

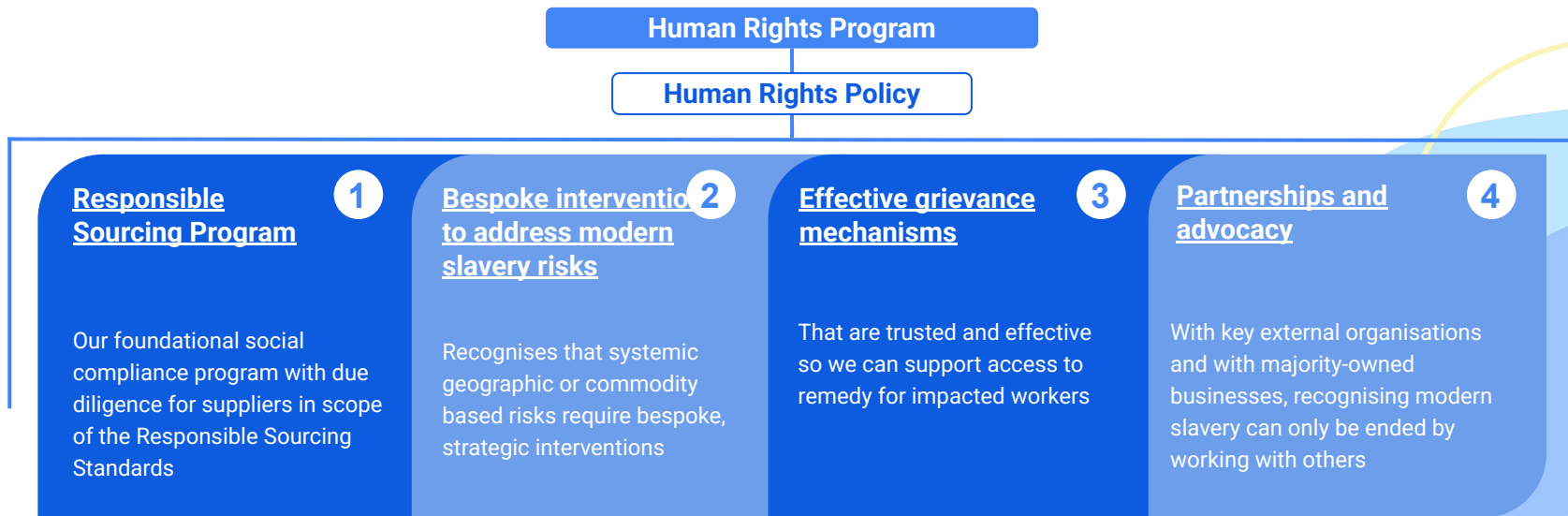
Woolworths Group's Human Rights Program

The Group Human Rights Program is the **overarching way that we work to identify, mitigate and remediate worker exploitation and modern slavery risks** in our operations and supply chain. Through our Program, we also have an ambition of improving the livelihoods of workers across our value chain.

The purpose of this document is to provide a high-level overview of Woolworths Group's Human Rights Program, including an outline of its four operational pillars which are designed to act as complementary and compensating controls.

Our Human Rights Program is informed by the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, as well as Woolworths Group's Risk Management Framework and Risk Appetite Statement.

Our Human Rights Program is supported by a number of documents, but at its core is guided by our **Human Rights Policy** which articulates Woolworth Group's overarching commitment to respecting the human rights of our own team members and workers in our supply chain. Whilst the four operational pillars are explained on the following pages, the below is a diagrammatic overview of our Program.



Pillar 1: Responsible Sourcing Program

Human Rights Policy

Scope: Overarching policy document which applies to Woolworths Group's operations, businesses, sellers and all suppliers

Overview: Our Human Rights Policy **articulates our overarching commitment to upholding respect for human rights**. We require all those we have a direct relationship with for goods and/or services we sell or use in our businesses to comply with this Policy. We also require that suppliers communicate this Policy to their own suppliers and/or contractors and extend the principles of this Policy throughout their supply chain and operations. Our Human Rights Policy is shared with suppliers during onboarding and forms part of their contract of doing business with Woolworths Group. All suppliers may at any time be required to participate in activities to verify compliance with our Human Rights Policy.

Responsible Sourcing Standards and Addendums

Scope: All suppliers in scope of the Responsible Sourcing Program*

Overview: Our Responsible Sourcing Standards **outline our expectations for suppliers in scope of our Responsible Sourcing Program** which is a key component of our approach to human rights that enables us to assess social compliance through audits.

