

# Responsible Sourcing Standards

We create better experiences together for a better tomorrow

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# Introduction

## Overview

We believe in earning our customers' trust by acting responsibly and doing the right thing for our people, our customers, our communities, and our environment. We are committed to upholding human rights, not only with respect to our own team members but also for workers in our global supply chain.

Woolworths Group's Responsible Sourcing Standards (**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 manage human rights risks and assess social compliance.

The Responsible Sourcing Program is one of the four operational pillars comprising our Human Rights Program (see below diagram).



Our Responsible Sourcing Program governs how we manage human rights risks with suppliers. The Responsible Sourcing Program consists of two main documents - the **Human Rights Policy** and the **Standards** - with three supporting **Addendums** on specific topics.

The Standards are further supported by the **Responsible Sourcing Program Supplier Guidelines** which provide suppliers with further guidance on our expectations for doing business with Woolworths Group.

Our Human Rights Policy applies to all suppliers of goods and services to the Group, while only select categories of suppliers are also in scope of the Standards, Addendums and Supplier Guidelines.



The Standards outline our expectations across the following key categories:

- Compliance with Local Laws
- Management Systems and Training
- Social and Labour Standards
- Environmental Standards
- Additional Standards on Overseas or Foreign Migrant Workers, Subcontracting and Homeworkers, and Responsible Sourcing of Minerals (where applicable).

They have been benchmarked to leading international frameworks and standards including:

- International Labour Organisation (ILO)'s core conventions
- United Nations Universal Declaration of Human Rights (UDHR)
- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- Ethical Trading Initiative (ETI)'s Base Code
- United Nations Global Compact's (UNGC) core values on human rights, labour standards, the environment and anti corruption
- Emerging best practices from global peer programmes in various industry sectors
- The Consumer Goods Forum (CGF) Human Rights Coalition's Priority Industry Principles.

We will review these Standards where necessary, and at a minimum every two years to ensure that they remain current, align with any developments and changes in standards or regulation, and address emerging issues.

### Contact Us

We encourage our suppliers to be open and honest about the challenges they face so we can work with them to find practical solutions. For questions, feedback or further information regarding these Standards including our approach to responsible sourcing, please contact us directly at: [responsiblesourcing@woolworths.com.au](mailto:responsiblesourcing@woolworths.com.au).

# Application of the Standards

## Scope

The Standards apply to all of our suppliers with whom we have a direct relationship for Woolworths Group branded goods and services **we sell or use** in our businesses (i.e. trade suppliers).

The Standards also apply to suppliers with whom we have a direct relationship with for goods and services that are **not for resale** (i.e. non-trade suppliers). These suppliers are in scope where they are in an inherently high risk category and have sufficient connection to the Woolworths Group brand.<sup>1</sup>

Where there is a conflict between our requirements and standards and the local laws, rules and regulations, we expect suppliers to demonstrate legitimate efforts to uphold the more stringent requirements and standards but acknowledge there may be pragmatic challenges in doing so. Where suppliers operate in countries that have requirements less stringent than our Standards, suppliers are expected to uphold our Standards.

The categories in scope of our Responsible Sourcing Standards are listed in the table below. As our Program matures, we are progressively expanding the scope of our Standards to include more suppliers in lower tiers of our supply chain (i.e. Tier 2).

**Note:** Direct suppliers are defined as our Tier 1 suppliers. Suppliers to our direct suppliers are considered Tier 2, and so on, down the supply chain.

Suppliers in-scope of Woolworths Group's Responsible Sourcing Standards	
Business unit	Category
Supermarkets and Metro	Woolworths Own Brand
	Fresh Meat, Poultry and Seafood (Including products sold behind the counter)
	Fresh Produce (All fresh fruit and vegetables, including those packaged and loose, and floral products)
	Bulk Commodities (Commodities sourced directly by Woolworths Group teams that form all or part of any own-brand product)
Big W	Big W Own Brand (Including any product carrying Big W's name and address)

<sup>1</sup> High risk categories are identified through a combination of our own internal risk assessment processes and by reference to external risk indices. Further detail on 'sufficient connection' is included within the table on page 3.

<b>Non-trade (Goods and services not for re-sale required for the operation of the Group's core businesses)</b>	<p>Suppliers in high risk categories that are sufficiently connected to the Woolworths brand.<sup>2</sup></p> <p><b>Note:</b> <i>Sufficient connection to the brand is determined based on several criteria, including (but not limited to), whether the product has a Woolworths logo on it, whether it is produced exclusively for Woolworths Group, whether we have significant control over the production of the product or how a service is performed, or whether the product or service is considered material to meet our external Sustainability commitments.</i></p>
<b>Companies that are majority owned by the Group<sup>3</sup></b>	<p>Own Brand products and services of our majority owned business (for example, PetStock, Quantum and Statewide Independent Wholesalers)</p>

While suppliers of vendor branded goods and services are not in scope of the Standards, they are in scope of our Human Rights Policy and therefore are required to have established arrangements and processes in place which are consistent with our commitment to responsible sourcing and upholding human rights.

### Our Expectations

We expect that suppliers through all tiers of our supply chain are committed to the same standards as we are. Achieving this together means we must build stronger partnerships and strive to improve supply chain sustainability and the livelihood of workers within it.

Suppliers who are in scope of these Standards must be able to meet our minimum expectations as set out in these Standards and have capacity to continuously improve on key responsible sourcing indicators. We expect our suppliers to communicate these Standards with their suppliers so that our expectations and standards are known and implemented at multiple supplier tiers.

Where human rights issues are identified in the supply chain, we expect suppliers to work collaboratively with Woolworths Group and third parties to engage with affected stakeholders and provide remediation in line with the United Nations Guiding Principles on Business and Human Rights (**UNGPs**). Guided by the UNGPs, we are committed to providing for, or cooperating in, remediation where we have caused or contributed to adverse human rights impacts.

