



Report

GRI G3 Application Level Assessment

Woolworths Limited

Corporate Responsibility Report 2008

PREPARATION OF REPORT

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1 Introduction

Woolworths Limited (Woolworths) commissioned Net Balance Management Group Pty Ltd (Net Balance) to undertake a third-party Application Level Assessment of its 2007/08 Corporate Responsibility Report (the Report) against the requirements of the Global Reporting Initiative (GRI) G3 Guidelines. The Report, prepared by Woolworths presents the organisation's corporate responsibility performance over the period 1 July 2007 to 30 June 2008.

The Net Balance team comprised Terence Jeyaretnam (Lead Assurance Provider and Lead Certified Sustainability Assurance Practitioner, International Register of Certified Auditors UK), Melinda Leth (Senior Associate), Alan Dayeh (Senior Consultant) and Gareth Evans (Project Consultant).

The objective of the third-party application level check was to evaluate the Report's content against the requirements of the GRI G3 Guidelines, to comment on GRI Application Level appropriate to the report, and to identify any gaps in the Report. Net Balance reviewed the Report's contents against the Profile Disclosures, Disclosures on Management Approach and Performance Indicators.

1.1 GRI G3 and Application Levels

Where a reporting organisation has used the GRI to shape and guide the content of its sustainability reporting, it is required to declare the level to which it has applied the GRI Reporting Framework via the 'GRI Application Levels' System. To meet the needs of beginners, advanced reporters, and those in between, there are three levels in the system. They are titled C, B, and A, each level indicating a more comprehensive level of application of the GRI Reporting Guidelines. A "plus" (+) is available at each level (e.g., C+, B+, A+) for reports that have been externally assured. The Application Level communicates how much of the Reporting Framework has been used in the reporting process. All G3-based reports must declare their Application Level; the Standard Disclosure Criteria Table for determining the Application Level is shown in Figure 1.

Report Application Level		C	C+	B	B+	A	A+
Standard Disclosures	G3 Profile Disclosures OUTPUT	Report on: 1.1 2.1 - 2.10 3.1 - 3.8, 3.10 - 3.12 4.1 - 4.4, 4.14 - 4.15	Report Externally Assured	Report on all criteria listed for Level C plus: 1.2 3.9, 3.13 4.5 - 4.13, 4.16 - 4.17	Report Externally Assured	Same as requirement for Level B	Report Externally Assured
	G3 Management Approach Disclosures OUTPUT	Not Required	Report Externally Assured	Management Approach Disclosures for each Indicator Category	Report Externally Assured	Management Approach Disclosures for each Indicator Category	Report Externally Assured
	G3 Performance Indicators & Sector Supplement Performance Indicators OUTPUT	Report on a minimum of 10 Performance Indicators, including at least one from each of: Economic, Social and Environmental.	Report Externally Assured	Report on a minimum of 20 Performance Indicators, at least one from each of Economic, Environmental, Human rights, Labor, Society, Product Responsibility.	Report Externally Assured	Report on each core G3 and Sector Supplement* Indicator with due regard to the Materiality Principle by either: a) reporting on the Indicator or b) explaining the reason for its omission.	Report Externally Assured

*Sector supplement in final version

Figure 1: Application Level Determination (Source: Global Reporting Initiative www.globalreporting.org)

2 Methodology

The methodology for the assessment comprised the following:

- A review of the final draft Report against the core principles of the GRI and GRI indicators. The review also made comment on the relevance and appropriateness of some indicators to Woolworths.
- A check to determine where the Report should be positioned in terms of the three Application Levels of reporting as required by GRI.
- Preparation of this report outlining the findings of the GRI G3 assessment.

3 Results

3.1 Profile Disclosure Assessment

Detailed results of an assessment of all the GRI Standard Disclosures are contained in Appendix A. For each disclosure adherence to the GRI Guidelines is indicated by a 'C' for Conformance; a 'PC' for Partial Conformance; and a 'NR' for Not Reported. 'NA' is used where an issue is not applicable to Woolworths' operations. Partial Conformances are regarded as reported, with suggestions provided as to where improvements could be made.

Based upon Net Balance's assessment of Woolworths' 2008 Corporate Responsibility Report, it was found that:

- For the G3 Profile Disclosure output, Woolworths reports on all GRI items required for Application Level B. Partial Conformances are regarded as reported, but where improvements could be made.
- For the G3 Management Approach Disclosures output, Woolworths was found to have the management approach for each indicator category reported.
- For the G3 Performance Indicator output, Woolworths reports on sufficient performance indicators for Application Level B.
- Woolworth's report was externally assured, and therefore the Application Level was classified as B+.