Suppliers in scope of the Responsible Sourcing Program must comply with the Standards and the Addendums, and cascade them throughout their operations and supply chain.

This document details 19 specific standards across 5 key categories:

1. Compliance with local laws
2. Management systems and Training
3. Social and Labour Standards
4. Environmental Standards
5. Additional Standards.

Additionally, there are 3 addendums which must be read in conjunction with the relevant section in the Standards. These include Labour Hire in Australian Horticulture, Responsible Recruitment and Child Labour.

Responsible Sourcing Supplier Guidelines

Scope: All suppliers in scope of the Responsible Sourcing Program*

Overview: Our Responsible Sourcing Supplier Guidelines **provides practical guidance to support suppliers understand our Responsible Sourcing Program and meet program requirements**.

Suppliers in scope of the Responsible Sourcing Program must comply with the Guidelines and cascade them throughout their operations and supply chain.

The Guidelines includes links to stand alone guidance on the following key topics:

- Responsible Sourcing Supplier Guidelines
- Developing Effective Grievance Mechanisms
- Guidance on Overtime Hours
- Supplier Speak Up FAQs
- Labour Hire Addendum FAQs
- Managing Zero Tolerance Breaches

Note: We are committed to working with our suppliers to find workable solutions and uplift capacity where required. However, if a supplier is unwilling to work with Woolworths Group to address issues that cause non-compliance, we reserve the right to review the suitability of our relationship with any such supplier. Deliberate or egregious misconduct by a supplier may result in immediate termination of their relationship with Woolworths Group.

Pillar 2: Bespoke interventions to address modern slavery risks

Whilst our Responsible Sourcing Program includes ongoing due diligence of in-scope suppliers, we recognise that modern slavery risks are also present in lower supply chain tiers. These risks - including risks based on geographies or commodities - require tailored interventions to seek to better manage these risks. For these situations, we develop bespoke interventions to address modern slavery risks.

In order to respond to the dynamic nature of human rights risks, we regularly review our interventions to make sure they remain effective. Our approach may take a variety of forms, examples of which include:

- **Category specific due diligence** where we have identified material risks particularly due to greater inherent risks and limited visibility over working conditions (e.g. beyond our direct supplier relationships at lower supply chain tiers such as tier 2 and 3). We have established targeted workstreams to address specific modern slavery risks in Seafood, Commodities and Cotton.
- **Guidance frameworks** where we have identified locations or sectors where human rights risks may be particularly severe, making remediating issues harder to influence. Examples of such frameworks include:
 - an **extreme-risk due diligence framework** which uses bespoke technology and tools to conduct screenings to identify network connections and extreme-risk exposure through trade or company ownership; and
 - a guidance framework for **meaningful engagement with impacted stakeholders** which involves engaging with affected stakeholders to learn from their experiences and inform our ongoing strategies.
- **Responsible recruitment initiatives** in high-risk regions (e.g. Thailand and Malaysia) and implementing **Responsible Purchasing Practices** with the aim of embedding responsible business throughout key areas which we can have the biggest impact on working conditions.
- **Worker voice activities** to gather sentiment, concerns and grievances directly from workers as we recognise that audits are not a silver bullet and benefit from the addition of compensating controls.
- Programs to enhance **supply chain transparency** beyond tier one in inherently higher risk categories across our trade and non-trade supply chain.

Pillar 3: Effective grievance mechanisms

The third pillar of our Human Rights Program reflects our commitment to providing effective and accessible grievance mechanisms that enable workers in our supply chain to directly raise complaints with us about adverse human rights impacts in our operations and supply chain. Providing access to trusted and effective grievance channels is integral to achieving this.

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. We partner with Issara Institute - an independent NGO operating 'on the ground' - which operates a multilingual helpline and provides an additional mechanism for workers to raise grievances. This multi-channel approach enhances access and inclusivity which are key elements in effective grievance mechanisms. 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 Group's [Speak Up](#) service is available for our team members and suppliers (and their workers) and can be accessed by workers in a number of different languages. We are also committed to working with our suppliers to ensure appropriate grievance mechanisms are made available within their own supply chains. Our Human Rights Policy and Responsible Sourcing 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.

