

Human Rights Policy

(formerly Responsible Sourcing Policy)

We create better experiences together for a better tomorrow

Human Rights Policy

1. Introduction

The Human Rights Policy (**Policy**) articulates Woolworths Group's commitment to upholding respect for human rights. This Policy replaces and supersedes Woolworths Group's former Responsible Sourcing Policy, and reflects the evolution of our approach since the Policy was first launched in 2018. Any references to the Responsible Sourcing Policy in other related Woolworths Group materials should be interpreted as referring to this updated Policy.

People are the core of our business - our customers, team members, suppliers, and the workers in our global supply chains. Our purpose is to create **better experiences together for a better tomorrow** and we are deeply committed to upholding respect for human rights. It is our ambition to integrate human rights into the way we go about our business every day, so that every decision has our purpose at its heart.

2. Scope

The Human Rights Policy applies to Woolworths Group's operations, businesses¹, sellers and all suppliers. This Policy is shared with suppliers during onboarding and forms part of their terms of engagement for doing business with Woolworths Group, including a requirement to do all things required and necessary to mitigate or reduce modern slavery risks in suppliers' own operations and supply chains. In doing all things required and necessary, we expect suppliers to communicate this Policy to their own suppliers and/or contractors and extend the principles of this Policy throughout their operations and supply chain.

3. Our Commitment

Woolworths Group is committed to respecting the human rights of our own team members, workers in our supply chain, the communities where we operate, and others affected by our activities and business relationships in accordance with the *United Nations Guiding Principles on Business and Human Rights (UNGPs)*. This means we undertake ongoing due diligence activities to identify, prevent and mitigate adverse human rights impacts derived from our internal or external operations.

We are committed to respecting internationally recognised human rights including those set out in the *International Bill of Human Rights* consisting of the *Universal Declaration of Human Rights*, the *International Covenant on Civil and Political Rights*, and the *International Covenant on Economic, Social and Cultural Rights*. We are also committed to respecting the fundamental rights set out in the International Labour Organisation's (**ILO**) *Declaration on the Fundamental Principles and Rights at Work* and its related core conventions. These include: the right to a safe and healthy working environment,

¹ Wholly owned businesses of the Group are required to comply with this Policy. Majority owned businesses of the Group are required to comply with this Policy or implement their own Policy that is consistent with the principles of this Policy.

the right not to be subject to forced labour, child labour or discrimination in respect of employment and occupations, and freedom of association and the right to collective bargaining.

As part of our commitment, we are a signatory to the United Nations Global Compact (**UNGC**) and this Policy embraces and reflects the UNGC's ten principles relating to human rights, labour standards, the environment and anti-corruption.

We recognise, respect and promote the rights of environmental, land, and human rights defenders as defined by the *United Nations Declaration on Human Rights Defenders*. Woolworths Group does not tolerate nor contribute to threats, intimidation or attacks against human rights defenders. We are committed to working with human rights defenders to create safe and enabling environments for civic engagement and human rights at local, national and international levels, and we do not tolerate retaliation against them.

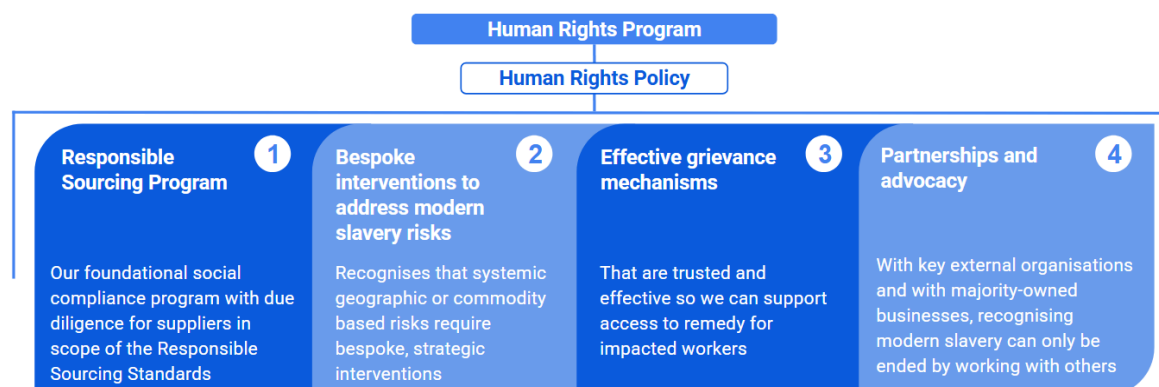
Where local laws and international standards differ from the commitments in this Policy, we will seek to follow the higher standard but acknowledge that there may be pragmatic challenges in doing so. Where local law and international human rights standards conflict, we will comply with the law while seeking ways to honour the principles of internationally recognised human rights.