### Verifying compliance with the Standards

To review compliance for those suppliers in scope of the Standards, we utilise an audit framework which is built on the principle of mutual recognition. This framework enables us to accept audits or findings from numerous social compliance industry programs across our global supply chain and aims to reduce the burden on suppliers who service multiple customers.

<sup>2</sup> This includes suppliers who meet the sufficient connection test in the following categories: *Building Construction, Business Services, Consumables, Electrical, Facilities Management Services, Fit-Out, Fixtures, Fleet, Forklifts, Freight, Hardware, Materials Handling Equipment, Packaging and Consumables, Plastic, Plumbing, Property Services, Property Services Rental, Refrigeration and HVAC, Repairs and Maintenance, Security Services, Staff Attire, Warehousing and 3PL Services, and Waste Services* (this list is at August 2025 and is subject to change).

<sup>3</sup> 'Majority owned businesses' refers to businesses that are controlled by the Group, but not wholly owned, as per the definition of 'control' in the Australian Accounting Standards.

Mutual recognition underpins Woolworths Group's Responsible Sourcing Program and we are continually seeking ways to simplify requirements and reduce duplication of effort. Suppliers may use an audit or SAQ conducted for other buyer(s) in order to meet our Responsible Sourcing Program requirements, provided this audit is valid, in-date, and conducted under one of the third-party schemes below.

The following list of schemes are currently accepted under our Responsible Sourcing Program mutual recognition approach:<sup>4</sup>

- Fair Farms
- Supplier Ethical Data Exchange (Sedex) and Sedex Members Ethical Trade Audit (SMETA)
- Global Good Agricultural Practice Risk Assessment (GAP, GRASP)
- Amfori Business Social Compliance Initiative (BSCI)
- LRQA ERS Standard
- Ethical Supply Chain Program (ESCP)
- Social Accountability (SA) 8000
- Worldwide Responsible Accredited Production (WRAP)
- NZGAP Social Practice Add-on.

The frequency of audits as required to review a supplier's compliance with the Standards varies from every six to 36 months. These audits may be announced, unannounced, or semi-announced.

In addition to the required due diligence, Woolworths Group verifies compliance with these Standards through other forms of due diligence including but not limited to: worker voice surveys, supplier self-assessments, requesting policies, procedures or records, implementing a corrective action plan, or by conducting an onsite visit.

Woolworths Group embraces the power of partnerships to create change. We are committed to working with our supplier partners to find workable solutions and uplift capacity where required. However, if a supplier is unwilling to work with Woolworths to address compliance issues under our Human Rights Policy and Standards, refuses to participate in the program or additional audit requirements, and/or fails to show improvement against critical audit findings, then we reserve the right to review the suitability of Woolworths Group's ongoing relationship with any such supplier and Woolworths may explore options to cease or suspend its relationship with any such supplier.

**Note:** Where we have actual knowledge or reasonable grounds to suspect that a **serious breach** of our Human Rights Policy or Responsible Sourcing Standards has occurred or is likely to occur, we may undertake additional due diligence activities such as site visits or audits. Audits may be announced (on a date and time agreed with in advance) or unannounced (at any time without notice to the supplier). A serious breach is defined as a 'Zero Tolerance' or 'Critical' non-conformance as defined in our **Responsible Sourcing Program Supplier Guidelines**.

More information on our expectations with regard to audit outcomes and non-conformances can be found in the Responsible Sourcing Program Supplier Guidelines available [here](#).

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<sup>4</sup> There are currently limited schemes which have an established audit methodology for service providers - in-scope service providers must ensure that their selected scheme offers audits specifically designed for service providers. Please contact our Responsible Sourcing team if you require support.

### How to report a breach of the Standards

Woolworths Group provides a Speak Up service for our team members and suppliers (including their team members and workers) as a mechanism by which responsible sourcing concerns can be raised confidentially and, if desired, anonymously.

We expect suppliers to embed Woolworths Group's Supplier Speak Up service as part of their grievance management policy and procedures. This includes ensuring workers are aware of the service and that Supplier Speak Up posters are posted in visible locations at all sites. In addition, Woolworths Group expects suppliers to have their own effective grievance mechanism in place, which is known, trusted and accessible to their workers.

For more information and to report a breach of the Standards, please visit the Speak Up website: [WoolworthsGroup.com.au/SpeakUp](https://WoolworthsGroup.com.au/SpeakUp).

### Further Guidance

A list of additional guidance materials can be found at the end of this document.



# Our Responsible Sourcing Standards

## Compliance with Local Laws

Suppliers must comply with local laws in the countries in which they operate, along with other applicable laws, rules, and regulations.

### Applicable Laws or Legal Requirements

Any reference to applicable laws or legal requirements in these Standards means any laws (statute, legislation, ordinance, code or other law) including any regulations under them and any code of practice, rules or standards issued by relevant authorities, regulators or industry bodies, that are applicable to the supplier, its workers, its operations, the goods or services provided or the supplier's dealings with us.

Woolworths has a strict policy on fraud, bribery and corruption. We do not tolerate, permit, or engage in any bribery, corruption, fraud or unethical practices in dealing with business partners, public officials and/or with any Woolworths Group representatives. Any offer, solicitation or acceptance of payments and gifts to Woolworths Group businesses and affiliated partners is strictly prohibited.

### 1. Business Integrity and Ethics

**1.1.** Suppliers operate in full compliance with all applicable local laws and other applicable internationally agreed laws, rules, and regulations related to worker welfare, health and safety, and environmental compliance.

**1.2** Suppliers have a valid and current business license and other documents required for legal operation, where relevant including but not limited to building safety, fire safety, waste disposal permits, and land rights (related licenses and permissions).

**1.3.** There are no omissions or errors in government permits, certificates, and other facility records.

### 2. Transparency

**2.1.** Suppliers are transparent with their policies, processes, and records to Woolworths Group and affiliated partners.

