

2026



# Salient Human Rights Issues

# Contents

|                                              |   |
|----------------------------------------------|---|
| What is a salient human rights issue?        | 1 |
| The Saliency Assessment process              | 2 |
| Salient human rights issues across the Group | 4 |
| Operationalising in action                   | 6 |



"A Brave Heart for a Better Tomorrow" artwork by David Williams of Giliimbaa.

## Acknowledgement of Country



Woolworths Group acknowledges the many Traditional Owners of the lands on which we operate, and pay our respects to their Elders past and present. We recognise their strengths and enduring connection to lands, waters and skies as the Custodians of the oldest continuing cultures on the planet.

Woolworths Group supports the invitation set out in the Uluru Statement from the Heart to walk together with Aboriginal and Torres Strait Islander peoples. We are committed to actively contributing to Australia's reconciliation journey through listening and learning, empowering more diverse voices, caring deeply for our communities and working together for a better tomorrow.

## Disclaimer

This document contains forward-looking statements based on the Group's current knowledge and assumptions as at the date of its publication. Please note these statements are subject to external factors beyond our control, are not guarantees of future performance, and actual results may therefore differ.

# What is a salient human rights issue?

Salient human rights issues are the most severe areas of human rights risk across a company's whole value chain, from the perspective of people who could be impacted. Typically, the most salient human rights considerations to a company are modern slavery or other related labour rights risks to workers in the supply chain, and are therefore the first addressed in a company's human rights journey.

This assessment was undertaken to understand and prioritise how the Group's human rights considerations may expand beyond modern slavery. Salient human rights issues are defined by the United Nations Guiding Principles on Business and Human Rights (UNGPs) as 'the human rights that are at risk of the most severe negative impacts through a company's activities or business relationships' and considered by the scale (how grave), scope (how widespread), irremediable character (how hard to make good) and likelihood of an adverse human rights impact.

## Why did we complete the Salient Human Rights Issue Assessment?

The UNGPs advise businesses to 'identify general areas where the risk of adverse human rights impacts is most significant... and prioritise these for human rights due diligence.'<sup>1</sup>

External stakeholders are also increasingly expecting companies to articulate a comprehensive assessment of their human rights risks beyond issues such as modern slavery, and to prioritise these for action. Importantly, a Salient Human Rights Issue Assessment (or Saliency Assessment) is not a comment on the adequacy or effectiveness of a company's existing controls – merely a reflection that these areas encompass inherent human rights-related risks.

The Saliency Assessment has enabled the following opportunities:

- **Broader Group lens:** Increased awareness of, and connection to, inherent human rights risks and impacts across the Group;
- **Maturing our Human Rights Program scope:** Build on our modern slavery work to date and continue maturing our broader human rights approach, so that we have visibility of key human rights risks beyond the scope of labour rights in our supply chain;
- **Prioritisation:** Assist us to prioritise human rights issues for additional due diligence and action as part of the next horizon of our Human Rights Program and Sustainability Strategy;
- **Consistency with international standards:** Understand areas of risk from a human rights perspective in line with international standards and how a number of external stakeholders are considering these risk areas, and communicate with external stakeholders through this lens.



# The Saliency Assessment process

The Woolworths Group Human Rights team partnered with business and human rights consultancy Pillar Two to conduct a detailed Saliency Assessment. This work included:

## Identifying:

Indicative human rights risks being identified and expanded upon through two rounds of workshops between Pillar Two, the Woolworths Group Human Rights team and various groups of internal and external stakeholders;

## Assessing:

Pillar Two assessing these indicative human rights risks in terms of potential severity and indicative likelihood in relation to Woolworths Group and our operations; and

## Transforming:

Transforming these indicative human rights risks into a final list of salient human rights issues through collaboration with Pillar Two, the Woolworths Group Human Rights team and other members of the business.