4. Our Approach

We are committed to respecting all internationally recognised human rights through our operations and supply chain, while placing specific efforts on the rights that are most relevant to our activities and business relationships. Forced labour is the most material human rights risk in our supply chain and we therefore prioritise our efforts on identifying, mitigating and addressing labour rights risks to workers. We also recognise that particular groups in our global supply chains may be disproportionately impacted, and we commit to respect women's and children's rights as well as those of internal and foreign migrant workers.

Periodically, we review the human rights that are most salient to our operations and supply chain, and update our focus areas as required. We work to integrate and embed responsibility for managing human rights across Woolworths Group by using and building our leverage with business partners to identify, prevent and mitigate human rights impacts in which we may be involved.

Our **Human Rights Program** is the way in which we seek to identify, prevent and mitigate key risks to people across Woolworths Group's operations, businesses, sellers, and all suppliers. Recognising that one size does not fit all in terms of how we manage human rights risks, our Human Rights Program comprises four operational pillars, summarised by the diagram below, which are designed to act as complementary and compensating controls.



Further detail on our Human Rights Program is included in our [Human Rights Program Overview](#).

5. Our Expectations

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 all relevant laws, rules and regulations in the countries in which they operate, and with this Policy. This includes having established arrangements and processes in place which are consistent with a commitment to upholding respect for human rights in their operations and supply chains. 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.

We expect suppliers to communicate this Policy to their own suppliers and/or contractors and cascade the principles of this Policy throughout their supply chain and operations, including embedding these Policy requirements in contractual relationships with their suppliers where relevant. This may be verified by Woolworths Group any time, using tools such as third-party audits and/or worker voice.

We are committed to long term partnerships and working with our suppliers to find workable solutions and uplift capability where required. However, if a supplier is unwilling to work with Woolworths Group to address issues that cause non-compliance with this Policy, refuses to participate in due diligence requirements, and/or fails to show improvement against audit findings, then we reserve the right to review the suitability of Woolworths Group's ongoing relationship with any such supplier. Woolworths Group may cease or suspend its relationship with any such supplier, particularly in circumstances where the supplier's conduct is considered deliberate or egregious.

6. Human Rights Due Diligence

All suppliers may be at any time required to participate in and/or provide data for activities to verify their compliance with this Policy and address human rights risks in our shared supply chains. The nature of these activities will differ under each of the four operational pillars of our program (refer to the diagram above for an overview of the four operational pillars) and may include, but is not limited to, social compliance audits, site visits, worker voice surveys, third-party controls assessments, and supply chain transparency exercises.

Select categories of suppliers that are determined to be in scope of our **Responsible Sourcing Standards** are required to participate in routine human rights due diligence to monitor for compliance with the expectations set out in this Policy. This includes suppliers with whom we have a **direct relationship** for Woolworths Group branded goods and services we sell or use in our business (**trade suppliers**), or that are not for resale (**non-trade suppliers**).

Further detail on which suppliers are in scope for due diligence and what this due diligence involves is set out in our [Responsible Sourcing Standards](#).