With suppliers in many countries, we acknowledge there are different socio-cultural barriers that may prevent vulnerable workers from raising concerns, either directly with their employer (our supplier) or Woolworths Group. We know there is always more work to do to strengthen our grievance response and we continue to review our grievance mechanisms and processes to improve their effectiveness.

Our [Human Rights Grievance Process](#) provides further detail on our approach to conducting investigations and is based on international best practice for managing human rights grievance investigations, specifically UNGP 31.

Pillar 4: Partnerships and advocacy

A fundamental principle of our Program is that no global retailer is immune from the risks of modern slavery, these are immensely challenging issues and can only be ended by working together.

We want to play a leading role in this space, and to build a community of best practice to leverage our collective knowledge and influence. Woolworths Group therefore seeks to work across a range of multi-stakeholder partnerships that represent an opportunity to both scale impact and promote a pre-competitive, collective approach to tackling complex, systemic issues.

We regularly engage with key external stakeholders to understand their expectations in relation to human rights and seek to contribute to industry-wide change through partnerships and advocacy. This includes civil society, government, workers and unions.

We are also conscious that new businesses who become majority or wholly owned by the Woolworths Group will likely have different inherent modern slavery risks in their operations and supply chains, and are at varying levels of maturity in managing these risks. We therefore partner with new businesses to support them to integrate into Woolworths Group and adopt human rights processes that align with our program expectations.

Some of our key partnerships include:



Appendix: Human Rights Program Document Hierarchy

The Human Rights Program is governed by a document hierarchy that sets out the relevant governance documentation that underpins the effective management of our Human Rights Program. Some of these documents are public facing and others are internal only to support the operationalisation of our Program. Set out below is a snapshot of where some of our key documents, including those referenced in this document, sit within the document hierarchy.

Please note this is not an exhaustive list of all governance and programmatic documents guiding our Human Rights Program.

2. Standards

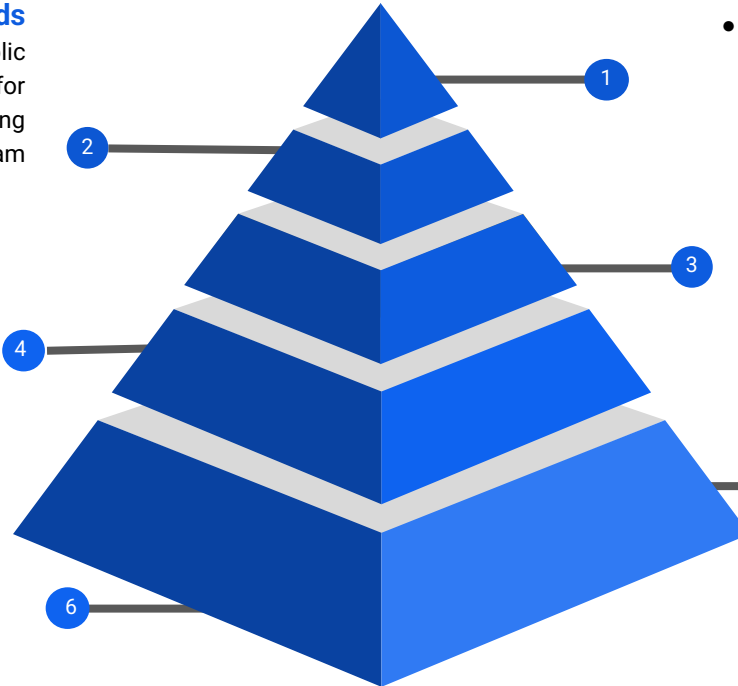
- E.g. **Responsible Sourcing Standards** - public facing document outlining our expectations for suppliers in scope of our Responsible Sourcing Program

4. Guidance

- E.g. **Responsible Sourcing Program Supplier Guidelines** - public facing document providing practical guidance to support suppliers understand our program requirement

6. Framework

- E.g. **Extreme-Risk Human Right Due Diligence (ERDD) Framework** - internal due diligence process seeking to minimise our exposure to 'extreme' human rights risk



1. Policies

- E.g. **Human Rights Policy** - public facing policy articulating our overarching commitment to upholding respect for human rights

3. Procedures

- E.g. **Responsible Recruitment Addendum** - public facing document providing suppliers with clarity on our expectations as they relate to the recruitment of migrant workers in our supply chain

5. Process

- E.g. **Human Rights Grievance Process** - public facing document providing an overview for complainants and respondents of our grievance investigations process