**2.2.** Suppliers allow assessor(s) full access to facility premises, workers, and records.

**2.3.** Suppliers do not interfere with assessor(s) during the worker interview process. Suppliers do not "coach" workers to provide false or misleading responses to questions during interviews.

**2.4.** Suppliers provide complete and accurate documents related to payroll, time attendance, and production records for the past 12 months at the minimum, or longer if available.

**2.5.** Suppliers are not hiding workers and premises (e.g. dormitories, warehouses). In the case of manufacturing or the production of goods, subcontracting or moving production capacity to another site or worker's home is not done without written approval from Woolworths Group's Responsible Sourcing team. In the case of services, suppliers do not subcontract those services without Woolworths Group's consent.

### **3. Bribery and Corruption**

**3.1.** Suppliers are prohibited from offering, paying, soliciting, or accepting bribes, including payments, gifts, or other favours intended for inappropriate business advantages to and from Woolworths Group, Woolworths Group's representatives, third-party auditing firms, customs or trade officials, sub-tier suppliers, recruiting agents etc.

**3.2.** Suppliers are prohibited from bribing assessors in the form of any monetary compensation, gifts, or favours that may impact the outcome of the assessment.

## Management Systems and Training

Management systems are important for suppliers to build and develop in order to support compliance requirements and sustainability goals. Suppliers are responsible for establishing these management systems to support their operations and are expected to provide adequate information to all employees via regular communication and training.

Due to the risk of bondage and indenture arising from the use of recruitment fees, suppliers support and comply with the 'Priority Industry Principles' and align recruitment fee policies to the ILO definitions of recruitment fees and related costs. This means that no worker should pay for a job, and all costs related to recruitment must be borne by the employer and/or be repaid to the worker by the employer within one month of hiring.

### 4. Management Systems and Training

- 4.1. Suppliers appoint a senior manager or management team to be accountable for all social compliance requirements in the facility, or in the case of a service provider appoint a senior manager or management team to be accountable for social compliance requirements for the organisation.
- 4.2. Suppliers maintain a list of local law regulations and customer requirements and routinely update this list to identify and monitor changes in legal compliance.
- 4.3. Suppliers have written policies and internal procedures to oversee all aspects of compliance, including but not limited to, code of conduct, health and safety, environment, recruitment practices and worker welfare. Suppliers communicate all policies and procedures to all workers to ensure understanding and implementation.
- 4.4. Training and training materials are provided to all workers in a language that they understand, and training records are maintained on a regular basis.
- 4.5. There are regular reviews and updates of policies and systems (e.g. meetings with management and workers, workshops and training) with changes documented and communicated to workers.
- 4.6. Suppliers communicate these Standards and expectations under the Human Rights Policy to their suppliers.
- 4.7. Suppliers conduct internal audits (at least annually) to identify improvement opportunities. Audit reports are maintained and available for review.

### 5. Hiring, Disciplinary and Termination Practices

Amongst others, Woolworths Group upholds the Consumer Goods Forum Human Rights Coalition's Priority Industry Principles, as also outlined in the Responsible Recruitment Requirements (see standard 7). These are considered core standards to address key drivers of forced labour: every worker should have freedom of movement, no worker should pay for a job, and no worker should be indebted or coerced to work. Please also refer to Standards 7 and 17 for further details on the requirements related to recruitment fees.

- 5.1. Suppliers have a responsible recruitment policy and/or procedure that details recruitment practices and worker expectations, and that adopts the Consumer Goods Forum Human Rights Coalition's Priority Industry Principles.

**5.2.** Suppliers conduct their own due diligence on third-party recruitment partners or agencies to ensure that worker recruitment practices are aligned with their recruitment policy, including from hiring countries.

**5.3.** Workers are not indebted or coerced to work. No workers should pay to work (see also Standard 17.3).

**Note:** for PALM Scheme or NZ RSE scheme workers, where there is any inconsistency between Woolworths Group's Human Rights Policy and Responsible Sourcing Standards, and Australian or New Zealand Government requirements related to recruitment costs, Government requirements will take precedence.

**5.4.** Workers are not required to leave deposits, identity papers (e.g. passports, visas) or bank cards with their employers.

**Exception:** Where security is a concern and workers do not have access to a safety box, suppliers may retain the worker's documentation if, and only if, the worker provides a written consent and the supplier has a way of allowing workers access to these documents at all times.

**5.5.** Employment contracts are signed and a signed copy is provided to each worker for their records.

**5.6.** Probationary periods are outlined in contracts and align with local law.

**5.7.** Employment contracts comply with applicable local laws and international standards and are written in a language that the worker understands. Employment contracts contain (without limitation) information on: the scope of work, wage, benefits, leave, working hours, overtime, disciplinary procedures and grievance mechanisms.

**5.8.** Suppliers document and communicate with all workers a disciplinary policy which includes: steps for escalating disciplinary action, workers' code of conduct, suspension and termination. A copy of each worker's acknowledgement of this policy is kept in the worker's records.

**5.9.** Managers and supervisors are trained on disciplinary procedures and worker engagement practices.

**5.10.** Workers are informed when a disciplinary procedure has been initiated against them and have a right to participate and a right to appeal without fear of reprisal during this process.

**5.11.** Suppliers maintain written records of disciplinary actions taken, including termination records as required by law.

## Social and Labour Standards

All workers must be treated with respect and dignity. Suppliers are to provide workers with a safe place to work, and respect workers' rights to freedom of association. Worker grievances are to be heard, appropriately investigated, and any required remediation action taken, in addition to building capacity and awareness around social and labour practices.

### 6. Child Labour

#### **Addendum to the Standards:**

#### **Child labour refers to work that:**

- Is mentally, physically, socially or morally harmful to children
- Prohibits educational or social development:
  - by depriving them of the opportunity to attend school;
  - by obliging them to leave school prematurely;
  - by requiring them to attempt to combine school attendance with excessively long and/or heavy work.