## Supporting prioritisation of our work to maximise our impact

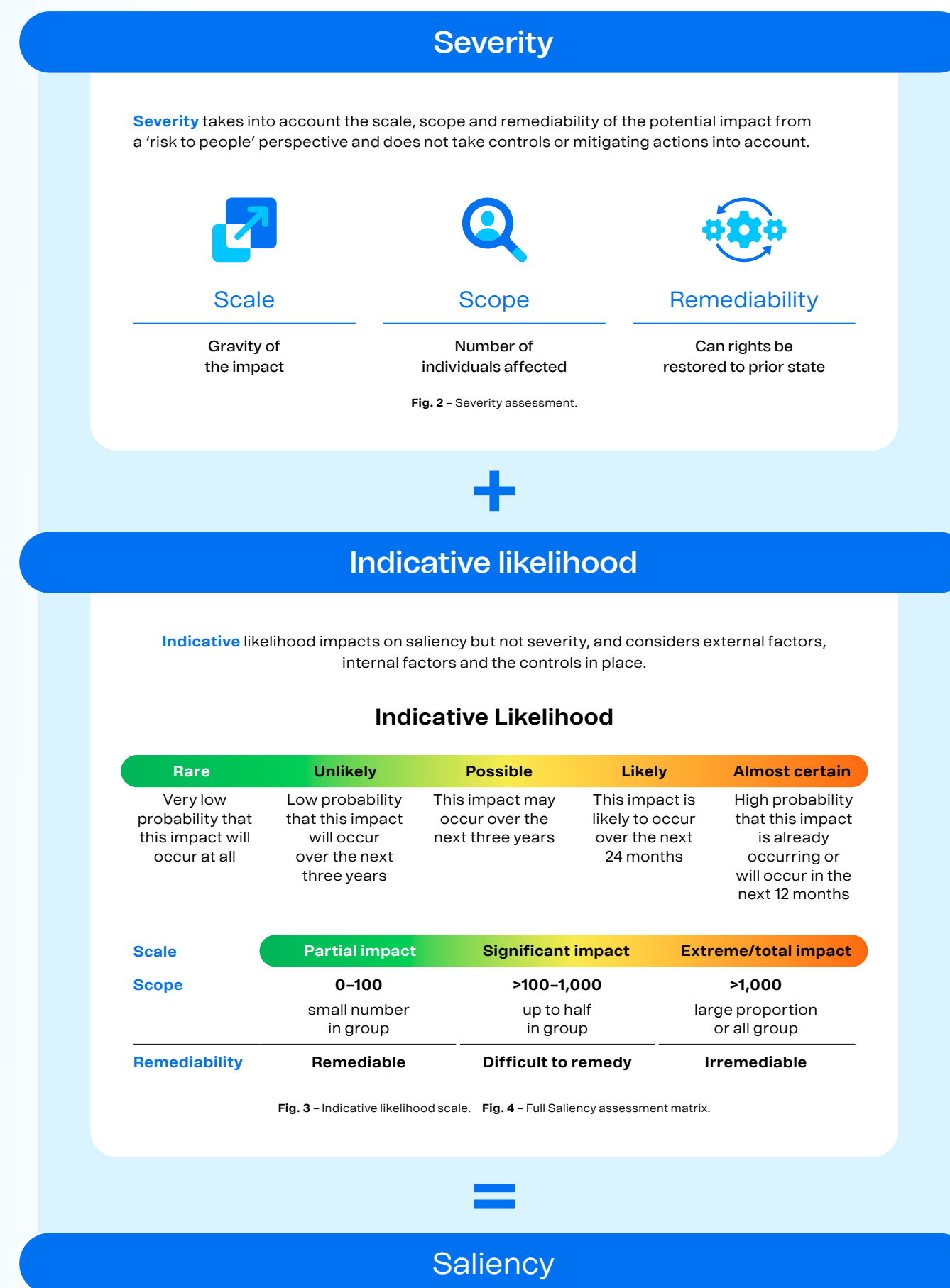
Both Materiality and Saliency Assessments are helpful activities for a business to identify where it should focus its efforts to have a positive impact – and prevent the most negative impacts. These assessments then help us prioritise how we address impacts across our extended supply chain.

In September 2023, we engaged sustainability consultancy BWD Strategic to conduct a double materiality assessment. This assessment aimed to identify the most significant sustainability-related impacts, risks, and opportunities for our current and future operations. The double materiality approach enables us to prioritise focus areas by considering both the **impact of sustainability issues on our business and our business's impact on sustainability**. Human Rights was validated as one of these material areas.

As we continue our commitment to embedding respect for human rights across our own operations and supply chain, we also worked with Pillar Two to conduct a Human Rights Saliency Assessment.

Our work with Pillar Two validated that labour rights and forced labour remain the most salient human rights issues in our supply chain, whilst also identifying five additional salient issues across the Group.

In determining our salient human rights issues, indicative human rights risks were assessed through the following formula:



# Salient human rights issues across the Group

Within our salient human rights issues, there are specific areas which are a continuum of focus and progress by the business and others which are new and emerging human rights risks. Assessing and considering these risks from a human rights perspective will help us develop a more robust response to issues where necessary, in turn promoting better outcomes for potentially impacted stakeholders and enabling the business to stay ahead of evolving risk.

The work done to prioritise and manage these issues is homed in different teams across the business, however it is important to note that whilst each area may have a primary "home", this is to support the delivery of prioritisation, strategy and targeted resourcing, and work is then partnered with and driven by the business.

- **Combating labour exploitation in our supply chain:** This work is led by our Group Sustainability – Human Rights team through our Human Rights Program which has, to date, prioritised identifying, mitigating and remediating modern slavery, labour rights and worker exploitation risks, in our supply chain
- **Addressing community and environmental impacts:** This work is led by our Group Sustainability – Social Impact and Group Sustainability – Planet teams
- **Affordable nutritious food:** This work is led by our Group Sustainability – Social Impact team
- **Protecting privacy, and responsibly using data, of customers and employees:** This work is led primarily by the Group Data and Privacy teams as well as Group Cyber Security teams

- **Creating an equitable, diverse and inclusive workplace and Providing a work environment where team are safe, healthy and well** is primarily led by our Group People team

## Our Approach – Mainstreaming human rights-based approaches

Importantly, we are not looking to replace the existing controls we have in place in these issue areas, but rather to highlight how bringing a human rights lens may reveal a new perspective or layer to an issue, as well as new ways to engage with rights holders and remediate harm. By mainstreaming human rights-based approaches outside of just the Human Rights team, decision-makers across the Group can be more aware of human rights considerations within these salient issue areas which is also about recognising the inherent interconnected nature of issues. Internal governance and the approach for each salient issue is outlined in the following pages. Our Saliency Assessment is intended to articulate our Group wide salient issues. For more information and progress reporting, see Woolworths Annual Reporting Suite, including the Modern Slavery Statement, Sustainability Report, and Group Annual Report.

