



Woolworths Group Responsible Sourcing Grievance Process

Woolworths recognises that effective grievance mechanisms are key to safeguarding worker rights in our operations and supply chain. This is articulated both in our Responsible Sourcing Policy and Standards.

We are committed to working with our suppliers to ensure appropriate mechanisms are made available within their own supply chains to ensure grievances can be raised and resolved through appropriate channels.

Focus on supplier capacity development

While Woolworths provides a Supplier Speak Up service (see below), we also require suppliers to have their own effective grievance mechanism in place, as outlined in our Responsible Sourcing Standards. Where appropriate, workers and suppliers should use all internal or local mechanisms as a first step to raise and resolve complaints.

Woolworths is developing a guidance program for suppliers to support their knowledge and capacity to develop their own effective grievance mechanism, while at the same time recognising that the development of such a program is ultimately a supplier's responsibility. This includes general guidance on:

- the importance and benefits of establishing an internal grievance mechanism
- developing grievance policies and procedures for each supplier site
- providing a variety of confidential and safe methods to raise grievances
- documenting grievances received, the process followed and their resolution
- the importance of protecting those that have raised a grievance.

What is Woolworths' Supplier Speak Up?

The Woolworths Group provides a Speak Up service for our team members and direct suppliers (and their team members) as a mechanism by which responsible sourcing concerns can be raised anonymously.

The Speak Up service is provided for escalation of those matters that cannot be raised through existing procedures.

To guarantee independence, an external provider is responsible for the operation of the service. Concerns can be raised with the service by email, website and telephone (in which case they are answered by call centre operators who are specially trained to gather and record sensitive information). All concerns are then documented and a report is sent to a nominated Woolworths representative to escalate. Concerns can be raised on a confidential or anonymous basis.

Typically, people who raise concerns will be provided with progress reports as appropriate as a matter progresses, and the findings or outcomes arising from the complaint.



What would constitute a grievance?

For the purpose of this process, a grievance is an evidence-based report of alleged non-compliance with our Responsible Sourcing Policy or Standards that has occurred in our upstream supply chain and has a direct adverse human rights impact.

How are grievances raised?

We may receive grievances through one of a variety of different channels, including through our Speak Up service, our Responsible Sourcing email inbox, through audit findings or possibly other third party stakeholders.

The OECD's National Contact Points mechanism can be used in instances where individuals or organisations feel they cannot raise a concern with us directly.

Investigating concerns

We recognise that grievances raised will vary in scale, complexity and geographical origin. We apply a framework of investigation principles, which can be adjusted depending on the nature of the particular issue and circumstances. These principles are described below.

Initial assessment

The Responsible Sourcing team along with relevant internal business partners undertake a desktop review of the grievance. This review aims to establish, for example:

- The employees, workers, products or services involved
- Seriousness of the issue (e.g. if there is immediate physical danger to people)
- Whether the grievance been raised previously directly with the employer.

The Responsible Sourcing team will recommend next steps to the Decision Group depending on the outcome of this assessment. The Decision Group will include relevant senior staff (e.g. QA, commercial, legal), depending on the nature of the issue under investigation.

Investigation process

Depending on the outcome of the initial assessment and the recommendation of the Decision Group, a formal investigation process may be triggered. The form of this investigation will depend on the particular situation, however it may include:

- Interviews of relevant parties
- Assessment of evidence to confirm that complaints raised are substantiated
- Identify if any corrective actions have occurred and if these have been effective.

Remediation

At the conclusion of the investigation, if allegations have been substantiated, the Responsible Sourcing team and internal partners will engage with the supplier to develop a remediation plan.

The Responsible Sourcing team will monitor progress against any remediation plan, provide updates to the Decision Group and, where appropriate, the individual or group that raised the grievance. The nature of the remediation plan, corrective actions and time period for remediation will depend on the



particular circumstances of the grievance. In the most serious instances, Woolworths may cease trade with the supplier until critical corrective actions are remedied.

Continuous improvement

We are committed to further developing our grievance process to make it more accessible to workers in both our local and global supply chain.

Strengthening our grievance response and working with suppliers to ensure appropriate mechanisms are made available within their own supply chains is a priority. The Responsible Sourcing Standards reaffirm the eight characteristics of an effective grievance process outlined by the United Nations Guiding Principles on Business and Human Rights (known as the UNGPs), and we will work with suppliers to raise awareness of these.