

2026

Our Human Rights Program:

A Deeper Dive



Contents

Respecting Human Rights in our supply chain: A deep dive on our Human Rights Program	1
Human Rights program	2
Understanding materiality vs. saliency	3
Deep dive	4
Forced labour	6
Responsible recruitment	7
Working hours	8
Decent work – living wage	9
Dignity and livelihoods	10
Principles which support our approach	12



"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.

Respecting Human Rights in our supply chain:

A deep dive on our Human Rights Program

In addition to the Saliency Assessment processes undertaken, we have taken the opportunity to conduct a programmatic deeper dive of our HR Program to help understand and identify potential new priority areas, particularly those which are most important to the experiences of workers in our supply chain.



Human Rights program

Since our Responsible Sourcing Program was launched in 2018, we have sought to identify, mitigate and remediate risks of modern slavery and worker exploitation, prioritising forced labour and labour rights as the most material risk in the Group's supply chain.

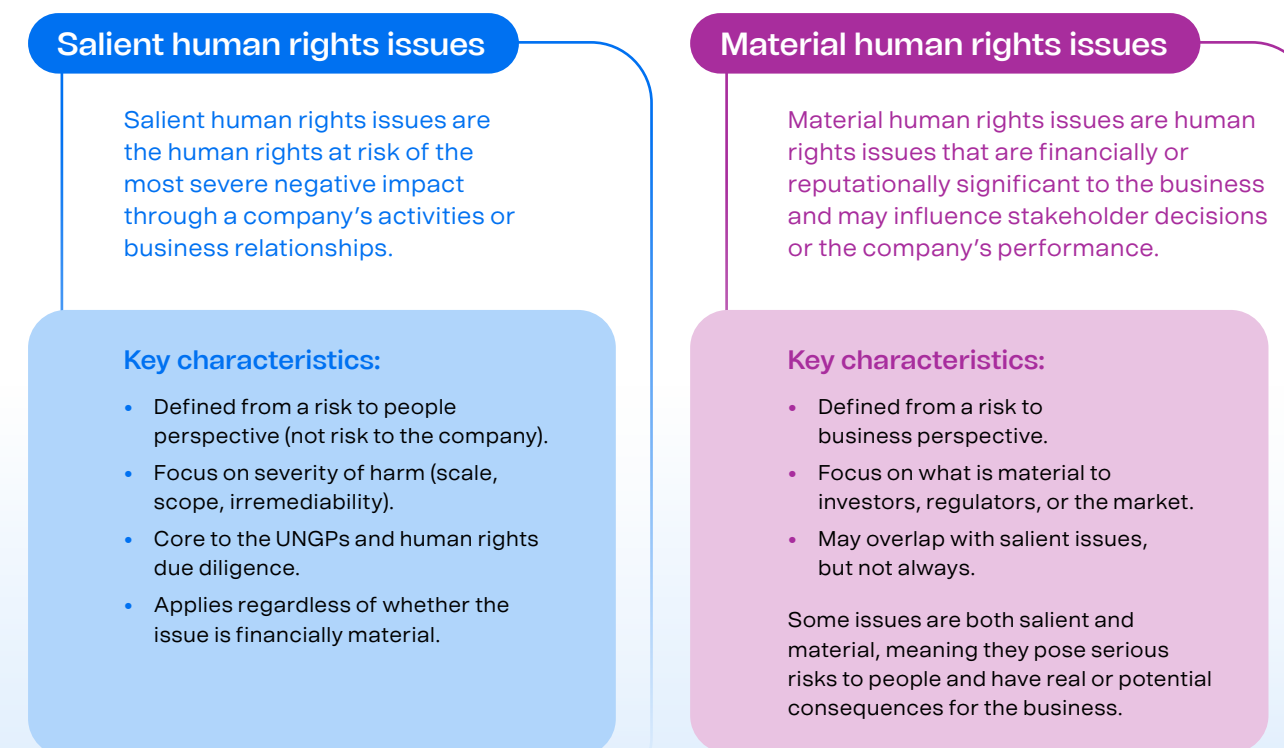
In 2021, our Responsible Sourcing Program expanded to more formally capture the additional 3 pillars which operationalise our work, thus forming our Human Rights Program, inclusive of:



Whilst labour rights remain our key material risk, our program has steadily matured, whilst at the same time we have an ambition to play a leading role in advancing the most salient human rights issues in our supply chain and being a leader in this space. Understanding what our salient issues are is critical to help us prioritise our work and focus our efforts.

