

Respecting **human rights**



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Acknowledgement of Country

Woolworths Group acknowledges the many Traditional Owners of the lands across Australia, and we pay our respects to their Elders past and present. We recognise their strengths and enduring connection to lands, waters and skies as the Custodians of the oldest continuing cultures on the planet. We are committed to actively contributing to Australia’s reconciliation journey through listening and learning, empowering more diverse voices, caring deeply for our communities and working together for a better tomorrow.

Disclaimer

The forward-looking statements in this Statement are based on management’s good faith, current expectations and reflect judgements, assumptions and estimates and other information available as at the date of this Statement. They are, by their nature, subject to significant uncertainties, many of which are outside Woolworths Group’s control. Actual results, circumstances and developments may differ materially from those expressed in this Statement and readers are cautioned not to place undue reliance on these forward-looking statements. Forward-looking statements should be read in conjunction with, and are qualified by reference to the expectations, judgements, assumptions, estimates and other information and risk factors, referred to above.

Statement on reporting entities

Woolworths Group Limited (ACN: 000 014 675) is an Australian public company listed on the Australian Securities Exchange (ASX: WOW). The Company is registered at 1 Woolworths Way, Bella Vista NSW 2153, Australia. This Statement has been published in accordance with the *Modern Slavery Act 2018* (Cth) (*MS Act* or *Act*). It identifies the steps Woolworths Group Limited and its wholly owned entities (together, for the purposes of this Statement, Woolworths Group or Group) and the reporting entities (listed in Appendix on page 44) took to identify, assess, mitigate and remediate modern slavery risks in their operations and supply chains during the year ending 29 June 2025 (F25). Woolworths Group Limited makes this joint Modern Slavery Statement (Statement) on behalf of itself and the reporting entities listed on page 44 (other than The Quantum Group Holdings Pty Limited, The Quantum Group Pty Limited, PFD Food Services Pty Limited, Statewide Independent Wholesalers Limited and Petstock Pty Ltd who will prepare separate reports for F25). All amounts are expressed in Australian dollars unless another currency is indicated. This Statement contains forward looking statements. Please read our disclaimer for more information.

Engaging and consulting with entities to prepare this Statement

The development of this Statement was led by our Human Rights team, with input from a range of stakeholders across Woolworths Group. Members of the Human Rights Steering Committee and senior management with functional responsibility for the day-to-day management of Woolworths Group have been involved in the development and review of this Statement. Woolworths Group executives who are appointed as directors of our reporting and controlled entities support consultation in relation to the development of this Statement.

Mandatory reporting criteria

This Statement was prepared to meet the mandatory reporting criteria set out under the Act. The table below identifies where each criterion of the Act is disclosed within sections of this Statement.

MS ACT CRITERIA	REFERENCE IN THIS STATEMENT
Identify the reporting entity	Inside front cover and page 44
Describe the reporting entity’s structure, operations and supply chains	Pages 2–5
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Pages 6–11
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Pages 12–37
Describe how the reporting entity assesses the effectiveness of these actions	Pages 40–41
Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Inside front cover
Provide any other relevant information	Pages 38–39, 42–44

CEO message

This year’s Modern Slavery Statement reflects the progress we have made to deliver meaningful impact for workers in our supply chain. As a business, upholding respect for human rights is consistent with our purpose, and whilst we acknowledge that there is still more work to do, we are proud of the progress we’ve made.

My over 30 years of retail experience has taught me the fundamental importance of our people. As one of Australia’s largest employers, with relationships that extend far beyond our direct team members, we are conscious of the welfare and workplace conditions of our team and workers in our supply chain. We recognise that no retailer is immune to the risks of modern slavery, and with an estimated 50 million people living in situations of modern slavery on any given day¹, this represents a significant global challenge.

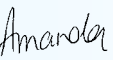
At Woolworths Group we know that business resilience is interconnected with ethical practices. For example, this year we found an indicator of modern slavery at a supplier site where salary deductions were used as a disciplinary measure, ranging up to ~20% of the monthly minimum wage for the region. We partnered with the supplier for nine months to remediate workers and put systems in place to prevent this happening again, delivering real impact to current and future workers.

Addressing the root cause of modern slavery issues remains core to our approach. Building on previous learnings addressing responsible recruitment, in F25 we initiated a new concept – the ‘Ethical Recruitment Marketplace’ – through our partnership with the

Consumer Goods Forum and other members of the Human Rights Coalition. This initiative brings scale by connecting multiple partners across various touch points in the migrant worker recruitment journey. Closer to home, our Australian horticulture supply chain remains a focus, where we continue to advocate for a National Labour Hire Licensing Scheme.

Looking ahead, we have an ambition to play a leading role in advancing the most salient human issues in our supply chain. We know that the challenge of modern slavery is not unique to us and will only be solved by partnership and collaboration at scale to lift the tide of what responsible supply chains mean across the board. Through our collaborative efforts, we want to work towards changing the grassroots causes of modern slavery so that we reduce our risk exposure, support our business resilience and streamline global efforts to tackle a global problem. Respecting human rights is not only the right thing to do, it is good for business as well.

This Statement was approved by the Woolworths Group Board on 26 August 2025 on behalf of all reporting entities covered by this Statement.

 Amanda Bardwell
Chief Executive Officer

Key progress in F25



- 1,085 audits conducted, 184 critical non-conformances remediated, 49 site visits conducted, over 580 workers reached through worker voice surveys
- ~\$506,000 returned to more than 200 workers in our supply chain
- Played a leading role on work to deliver an ‘Ethical Recruitment Marketplace’ with the Consumer Goods Forum’s Human Rights Coalition, which seeks to make ethical recruitment the norm
- Partnered with Issara Institute to continue the implementation of our Responsible Recruitment Addendum through their grievance mechanism, remediation management systems and supplier resources
- Identified and remediated a modern slavery indicator in our electric vehicle supply chain
- Finalised our Salient Human Rights Issues, informed by engaging internal and external stakeholders, including workers in our supply chain
- Engaged an expert third party to conduct a governance review of our Human Rights Program, providing an uplift of our program governance
- Developed a practical and fit-for-purpose Non-Trade Management Alignment Assessment that assesses non-trade suppliers’ maturity in managing human rights risks.

1 [International Labour Organization, ‘50 million people worldwide in modern slavery’ \(2022, Web Page\).](#)



Our structure, operations and supply chain

Our structure

Woolworths Group is one of Australia and New Zealand's largest food and everyday needs retailers. The Group covers an extensive retail footprint across Australia and New Zealand, supported by a supply chain that touches many industries including logistics, horticulture and manufacturing in Australia and overseas.

Woolworths Group Limited is the parent entity, with the Group also comprising a number of other subsidiary reporting entities. Details of each reporting entity covered by this Statement, together with a description of their respective activities, are set out in the Appendix on [page 44](#).



Woolworths Retail

Woolworths Supermarkets and Metro are our cornerstone food retail businesses in Australia and New Zealand, with customers engaging with us through both our extensive physical store network and our online and in-app digital shopping platforms.

In F25, we brought together key components of our Australian Food business, including Woolworths Supermarkets, Metro, Greenstock (red meat supply), Woolworths Food Company (own brand design, sourcing and supply) and The Kitchenary (convenience food including chilled and frozen meals) under Woolworths Retail.

Group Platforms

Woolworths Group's platforms support our retail businesses and include our distribution and fulfilment network, Primary Connect; our data and advanced analytics company, Quantum; and our retail media business, Cartology.

W Living

BIG W, Petstock and Healthylife are our specialty retail businesses providing customers with everyday needs both in-store and online, with an extended third-party (3P) range of everyday items available through our marketplace offering.

Our operations

Our commitment to respecting human rights starts with our team. At the heart of everything we do is our purpose – creating better experiences together for a better tomorrow.