Net Balance also reviewed Woolworths' report against the GRI reporting principles. The report was found to demonstrate:

- relevance and materiality
- stakeholder inclusivity
- sustainability context
- completeness
- balance
- comparability
- accuracy
- timeliness
- clarity
- reliability.

3.2 Conclusions

According to the above, Woolworths' Application Level has been classified by Net Balance as B+. An Application Level of B+ demonstrates robust sustainability reporting and well developed reporting systems based on the GRI Reporting Framework.

3.3 Key Recommendations

While Section 4 (below) provides a list of recommendations based on the gap analysis, the following represent key recommendations:

- Stakeholder engagement: Net Balance recommends that Woolworths clearly articulates how stakeholders are selected and how they are engaged. Results of engagement and key concerns should be included in future reports.
- Human rights: Additional reporting on supply chain audits is suggested.

- Product responsibility: Net Balance recommends Woolworths expands on the reporting of product non-compliance, product recalls and any breaches of customer privacy.
- Society: Net Balance recommends increased reporting on management practices and performance in anti-bribery and anti-corruption.

4 Recommendations

Net Balance has identified the following recommendations as a result of the Application Level Assessment.

Strategy and analysis

1.2

Net Balance recommends Woolworths includes in future Corporate Responsibility Reports the process of identifying and prioritising risks and challenges and the role of stakeholders in this process.

Net Balance recommends that Woolworths includes in future Corporate Responsibility Reports the process for prioritising risks and opportunities in terms of relevance to long term strategy and performance targets.

Organisational profile

2.8

Net Balance recommends Woolworths also reports on sales revenue and costs by country.

Scope and Boundary

3.5

Net Balance recommends that Woolworths includes stakeholder engagement and methods used for determining materiality and how they are prioritised in future reports.

Commitment to external initiatives

4.11

Net Balance recommends Woolworths provides a brief discussion of the application of the precautionary principle to the organisation's sustainability initiatives.

Stakeholder engagement

4.15

Net Balance recommends that Woolworths clearly articulates how stakeholders are selected and how they are engaged. Net Balance recommends this be included as part of the stakeholder engagement strategy currently being developed.

4.16

Net Balance recommends that Woolworths reports on the frequency of engagement and indicates whether any engagement was conducted as part of the preparation of the Report.

4.17

Net Balance recommends Woolworths reports the issues raised by stakeholder groups and how Woolworths has responded to their concerns.

Human Rights

HR4

Net Balance recommends Woolworths reports on total number of discriminations and actions taken.

HR6

Net Balance recommends Woolworths reports on the findings of audits conducted on suppliers to establish the number of operations having significant risk of incidents of child labour.

HR7

Net Balance recommends Woolworths reports on the findings of audits conducted on suppliers in relation to incidents of forced or compulsory labour and measures to eliminate it from suppliers operations.

Labour practices

LA4

Net Balance recommends Woolworths reports on the percentage of employees covered by collective agreements.

Training and education

LA10

Net Balance recommends Woolworths reports training as average hours by employee category.

LA13

Net Balance recommends Woolworths reports on minority groups and other indicators of diversity concerning employees and governance bodies.

Product responsibility**PR2**

Net Balance recommends Woolworths reports on the non-compliance of products and services concerning health and safety impacts during their life cycle by type of outcomes.

PR4

Net Balance recommends Woolworths reports non-compliance and product recalls concerning product and service information and labelling by type of outcomes.

PR7

Net Balance recommends Woolworths expands on the reporting of non-compliance and product recalls concerning marketing communications.

PR8

Net Balance recommends Woolworths reports on number of substantiated complaints regarding breaches of customer privacy.

Society**S04**

Net Balance recommends Woolworths reports on incidents of corruption.

S06

Net Balance recommends Woolworths reports on contributions to political parties.

S08

Net Balance recommends Woolworths reports the significant fines received.

5 Appendix A – Assessment of GRI Disclosures

	GRI No.	Description	Woolworths 2008 Sustainability Status	Comments
STRATEGY & PROFILE		Disclosures that set the overall context for understanding organisation's performance such as its strategy, profile, and governance.	C	Woolworths discusses sustainability strategy, profile and governance issues with the Corporate Responsibility Report. However, more detailed discussions of these topics are provided in the Annual Report and the strategy in the Sustainability Strategy 2007-2015.
Strategy and Analysis	1.1	<p>Statement from the most senior decision-maker of the organisation (e.g., CEO, chair, or equivalent senior position) about the relevance of sustainability to the organisation and its strategy.</p> <p>The statement should present the overall vision and strategy for the short-term, medium-term (e.g., 3-5 years), and long-term, particularly with regard to managing the key challenges associated with economic, environmental, and social performance. The statement should include:</p> <ul style="list-style-type: none"> - strategic priorities and key topics for 	C	The CEO and Chairman's reports address strategic priorities, broader trends such as drought and the economic downturn, key events and achievements such as the introduction of maternity leave, key challenges and performance.

