

Human Rights Grievance Process

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Human Rights Grievance Process

At Woolworths Group, we're committed to providing effective grievance mechanisms to remedy adverse human rights impacts. All Woolworths Group team members are covered by the Group's own internal grievance channels, including but not limited to Team Member Speak Up.

Our Responsible Sourcing Policy and Standards require that all of our suppliers have their own effective grievance mechanisms in place and we encourage the use of these channels in the first instance to resolve grievances.

If these channels are unavailable or ineffective, we are committed to providing a safe, confidential, accessible and effective mechanism for any supplier or worker in our supply chain to raise grievances.

This document provides an overview for complainants and respondents of our grievance investigations process, noting that often the issues raised can be complex. This means it often takes time to investigate complaints.

Alignment of our Policy

For the purpose of this process, a grievance is an evidence-based report of alleged non-compliance with our Responsible Sourcing Policy or Standards that has occurred in Woolworth Group's supply chain and has a direct adverse human rights impact. By 'evidence-based report', we require that the complainant should be able to produce information to substantiate and support their complaint.

How are grievances raised?

Grievances may be received through various channels, including anonymously through our independently administered Speak Up service (online or through the telephone hotline), our Responsible Sourcing email inbox, via audit findings, or from third-party stakeholders such as unions and NGOs. In the rare case where individuals or organisations feel they cannot raise a concern with us directly, the OECD's National Contact Point mechanism, or other judicial or non-judicial mechanisms can also be used to report a grievance.

Woolworths Speak Up

Our independently administered Speak Up service is provided for escalation of those matters that cannot be raised through existing procedures.

An external provider is responsible for the operation of the service and reports can be made confidentially and/or anonymously if preferred. Concerns can be raised with the service by email, website and telephone (in which case they are answered by experienced call centre operators).

Reported concerns are documented in the confidential portal and a report is sent to a nominated Woolworths Speak Up manager to escalate. Typically, people who raise concerns will be provided with updates as appropriate as the matter progresses, and the findings or outcomes arising from the complaint.

Woolworths Group Supplier Speak Up Policy is available here and includes relevant information with respect to "protected disclosures". A 'protected disclosure' can be made in respect of misconduct or an inappropriate state of affairs involving a Woolworths Group company. The specific legislative protections that apply and details of how to make a protected disclosure are set out in the Supplier Speak Up Policy.

Principled approach to investigating grievances

Human Rights grievances vary in severity, complexity and geographical origin. Our investigation procedure may be adjusted in individual cases depending on the particular circumstances and requirements. However, we manage all investigations in accordance with the following ten principles:

1. Human rights-based approach: we seek to achieve outcomes and remedies that are consistent with internationally recognised human rights.
2. Independence: we conduct investigations in a manner that is independent, objective and free from conflicts of interest.
3. Confidentiality: we maintain confidentiality of the parties, allegations and evidence in an investigation.
4. Fairness and natural justice: we treat complainants and respondents fairly throughout an investigation, addressing power imbalances where appropriate and providing an opportunity to respond to all allegations.

5. **Accessible and responsive:** we raise awareness of Supplier Speak Up and increase its accessibility to all complainants. Where possible, we accommodate special needs and/or barriers to access in the investigation process.
6. **Timely and efficient:** we deal with grievances in a timely and efficient manner, prioritising them based on severity. The duration of investigations will depend on the circumstances in each case. However, we always strive to keep all parties regularly informed of the steps that are being taken and the results of the process.
7. **No victimisation:** we don't tolerate victimisation of anyone who has raised a grievance or been involved in an investigation. Similarly, the Group will not tolerate threats, intimidation or violence against any human rights defender, customer or team member in relation to our operations. The Group will not retaliate against any worker or stakeholder raising credible allegations through legal actions or by imposing punitive economic measures.
8. **Clear communication:** we maintain regular communication with all parties involved in an investigation and communicate with broader stakeholders through our annual reports.
9. **Complainant experience and care:** throughout an investigation, we encourage all parties to feel safe and respected.
10. **Complementary and collaborative:** we collaborate with our suppliers to complement, support and strengthen their own operational-level grievance mechanisms.

Investigation stages

There are six stages in our investigation process. They are:

1. **Receiving a grievance:** an initial assessment is conducted to determine whether the worker or company is in the Group's supply chain and covered by the human rights investigations procedure.
2. **Intake process:** we conduct a triage process to prioritise and assess the grievance. It is then allocated to an investigator, recorded in our systems, and notified to relevant stakeholders.
3. **Investigation:**
 - The investigator conducts a desktop review to scope the investigation and present it to the Investigation Working Group. The Working Group is a cross-functional group of team members established in each case. It is generally composed of the investigator, a legal representative, a responsible sourcing representative, and a relevant commercial/ category manager.
 - The investigator then drafts and implements an investigation plan, including meetings with the complainant, respondent and any witnesses, and any further follow-up meetings with the Working Group.
 - Finally, the investigator prepares the Investigation Report. The Report sets out the evidence analysed, factual findings, and recommendations to the decision maker.
4. **Outcome:** the Investigation Report is considered at the final Working Group meeting. Feedback is received and any required amendments are made. This includes a determination of whether the allegations are substantiated; not substantiated (disproven); or not substantiated (insufficient evidence).