Woolworths Group recognises that not all work done by children should be classified as child labour. This includes activities such as helping their parents around the home, assisting in a family business, or earning pocket money outside of school hours and during school holidays. These kinds of activities contribute to children's development and to the welfare of their families. They provide them with skills and experience, and help to prepare them to be productive members of society during their adult life.

Child labour should not be present in Woolworths Group's supply chain and no child should partake in the production of goods and services in the supply chain. We rely on our suppliers and community partners to keep children in schools and other educational facilities until they reach the legal minimum age to work.

**6.1.** Suppliers are prohibited from using child labour. If necessary, Woolworths refers to the ILO's Minimum Age Convention No. 138, where strong legislative child labour protections are absent.

**6.2.** Suppliers maintain a written hiring policy and age verification procedure in place for the recruitment of all workers, both full-time and part-time or temporary.

**6.3.** Suppliers maintain copies of official government records and/or identification papers that verify workers' date of birth and legal right to work. In countries where proof-of-age documents, birth certificates, or other government issued forms of identification are not available, suppliers seek an independent and reliable way of verifying a worker's age (e.g. education certificates, election cards, residential documents, or similar proof).

**6.4.** There are no workers employed during school hours who are under the age for mandatory schooling, as required by local law.

**6.5.** Young workers (who are under the age of 18 and above the legal minimum working age) do not engage in any night work in any industrial undertaking, and in accordance with ILO Convention No. 090.

**6.6.** Suppliers comply with local laws on the employment of young workers. Young workers do not engage in any hazardous work.

**6.7.** Suppliers take necessary precautions and protocols to ensure that young workers are protected from working conditions that could potentially pose harm to their health, safety, or development.

**6.8.** Suppliers comply with working hours and overtime hour restrictions for young workers as required by law, and with the minimum wage, benefits and entitlements prescribed by law.

**6.9.** Where required by law, suppliers obtain all legal approvals for all young workers. This may include, but is not limited to, providing health examinations for young workers prior to employment and/or on a regular basis after they start employment, as well as paying for any expenses associated with registering young workers with local authorities.

**6.10.** Suppliers encourage and allow eligible workers, especially young workers, to pursue educational opportunities.

**6.11.** Suppliers comply with all local regulations and requirements for all legal apprenticeship or vocational education programs (e.g. student workers), and maintain documentation of these programs.

**6.12.** Suppliers with childcare facilities available to workers do not have these facilities overlap with production areas.

**6.13.** Children are prohibited from accessing production areas at all times, even when the production areas are not in operation.

## **7. Forced Labour**

### **Addendum to the Standards:**

This standard must be read in conjunction with the [Responsible Recruitment Addendum](#).

Forced labour includes all forms of forced labour, including but not limited to bonded, indentured, involuntary prison, or involuntary labour. This also includes indebted labour to which migrant workers are particularly vulnerable as they may pay fees to agencies and brokers for recruitment and placement in jobs abroad. Woolworths Group upholds that no worker should pay for a job in line with the Priority Industry Principles. This means that all costs related to recruitment must be borne by the employer and/or be repaid to the worker by the employer during onboarding. Fees may cover costs including the recruitment itself, travel, visa and administrative costs and other various forms of unspecified “fees” and “service charges”.

**Note:** for PALM Scheme or NZ RSE scheme workers, where there is any inconsistency between Woolworths Group’s Human Rights Policy and Responsible Sourcing Standards, and Australian or New Zealand Government requirements related to recruitment costs, Government requirements will take precedence.

**7.1.** Suppliers have a written policy prohibiting all forms of forced labour, including but not limited to bonded, indebted, indentured, involuntary prison, or involuntary labour.

**7.2.** Suppliers communicate this policy to all workers and conduct training to all managers and supervisors to ensure understanding of this policy.

**7.3.** Employment is freely chosen. All workers have the right to enter into or terminate their employment freely without fear of retaliation, threat of physical or mental coercion, or facing unlawful notice periods.

**7.4.** All overtime work is voluntary. Suppliers ensure that workers have the right to refuse overtime work without fear of retaliation or disciplinary actions.

**7.5.** Workers are not forced to work by a family member, associate, or friend for any reason.

**7.6.** Workers retain possession of their own original identification papers or personal things (e.g. passports, visas, ID cards, bank cards etc.).

**Exception:** Where security is a concern and workers do not have access to a safety box, suppliers may retain the worker's documentation if, and only if, the worker provides a written consent and the supplier has a way of allowing workers access to these documents at all times.

**7.7.** Suppliers do not subject, bind, or encourage workers to employment as a condition of fulfilling terms of debt to a third party or to the employers themselves. Personal loans to workers under circumstances where repayment terms suggest debt bondage or forced labour is strictly prohibited.

**7.8.** Workers have the freedom of leaving the workplace premises at the end of their working shifts. If entrances are guarded for safety reasons, workers have free access at all times.

**7.9.** Workers have the freedom of movement during working shifts to take designated breaks (e.g. bathroom, drinking water, etc.) and/or under exceptional cases where they need to take personal leave for family emergencies or illnesses, without fear of retaliation or disciplinary action.

**7.10.** Workers are not forcibly required to live in employer-owned or controlled housing arrangements. For workers who live in employer-owned or controlled housing facilities, their freedom of movement is not unreasonably restricted.

**7.11.** Suppliers ensure no worker is required to pay a deposit or bond to secure work, nor is required to pay any reimbursements to cover their recruitment fees and costs.

**7.12.** Suppliers pay the full costs of recruiting workers, including prompt repayment of recruitment fees back to the worker where it is identified that they have been paid by the worker.

## **8. Harassment or Abuse**

**8.1.** Suppliers do not engage in, or support any form of, corporal punishment, mental or physical coercion such as sexual harassment and verbal abuse, as a means to maintain labour discipline.