		<p>the short/medium-term with regard to sustainability, including respect for internationally agreed standards and how they relate to long-term organisational strategy and success;</p> <ul style="list-style-type: none"> - broader trends (e.g., macroeconomic or political) affecting the organisation and influencing sustainability priorities; - key events, achievements, and failures during the reporting period; - views on performance with respect to targets; - outlook on the organisation's main challenges and targets for the next year and goals for the coming 3-5 years; and - other items pertaining to the organisation's strategic approach 		
	1.2	<p>Description of key impacts, risks, and opportunities.</p> <p>The reporting organisation should provide two concise narrative sections on key impacts, risks, and opportunities.</p> <p>Section One should focus on the organisation's key impacts on sustainability and effects on stakeholders, including rights as defined by national laws and relevant internationally agreed standards. This should take into account the range of reasonable expectations and</p>	PC	<p>Woolworths reports on the significant impacts the company has on sustainability and their progress and performance in addressing the challenges and opportunities. Woolworths discusses the process for prioritising challenges and opportunities in the Woolworths Sustainability Strategy 2007-2015.</p>

interests of the organisation's stakeholders. This section should include:

- a description of the significant impacts the organisation has on sustainability and associated challenges and opportunities. This includes the effect on stakeholders' rights as defined by national laws and the expectations in internationally-agreed standards and norms;
- an explanation of the approach to prioritising these challenges and opportunities;
- key conclusions about progress in addressing these topics and related performance in the reporting period. This includes an assessment of reasons for underperformance or over-performance; and
- a description of the main processes in place to address performance and/or relevant changes.

Section Two should focus on the impact of sustainability trends, risks, and opportunities on the long-term prospects and financial performance of the organisation. This should concentrate specifically on information relevant to financial stakeholders or that could become

Woolworths reports on the sustainability trends and the governance arrangements to manage risks and opportunities. Woolworths discusses the process for prioritising risks and opportunities in terms of a long term strategy in the Woolworths Sustainability Strategy 2007-2015.

		<p>so in the future. Section Two should include the following:</p> <ul style="list-style-type: none"> - a description of the most important risks and opportunities for the organisation arising from sustainability trends; - prioritisation of key sustainability topics as risks and opportunities according to their relevance for long-term organisational strategy, competitive position, qualitative, and (if possible) quantitative financial value drivers; <p>Table(s) summarising:</p> <ul style="list-style-type: none"> - targets, performance against targets, and lessons-learned for the current reporting period; and - targets for the next reporting period and mid-term objectives and goals (i.e., 3-5 years) related to key risks and opportunities. <p>Concise description of governance mechanisms in place to specifically manage these risks and opportunities, and identification of other related risks and opportunities.</p>		
Organisational Profile	2.1	Name of the organisation.	C	
	2.2	Primary brands, products, and/or services.	C	.

		The reporting organisation should indicate the nature of its role in providing these products and services, and the degree to which it utilises outsourcing.		
	2.3	Operational structure of the organisation, including main divisions, operating companies, subsidiaries, and joint ventures.	C	
	2.4	Location of organisation's headquarters.	C	
	2.5	Number of countries where the organisation operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report.	C	The 2008 Corporate Responsibility Report focuses on its operations in Australia and New Zealand. Woolworths also operates in India, Hong Kong and Shanghai. However, these operations are not material due to their size and consequently are not discussed in detail the Report.
	2.6	Nature of ownership and legal form.	C	Woolworths is a publicly listed company on the ASX.
	2.7	Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries).	C	
	2.8	Scale of the reporting organisation, including: <ul style="list-style-type: none"> - number of employees; - net sales (for private sector organisations) or net revenues (for public sector organisations); - total capitalisation broken down in terms of debt and equity (for private sector organisations); and 	C	Woolworths reports the number of employees, net sales, total capitalisation, total assets, ownership including 40, 000 employees who are shareholders and the number of employees in each country.