Our core operations centre around our Woolworths Supermarket and Metro stores in Australia and New Zealand. Customers engage with these brands through our extensive physical store network, encompassing 1,117 Australian Supermarkets and Metro locations and 184 New Zealand Supermarkets, and through our online digital shopping platforms.

Food retail eCommerce orders are fulfilled both within our store network through Same Day and On Demand options, as well as within our customer fulfilment centres (CFCs) where dedicated team members manage the fulfilment of business-to-consumer (B2C) and business-to-business (B2B) online orders. The Group operates six CFCs across Australia.

Primary Connect, the Group's supply chain and logistics business, supports our retail operations through its 25 Group-owned distribution centres (DCs) in Australia and New Zealand, with products then transported by road, rail and sea, using a fleet of road trailers and carrier partners.

The Group's specialty retail businesses BIG W, Petstock and Healthylife provide customers with everyday needs both in-store and through online marketplaces, which offer customers an extended product range sold by third-party sellers. These sellers leverage the Group's marketplace offering to showcase their products and maintain direct customer relationships from purchase through to delivery. The BIG W store network comprises 179 locations in Australia.

Our Group platforms support our retail businesses, providing services and capabilities including loyalty and subscriptions through our Everyday business, retail media and insights through Cartology, artificial intelligence and advanced analytics through wiq, and third-party logistics through Primary Connect+ (PC+).

The Group's commitment to sustainability is reinforced by business accelerators. W360 focuses on delivering innovations in energy, waste and packaging. W23, the Group's venture capital and innovation fund, strategically invests in start-ups within the retail and climate technology sectors.

The Group's operations are supported by directly employed professional team members in support functions across offices in Australia, New Zealand, Hong Kong SAR, Thailand and Bangladesh. The Group also utilises indirect workers to meet variable labour needs and provide services within our facilities. This includes labour hire workers who assist with tasks such as picking and packing products in Australian and New Zealand DCs or retail eCommerce orders at CFCs, and operations services workers who perform outsourced regular work like cleaning, trolley collection, and security services.

Our supply chain

Woolworths Group has a complex, geographically dispersed supply chain which includes over 16,000 direct suppliers, ranging from small family businesses through to global multinational companies.

- **Trade:** We partner with 10,933 direct trade suppliers of vendor brand, own brand and fresh produce products.¹ Trade products span an array of categories, including apparel, long life food, fresh food and general merchandise. Vendor brand suppliers provide third-party-branded products that are often common household names, and own brand suppliers make products specifically for the Group. Some suppliers provide both vendor brand and own brand products.

For own brand products, ~81% of food manufacturing sites are in Australia and New Zealand, with non-food trade categories in supermarkets such as general merchandise, and health and beauty, sourced mainly from China ~78% and Australia ~5%. In F25, ~96% of all fresh fruit and vegetables and 100% of fresh meat sourced by Greenstock, for Australian supermarkets, was sourced from Australian farmers and growers. Similarly, 100% of own brand fresh meat for Woolworths New Zealand is sourced within New Zealand. Of the 461 sites that supply own brand products to BIG W, ~92% are located in China, Bangladesh and India.

- **Non-trade:** We source products, equipment and services directly from 5,459 non-trade suppliers. Examples of non-trade products include those that may feature a Woolworths Group brand, such as shopping baskets, trolleys or team member uniforms. They also include products that are not branded such as packaging material or IT equipment. The majority of non-trade services operate in facilities that are owned and operated by the Group across Australia and New Zealand including our retail stores, DCs and CFCs. Examples of non-trade services include cleaning, trolley collection, security services and logistics.

Tens of thousands more indirect suppliers contribute to our supply chain through the provision of goods and services to our direct suppliers, often referred to as tier two, tier three, and so on, or suppliers at lower tiers. Like many global retailers, having full transparency of indirect suppliers at the lower tiers of the supply chain is a common challenge. We recognise that modern slavery risks are often found at these lower supply chain tiers, and we discuss our progress on improving supply chain visibility on [page 23](#).

Throughout this Statement, we refer to 'suppliers' and 'sites'. Suppliers are businesses that the Group has made a payment to. Sites are the facilities used by suppliers to produce the goods they supply. One supplier may have multiple sites across different countries or locations.

¹ This includes all suppliers of goods for resale, including produce, meat, BIG W and other vendor and own brand suppliers.



Our operations and supply chain

Agricultural and raw materials



The farming and sourcing of raw materials is fundamental to delivering fresh, quality food and everyday needs for our customers. This includes suppliers of fresh products like fruit and vegetables, meat and seafood. Fresh products may be supplied directly to the Group for resale to customers, or used as an ingredient in own brand food products. This also includes suppliers of raw materials that feature in non-food products such as cotton.

464 direct horticulture suppliers

25 direct meat suppliers to Greenstock

35 approved suppliers of BIG W cotton products

Supply chain intermediaries



Raw materials and ingredients may pass through the hands of a number of sub-tier suppliers before making their way to direct suppliers that complete manufacturing or processing, including agents, brokers and traders. The exact make-up of the supply chain may vary depending on the sector or commodity, with some commodities featuring very complex supply chains. The Group also sources some ingredients directly in bulk, either to sell to customers or to supply to direct suppliers making other own brand products.

10,000+ estimated ingredient suppliers to tier one suppliers¹

65 agents/brokers in tier one of our trade supply chain

Manufacturing



We engage directly with manufacturing suppliers to produce our own brand food and non-food products that we sell to customers or use in our business. This may include the production of clothing, household goods or own brand food products for resale, as well as goods not for resale such as packaging, trolleys and shopping baskets used in the operation of our business. These manufacturing sites are located around the world. We also engage directly with vendor brands to supply products for resale, as well as products used in the operation of our business.

2,014 own brand supplier sites across

48 countries

As one of the largest retailers in Australia and New Zealand, our operations and supply chain are made up of multiple parties, each playing a role in contributing to our ambition of respecting human rights across our operations and supply chain.

Warehouse and distribution



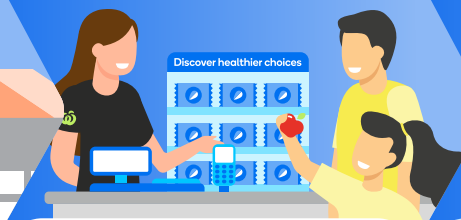
Primary Connect is Woolworths Group's core logistics and supply chain network, operating the largest retail supply chain network across Australia and New Zealand. Our team, based primarily in distribution centres, is responsible for picking and packing products which are then transported by road, rail and sea to our entire network of Woolworths Supermarkets, Metro and BIG W stores, as well as to our CFCs. We also extend this capability to other businesses through our commercial service, Primary Connect+.

25 Group-owned DCs

~1,200 road trailers

68 carrier partners

Retail businesses



Our retail and B2B businesses provide Australian and New Zealand customers with their food and everyday needs, both in-store and online, supported by our adjacent services. Our store team members are critical in serving our customers and making sure we are providing great shopping experiences while maintaining a safe and inclusive work environment. Our business is also supported by team members in professional roles such as finance, legal, procurement, replenishment and human resources.

~203K team members²

1,117 Australian Supermarkets and Metro

184 New Zealand Supermarkets

179 BIG W stores

Last mile delivery



Customers may purchase products directly from our retail stores, or arrange for orders to be delivered to their home or business through our online shopping platforms, supported by last mile delivery services. Some of our last mile delivery partners deliver products to customers in Woolworths Supermarkets branded trucks. To service community demand for online food and grocery delivery, we also have partnerships with a range of on-demand delivery platforms engaged through a point-to-point mode.

25.7M customers served per week on average

6 CFCs

¹ Increasing our supply chain visibility beyond our immediate supply chain partners is a continued priority for higher-risk value categories, however remains a challenge. See page 23.