**8.2.** Suppliers educate and train supervisors and managers to prohibit the use of, or threat of, verbal and physical violence, including slaps, pushes, screaming, yelling, demeaning language, or verbal intimidation as a means to maintain labour discipline.

**8.3.** Suppliers do not subject workers to psychological or mental abuse, such as signing letters of self-criticism and publicly humiliating workers who are subjected to disciplinary measures.

**8.4.** Security practices or pat-downs are gender-appropriate and non-intrusive to workers.

## **9. Non-discrimination**

**9.1.** Suppliers treat all workers with dignity and respect.

**9.2.** Suppliers make employment decisions (e.g. recruitment and hiring, promotions, job assignments, compensation, allowances and bonuses, etc.) on the basis of a worker's education, training, demonstrated skills, and job performance.

**9.3.** Suppliers do not discriminate against workers based on individual characteristics, race, caste, social background, disease, ethnic and national origin, religion, age, disability, gender, marital status, pregnancy, sexual orientation, political affiliation, and/or participation in worker organisations.

**9.4.** All workers have equal opportunity for employment, promotion, training, and retirement based on their ability and job performance.

**9.5.** Suppliers do not require pregnancy or medical testing of workers as a condition of employment. However, in certain circumstances - such as a global pandemic or other health emergency - requiring proof of vaccination and/or medical testing may be permitted, only if objectively necessary for workers' health and safety.

**9.6.** Suppliers do not make decisions about a female worker based on her pregnancy status that may result in dismissal, threats, or disadvantages in employment benefits. Pregnant workers are not engaged in work that creates risk to themselves and/or their babies.

## **10. Right to Freedom of Association and Collective Bargaining**

**10.1.** Suppliers respect the right of all workers to freedom of association and collective bargaining, including to form and join trade unions for the protection of their interests. No worker is subjected to harassment, intimidation, or retaliation for their efforts to associate or bargain collectively.

**10.2.** Suppliers do not interfere with or prevent these activities, or place other restrictions on the exercise of this right.

**10.3.** Suppliers do not discriminate against union members or worker representatives by refusing to hire them or by terminating workers based on their union affiliation or organising efforts.

**10.4.** Worker representatives are elected freely without supplier management interference.

**10.5.** Suppliers give worker representatives access to the workplace to carry out their representative functions, including access to workers and management.

**10.6.** Where an Enterprise Agreement (EA) is in place, suppliers must adhere to the terms of the agreement. The EA is negotiated freely, voluntarily, and in good faith. Suppliers keep all past and present EAs on record.

**10.7.** Where the right to freedom of association and collective bargaining is restricted under local law, the employer facilitates, and does not hinder, the development of an alternative means for independent and free association and bargaining.



## 11. Grievance Mechanisms

Suppliers maintain and provide grievance mechanisms (e.g. confidential suggestion boxes, hotlines, email, worker committees, designated spaces for worker meetings, meetings between management and worker representatives, etc.) as a way to provide confidential means for workers to raise grievances.

**11.1.** Workers are trained and aware of grievance mechanisms and understand that they can communicate without fear of retaliation, intimidation, harassment, or discrimination. This includes ensuring workers are aware of Woolworths Group's Speak Up service and that Speak Up posters are displayed in visible locations at all sites.

**11.2.** Suppliers maintain a resolution history of grievances raised, including evidence of communication between management and workers, and whether or not a resolution was reached.

**Guidance Note on Effective Grievance Mechanisms:** Further guidance for suppliers on developing effective grievance mechanisms is [here](#).

## 12. Wages and Benefits

**12.1.** Suppliers maintain complete and accurate payroll documents and worker profiles for each worker for at least 12 months, or longer if required by law, and require the same of any labour hire providers (including compliance checks).

**12.2.** Suppliers pay at least the legal minimum wage for regular hours worked, or the industry wage agreed within any existing EA if applicable, whichever is higher. Where suppliers are lawfully able to compensate workers via piece rates and this model of remuneration is adopted, the payment received must be fair and proportional to the hours worked, and at least correspond to the national or regional legally mandated minimum wage, and comply with any other applicable legal requirements.

**12.3.** Suppliers pay workers correctly on overtime hours at premium rates, as legally required or agreed within an EA, whichever is higher.

**12.4.** All workers are provided with written information in a language they understand about their employment conditions including wages, incentive systems, compensation and benefits, and bonuses to which all workers are entitled to under applicable law.

**12.5.** Suppliers maintain a wage calculation example including regular hours and overtime hours (with premium). Wage calculation is communicated to workers and acknowledged in writing.

**12.6.** Suppliers provide workers an understandable wage statement or pay slip, which includes information on days worked, standard hourly rate or piece rate, overtime hours and premiums, bonus and all deductions, etc.

**12.7.** Suppliers pay workers in a timely manner within defined time frames. Where no time frame limits are specified by law, payment must be paid at least within thirty (30) days.

**12.8.** Suppliers provide all legally required benefits, including all forms of paid leave (including, but not limited to, public holidays, annual leave and sick leave), to all workers.

**12.9.** Suppliers forward all withholdings to appropriate government authorities, as required by law.

**12.10.** Suppliers do not take deductions from workers' wages as a disciplinary measure or any deductions from wages not provided for by law, without written consent from the worker.

**12.11.** Workers are paid correctly for all paid time off (e.g. breaks and leave) and work stoppages, if any, as required by law.

**12.12.** Workers have a right to refuse goods and services provided by their employer, such as housing and meals. Any deductions for these goods and services are reasonable and do not exceed the actual cost to the suppliers.

**12.13.** Suppliers provide workers with all the necessary tools, personal protective equipment (**PPE**), and uniforms to perform their work, at no charge.

**12.14.** Benefits, including but not limited to social insurance, retirement benefits, severance, maternity, etc, are paid correctly and on time, as required by law.