		<ul style="list-style-type: none"> - quantity of products or services provided. <p>In addition to the above, reporting organisations are encouraged to provide additional information, as appropriate, such as:</p> <ul style="list-style-type: none"> - total assets; - beneficial ownership (including identity and percentage of ownership of largest shareholders); and - breakdowns by country/region of the following: - sales/revenues by countries/regions that make up 5 percent or more of total revenues; - costs by countries/regions that make up 5 percent or more of total revenues; and - employees. 		
	2.9	<p>Significant changes during the reporting period regarding size, structure, or ownership including:</p> <ul style="list-style-type: none"> - the location of, or changes in operations, including facility openings, closings, and expansions; and - changes in the share capital structure and other capital formation, maintenance, and alteration operations (for private sector organisations). 	C	<p>Woolworths reports on changes in the number of stores from the last reporting period including new stores and stores that were closed in the reporting period. There were no other changes to size, structure or ownership reported.</p>

	2.10	Awards received in the reporting period.	C	Woolworths reports on both internal and external awards. External awards received include the 'Lumley Fleet Services Award' for driver safety and the 'Best Individual Contribution to Health and Safety' awarded to 2 Woolworths employees.
Report Profile	3.1	Reporting period (e.g., fiscal/calendar year) for information provided.	C	Financial Year.
	3.2	Date of most recent previous report (if any).	C	This is the first year that Woolworths has produced a integrated corporate responsibility report incorporating environmental, social, workplace and marketplace achievements.
	3.3	Reporting cycle (annual, biennial, etc.)	C	Annual.
	3.4	Contact point for questions regarding the report or its contents	C	Group Sustainability Manager.
Report Scope and Boundary	3.5	<p>Process for defining report content, including: determining materiality;</p> <ul style="list-style-type: none"> - prioritising topics within the report; and - identifying stakeholders the organisation expects to use the report. <p>Include an explanation of how the organisation has applied the 'Guidance on Defining Report Content' and the associated Principles.</p>	C	Woolworths provides a brief discussion on the material issues and the method for prioritisation in the Woolworths Sustainability Strategy 2007-2015.
	3.6	Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers).	C	The 2008 Corporate Responsibility Report focuses on its operations in Australia and New Zealand. Woolworths also operates in India, Hong Kong and Shanghai.

			However, these operations are not material due to their size and consequently are not discussed in detail in the Report.
3.7	State any specific limitations on the scope or boundary of the report. If boundary and scope do not address the full range of material economic, environmental, and social impacts of the organisation, state the strategy and projected timeline for providing complete coverage.	C	The 2008 Corporate Responsibility Report focuses on its operations in Australia and New Zealand. Woolworths also operates in India, Hong Kong and Shanghai. However, these operations are not material due to their size and consequently are not discussed in detail the Report.
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organisations.	C	Woolworths has a joint venture in India and buying offices in Hong Kong and Shanghai. These are relatively small operations and hence are not considered material in this Report.
3.9	Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report. Explain any decisions not to apply, or to substantially diverge from, the GRI Indicator Protocols.	C	
3.10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g., mergers/acquisitions, change of base years/periods, nature of business, measurement	NA	This is the first year Woolworths has produced an integrated corporate responsibility report that incorporates environmental, social, workplace and marketplace achievements.

		methods).		
	3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.	NA	This is the first year Woolworths has produced an integrated corporate responsibility report that incorporates environmental, social, workplace and marketplace achievements.
GRI Content Index	3.12	<p>Table identifying the location of the Standard Disclosures in the report.</p> <p>Identify the page numbers or web links where the following can be found:</p> <ul style="list-style-type: none"> - Strategy and Analysis 1.1 – 1.2; - Organisational Profile 2.1 – 2.10; - Report Parameters 3.1 – 3.13; - Governance, Commitments, and Engagement 4.1 – 4.17; - Disclosure of Management Approach, per category; - Core Performance Indicators; - any GRI Additional Indicators that were included; and - any GRI Sector Supplement Indicators included in the report. 	C	GRI Index.
Assurance	3.13	Policy and current practice with regard to seeking external assurance for the report. If not included in the assurance report accompanying the sustainability report, explain the scope and basis of any external assurance provided. Also explain the relationship between the reporting	C	Net Balance assured the 2008 Corporate Responsibility using the AA1000 Assurance Standard. Net Balance was not responsible for preparation of any part of the Report. Net Balance ensures our team's independence by selecting team members who had no other involvement with Woolworths during the reporting

		organisation and the assurance provider(s).		period that could impair the team's independence or objectivity.
Governance	4.1	<p>Governance structure of the organisation, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organisational oversight.</p> <p>Describe the mandate and composition (including number of independent members and/or non-executive members) of such committees and indicate any direct responsibility for economic, social, and environmental performance.</p>	C	<p>Woolworths briefly outlines the Committees of the Board including: the Audit, Risk Management and Compliance Committee; Corporate Governance Committee and; People Policy Committee. Woolworths refers the reader to the Annual Report for more information. The Annual Report can be found at www.woolworthslimited.com.au.</p>
	4.2	<p>Indicate whether the Chair of the highest governance body is also an executive officer (and, if so, their function within the organisation's management and the reasons for this arrangement).</p>	C	<p>The Chairman of Woolworths is not an executive officer.</p>
	4.3	<p>For organisations that have a unitary board structure, state the number of members of the highest governance body that are independent and/or non-executive members.</p> <p>State how the organisation defines 'independent' and 'non-executive'. This element applies only for organisations that have unitary board structures. See the glossary for a definition of 'independent'.</p>	C	<p>Woolworths lists the position and qualifications of each member of the Board members in the Report. Independent and Non-executive are terms defined under the Corporations Act (2001).</p>

