, time or direct financial donations.

Woolworths Group can only make charitable donations that are legal and ethical under local laws and practices, and in line with Woolworths Group's values. In Australia, charitable organisations could include an organisation that has deductible gift recipient (DGR) status with the Australian Taxation Office, such as a charity, but may also include a national or state based organisation or local community group that does not have DGR status but provides services to the communities that it serves and the Charitable Donation is made by Woolworths in furthering the work of that organisation or community group in a community in which the Woolworths Group operates.

Team members and partners must be careful to make sure that charitable donations are not used to facilitate or conceal bribery.

Please see the latest Gifts & Entertainment Policy of Woolworths Group for more details.

## Investigation and Reporting

Woolworths' Head of Group Security & Investigations is appointed as the FABC Officer. Their role is to provide oversight and advise the business so that fraud, bribery and corruption risks are identified, assessed, and breaches are investigated.

We will always review, investigate and take action where fraud, bribery or corruption is reported, and inform the appropriate authorities as required.

If a team member or partner suspect or witness fraud, bribery, or corruption:

- **Speak to your leader**
- **Contact the People Team:**
  - **Australia** - People Advisory or BIG W Employee Services - 1800 008 584 (option 5) Or speak to the Team Experience Partner
  - **NZ** - Team Services - 0800 735 477 Or speak to the Team Experience Partner
  - **Asia**- Please speak to the Team ExperiencePartner
- **Raise a Speak Up report:** Speak Up is Woolworths' independent (external to Woolworths Group) and confidential avenue to raise breaches or misconduct. Find all information and a link to the policies on [woolworthsgroup.com.au/speakup](https://woolworthsgroup.com.au/speakup).
- **Contact the FABC Officer** by raising a Speak Up report as per above. Reports will be triaged and allocated to the FABC Officer as appropriate.

## Consequences of breaching this policy

A breach of this policy by a team member may result in disciplinary action, which may include termination of employment or engagement. Team members should also be aware that breaches of this policy may also be a breach of the law and result in criminal prosecution.

A breach of this policy by a partner may result in Woolworths Group terminating its relationship.

## Related Documents

### Policies:

- Code of Conduct
- Conflict of Interest
- Gifts and Entertainment Policy
- Responsible Sourcing Policy
- Speak Up Policies

## Obligations

- Anti-Bribery & Corruption Laws in relevant jurisdictions
- *Criminal Code Act 1995* (Cth)
- Relevant State and Territory Crimes Act which address FABC offences.
- *Corporations Act 2001* (Cth)
- Other relevant legislation.

## Policy Changes

<b>Policy Changes</b>	<p>This policy supersedes previous versions. This policy may be changed at any time, and does not form part of any team member's contract of employment.</p> <p>Version 2</p> <p>Details of Changes</p> <ul style="list-style-type: none"> <li>• Clarification of the role of the FABC Officer in each instance, and provision of contact details for that function</li> <li>• Update of section "related documents" and addition of external obligations</li> <li>• Explanation of terms where appropriate</li> <li>• Reformatting for readability</li> <li>• Alignment of style and language to new branding</li> </ul>
<b>Date effective:</b>	April 2023
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<b>Policy Owner:</b>	Chief Risk Officer