Understanding materiality vs. saliency

Both Materiality and Saliency Assessments are helpful activities for a business to identify where it should prioritise its efforts to have a positive impact – and prevent the most negative impacts – across its supply chain.



Recognising that human rights risks are dynamic

Whilst understanding our salient issues is vital to support risk prioritisation, the issues identified are not exhaustive and we continue to work to embed respect for all human rights throughout our supply chain. Guiding Principle 24 of the UNGPs acknowledges that it may not always be possible for a business to take effective action on all its human rights impacts simultaneously, and articulates how businesses should prioritise impacts for their attention by first seeking to prevent and mitigate those that are most severe or where delayed response would make them irremediable.

Global salient issues remain in our sights

Whilst the issues identified in our deep dive assessment reflect data and input specific to our supply chain, and therefore have helped us to work through associated actions to seek to address them, we remain committed to core global modern slavery risks, such as child labour and will continue commodity or geographic initiatives where we identify risks in our supply chain. In the following section we will go into more detail on our salient issues and whilst some are covered in more depth than others, this is a reflection of our own program maturity and experience and is not a reflection of the relative importance of the issues nor of our commitment to them.



Deep dive

This document provides a programmatic deep dive on the risks of modern slavery, exploitation and lived experiences in our supply chain.

We are committed to engaging with affected stakeholders to learn from their experiences and inform our ongoing strategies. Aligned with the UNGPs, 'affected stakeholders' in this context refers to individuals and groups whose human rights may be the most severely impacted in our operations and supply chain. In F24, we partnered with Shift, a business and human rights non-profit organisation, to design a Guidance Framework for Meaningful Engagement with Stakeholders (Engagement Framework). The Engagement Framework has nine principles and aims to help our Human Rights team continue to embed a 'risk to people' lens rather than leading with 'risk to business' when designing and evaluating key activities.

In F25, we utilised the Engagement Framework principles when designing and delivering the worker surveys that helped validate our salient issues for our HR Program. Through this engagement, workers in our Australian supply chain reported living conditions and accommodation as their highest area of concern, whereas workers in our Thailand supply chain reported wages and job stability as the areas of greatest concern.

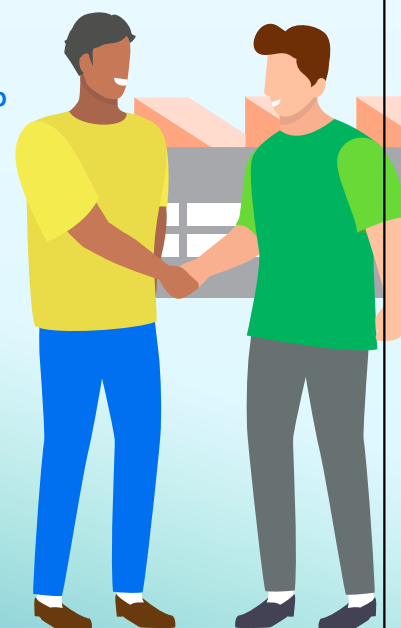
These findings challenged our perception that recruitment fee issues would be ranked of greatest importance to workers in our supply chain, reinforcing the importance of incorporating worker's perspectives in our HR Program so that our interventions include addressing areas of highest concern for workers.

Based on the results of worker surveys, supply chain data and trend analysis, we have identified the following priority areas for our HR Program. This deeper analysis will help to guide our strategy in the future.

Forced labour



Responsible recruitment



Working hours



Decent work – living wages



Dignity and livelihoods



Forced labour

The issue:

According to global estimates, there are approximately 50 million people living in conditions of modern slavery, with the majority (almost 28 million) in forced labour¹.