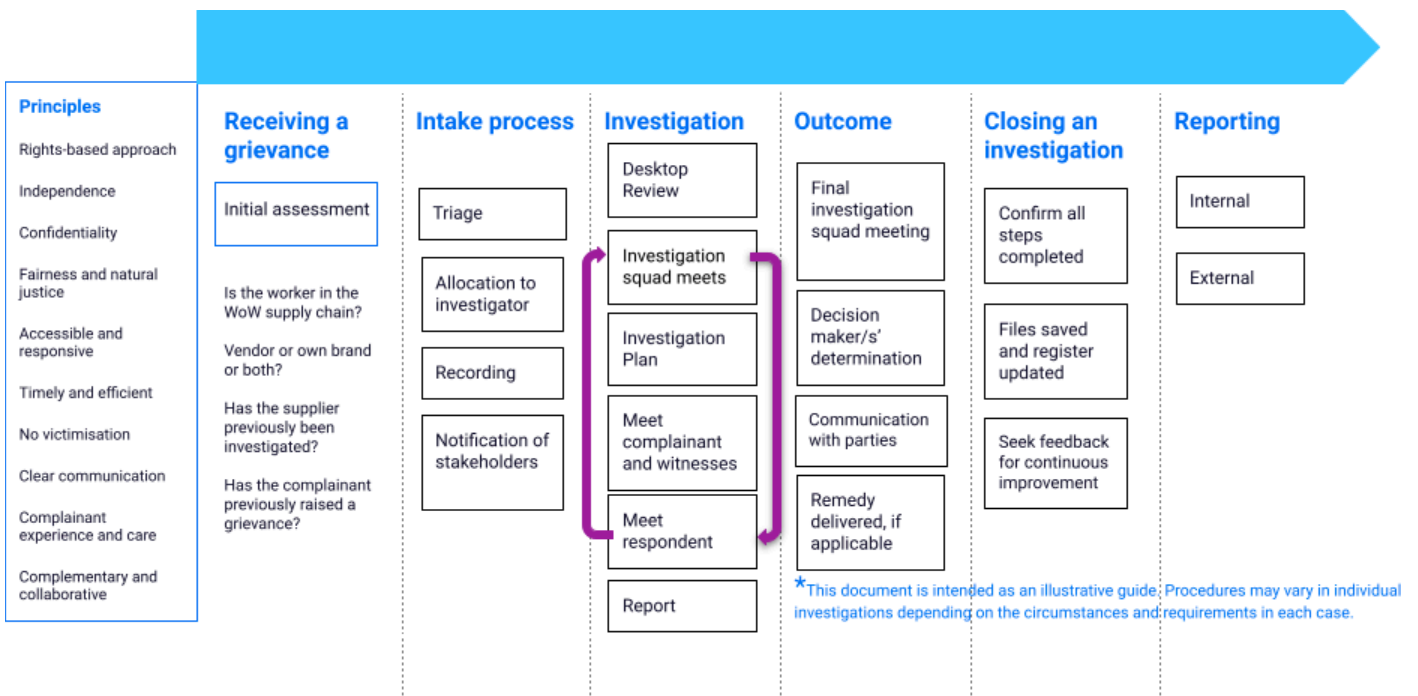
If the allegations are substantiated, the Human Rights Team and internal partners will engage with the supplier to develop a remediation plan. Consideration will be given to the most appropriate remedy/-ies in each case, taking into account the complainant's wishes.
5. **Closing an investigation:** after the outcome has been determined, relevant parties have been notified, and (if appropriate) remedies delivered (or a plan has been implemented to do so), an investigation is closed.
6. **Governance and reporting:** we report internally and externally (via our Modern Slavery Statement) on our investigations. This helps us to identify and highlight issues in order to make required operational changes and continuously improve our investigations and grievance handling process. Privacy and confidentiality of individuals will be respected at all times.

Our procedures are based on international best practice for managing human rights grievance investigations, specifically, UN Guiding Principle (UNGP) 31 ([effectiveness criteria](#)). Similarly, our approach to remediation also aligns with the UNGPs¹ which call for companies to consider whether they have “caused, contributed to or are directly linked” to the breach to determine their level of cooperation in remediation. We will determine the appropriate action to take depending on the particular circumstances in each case.

We are committed to further developing our grievance process to make it more accessible to workers in both our local and global supply chain. Strengthening our grievance response and working with suppliers to ensure appropriate mechanisms are made available within their own supply chains is a priority.

More information on our Speak Up Policy can be accessed on the Woolworths Group [website](#). Translations are available in eight languages to facilitate access to all affected stakeholders in our supply chain.

Procedure: Human rights investigations*



¹ https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinessshr_en.pdf