² Including 8,984 contracted team members in Australia and New Zealand.



Our sourcing footprint

We source products from multiple geographies with different inherent risks. This map shows all the countries we source from directly and the level of their inherent human rights risk, and highlights the top 13 countries by site number where suppliers covered by our RS Program are located. It also includes the number of in-scope supplier sites in those countries, an overlay of those countries' top three labour rights risks and the key intercountry labour migration corridors we've identified for issues of responsible recruitment.

Labour rights risks

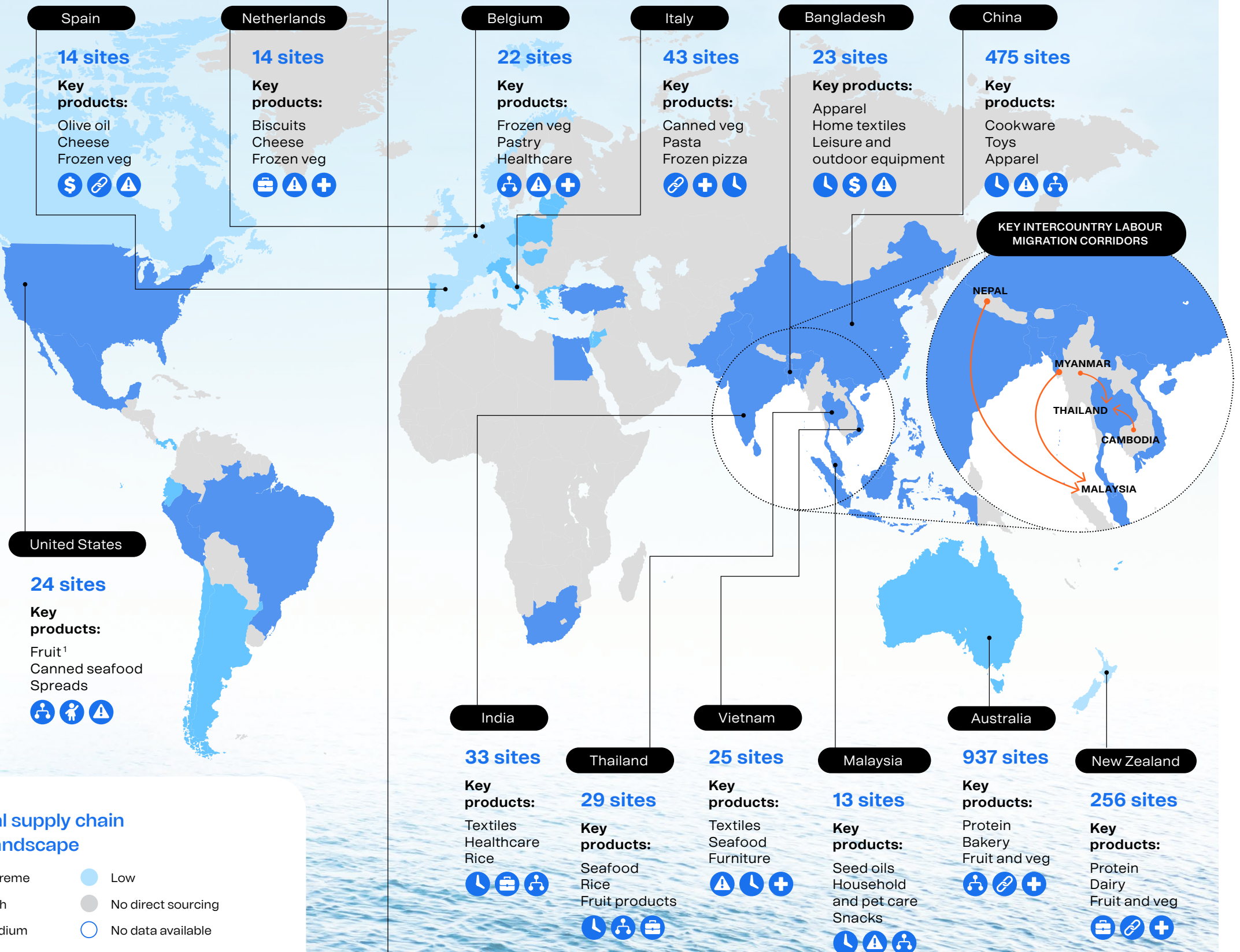
- Freedom of association
- Forced labour
- Health and safety
- Working hours
- Discrimination
- Regular employment
- Children and young workers
- Wages

Source: Sedex Pre Assessment, Country/region and sector risk (2025).

Global supply chain risk landscape

- Extreme
- High
- Medium
- Low
- No direct sourcing
- No data available

Source: LRQA, EIQ Country Risk Supply Chain Risk: Labour Index (2025).



¹ ~96% of all fresh fruit and vegetables for Australian supermarkets are sourced from Australian farmers and growers. We source fruit from the United States for supplementary supply.



Identifying risks of modern slavery

Our operations and supply chains are exposed to diverse and evolving human rights risks. We strive to have the right people, processes and systems in place to continuously monitor our risk environment, and are committed to ongoing learning and improvement.

We know that risks may arise from, amongst other things, the social and political context of the countries where we work and source from, and the products and services we procure. As such, our modern slavery risk profile is continually evolving, and we use multiple tools to monitor our internal and external environment to identify risks. Our Human Rights Program is designed to address these risks and, in line with the United Nations Guiding Principles on Business and Human Rights (UNGPs), we take a risk prioritisation approach by focusing on the highest risks in our supply chain.

Third-party screening

EiQ forced labour risk assessment and insights: an integrated platform that enables the identification of critical risks associated with specific sourcing countries, product categories, or commodities, which informs the Group's sourcing strategies and forced labour risk assessments.

Sentinel supplier screening: supports ongoing vigilance by analysing adverse media and internet data in various languages relevant to sourcing countries and cross-referencing information with 33 international sanctions lists. Sentinel identifies incidents and negative news pertaining to human rights violations, including forced labour risks. In F25, 109 potential incidents were identified and reviewed (vs 121 in F24), and further action was taken on 14.

Control Risks' geopolitical risk monitor: provides monthly reports which give insights into geopolitical dynamics, potential supply chain disruptions, and evolving regulatory landscapes. In F25, the Philippines and India were added to this scope for proactive monitoring. This year's reports highlighted global risks such as ongoing labour protests by workers in Bangladesh and heightened risks for workers due to conflict in India and Pakistan. In both scenarios, risk-specific working groups were set up to monitor the situation, including potentially adverse impacts to workers and our suppliers.

Sayari Graph (Sayari): a risk investigation and analysis platform which leverages trade and beneficial ownership data from official sources, allowing us to uncover supply chain connections and flag potential links to forced labour at multiple tiers. In F25, this tool helped us improve transparency below tier one for select inherently higher risk supplier categories (see [pages 9–10](#) and [page 26](#)).

Responsible Sourcing Program tools

- **Sedex Radar:** an online tool designed to identify key labour, human rights and governance risks by combining inherent country and industry sector risk information with the data collected from supplier sites within the Sedex platform. We use this platform to segment new in-scope supplier sites into risk categories, which inform further due diligence measures.
- **Third-party audit reports:** are tracked through a centralised dashboard of audit findings, which enables our team to identify trends in non-conformances and track changes over time. See [page 19](#).
- **Issara Institute's 'Inclusive Labour Monitoring' dashboard:** allows us to view real-time data on worker-reported issues in our South-East Asia supply chain, including all calls made by workers to Issara Institute (Issara)'s hotline, details on the issue raised, severity gradings and records of remediation actions taken by suppliers. In F25, 60 worker-reported issues were recorded (see [pages 32–33](#)). Issara Strategic Partners monthly meetings provide an update on recruitment trends and challenges on the ground.