**12.15.** Wages for probationary workers are not less than the lowest wage for the equivalent job within the company.

**12.16.** Suppliers do not change or terminate worker contracts for purposes of avoiding wage and benefit requirements.

#### **Guidance note on Living Wages:**

Woolworths Group believes that wages should always be enough to meet the basic needs of workers and their families, and be able to provide some discretionary income for them. Whilst we recognise that there is no universal guidance on how to calculate such a wage, we strive to work closely with our suppliers to promote freedom of association and collective bargaining, as well as better wage management systems – particularly in jurisdictions lacking a robust minimum wage setting mechanism. To this end, we seek to collaborate with global organisations to move towards achieving living wages, not just minimum wages, for all workers and their families who do not have the benefit of robust minimum wage frameworks in their jurisdiction.

### **13. Working Hours**

**13.1.** Suppliers keep complete time attendance records for each worker for at least 12 months, or longer if required by law.

**13.2.** Suppliers maintain and communicate a working hours policy to all workers. All overtime work should be voluntary, reasonable and comply with local laws. Workers may refuse unreasonable overtime work without any fear of retaliation, disciplinary action, or punishment.

**13.3.** Regular working hours do not exceed 48 hours per week, or allowable limits under applicable laws or EA), whichever is more stringent.

**13.4.** Overtime hours do not exceed the legal limits or 12 hours per week (up to a total of 60 hours), whichever is lesser. The following exceptions are permitted if:

- The overtime hours are allowed by national law or EA; **and**
- Appropriate safety measures are implemented to protect workers; **or**
- Suppliers can demonstrate and prove exceptional circumstances (e.g. production peaks, accidents, or emergencies).

**13.5.** Suppliers have management systems in place to monitor, determine and remediate excessive working hours to demonstrate management and control of working hours.

**13.6.** Workers are provided with at least one rest day in every seven day period, or two rest days in every fourteen day period, or as required by national law or EA, whichever is stricter.

**13.7.** Suppliers provide workers with reasonable meal and rest breaks.

**13.8.** Suppliers comply with national and local laws for workers' entitlements to public and annual holidays.

**13.9.** Suppliers have a reliable system to keep accurate and complete records.

**13.10.** Suppliers provide a functioning and reliable timekeeping system that allows workers to record their own hours (e.g. punch in, swipe card, etc.).

**Note:** for logistics suppliers, where there is any inconsistency between Woolworths Group's expectations for working hours and the National Heavy Vehicle Laws, the National Heavy Vehicle Laws will take precedence.

**Guidance Note on Overtime Hours:** Further information is available [here](#).

## **14. Health and Safety**

**14.1.** Suppliers comply with all applicable laws regarding working conditions, good housekeeping, and provide workers with a safe and hygienic workplace. Health and safety procedures comply with all national and local laws.

**14.2.** Suppliers have a health and safety policy and provide regular health and safety training to all workers. Training records are maintained.

**14.3.** If required by law, suppliers have a health and safety committee with documented regular meetings.

**14.4.** A senior manager should be assigned to be responsible for health and safety.

**14.5.** Suppliers provide adequate and effective ventilation to allow proper circulation of air in the workplace and maintain temperature control. Windows or ventilation systems comply with legal requirements.

**14.6.** Suppliers provide appropriate and sufficient lighting to allow workers to see potential barriers or obstacles on their way to the nearest exits, perform their jobs, and stay alert in their surroundings.

**14.6.1.** The surrounding grounds are well lit if night work is done.

**14.6.2.** All exit routes, including but not limited to stairways, are well lit and have handrails.

**14.7.** Production floors have proper construction, drainage, and maintenance to prevent workers from slipping.

**14.8.** There are a sufficient number of functional and sanitary toilets per floor and gender, in accordance with local law.

**14.9.** All workers have access to potable drinking water and clean water for washing.

**14.10.** Smoking is prohibited in areas where there may be fire risks.

**14.11.** Where applicable, workers are provided with PPE including, but not limited to, masks, gloves, goggles, ear plugs, guards, and boots at no cost.

**14.11.1.** Workers have been trained on how to properly use PPE and its benefits, and training records are maintained.

**14.11.2.** Suppliers monitor to ensure that workers are correctly using the provided PPE.

**14.12.** Suppliers comply with all laws regarding machine safety and take all steps to ensure machine safety with operational safety devices or guards.

**14.12.1.** Machines and equipment are inspected and maintained on a regular basis with records kept.

**14.12.2.** Specialised equipment or machinery have all required and valid licenses/permits (e.g. forklifts, cargo lifts, boilers, compressors, etc).

**14.12.3.** Specialised equipment or machinery operators are licensed where legally required and trained in safety operating procedures.

**14.13.** First aid kits and medical care are provided and available onsite at all times.

**14.13.1.** First aid kits are kept up to date (contents not expired), and contain, at a minimum: bandages, cotton balls, scissors, gloves, and antiseptic wipes.

**14.13.2.** Suppliers conduct and pay for regular occupational health checks for workers, as required by local law.

**14.13.3.** Suppliers maintain functioning emergency eye wash stations or showers where corrosive chemicals or solvents are used.

**14.14.** Suppliers have a system to identify, evaluate, and minimise risk from physically demanding work to prevent work related injuries or health impacts on workers.

**14.15.** Suppliers maintain a procedure for handling worker injuries and incidents. All incidents are reported and recorded for at least 12 months or longer. Where required by law, incidents are reported to local authorities.

**14.16.** Suppliers maintain structural and building safety, and maintain all legally required building or construction certificates/reports/permits.

**14.16.1.** Building inspections are conducted on a regular basis, or as required by local law or standard practice.

**14.16.2.** Maximum occupancy signage is visibly posted in each room of the building, near each entrance. Maximum occupancy is within building permit requirements.

**14.17.** Suppliers comply with all applicable laws regarding fire safety and take measures to plan for emergencies and prevent injuries and accidents.