	<p>4.4</p>	<p>Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.</p> <p>Include reference to processes regarding:</p> <ul style="list-style-type: none"> - the use of shareholder resolutions or other mechanisms for enabling minority shareholders to express opinions to the highest governance body; and - informing and consulting employees about the working relationships with formal representation bodies such as organisation level 'work councils', and representation of employees in the highest governance body. <p>Identify topics related to economic, environmental, and social performance raised through these mechanisms during the reporting period.</p>	<p>C</p>	<p>The Corporations Act (2001) provides opportunity for shareholder input through Annual General Meeting (AGM) as well as for shareholders to convene a general meeting on specific issues of concern (Section 249D). Woolworths Limited states employees can provide feedback to the businesses through workshops, focus groups, online surveys, team talks, road shows and conferences.</p>
	<p>4.5</p>	<p>Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organisation's performance (including social and environmental performance).</p>	<p>C</p>	<p>In Australia, under the Corporation Act (2001) the non-Exec Board members don't receive performance incentives in form of shares/options. They are paid a fixed fee, the directors' fee. The shareholders vote at the AGM on the aggregate cap for directors fees. Refer to the Remuneration Report in the Annual Report pp35. The Annual Report can be found at www.woolworthslimited.com.au.</p>

	4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided.	C	Woolworths has in place a Corporate Governance Manual which outlines Directors duties, board meeting and papers, continuous disclosures, securities trading and related parties benefits. The Corporate Governance manual is available at www.woolworthslimited.com.au .
	4.7	Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organisation's strategy on economic, environmental, and social topics.	C	This is provided in the Annual Report.
	4.8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation. Explain the degree to which these: are applied across the organisation in different regions and department/units; and relate to internationally agreed standards.	PC	Woolworths reports on a number of internal codes of conduct, policies and principles relating to sustainability.
	4.9	Procedures of the highest governance body for overseeing the organisation's identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles.	PC	Woolworths broadly discusses the procedures of the Board and its committees.

	Include frequency with which the highest governance body assesses sustainability performance.		
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance.	C	
4.11	Explanation of whether and how the precautionary approach or principle is addressed by the organisation.	NR	
4.12	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organisation subscribes or endorses. Include date of adoption, countries/operations where applied, and the range of stakeholders involved in the development and governance of these initiatives (e.g., multi-stakeholder, etc.). Differentiate between non-binding, voluntary initiatives and those with which the organisation has an obligation to comply.	PC	Woolworths reports on the externally developed sustainability charters, principles and policies.
4.13	Memberships in associations (such as industry associations) and/or national/international advocacy organisations in which the organisation: - has positions in governance bodies;	C	Woolworths is a member of a large number of associations including Australian National Retailers Association, Australian Institute of Packaging, Packaging Council of Australia and Business Council of Australia.

		<ul style="list-style-type: none"> - participates in projects or committees; - provides substantive funding beyond routine membership dues; or - views membership as strategic. <p>This refers primarily to memberships maintained at the organisational level.</p>		
Stakeholder Engagement	4.14	<p>List of stakeholder groups engaged by the organisation.</p> <p>Examples of stakeholder groups are:</p> <ul style="list-style-type: none"> - communities; - civil society; - customers; - shareholders and providers of capital; - employees, other workers, and their trade unions. 	C	Woolworths lists the stakeholders engaged through partnerships, Sustainability Advisory Group, employees and community groups.
	4.15	<p>Basis for identification and selection of stakeholders with whom to engage. This includes the organisation's process for defining its stakeholder groups, and for determining the groups with which to engage and not to engage.</p>	PC	
	4.16	<p>Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.</p> <p>This could include surveys, focus groups, community panels, corporate advisory panels, written communication, management/union structures, and other vehicles. The organisation</p>	PC	Woolworths outlines the types of engagement with stakeholders.