Listening to workers, suppliers and industry

- **Worker engagement:** our team regularly engages with workers through worker forums, union engagement and grievance mechanisms to gain insight into the human rights risks workers are exposed to. We monitor the number of grievances we receive each year to identify trends, see [page 35](#).
- **Supplier and industry collaboration:** our Human Rights team has regular engagement with suppliers to gain visibility over industry-specific risks. We also collaborate closely with our audit schemes and certification bodies to understand issues they experience when conducting audits.

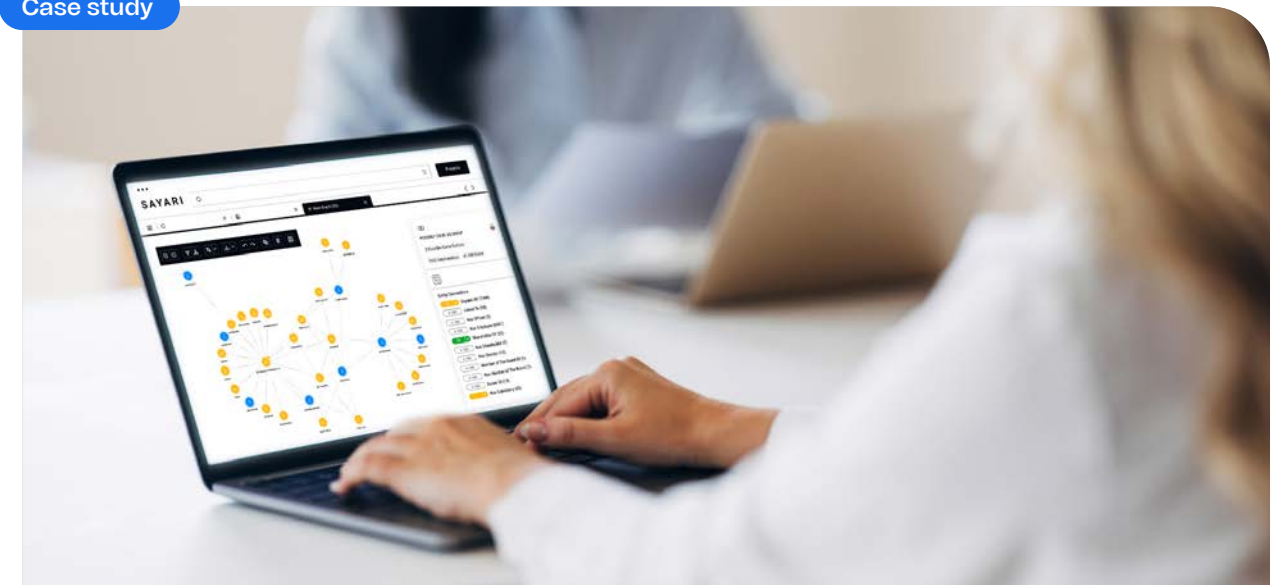
Forced labour risk assessment

Forced labour is one of the most salient modern slavery risks in our supply chain. Accordingly, we conduct periodic forced labour risk assessments to identify which categories in our supply chain have an inherently higher risk of forced labour. Building on our initial forced labour risk assessment in F20, we conducted our second forced labour risk assessment in F23. At a high level, the findings of our F23 assessment were:

- **trade – food:** seafood remains our top food product risk
- **trade – non-food:** cotton and apparel remain our top non-food risks, and risk has increased for hard goods such as domestic appliances and computer equipment
- **non-trade products:** preferred dress (uniforms) has increased to the most extreme risk
- **non-trade services:** construction, waste management (particularly recycling), transport and storage (warehousing) remain top risks. In operations services, property management services, including cleaning and security services, remain high risk.

These results reaffirm that our current human rights strategic priorities are appropriate to manage the most material forced labour risks in our supply chain. We plan to conduct a further forced labour risk assessment in F26 to better inform our mitigation strategies.

Case study



Using Sayari Graph to mitigate supply chain risk identified through adverse media reports

In F25, we utilised Sayari to identify and mitigate risks in our trade supply chain that were raised by adverse media reports. Across F25 we identified three adverse media reports alleging separate cases of links to forced labour in extreme-risk regions in China, two relating to global tomato paste supply chains and one relating to seafood. The reports named specific international brands and companies that were alleged to have trade links down their supply chains to extreme-risk regions.

Using Sayari, we screened eight tomato product suppliers and 64 direct seafood suppliers that were geographically relevant to the allegations made in the specific reports for links to the named entities. Through this screening, no trade or ownership links to the companies or brands named in the reports were identified. This kind of due diligence is helpful for quickly assessing risk in relation to adverse media reports when they arise, particularly when they concern supply chain relationships beyond our direct relationships. We acknowledge the inherent risks in several product categories originating from China, and describe our processes to mitigate these risks in more detail on [page 26](#).





Case study

Remediating a modern slavery indicator in our electric vehicle supply chain

Our ambition of a 100% electric vehicle (EV) home delivery fleet in Australia by 2030, and our efforts to reduce Scope 3 emissions, have required the ongoing procurement of EVs from several new to market suppliers. We are cognisant of the inherently higher risk of modern slavery in EV supply chains.¹ Workers in the industry are vulnerable to forced labour, hazardous conditions and excessive overtime, among other forms of exploitation both in the production of the vehicles in China, and in the operations to extract raw materials such as cobalt for lithium-ion batteries in the Democratic Republic of Congo.²

Given the inherently higher risk, we utilised Sayari to help identify and validate the ownership structure of a supplier of EVs, with the findings indicating the possibility of links to extreme-risk regions of China. We therefore required our supplier to undergo a third-party social compliance audit, and a site visit from our Human Rights team at the manufacturing site that produces vehicles for the Group. The audit identified multiple non-conformances with local and international laws, and our Responsible Sourcing (RS) Standards. As we gathered further information from the supplier, we found that the supplier was making unlawful salary deductions from workers’ pay, which is a form of withholding wages. The deductions were in the form of disciplinary fines for a range of infractions, ranging up to ~20% of the monthly minimum wage in the region. This finding was assessed by our third-party advisors LRQA as an indicator of modern slavery.³

In line with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and our Human Rights Program (HR Program) principles, we supported our supplier to remediate the impact on workers and put systems in place to mitigate and prevent future harm. After approximately nine months of supporting our supplier through the remediation process, upon follow-up audit it was confirmed that the supplier has now:

- changed their processes to align with local regulations and our RS Standards across areas such as employment registration and wages and benefits, including remediating workers for historic underpayments such as unpaid overtime
- improved safety and workplace conditions
- implemented a social compliance standard to monitor their supply chain.

This supplier will be required to undergo a social compliance audit in F26 to assist us to continue to monitor the site. Drawing on this experience, we have implemented Sayari pre-screening for all potential suppliers of solar panels and EVs to the Group, with results used to inform sourcing decisions. As a precondition prior to purchase, it is also mandatory for any potential EV supplier who will supply EVs to the Group on an ongoing basis to undergo a social compliance audit at the manufacturing facility.

1 James Cockayne, Edgar Rodriguez and Oana Burcu, ‘The Energy of Freedom?’ Solar energy, modern slavery and the Just Transition’ (2022) University of Nottingham Rights Lab.
2 Walk Free, Beyond Compliance in the Energy Sector: Assessing UK and Australian Modern Slavery Act Statements (2023).
3 International Labour Organization, ILO Indicators of Forced Labour (2012).

Our Group-level salient human rights issues

In F23, we commenced work with third-party human rights experts Pillar Two to conduct a Group-wide Human Rights Saliency Assessment. Salient human rights issues are defined as ‘the human rights that are at risk of the most severe negative impacts through a company’s activities or business relationships¹, ‘based on potential impacts’ scale (gravity of impact), scope (number of people impacted), irremediable character (how hard to make good the impact) and likelihood.