The Asia Pacific region is disproportionately affected, hosting the largest number of people in modern slavery, with estimates of close to 30 million individuals living in conditions of modern slavery, and around 15 million of those impacted by forced labour².

Critically, the most significant number of people exploited in situations of forced labour are in corporate supply chains in the private economy³.

Key actions:

Since launching the Group's Responsible Sourcing Program in 2018, we have prioritised forced labour and, correspondingly, labour rights in our supply chain, working to identify, mitigate, and remediate modern slavery and worker exploitation.

As our Program has matured, we have progressively been seeking to understand grassroots drivers and introduce pilot programs to redress these. We believe that by focusing our efforts on recognising the patterns that contribute to recurrent issues, we can better work to address them at a systemic level.

Through our efforts, in F22 we disclosed the identification of a confirmed case of Modern Slavery in our supply chain and, pleasingly, in F23

Why it matters:

Woolworths Group recognises that business resilience is closely linked with ethical practices, and that respecting human rights aligns with our core values and business strategy. Our complex global supply chain, of which our largest number of suppliers outside of Australia and New Zealand are based in the Asia region, means there are inherent supply chain risks that could negatively affect workers and our operations.

we were able to disclose that we had worked with our supplier to successfully remediate the situation. More recently, in F25 we were able to remediate a modern slavery indicator which had been identified in our electric vehicle supply chain. Being able to identify issues, we consider to be examples of the effectiveness of our program, though we know there is always more work to do.

We also seek to work within our industry partnerships for collaborative actions that can bring scale to these shared challenges.

We will continue this core work as the cornerstone of our approach to human rights risks in our supply chain.

Relevant SDGs:



Responsible recruitment

The issue:

Forced labour is a complex issue, perpetuated by unethical recruitment across supply chains, often at multiple points in the recruitment journey, which is often beyond direct control of individual companies. Migrant workers, in particular, are highly vulnerable to these exploitative practices. A common and devastating form of modern slavery is debt bondage, where individuals are trapped in a cycle of debt, often incurred through exorbitant recruitment fees, forcing them to work to repay sums they can never realistically cover. This practice is explicitly identified as the world's most widespread form of slavery. Responsible recruitment refers to ethical, fair and transparent hiring practices that protect workers from exploitation, including embedding the principle that no worker should pay for a job.

Key actions:

Following the identification of modern slavery at a supplier site in Malaysia in F22, we developed our Responsible Recruitment Addendum ("Addendum"). The Addendum outlines requirements and guidance for supplier sites in Malaysia and Thailand to embed the Priority Industry Principles, which are considered core standards to address key drivers of forced labour. The Priority Industry Principles are: every worker should have freedom of movement; no worker should pay for a job; and no worker should be indebted or coerced to work.

In Australia, we have a "Labour Hire Provider Addendum" which seeks to address the risk posed by LHPs in our Australian horticulture supply chain. We will continue to progressively embed both of these Addendum requirements- via audits, site visits and worker voice activities. Based on our experience over the last several years, we have identified the

Why it matters:

Retailers and manufacturers and their suppliers are just two stakeholders in the recruitment supply chain, and risks can reside and originate outside of our direct control in networks of labour recruiters. This remains a pervasive challenge in global supply chains. Responsible recruitment initiatives can seek to address root cause risks of forced labour since recruitment related exploitation is often the primary pathway into forced labour but must become sustainable business models themselves in order to survive.

inherent limitations to our ability to solve for ethical recruitment alone. We recognise that in order to successfully embed ethical recruitment, we need collective action to bring scale.

In F25, in our role as a co-chair of the Consumer Goods Forum (CGF) Human Rights Coalition (HRC), we initiated a new concept – the 'Ethical Recruitment Marketplace' (Marketplace) – to seek to bring scale by bringing together multiple partners through multiple capabilities and project streams as they touch upon the migrant worker recruitment journey.