Human rights due diligence is an ongoing process that evolves as our business activities and relationships do. In certain instances, there may be human rights risks that require heightened due diligence to assess these risks and address them effectively, and we may therefore make changes or

enhancements where appropriate. While certain forms of due diligence (e.g. audits) are an important component to our Responsible Sourcing Program, they have limitations. We therefore reserve the right to reject any audit report or form of due diligence where we believe that it is warranted.

7. **Grievance Mechanisms and Remedy**

We are committed to providing avenues for affected individuals, workers or communities to raise human rights grievances without fear of retaliation, intimidation, harassment, discrimination or victimisation. We provide a Speak Up service for our team members and our suppliers (and their workers) as a mechanism by which human rights concerns can be raised confidentially and, if desired, anonymously. Our supplier Speak Up service can be accessed by workers in a number of different languages, with supporting materials available to communicate this service to workers.

In instances where it is identified that our activities or business relationships have caused or contributed to adverse human rights impacts, we are committed to providing for, or cooperating in, appropriate and effective remediation through legitimate processes. These remedies may be provided through direct engagement with affected individuals and communities, or in collaboration with our suppliers or other third parties.

We are committed to aligning our grievance and remedy processes with the effectiveness criteria set out in the UNGPs.² We report on the effectiveness of our grievance mechanisms and remediation processes through our annual Modern Slavery Statement, and we are committed to continuously reviewing them to improve their effectiveness.

For all of these principles, we expect the same of our suppliers.

8. **Governance**

This Human Rights Policy has been approved by the Woolworths Group Board (**the Board**).

The Board holds ultimate accountability for the governance of Woolworths Group's Human Rights Program. The Board is supported by the Sustainability Committee who is responsible for monitoring the implementation of human rights initiatives and due diligence.

At management level, the Chief Group Public Affairs, Communication and Sustainability Officer is the executive sponsor of the Human Rights Program and is responsible for overseeing its execution. The Group Human Rights team, led by the General Manager of Human Rights, is responsible for the execution and day-to-day operations of the Human Rights Program including developing our overarching strategy and annual work plan.

9. **Ongoing Improvement**

We recognise that our suppliers operate within a number of diverse legal frameworks and operating environments globally. We also recognise that we need to continuously monitor our approach to human rights.

² The UNGPs outline eight effectiveness criteria for non-judicial grievance mechanisms: legitimate, accessible, predictable, equitable, transparent, rights-compatible, based on engagement and dialogue, and a source of continuous learning.

We are committed to monitoring and evaluating our approach to managing human rights risks and we communicate our progress transparently to external stakeholders including through our annual Modern Slavery Statement. Within our Modern Slavery Statement, we provide a detailed description of our strategic priorities including the activities undertaken each year to uphold our commitment to respecting human rights. We conduct an annual planning process to define the scope of our annual efforts and activities to ensure our strategic priorities remain relevant to effectively managing human rights risks across our operations and supply chain.

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.

10. Policy Development and Review

This Policy has been developed by Woolworths Group's Human Rights team with input from human rights experts and has been approved by the Board.

We review this Policy and its related standards every two years, or when circumstances dictate; for example, to align with changes in regulations or to address emerging issues. Following a review of the Policy, relevant changes will be communicated to suppliers, and relevant team members. We are committed to working with our suppliers to implement improvement plans and support them in achieving compliance.

Version:	5
Date approved:	August 2025 By Woolworths Group Board
Date effective:	August 2025
Accountable:	Chief Group Public Affairs, Communication and Sustainability Officer through the General Manager - Human Rights
Contact:	Responsible Sourcing team via: Email: responsiblesourcing@woolworths.com
Grievance mechanism:	Supplier Speak Up: WoolworthsGroup.com.au/SpeakUp
Related policies and guidance materials:	<ul style="list-style-type: none">• Human Rights Program Overview• Responsible Sourcing Standards• Responsible Sourcing Program - Trade Supplier Guidelines• Human Rights Grievance Process• Supplier Speak Up and Protected Disclosure Policy• Team Member Speak Up and Protected Disclosure Policy