The assessment included consultation with a number of internal and external stakeholders, including investors, a worker representative and supply chain due diligence partners.

This process has formalised how we identify and articulate salient human rights issues across the Group, beyond our HR Program. As a result, whilst some of our salient issues remain the same (such as forced labour), this assessment acknowledges that work is already being done on some salient issues by other teams across the Group. It is important to emphasise that the Group is not looking to replace existing controls but rather reflecting that these areas feature human rights risks.

Importantly, the UNGPs also recognise that it may not always be possible for a business to take effective action on all its human rights impacts simultaneously, which we consider in our risk prioritisation.² The following table describes our salient human rights issues and the part of the Group primarily responsible for managing them:

Addressing community and environmental impacts	Our Climate and Nature, and Indigenous Affairs teams work with the business to address risks to communities like climate change and those unique to First Nations people.
Making nutritious food more accessible	Our Health and Nutrition team partners across the business to make healthier food more affordable and accessible to our customers.
Protecting privacy and responsibly using data of customers and team members	While we embrace the use of new and innovative technologies, we are aware of risks to privacy, social impacts and intellectual property, as prioritised by our Data and Privacy teams, and our Cyber Security team.
Creating an equitable, diverse and inclusive workplace	Through our People team, we remain committed to respecting and celebrating inclusivity.
Providing a work environment where team members and workers are safe, healthy and well	Whilst also led by our People team, at Woolworths Group health and safety is everyone’s concern, and we acknowledge our responsibilities to the physical and psychological safety and health of our team.
Combatting labour exploitation in our supply chain	We will continue to implement our HR Program to address modern slavery and labour rights issues in our supply chain, including through our RS Program and other HR Program pillars.

A programmatic deeper dive on risks of modern slavery and worker exploitation in our supply chain

Since 2018, our HR Program has focused on identifying, mitigating and remediating worker exploitation and modern slavery in our supply chain. We recognise, and our work with Pillar Two has validated, that labour rights and forced labour remain the most salient human rights issues in our supply chain. In F25, we conducted a more thorough examination of the issues experienced by workers in our supply chain to deepen our understanding and respond to the most material of these issues. We expanded upon our work with Pillar Two by overlaying supply chain data and trends, along with the application of our Guidance Framework for Meaningful Engagement with Affected Stakeholders to identify the most salient issues to workers based on their own lived experience. For more detail on this process, see page 26. Based on the results of surveys and trend analysis, we have identified the following priority areas for our HR Program: forced labour; responsible recruitment; working hours; decent work and living wages; and dignity and livelihoods. This deeper analysis will help to guide our future strategy.

1 UN Guiding Principles Reporting Framework, Salient Human Rights Issues (Web Page).
2 UN Guiding Principles on Business and Human Rights (2011), Principle 24.



Taking action to address risks

Our HR Program is the overarching way we manage key human rights risks, including worker exploitation and modern slavery, across our supply chain. Comprised of four pillars, the HR Program is implemented through our RS Program due diligence, specifically designed frameworks and bespoke strategies, policies, and purposeful partnerships.

Our Human Rights Program

Our HR Program is informed by the UNGPs, the International Labour Organization (ILO)'s Declaration on Fundamental Principles and Rights at Work, and the Woolworths Group Risk Management Framework and Risk Appetite Statement (both approved by the Woolworths Group Board). The latter identifies human rights as a 'level one' risk, meaning we take all reasonable measures to pursue elimination.

The HR Program does not directly govern risks to people in our operations. Risks to our direct team members, including pay, physical and psychological safety and conduct, are primarily managed by the Group's People team and the specific businesses and platforms in which they work (e.g. Supermarkets team or Finance team).

Our Human Rights Program pillars

Our HR Program has been in place for eight years. The first phase (2018-2020) of our work focused on the development and rollout of the RS Program for own brand and fresh suppliers. The current phase (2021-2025) maintains the RS Program as a core operational control, whilst also expanding bespoke human rights due diligence to strategically address modern slavery risks, uplifting our human rights governance processes, and enhancing our human rights framework to reflect the growth of the Group and our changing business needs.

As we continue to learn, and our HR Program matures, we have recognised that one size does not fit all in our supply chain, and that there is a need for complementary and compensating controls. Increasingly, our HR Program has taken a more proactive approach to focus on mitigation (rather than simply identification) through seeking to understand grassroots drivers and piloting associated programs to redress these. We believe that by focusing our efforts on recognising the patterns that contribute to recurrent issues, we can better work to address issues at a systemic level. Our HR Program is therefore based on four pillars. F25 outcomes for each pillar are described throughout this Statement.

1

Responsible Sourcing Program
Our foundational social compliance program with due diligence for suppliers in scope of the RS Standards.
[See pages 18-25](#)

2

Bespoke interventions to address modern slavery risks
Recognises that systemic geographic or commodity-based risks require unique interventions.
[See pages 26-34](#)

3

Effective grievance mechanisms
That are trusted and effective, so we can support access to remedy for impacted workers.
[See pages 35-37](#)

4

Partnerships and advocacy
With key external organisations and with majority-owned businesses, recognising modern slavery can only be ended by working with others.
[See pages 38-39](#)

Governance

Board

The Woolworths Group Board (the Board) is ultimately responsible for the governance of the Group's HR Program. The Board is supported by the Sustainability Committee (SUSCO) which is responsible for monitoring the implementation of human rights initiatives and due diligence. SUSCO monitors the progress of our HR Program via updates provided at each Committee meeting. In F25, reports covered the governance of the HR Program, key strategic initiatives, material incidents, long-term risks and our strategies to mitigate them. SUSCO also oversees the preparation of the Group's Modern Slavery Statement. Improvements to our control environment are periodically reported to the Board's Audit and Finance Committee via internal audit reports, and the Risk Committee through reporting on material risk actions and key metrics.

Management

At management level, the Chief Group Public Affairs, Communication and Sustainability Officer (CSO) is the executive sponsor of the HR Program and is responsible for its execution and managing human rights risks across the Group.

The Human Rights Steering Committee (SteerCo) provides input into management and remediation of modern slavery risks, and is comprised of senior leaders from key business units and Group functions. SteerCo membership is reviewed annually based on our strategic priorities, and in F25 this review included adding a representative who manages 'home essentials' categories within Woolworths Supermarkets.

Our Group Human Rights team is responsible for the day-to-day operations of the HR Program, including developing our overarching human rights strategy and annual work plan. Our team is based across Australia, New Zealand, Hong Kong SAR and China.



Uplifting the governance of our Human Rights Program

Our HR program comprises a framework of policies, standards, systems and processes which together establish the control environment for managing human rights risk. Having solid governance foundations is important to enable us to scale our impact and make sure our HR Program is clear, consistent and effective.

Our goal is to equip the Group to respond to a rapidly evolving human rights risk landscape, while maintaining our focus on respecting human rights for workers in our operations and supply chain. In line with this ambition, and with a focus on continuous improvement, an internal review of our RS Program was performed in F24. The review focused on the design and operating effectiveness of the RS Program across four key areas of our business – BIG W, Woolworths Food Company, Fruit and Vegetables and Greenstock. The review identified a number of opportunities for improvement, some of which focused on the design and effectiveness of our governance frameworks.