**14.17.1.** Suppliers maintain all valid and legally required fire safety certificates, licenses, and inspections.

**14.17.2.** Suppliers designate emergency response personnel with defined responsibilities.

**14.17.3.** Suppliers maintain a suitable fire detection and emergency alarm system that covers all areas of the production premises.

**14.17.4.** Emergency alarm systems are audible, functional, inspected, and tested regularly.

**14.17.5.** Fire extinguishers are sufficient in numbers as required by local law and adequately labeled according to the types of fire emergencies that they are used for.

**14.17.6.** Fire extinguishers and/or fire hoses are functional and properly mounted and secured throughout the workplace.

**14.17.7.** All fire-fighting equipment, including fire extinguishers and fire hoses, is clearly marked and easily accessible with operating instructions labeled. Equipment is routinely checked with relevant logs maintained.

**14.17.8.** Sprinkler systems meet legal requirements and are regularly maintained by a licensed professional.

**14.17.9.** There are a sufficient number of emergency exits in the workplace per floor, warehouse, office, etc.

**14.17.10.** Emergency lighting is provided with backup power and included along all exit routes, including stairways. The lighting is industrial grade and inspected regularly. Anti-explosive lights are installed in areas in which flammable and combustible materials are stored.

**14.17.11.** Emergency exits are kept clear, unlocked, and accessible at all times and open in the direction of emergency egress. Emergency exit doors meet legal requirements.

**14.17.12.** Fire and emergency evacuation plans are posted on every floor. Evacuation plans reflect floor layout, including a "you are here" sign, and are in a language understood by workers.

**14.17.13.** Evacuation drills are conducted regularly, at least once a year or more as required by local law, whichever is higher. Evacuation drills are conducted to cover all shifts, floors and buildings, and are recorded with photos and an attendee list.

**14.17.14.** Designated emergency assembly points are large enough to safely accommodate all workers during emergency evacuations.

**14.17.15.** Exit routes are marked and visible during fire emergencies and kept unobstructed and clear at all times.

**14.17.16.** Workers and supervisors are trained at regular intervals in fire safety, use of fire extinguishers, and other fire prevention procedures and emergency evacuation plans. Training is recorded and documented.

**14.18.** Suppliers comply with legal requirements regarding electrical safety. Electrical panels, wiring, circuits, outlets etc. are routinely checked for integrity and marked with appropriate safety warning labels.

**14.19.** Suppliers must inform Woolworths Group should there be a significant and immediate risk to the health or safety of workers (e.g. flooding, fire, chemical accidents, etc).

## **15. Health and Safety: Dormitories and Canteens**

**15.1.** Suppliers have procedures for monitoring and maintaining dormitories or housing accommodation, and canteens or kitchens, when provided, to be safe, hygienic, separate from production areas, and compliant with all related laws regarding building structural integrity, electrical safety, and fire safety.

**15.2.** Sleeping areas have clearly identifiable gender segregated options.

**15.3.** The living space per resident in the sleeping areas meets or exceeds local laws or industry standards, whichever is more stringent.

**15.4.** Residents are provided with their own mats or beds, and are not required to share mats or beds with others.

**15.5.** Residents have storage space for personal possessions that can be locked.

**15.6.** Residents have free access to sufficient toilet and shower facilities by gender according to local law or industry standards, whichever is more stringent.

**15.7.** Potable drinking water is provided to all workers in dormitories and canteens.

**15.8.** All kitchen and food service staff have valid health certificates, as legally required.

**15.9.** Suppliers provide hygienic equipment for food storage and preparation (e.g. refrigerators).

**Note:** for service providers, Woolworths Group acknowledges that workers are often performing work on or around sites that are maintained by Woolworths Group. In those circumstances, Woolworths Group will not expect suppliers to remedy issues that relate to Woolworths' sites.

## Environmental Standards

Suppliers are expected to comply with all applicable environmental laws and regulations, and maintain an environmental management system that identifies and manages environmental impacts.

### 16. Environment

**16.1.** Suppliers comply with national and local environmental laws and regulations, including maintaining all legally required and valid environmental permits, licenses, approvals, and other certifications.

**16.2.** Suppliers maintain an effective environmental management system that identifies environmental impacts including and not limited to water, wastewater, energy, air emissions, waste, hazardous materials, and other significant environmental risks.

**16.3.** Suppliers have a response plan for environmental accidents or emergencies. Where applicable, suppliers include procedures for notifying local community authorities.

**16.4.** Suppliers have trained environmental personnel to handle environmental accidents or emergencies.

**16.5.** Workers are trained on first aid and emergency actions in case of environmental accidents or emergencies.

**16.6.** Suppliers maintain a record of environmental emergencies or accidents, along with corrective and preventative plans.

**16.7.** All monitoring reports including but not limited to air, water, and noise are maintained regularly per local law.

**16.8.** Suppliers maintain a wastewater treatment policy and procedure with trained staff to oversee the operation. Wastewater treatment facilities must be appropriately sized and functioning to handle effluent capacity at all times.

**16.9.** Suppliers maintain an updated chemicals inventory that lists all chemicals used onsite in conjunction with Material Safety Data Sheets (**MSDS**) for each chemical in the inventory.

**16.10.** Suppliers prohibit the use of hazardous substances listed in Zero Discharge of Hazardous Substances - Manufacturing Restricted Substances List (ZDHC MRSL).

**16.11.** Suppliers comply with legal requirements regarding chemical management and handling, particularly hazardous substances used in the workplace.

**16.11.1.** Chemicals and hazardous substances are properly stored (e.g. away from ignition or combustible sources and sealed properly) and labelled with appropriate identification and safety handling precautions.

**16.11.2.** Chemical storage sites should be separate and covered, equipped with appropriate fire safety equipment, with proper ventilation, anti-explosive lights, and special PPE for workers handling chemicals.