		should indicate whether any of the engagement was undertaken specifically as part of the report preparation process.		
	4.17	Key topics and concerns that have been raised through stakeholder engagement, and how the organisation has responded to those key topics and concerns, including through its reporting.	PC	Woolworths reports on the material issues to the organisation.
MANAGEMENT APPROACH & PERFORMANCE INDICATORS				
Economic – Disclosure on Management Approach	DMA EC	Provide a concise disclosure on the management approach items outlined below with reference to the following economic aspects; economic performance, market presence and indirect economic impacts	C	Woolworths discusses the organisation’s economic performance and market presence.
Economic (EC) Performance Indicators: Economic Performance	EC1	Economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments.(Core)	C	
	EC2	Financial implications and other risks and opportunities for the organisation's activities due to climate change. (Core)	PC	Woolworths addresses the key challenges resulting from climate change. The likely financial risks posed to Woolworths itself are not covered.
	EC3	Coverage of the organisation's defined benefit plan obligations. (Core)	C	Woolworths reports on the superannuation contributions for permanent salaried employees of the company and its controlled entities to certain company sponsored

				superannuation funds in accordance with legislative requirements.
	EC4	Significant financial assistance received from government. (Core)	C	
EC Performance Indicators: Market Presence	EC5	Range of ratios of standard entry level wage compared to local minimum wage at significant locations of operation. (Additional)	NA	
	EC6	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation. (Core)	C	Woolworths reports on the percentage of food and types of food sourced locally and the number of suppliers they purchase from. Woolworths also report on codes of conduct such as Produce and Grocery Council Industry Code of Conduct.
	EC7	Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation. (Core).	C	Woolworths reports on the percentage of executives that were recruited locally and internally within the organisation.
EC Performance Indicators: Indirect Economic Impacts	EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement. (Core)	C	Woolworths has a community investment program including Fresh Food Kids Hospital Appeal and Community Grants which provide financial support for infrastructure and services.
	EC9	Understanding and describing significant indirect economic impacts, including the extent of impacts. (Additional)	PC	Woolworths commissioned Concept Economics to calculate the total economic output and employment multipliers for Woolworths based on annual sales revenue. Woolworths report the financial contribution and FTEs for indirect economic positive.
Environmental –	DMA	Provide a concise disclosure on the	PC	

Disclosure on Management Approach	EN	management approach items outlined below with reference to the following environmental aspects; materials, energy, water, biodiversity, emissions, effluents and waste, products and services, compliance, transport and overall.		
Environmental (EN) Performance Indicators: Materials	EN1	Materials used by weight or volume. (Core)	PC	Woolworths has made a commitment in the Woolworths Sustainability Strategy 2007-2015 to reduce packaging and minimise waste from Private Label products. The Sustainable Packaging Alliance (SPA) undertook a packaging review of 43 of Woolworths 'high-volume private label' products in 2007 to help identify sustainable packaging solutions. Work is in progress.
	EN2	Percentage of materials used that are recycled input materials. (Core)	PC	The Sustainable Packaging Alliance (SPA) undertook a packaging review of 43 of Woolworths 'high-volume private label' products in 2007 and identified the percentage of materials that has recycled content. Work is in progress.
EN Performance Indicators: Energy	EN3	Direct energy consumption by primary energy source. (Core)	C	
	EN4	Indirect energy consumption by primary source. (Core)	C	
	EN5	Energy saved due to conservation and efficiency improvements. (Additional)	C	
	EN6	Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a	C	Woolworths discusses energy efficient products such as E10 and services such as improved lighting and refrigeration in stores.

		result of these initiatives. (Additional)		
	EN7	Initiatives to reduce indirect energy consumption and reductions achieved. (Additional)	C	Woolworths reports on initiatives to reduce energy efficiency such as green store design, lighting and refrigeration and the reductions achieved by these programs.
EN Performance Indicators: Water	EN8	Total water withdrawal by source. (Core)	C	Woolworths reports on water sourced from municipal supplies.
	EN9	Water sources significantly affected by withdrawal of water. (Additional)	NA	
	EN10	Percentage and total volume of water recycled and reused. (Additional)	NA	Not material. More than 80% of Woolworths' Limited stores are in centres owned by a third party or the use of recycled water in food retail is limited by law.
EN Performance Indicators: Biodiversity	EN11	Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas. (Core)	PC	Woolworths has commissioned Environment Management Resources (ERM) Australia Pty. Ltd. to screen the location of all facilities and identify which facilities are located in or near protected areas or areas of high conservation values. This is work in progress - screened 264 addresses so far and found 80 of them within one kilometre of an area of biodiversity value.
	EN12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas. (Core)	NR	Woolworths has commissioned Environment Management Resources (ERM) Australia Pty. Ltd. to screen the location of all facilities and identify the facilities located in or near protected areas or areas of high conservation values. This is work in progress and once completed will enable Woolworths to report on the