As a result of the internal review, we engaged an independent third party to assess the current state of the HR Program’s governance and identify opportunities for improvement. The review assessed our current state against key elements of good practice governance sourced from international standards including the UNGPs. Based on this, in F25, we commenced work to address recommendations, including:

- developing a Human Rights Playbook to enhance the way document governance is captured and communicated
- formalising our overarching approach through a Human Rights Strategy, bringing together all pillars of our HR Program to clearly align with the Group’s strategic objectives

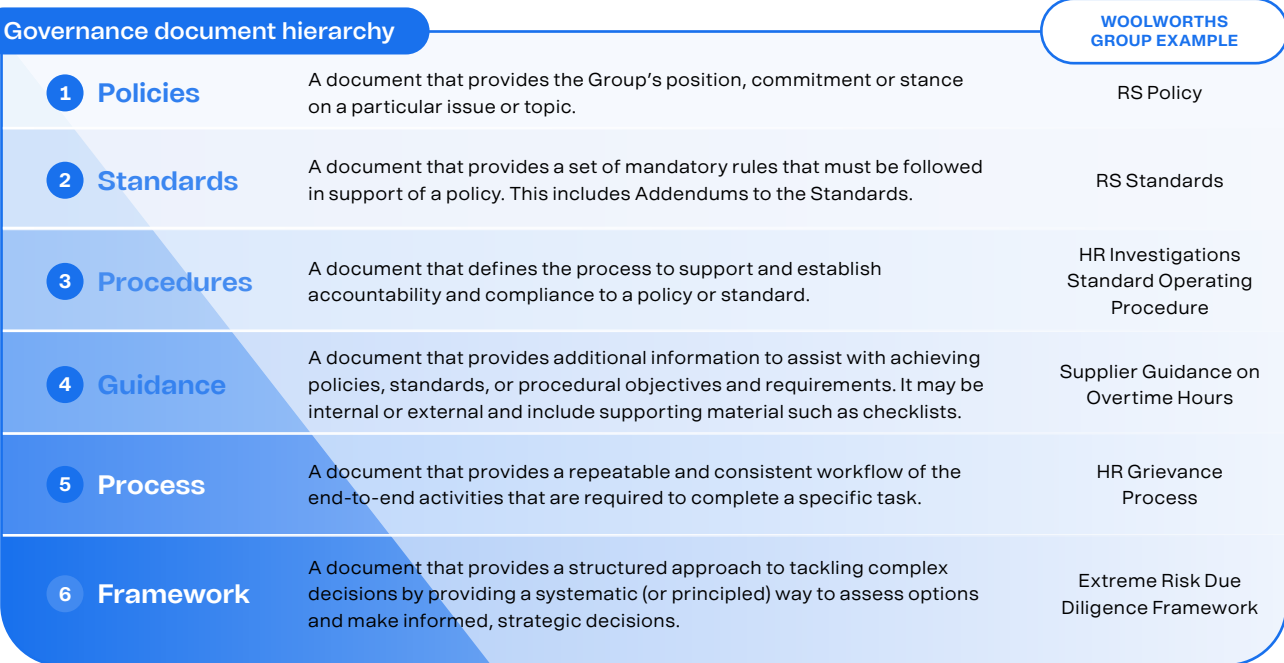
- revising our existing policy suite to make sure it remains aligned with evolving legal and regulatory standards, stakeholder expectations and emerging human rights risks.
- These actions have supported the Human Rights team to shift the HR Program to its next stage of maturity. In F26, we will continue to implement recommendations from the independent review, including launching our updated policy suite.

Lessons learned

In line with our ambition of continuous improvement, we have reflected on what was working, and what could be improved. We have learned that:

- it is important to balance the implementation of a fast-paced, dynamic HR Program with fit-for-purpose governance frameworks to support long-term effectiveness, consistency and targeted impact
- our focus on responding to sourcing risks and issues meant that some processes were not being formally documented as we moved at pace
- formally documenting processes will support us to scale our impact by enabling the business to take greater ownership in addressing human rights risks and support programmatic consistency into the future.

Drawing on this experience, our Human Rights team now includes a dedicated Human Rights Governance Manager to lead the execution of key actions and support an ‘always on’ approach to effective program governance.



Our policies

Our policies, standards and addendums outline our commitment to respecting human rights to our team and suppliers, and are key controls to manage the risk of modern slavery in our operations and supply chain.

Our policy framework is supported by publicly available guidance documents for suppliers on key areas, including guidance on developing effective grievance mechanisms and overtime hours. The following policies are the most relevant to mitigating the risk of modern slavery among our team and workers in our supply chains.

Team member policies

POLICY	PURPOSE AND IMPLEMENTATION
Code of Conduct	Outlines how we expect team members (including contractors) to behave towards each other, our customers and the community, including compliance with the Responsible Sourcing Policy and Standards. The Code was reviewed in F25, with updates to be published in F26. Team members are required to complete training during induction and then on a regular cycle.
Respectful Workplace Policy	Articulates the expectation that all team members treat everyone with respect when at work, when representing our businesses or when interacting with team members outside of work. This policy was updated in F25 to include an expanded section on sexual harassment to address our positive duty obligations, clearer responsibilities for our team members and leaders to prevent and address unacceptable behaviour and a new section outlining our expectations of third parties (including customers) when interacting with our team members.
Right to Work Policies	Promotes compliance with Australian and New Zealand immigration laws so that team members’ working rights are respected.
Fraud, Anti-Bribery and Corruption Policy	Outlines our commitment to complying with laws and regulations addressing fraud, bribery and corruption. Applies to all team members and is supported by annual training of team members in higher risk roles.
Team Member Speak-Up Policy and service	A reporting channel for team members and contractors, their families and associates to raise concerns confidentially and (if desired) anonymously.

Supply chain policies

POLICY	PURPOSE AND IMPLEMENTATION
Responsible Sourcing Policy	Underpinned by the UNGPs, the RS Policy sets expectations for our operations and all direct suppliers in relation to human rights and responsible sourcing, including modern slavery.
Responsible Sourcing Standards	Detailed requirements for all direct suppliers of own brand and fresh products. The Standards address the ILO core conventions, including forced or compulsory labour, and are underpinned by the UNGPs.
Requirements for Labour Hire Providers in our Australian Horticulture Supply Chain	Outlines specific requirements for the engagement of labour hire providers (LHPs) used by direct and indirect suppliers in our Australian horticulture supply chain. Implementation is supported by guidance and a checklist. F25 actions are outlined on page 21 .
Responsible Recruitment Addendum	Sets out supplier requirements, guidance and remediation protocols for two modern slavery indicators as they relate to the recruitment of migrant workers in our supply chain. In F25, we continued implementation with Thai and Malaysian suppliers through our partnership with Issara. See pages 28–29 for more information.
Child Labour Addendum	Sets out supplier expectations and remediation protocols relating to the respect for children’s rights in our supply chain. In F25, 109 suppliers from Asia received targeted communications on their responsibilities under the Child Labour Addendum.
Sustainable Cotton Policy	Sets out the minimum social and environmental requirements that apply to Group own brand products containing cotton. Progress in F25 outlined on page 27 .
Supplier Speak-Up Policy and service	Independently-hosted reporting channel for all suppliers and workers, their family and community members to raise concerns confidentially and (if desired) anonymously. Progress in F25 outlined on pages 35–37 .



Managing risk in our own operations

Direct

The majority of the Group’s approximately 203,000 team members are employed directly. This means we have visibility of employment terms and conditions, which are set out in contracts of employment and relevant industrial instruments that are regulated by Australian and New Zealand employment laws. Approximately 88% of Australian team members are covered by 29 enterprise agreements and 83% of New Zealand team members are in roles that are covered by 12 collective agreements.

We consider the risk of modern slavery in our direct team to be low. Clear policies, ongoing monitoring, team member training and accessible grievance mechanisms are key controls we use to mitigate the risk of modern slavery in our operations. We recognise the importance of freedom of association and acknowledge the right of team members to negotiate collectively. Woolworths Group has regular engagements with registered trade unions, and an estimated 35% of Australian team members and 53% of New Zealand team members are members of a registered trade union.