The ambition of the Marketplace is to move beyond the "first mile", seeking to connect the end-to-end ("100 mile") recruitment journey, applying supply and demand principles to make ethical recruitment sustainably viable as part of a virtuous circle of levers. The foundational pillars of action.

Relevant SDGs:



1 https://www.ilo.org/sites/default/files/2025-09/ILO_GEMS-2022_Report_EN_Web.pdf
 2 <https://www.walkfree.org/global-slavery-index/findings/regional-findings/asia-and-the-pacific/>
 3 <https://www.ilo.org/topics-and-sectors/forced-labour-modern-slavery-and-trafficking-persons>



Working hours

The issue:

Excessive working hours is a widespread and persistent challenge in global supply chains, and typically refers to working beyond national legal limits or international standards, and includes inadequate rest between shifts mandatory overtime. Excessive overtime can escalate into forced labour when overtime is involuntary or enforced through threats or penalties.

While international labour standards rightly seek to protect workers from harm associated with long working hours, in many contexts workers also actively seek overtime to supplement their wages. For some, overtime is not coercive, but a critical source of income and financial stability. Whilst it is important to consider the root cause drivers of this, it is also necessary to consider the unintended consequences of strict adherence and not understanding the practical realities. Workers may respond by changing employers – sometimes moving into less regulated, or higher risk workplaces, undermining the protective intent we are all seeking to adopt.

Key actions:

Taking action to address working hours and overtime requires structured actions to address root causes, mitigate risks and support workers rights and incorporate their perspectives.

Our Responsible Sourcing Program, along with our Supplier Guidance on Overtime, represents our core due diligence to identify excessive overtime. We will increasingly look to incorporate root cause analysis where excessive overtime is found to determine if overtime stems from poor forecasting, labour shortages, low wages or cultural norms. We recognise that responsible purchasing practices (RPP) and sustainable procurement initiatives must take into account and appropriately balance the costs and compliance burden on suppliers of all sizes through our supply chain.

Relevant SDGs:



Why it matters:

Excessive working hours can lead to serious negative effects on both worker health and safety as well as productivity and product quality.

We recognise that to have a 60-hour work week will be challenging in countries where legal requirements allow longer working hours. However, we know overtime can also be closely connected to deeper structural problems. It is therefore critical that requirements on working hours are considered and addressed alongside these structural challenges.

We must also be flexible enough to respond to the realities of production, (particularly agricultural) and take a pragmatic and balanced approach, which is centred on ensuring that overtime is conducted within the bounds of the law, is voluntary, and is coupled with protections for workers health and safety.

We strive for healthy good faith relationships with our suppliers in accordance with the purpose and provisions of the Food and Grocery Industry Code. We support initiatives that genuinely improve compliance efficiency for our suppliers and reduce audit duplication, while maintaining necessary responsible sourcing standards.

We will continue building on our RPP work, including working towards a formal and documented approach for RPP and sustainable procurement. Alongside our integration of responsible sourcing data into supplier scorecards in Asia, some of our commercial sourcing teams in Australia also began trialling a tool to better identify and inform costing considerations, including wage inputs, enabling the cost of labour to be factored into the proposed cost of goods.

Decent work – living wage

The issue:

Decent work, as defined by the International Labour Organization (ILO), encompasses productive employment that provides fair income, workplace security, social protection, and opportunities for personal development and social integration, while respecting fundamental rights at work.

The UN Global Compact encourages companies to promote and provide a living wage as an essential aspect of decent work to ensure all workers, families and communities can live in dignity.

To move towards our longer-term ambition, we will take a risk prioritisation approach, including focusing on countries where the living wage gap is the biggest, where the social safety net for workers is weakest, and where we can make the most impact based on our presence and scale.

Key actions:

Our first step is to focus on our own approach to responsible purchasing practices (RPP). RPP is a widely accepted term modelled on an inherent recognition of the role a business can play in supporting the conditions for decent work and respect for human rights in a supply chain. The concept seeks to embed responsible business through five key areas which can have the biggest impact on working conditions, including as examples, strategic planning and forecasting, sourcing and lead times, and buying.