				impacts of operation on biodiversity.
	EN13	Habitats protected or restored. (Additional)	NR	
	EN14	Strategies, current actions, and future plans for managing impacts on biodiversity. (Additional)	PC	Woolworths has commissioned Environment Management Resources (ERM) Australia Pty. Ltd. to screen the location of all facilities and identify which facilities are located in or near protected areas or areas of high conservation values. This is work in progress - screened 264 addresses so far and found 80 of them within one kilometre of an area of biodiversity value.
	EN15	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk. (Additional)	NR	
EN Performance Indicators: Emissions, Effluents, and Waste	EN16	Total direct and indirect greenhouse gas emissions by weight. (Core)	C	
	EN17	Other relevant indirect greenhouse gas emissions by weight. (Core)	C	Woolworths' reports business travel and transport of products.
	EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved. (Additional)	C	
	EN19	Emissions of ozone-depleting substances by weight. (Core)	NR	
	EN20	NOx, SOx, and other significant air emissions by	NA	

		type and weight. (Core)		
	EN21	Total water discharge by quality and destination. (Core)	NA	
	EN22	Total weight of waste by type and disposal method. (Core)	C	
	EN23	Total number and volume of significant spills. (Core).	C	Woolworths reported one fuel spill in Victoria.
	EN24	Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally. (Additional)	NA	
	EN25	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organisation's discharges of water and runoff. (Additional)	NA	
EN Performance Indicators: Products & Services	EN26	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation. (Core)	C	Woolworths reports on initiatives such as recycling of packaging and plastic bags.
	EN27	Percentage of products sold and their packaging materials that are reclaimed by category. (Core)	NR	Woolworths does not report the number of products reclaimed as a percentage of sales. The EU Directive on Extended Producer Responsibility to which this indicator relates, is not mandatory in Australia.

EN Performance Indicators: Compliance	EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations. (Core)	C	No fines or prosecutions for non-compliance with environmental laws.
EN Performance Indicators: Transport	EN29	Significant environmental impacts of transporting products and other goods and materials used for the organisation's operations, and transporting members of the workforce. (Additional)	C	Woolworths reports on the greenhouse gas emissions from the transport of products.
EN Performance Indicators: Overall	EN30	Total environmental protection expenditures and investments by type. (Additional)	NR	
Human Rights – Disclosure on Management Approach	DMA HR	Provide a concise disclosure on the management approach items outlined below with reference to the following human rights aspects; investment and procurement practices, non-discrimination, freedom of association and collective bargaining, abolition of child labour, complaints and grievance practices, security practices and indigenous rights	PC	
Human Rights (HR) Performance Indicators: Investment & Procurement Practices	HR1	Percentage and total number of significant investment agreements that include human rights clauses or that have undergone human rights screening. (Core)	NA	
	HR2	Percentage of significant suppliers and contractors that have undergone screening on	PC	Woolworths is developing an Ethical Sourcing Policy that includes human rights criteria. The Policy is due to be

		human rights and actions taken. (Core)		implemented in February 2009 and will require all suppliers of Woolworths Private Label products to comply.
	HR3	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained. (Additional)	PC	All employees as part of their induction to Woolworths are informed of the Code of Conduct and receive a copy of the Code to sign confirming they have read and understand the Code.
HR Performance Indicators: Non-discrimination	HR4	Total number of incidents of discrimination and actions taken. (Core)	NR	
HR Performance Indicators: Freedom of Association & Collective Bargaining	HR5	Operations identified in which the right to exercise freedom of association and collective bargaining may be at significant risk, and actions taken to support these rights. (Core)	NA	
HR Performance Indicators: Child Labour	HR6	Operations identified as having significant risk for incidents of child labour, and measures taken to contribute to the elimination of child labour. (Core)	NR	Woolworths is developing an Ethical Sourcing Policy that includes human rights criteria. The Policy is due to be implemented in February 2009.
HR Performance Indicators: Forced & Compulsory Labour	HR7	Operations identified as having significant risk for incidents of forced or compulsory labour, and measures to contribute to the elimination of forced or compulsory labour. (Core)	NR	Woolworths is developing an Ethical Sourcing Policy that includes human rights criteria. The Policy is due to be implemented in February 2009.
HR Performance Indicators: Security Practices	HR8	Percentage of security personnel trained in the organisation's policies or procedures concerning aspects of human rights that are relevant to	NA	

		operations. (Additional)		
HR Performance Indicators: Indigenous Rights	HR9	Total number of incidents of violations involving rights of indigenous people and actions taken. (Additional)	NR	
Labour Practices and Decent Work – Disclosure on Management Approach	DMA LA	Provide a concise disclosure on the management approach items outlined below with reference to the following labour aspects; employment, labour/management relations, occupational health and safety, training and education, diversity, and opportunity.	PC	Woolworths reports on many aspects of labour, employment, occupational health and safety, training and education and diversity.
Labour Practices & Decent Work (LA) Performance Indicators: Employment	LA1	Total workforce by employment type, employment contract, and region. (Core)	C	
	LA2	Total number and rate of employee turnover by age group, gender, and region. (Core)	C	
	LA3	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations. (Additional)	C	
LA Performance Indicators: Labour/ Management Relations	LA4	Percentage of employees covered by collective bargaining agreements. (Core)	NR	Woolworths reports on key employee engagements with unions that took place during the reporting year.
	LA5	Minimum notice period(s) regarding significant operational changes, including whether it is	NR	