We acknowledge that risks to our team may be greater in inherently higher-risk geographies, including the geographies our Asia team operates in. However, our 188 directly employed team members

across the Asia region are performing specialised roles, including sourcing and quality assurance for our Group businesses such as Woolworths Retail and BIG W. These team members are engaged directly on employment terms and conditions that comply with the Group’s policies and procedures and are regulated by the relevant local laws of the country they are based in. These factors lower the risk of modern slavery as the Group has direct visibility over team members’ employment terms and conditions, and engages team members in these geographies to perform specialised roles, as opposed to base skill work.

We have implemented controls, monitoring and governance arrangements to make sure that we are meeting our legal requirements to our team members. This includes enhancing rostering and time and attendance guidelines and instructions so that our team members are paid correctly in accordance with applicable industrial instruments, and conducting reviews of our historic compliance with numerous modern awards, enterprise agreements and collective agreements, and legislative entitlements in Australia and New Zealand. We continue to remediate any shortfall where we identify it.

Indirect

We recognise that the risk of modern slavery is inherently higher for indirect workers engaged to perform work for the Group, and we seek to implement proportionate controls to mitigate this risk. These include:

- contractual controls in our contracts with suppliers of indirect workers on our sites, including compliance with our RS Policy and a modern slavery clause
- monitoring the progress of two labour hire providers who provide workers in our Australian DCs in closing out the non-conformances identified in baseline social compliance audits
- ongoing internal and external monitoring of cleaning and trolley collection suppliers at Group trading sites in Australia and New Zealand (see below).

Our commitment to effective governance and monitoring of the trolley collection and cleaning contracting supply chain continues. In F25, 74 Australian trading sites were externally audited, and 62 sites were internally audited by the Group’s Facilities Management Compliance team. This exceeded our target of having 5% of trading sites audited in each audit cycle. Where non-compliance is identified, our approach is to partner with primary contractors to remedy breaches and, where required, provide an appropriate outcome for affected workers.

However, if the non-compliance is sufficiently serious or the contractor does not cooperate in remediation, we will no longer engage the contractor. As a result of audits in F25, ~\$54,200 was repaid to 23 workers at 16 sites. Once all issues, including underpayments (if any), were rectified, one primary contractor was terminated from a site, and five subcontractors were terminated from six sites. Consent to engage a further three subcontractors was withdrawn, resulting in them being terminated from all 21 Woolworths Group sites they serviced.

The Group is in the process of in sourcing trolley collection and cleaning work across Australia. To date, 473 Woolworths Supermarkets across Australia have moved towards in sourcing cleaning and trolley collection. We anticipate that over time this direct employment model will reduce the level of inherent labour rights risks in our cleaning and trolley collection supply chain.

In New Zealand, work continued to have cleaning and trolley collection contractors become full members of Building Service Contractors of New Zealand (BSCNZ). For more information on this process and related findings, see the case study overpage.

Case study

Managing risk with cleaning contractors in New Zealand

To support our ongoing monitoring of the inherently higher risk category of cleaning and trolley collection suppliers in New Zealand, we require all cleaning and trolley collection suppliers in this category to maintain full membership with Building Service Contractors of New Zealand (BSCNZ). This membership includes a commitment to adhere to the BSCNZ Code of Conduct, which focuses on social practice, compliance with New Zealand employment laws, and industry-relevant wage and employment standards. To maintain full membership, suppliers must successfully pass an independent initial audit, and then take part in yearly targeted inspections. Four suppliers became full members in F25, bringing the total number of suppliers with full membership to 16 (73%). The six remaining suppliers are preparing for their audit to become BSCNZ members.

Where a supplier has critical non-conformances identified in a BSCNZ social compliance audit, they are stood down by BSCNZ, preventing them from re-applying for membership for one year. In such instances, we prioritise partnering with our suppliers for remediation of the issues by putting the supplier on a management action plan (MAP) to address non-conformances identified ahead of their re-audit, which occurs once their stand down period is over. In F25, one supplier completed a MAP, following critical findings in a BSCNZ audit related to non-compliant provisions around holiday pay. The MAP included the completion of a detailed payroll audit and repayment to workers of any owed amounts identified, introduction of additional compliance checks in payroll processes, as well as the update of employment agreements. It resulted in the repayment of ~\$9,450 NZD to seven workers, while three former workers owed ~\$3,730 NZD in total were unable to be located. As their stand down period is now over and identified issues have been remediated, the supplier is now preparing to re-apply for BSCNZ membership.



Responsible Sourcing Program

Our Responsible Sourcing (RS) Program governs how we manage human rights risks with suppliers. The RS Program consists of two main documents – the RS Policy and RS Standards – with addendums on specific topics. Our RS Policy applies to all suppliers of goods and services to the Group, while select categories of suppliers are also in scope of the RS Standards.

Trade

We take a risk-based approach to managing risk in our trade supply chain, where:

- all trade suppliers, including those of vendor branded goods, are expected to have established arrangements and processes consistent with our commitment to upholding human rights outlined in the RS Policy
- sites producing Woolworths Group own brand and fresh products are in-scope of our RS Standards (referred to as ‘in scope suppliers’). For these products, suppliers are producing, manufacturing and packing products directly for our businesses, so we have greater connection to the workers and influence to remediate issues.

Sites in scope of our RS Standards are subject to risk assessment. This risk assessment entails ‘segmentation’ of sites into four segments: priority, moderate, specialised, and minimum risk.

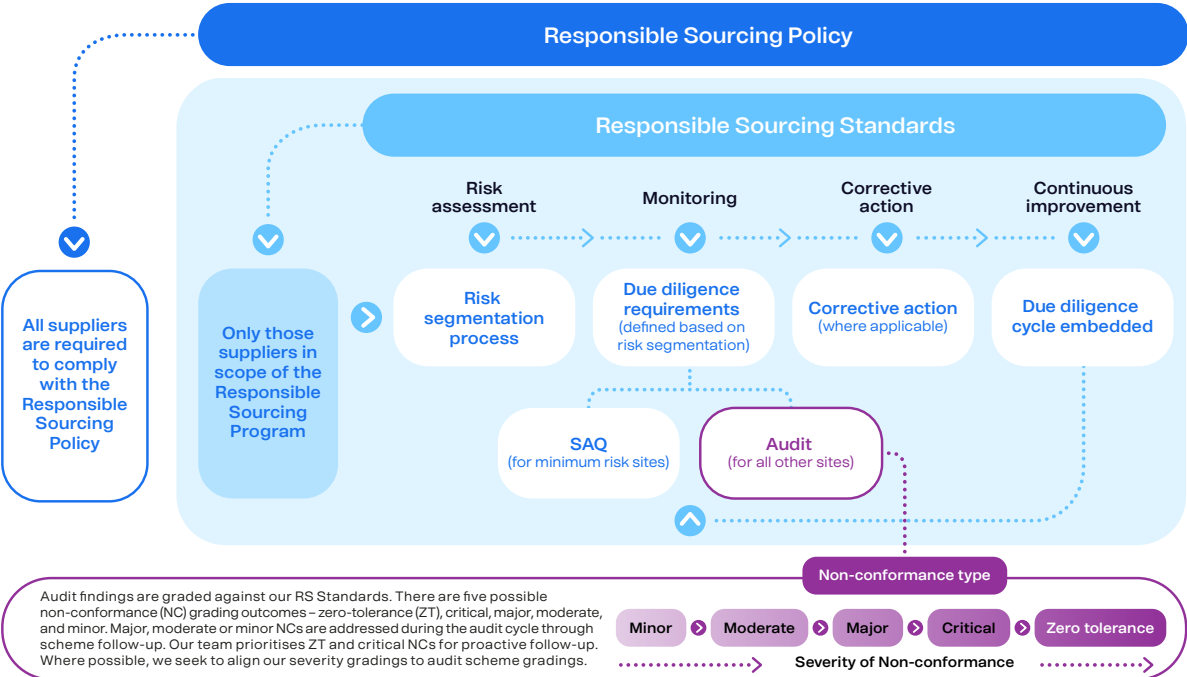
Risk segmentation drives due diligence requirements, which may include self-assessment questionnaires

(SAQs) and third-party audits. These activities are complemented by our expansion of worker voice, our grievance mechanism Speak Up, technology tools to flag new risks, and transparency efforts to expand supply chain visibility.