1

Combating labour exploitation in our supply chain

3

Affordable, nutritious food

5

Protecting privacy, and responsibly using data, of customers and employees

6

Providing a work environment where team are safe, healthy and well

4

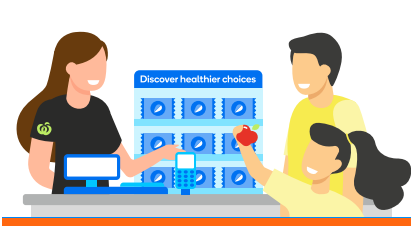
Creating an equitable, diverse and inclusive workplace

2

Addressing community and environmental impacts



# Operationalising in action



## 1 Combatting labour exploitation in our supply chain

We expect our suppliers to respect workers' fundamental rights at work, including the right not to be subject to forced labour, child labour or discrimination in respect of employment and occupations, and freedom of association and the right to collective bargaining.

### Team responsible:

**Group Sustainability – Human Rights team:**  
Lead through our Human Rights Program which has, to date, prioritised addressing, mitigating and remediating modern slavery and worker exploitation risks, across our value chain.

### SDGs:



## 2 Addressing community and environmental impacts

Our business and suppliers rely on a healthy planet to meet customer needs. Climate change is also a risk multiplier for human rights impacts: for example, workers may be at higher risk of labour exploitation due to forced climate-related displacement.

### Team responsible:

**Group Sustainability – Planet and Group Sustainability – Social Impact teams:**  
We aim for net-zero emissions across our value chain by 2050, aligned with a 1.5° C pathway. We work closely with our suppliers and other supply chain participants to meet these challenges. We will continue to work towards reconciliation with First Nations communities in line with our Reconciliation Action Plan (RAP), as led by our Social Impact team.

### SDGs:



## 3 Affordable, nutritious food

Health as a human right encompasses access to affordable, nutritious food. Given our reach and scale, we believe we have a role to play in offering an attractive, affordable, healthier range of foods and drinks.

### Team responsible:

#### Group Sustainability – Social Impact :

As one of the largest grocery retailers across Australia and New Zealand, we can make a tangible impact by supporting customers in achieving their health aspirations. We continue to realise this, with our own brand range being ranked the healthiest of the four major Australian retailers for five years in a row. Our work to reduce hunger and food waste goes hand in hand with this goal. By leveraging our extensive retail network and partnerships, we can help address food insecurity by converting surplus food into millions of meals for people in need.

### SDGs:



Our Saliency Assessment is intended to articulate our Group wide salient issues. We identified six salient human rights issues across the Group.

➔ For more information and progress reporting, see Woolworths Annual Reporting Suite, including the Modern Slavery Statement, Sustainability Report, and Group Annual Report.



## 4 Creating an equitable, diverse and inclusive workplace

We remain committed to creating an inclusive workplace that embraces and promotes diversity, and respects the right to non-discrimination. We recognise the value our team's diversity brings to our business and our customers. As one of Australia's largest employers, we believe that creating a safe and inclusive workplace is critical to creating better experiences together for a better tomorrow.

### Team responsible:

#### Woolworths Group People Team:

Led through our People team, we work hard to respect and celebrate inclusivity. Whilst this issue is focused on our team members, similar rights for workers in our extended supply chain are covered by 'Combatting labour exploitation in our supply chain.'

### SDGs:



## 5 Protecting privacy, and responsibly using data, of customers and employees

We care deeply about the rights of our team, customers and partners in relation to their personal information. We are committed to keeping personal information safe and secure, and using it responsibly. Ethical and responsible practices aligned to rights-based approaches are crucial for navigating this evolving landscape.

### Team responsible:

#### Woolworths Group Data and Privacy teams and Cyber Security team:

We take a privacy-by-design approach to our systems and the various technologies implemented across our businesses.

### SDGs:



## 6 Providing a work environment where team are safe, healthy and well

We care about the physical and psychological safety and health of our direct team members and workers in our supply chain. We are committed to creating a safe work environment, where people arrive home from work free from injuries and illness.

### Team responsible:

#### Woolworths Group People team:

Whilst led by our People team, at Woolworths Group health and safety is everyone's concern, and we acknowledge our responsibilities to the physical and psychological safety and health of our team.

### SDGs:





1 Woolworths Way, Bella Vista NSW 2153

**Tel:** (02) 8885 0000

**Web:** [www.woolworthsgroup.com.au](http://www.woolworthsgroup.com.au)

We encourage you to contact us if you have feedback or questions at [responsiblesourcing@woolworths.com.au](mailto:responsiblesourcing@woolworths.com.au)