**16.11.3.** Chemicals and hazardous substances are contained in secondary containment to prevent leakages, spills, and accidents. Secondary containment provides sufficient volume to store chemicals and hazardous substances.

**16.11.4.** Suppliers separate hazardous from non-hazardous materials. Flammable and combustible materials and chemicals are safely stored away from sources of ignition.

**16.11.5.** Workers are trained regularly to handle, clean up, and dispose of chemicals and hazardous substances. Training records are maintained.

**16.11.6.** Gas cylinders are properly marked, used, inspected, stored, and secured.

**16.11.7.** Expired or deregistered chemicals and used chemicals are properly and safely disposed of by certified third party professionals.

**16.11.8.** If applicable, chemicals used in agriculture comply with industry standards and local law.

**16.11.8.1.** Agrichemical applications must be recorded (e.g. where, when, dosage, climatic conditions, etc.) and available for review upon request.

**16.11.8.2.** Suppliers monitor and manage runoffs to the adjacent environment from workplace activities.

**16.11.8.3.** Suppliers comply with all local resources management laws (e.g. tree clearing regulations, water usage regulations, etc.).

**16.11.8.4.** Suppliers comply with all local laws for pest management, including large vertebrate birds or other pests according to environmental standards.

**16.12.** Suppliers have proper waste management procedures in place to carefully dispose and handle waste materials on site according to local law. Suppliers ensure that there is no illegal dumping of waste to the local environment.



## Additional Standards (if applicable)

### 17. Overseas or Foreign Migrant Workers

Overseas or foreign migrant workers are any workers who are not a citizen or permanent resident of the country of employment and have additional requirements before being allowed to work in the country. They are often found in countries and industry sectors where the labour supply is limited and can face unique risks that make them vulnerable to exploitation.

These Additional Standards on Overseas or Foreign Migrant Workers apply if suppliers recruit, either directly or indirectly via a third party, overseas or foreign migrant workers into their business or supply chain. This includes meeting additional legal standards before workers are allowed to work in the country. The same requirements throughout this document apply to overseas or foreign migrant workers.

**17.1.** Suppliers have a management system in place to monitor and check labour hire/recruitment agencies against legal compliance and hiring practices.

**17.2.** Suppliers communicate a clear policy to all labour hire/recruitment agencies that no recruitment fees or other forms of payment are to be levied to workers.

**17.3.** Suppliers ensure that there were no deposits or other charges paid or services provided by workers either for their jobs or to cover other fees at the site or at their place of origin, including fees levied during termination.

**17.4.** Workers' contracts accurately reflect the agreed payment, the agreed terms in the recruitment process, and are written in a language understood and signed by workers.

**17.5.** Where applicable for workers recruited overseas, all workers get pre-departure training in their native language and arrival training in a language they understand. Suppliers work with third-party recruitment agencies to ensure that this requirement is met. If foreign workers are recruited within the country, suppliers verify that the conditions for arrival training are met before allowing workers to commence work.

**17.6.** All training or on-boarding records are maintained for each worker.

**17.7.** Workers do not have their passports, identity papers, or ATM cards retained for employment.

**Exception:** In exceptional cases where security is a concern, workers may be provided with a means of personal retention. If this is not possible, suppliers must receive written permission from workers to safe-keep their documents and allow full access at all times.

**17.8.** Suppliers have an appointed individual in management, or a translator, who speaks the local language of the workers or provides access to a similar service, to facilitate grievance resolutions.

**17.9.** Workers must be able to access and use the internal grievance mechanisms in a language they understand.

### 18. Subcontracting and Homeworkers

**18.1.** Subcontracting arrangements are prohibited unless suppliers obtain written approval from Woolworths Group for any subcontracted work before it begins. This may include a due-diligence requirement and assessment against the Responsible Sourcing Standards.

Subcontracting is a situation where key activities, such as production or delivery of a service, are subcontracted by the supplier approved to trade with Woolworths Group to another site or service provider (referred to as the subcontracted site or subcontractor). Suppliers engaging in approved subcontracting arrangements must have adequate management systems in place to ensure their subcontractors comply with these Standards.

**18.2.** Woolworths Group's Responsible Sourcing team must be informed if homeworking is used as part of production and this may require a risk assessment process. In all homeworking arrangements, suppliers must have policies and procedures in place to control external working arrangements and working conditions, maintain a roster for all homeworkers used, ensure correct payment for homeworkers, as well as maintain all legally mandated documents, as required by law.

## **19. Responsible Sourcing of Minerals**

**19.1** Where minerals from conflict-affected and high-risk areas are a key component of final production, suppliers must have adequate due diligence and disclosure procedures in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

## Guidance notes

### Guidance notes

This document comprises 19 Standards and three thematic guidance notes. The Standards are numbered and form a part of our compliance checks. The guidance notes provide further information and articulate our position in three key areas:

- [Characteristics of establishing an effective operational-level grievance mechanism](#)
- Living wages (see Standard 12)
- [Overtime management](#)

The three guidance notes are not audited against but offer suppliers guidance to assist in interpreting and implementing the Standards, where relevant.

### Additional Requirements in addendum to the Standards

Additionally, there are three stand alone documents in addendum to the Standards that are referenced in, and must be read in conjunction with, the relevant section and to which additional requirements may apply. These addendums are not audited against but have certain additional requirements for in-scope suppliers to each addendum, and include:

- [Woolworths Responsible Recruitment Addendum: Supplier Requirements, Guidance & Remediation Protocols](#) (in addendum to Standards 5, 7 and 17)
- [Responsible Sourcing Standards Addendum: Requirements for Labour Providers in our Australian Horticulture Supply Chain](#) (in addendum to Standard 5)
- [Child Labour Addendum: Supplier Requirements, Prevention and Remediation Protocol](#) (in addendum to Standard 6).

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<b>Related policies:</b>	Available <a href="#">here</a> .