		specified in collective agreements. (Core)		
LA Performance Indicators: Occupational Health & Safety	LA6	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs. (Additional)	PC	Woolworths discusses the Health and Safety initiatives, policies and committees in place.
	LA7	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region. (Core)	PC	Woolworths reports Lost Time Injury Frequency Rate by business. Woolworths reports total absenteeism and work related fatalities for the organisation, but not by business.
	LA8	Education, training, counselling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases. (Core)	C	
	LA9	Health and safety topics covered in formal agreements with trade unions. (Additional)	NR	
LA Performance Indicators: Training & Education	LA10	Average hours of training per year per employee by employee category. (Core)	PC	Training reported as total spend and number of participants.
	LA11	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings. (Additional)	C	Woolworths has leadership, personal development and education programs in place.
	LA12	Percentage of employees receiving regular	C	All salaried employees participate in an annual

		performance and career development reviews. (Additional)		performance review.
LA Performance Indicators: Diversity & Equal Opportunity	LA13	Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership, and other indicators of diversity. (Core)	PC	Woolworths reported employee breakdown by gender and work category.
	LA14	Ratio of basic salary of men to women by employee category. (Core)	C	
Product Responsibility – Disclosure on Management Approach	DMA PR	Provide a concise disclosure on the management approach items outlined below with reference to the following product responsibility aspects: customer health and safety, product and service labelling, marketing communications, customer privacy and compliance.	PC	Woolworths reports on many aspects of customer health and safety, product labelling, marketing and customer privacy.
Product Responsibility (PR) Performance Indicators: Customer Health & Safety	PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures. (Core)	PC	Woolworths has a quality assurance program in place in supermarkets, general merchandise and consumer electronics that assess the health, safety and quality of products.
	PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of	NR	

		outcomes. (Additional)		
PR Performance Indicators: Product & Service Labeling	PR3	Type of product and service information required by procedures and percentage of significant products and services subject to such information requirements. (Core)	C	Woolworths reports that the Environmental Claims Policy and Ethical Sourcing Policy are for all Woolworths brands.
	PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labelling, by type of outcomes. (Additional)	NR	
	PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction. (Additional)	C	Woolworths conducts customer surveys and research to gauge satisfaction and discloses some results from the survey.
PR Performance Indicators: Marketing Communications	PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship. (Core)	PC	Woolworths has an Environmental Claims Policy. All buying, advertising and marketing staff have been trained in the Policy. Decision involving environmental certification must now be referred to a 'subject matter expert' for verification.
	PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes. (Additional)	NR	
PR Performance Indicators: Customer Privacy	PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data. (Additional)	NR	
PR Performance	PR9	Monetary value of significant fines for non-	PC	

Indicators: Compliance		compliance with laws and regulations concerning the provision and use of products and services. (Core).		Woolworths reported on the recall of its Woolworths Select tissue due to questionable environmental claims.
Society – Disclosure on Management Approach	DMA SO	Provide a concise disclosure on the management approach items outlined below with reference to the following society aspects; community, corruption, public policy; anti-competitive behaviour and compliance	PC	Woolworths reports on the impact of operations on communities and public policy activities.
Social (SO) Performance Indicators: Community	SO1	Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating, and exiting. (Core)	PC	Woolworths commissioned a study to assess the impact a new store would have on the surrounding community. Woolworths is investigating expanding this to more projects.
SO Performance Indicators: Corruption	SO2	Percentage and total number of business units analysed for risks related to corruption. (Core)	PC	Woolworths' discusses the Code of Conduct.
	SO3	Percentage of employees trained in organisation's anti-corruption policies and procedures. (Core)	PC	All employees receive a copy of the Woolworths Code of Conduct.
	SO4	Actions taken in response to incidents of corruption. (Core)	NR	
SO Performance Indicators: Public Policy	SO5	Public policy positions and participation in public policy development and lobbying. (Core)	C	
	SO6	Total value of financial and in-kind contributions	NR	Woolworths did not disclose political donations or in-

		to political parties, politicians, and related institutions by country. (Additional)		kind contributions.
SO Performance Indicators: Anti-Competitive Behaviour	SO7	Total number of legal actions for anti-competitive behaviour, anti-trust, and monopoly practices and their outcomes. (Additional)	NA	There were no legal actions during the reporting period.
SO Performance Indicators: Compliance	SO8	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations. (Core)	NR	Woolworths did not report the monetary value of significant fines and number of monetary sanctions.