Sustainable procurement can also sit alongside RPP by creating opportunities to prioritise sourcing from suppliers who themselves prioritise a commitment to human rights, rewarding sustainable labour

Why it matters:

Not only does decent work and living wage support people's standards of living and drive wider economic growth, it also makes our business more resilient.

Increased wages can lead to greater productivity, less absenteeism, and reduced recruitment and retention costs, as well as improved recruitment. Workers who earn more also have the capacity to spend more, which is a natural stimulus to the economy.

practices and creating a virtuous feedback loop across the supply chain.

We also recognise a role for partnership and collective action, working with others to create a shared understanding of living wage and shared momentum.

In future years, we will work to conduct living wage benchmarks and gap assessments to understand high risk supply chains and support prioritisation, as well as establish the framework for our own improvements.

Relevant SDGs:



Dignity and livelihoods

The issue:

In the context of human rights, dignity refers to the inherent worth and value of every human being, regardless of their characteristics, and the right to be treated with respect and fairness. In this context, this can include a focus on fair and secure employment, freedom from discrimination, harassment and abuse, housing conditions and, longer term, working collectively to advance the conditions that create opportunities for people to lead better lives.

Key actions:

We have commenced the use of worker voice as a key due diligence control in our supply chain, providing worker perspectives and experiences. In addition, we have partnered with Issara as an added mechanism for providing access and understanding worker sentiment in our supply chain in parts of our Asia sourcing footprint.

Why it matters:

As a starting point, poor livelihoods can cause or contribute to workers being driven into exploitative or unsafe conditions as a grass roots risk factor. Moreover, fair and dignified work contributes to business resilience, productivity and innovation.

This issue will form a part of our future strategy. As a starting point, we will look to:

- Increase targeted focus on housing and accommodation standards
- Consider gender equity programs and workforce participation
- Map livelihoods outcomes to understand risk and support prioritisation
- Consider partnerships, collaborative action and multi-stakeholder initiatives which explore wage security, such as pilots/programs for off-season employment in agriculture and skills development and economic empowerment.

Relevant SDGs:



Moving beyond compliance

Dignity and livelihoods are ultimately about people's ability to live and work with respect, security and agency. When livelihoods are stable and dignity is upheld, risks of exploitation reduce and workers are better able to exercise choice and their voice.

“As I have regular income after working here, I can take care of myself and my parents. So I think, my life has improved”
Woolworths supplier, Thailand

“My life and family life has improved due to this job, especially because my children can get quality education”
Woolworths supplier, Thailand

“A good and safe work environment is very important for my wellbeing. Stability and a good honest wage is of course important to me as well”
Woolworths supplier, Australia



Principles which support our approach

As we continue to learn, and our Human Rights Program matures, we have recognised that one size does not fit all in our supply chain, and therefore our approach is guided by a number of principles.

Risk based prioritisation

A key concept of the UNGP's, providing a structured way for business to focus efforts, especially when all issues cannot be addressed at once.

Continuous improvement

We recognise the value of shifting gradually from good practice to achieving and maintaining best practices in our supply chain. While mandatory requirements must be met by all suppliers – such as wages are paid on time and in full, workers receive a payslip for each pay period clearly indicating the components of their compensation – we expect suppliers to then focus on building capability for continuous improvement.

Worker centred approach

Identifying actual or potential situations of modern slavery demonstrates our program is effective. It means we are better placed to provide remedy to affected workers and address root causes.

Where potential situations of modern slavery are identified, we will always do the right thing, which means acting in the best interests of potentially affected workers.

Collaboration for scale

Whilst we will develop our own action plans to support our efforts to achieve our priorities, we also recognise that with the highly connected nature of global supply chains, collaboration is crucial in order to drive change and bring scale.



ARMSTRONG

Communication design, consultancy and production.
www.armstrong.studio





1 Woolworths Way, Bella Vista NSW 2153

Tel: (02) 8885 0000

Web: www.woolworthsgroup.com.au

We encourage you to contact us if you have feedback or questions at responsiblesourcing@woolworths.com.au