Recognising many of our suppliers are already part of a third-party social compliance scheme that may be required by other retailers, our RS Program is based on the principle of mutual recognition. This means we accept a number of third-party programs to reduce suppliers’ compliance burden. Suppliers may use an audit conducted for other buyer(s) to meet our requirements as long as the audit was conducted under one of eight approved third-party social audit schemes.¹

Sites in the moderate, priority and specialised risk segments typically require third-party social audits. Once audited, these sites move onto a regular audit cycle. For minimum risk sites, the minimum due diligence requirements include audit scheme membership and SAQs.

Our Responsible Sourcing Due Diligence and Supplier Engagement Framework



¹ The eight approved audit schemes are: Fair Farms, amfori BSCI; Supplier Ethical Data Exchange (Sedex) SMETA; Social Accountability SA 8000; Ethical Supply Chain Toy Program (ESCP); Worldwide Responsible Accredited Production (WRAP) GLOBALG.A.P Risk Assessment on Social Practice (GRASP) and NZGAP Social Practice Add-on.

Outcomes for audited sites

In F25, 1,085 audits were conducted at in-scope sites in our trade supply chain.¹ Of these audits, zero had zero tolerance NCs, 206 had critical NCs, 768 had moderate or major NCs, and 111 had minor or no NCs.

The number of audits conducted in our trade supply chain has steadily increased year on year since our Program began. However, we have seen a continued reduction in the number of audits with critical NCs over time. In F25, there was a 16% reduction in critical NCs related to health and safety across Australia, China and India, compared to F24. Examples of critical NCs related to health and safety include missing fire safety licensing, inadequate alarm systems and obstructed emergency exits. In our experience, once a critical NC in health and safety is addressed, it tends to not be a recurrent issue. This reduction in critical NCs indicates a maturity in suppliers’ health and safety management systems. Other critical NCs can be more systemic and challenging to resolve (see below for more detail on our approach).

Through the ongoing implementation of our RS Program, we aim to continue reducing the number of critical NCs, building sustainable strategies to address persistent issues.

Critical NCs in Asia

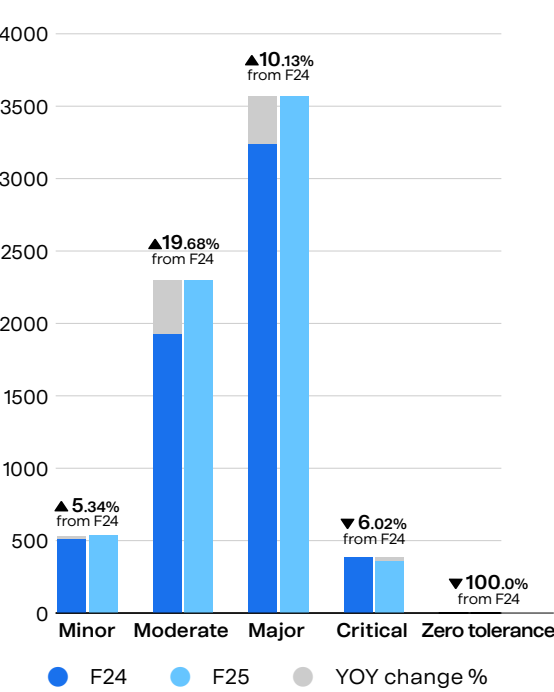
There were a total of 147 critical NCs across 94 audits in Asia in F25, with 46% of these found in China, and the remainder across Bangladesh, Thailand, Malaysia and India. Forty-two percent of critical NCs related to health and safety. This included blocked fire exits, and inadequate or outdated fire safety systems. Nineteen percent of critical issues in Asia related to environmental issues including systems to safely label, store, and dispose of high-risk chemicals, and maintaining valid and legally required environmental permits. The remaining critical issues related to working hours, recruitment fees, and management system failures leading to inadequate or missing documentation of working hours and wages. We continue to highlight common causes of critical NCs in supplier trainings and site visits in Asia, and we are seeing a continued reduction in critical NCs year-on-year.

Building licensing in China

We have focused on reducing the number of long-term consecutive critical NCs in China related to factories missing building and fire safety licensing and permits, due to broader administrative challenges that can take many years to resolve. We have seen a 30% reduction of NCs in this category this year, with six sites addressing all critical NCs related to this issue. We have commenced a proactive project in partnership with a third-party certifying body to address the remaining 14 sites’ long-term outstanding non-conformances.

¹ This number includes specialised sites, which are discussed in more detail on page 20.

NCs identified across audits



Wage repayments

Wage underpayments accounted for 24% of critical NCs identified in audits in F25. Remediation of underpayments involves repayments of owed wages to workers as part of the corrective actions. These repayments in the trade supply chain are verified by third-party auditors.

In F25, ~\$506,000 was repaid to over 200 workers across our supply chain, including workers in our trade and non-trade supply chains. In trade, over ~\$264,000 was repaid, 44% of which was repaid to over 140 workers in our horticulture supply chain. For details on underpaid wages in non-trade see pages 16–17 and 35–36.

Wage underpayments can occur for various reasons. The most common causes of wage underpayments related to miscalculations of wages owed under the relevant Award such as leave-loading and overtime which were typically mistakes as opposed to deliberate acts. Forty-two percent of wage underpayments identified in F25 were attributed to mismanagement or lack of oversight of LHPs’ wage payment practices. Where LHPs are responsible for calculating and making wage payments, suppliers may not have full visibility of payments made. Typical corrective actions in these cases involve wage repayments as well as strengthening management systems to enhance LHP oversight. For further detail on our approach to LHPs see page 21.



Specialised risk segmentation

Despite Australia and New Zealand not typically being ranked ‘high risk’ in global indices, modern slavery risks such as deceptive recruitment, debt bondage and forced labour are still present in industries that rely on third-party LHPs and casual or seasonal migrant labour.

The specialised risk segment of our RS Program recognises these risk factors and captures suppliers in Australia and New Zealand, primarily in our horticulture and meat supply chains.

Australian horticulture

In Australian horticulture, in F25 we completed the rollout of baseline social compliance audits for direct fruit and vegetable (F&V) suppliers, before those suppliers move onto a regular audit cycle in F26.¹ Ninety-nine percent of in-scope F&V suppliers have completed their baseline audit, with the exception of four sites with audits booked for their peak season, which will occur in H1 F26. For details on our approach to transparency and visibility in the F&V supply chain see [page 23](#).

In F25, 219 audits were conducted in F&V, of which 25% had at least one critical NC. In total there were 108 critical NCs identified in our Australian F&V supply chain, with these NCs found at 55 sites. Of the 219 audits conducted, NCs were noted in the following areas:

Health and safety: This year saw a 32% reduction in critical health and safety NCs in F&V compared to F24. As sites in F&V are now moving onto a regular audit cycle, many critical health and safety issues found in their first audits have been resolved and are not recurring. This includes inadequate fire safety systems that have since been upgraded, or missing fire safety licences that have since been obtained.

Foreign migrant workers: The proportion of critical NCs affecting foreign migrant workers is comparable to last year, representing 20% of total critical NCs. The majority of these NCs are related to suppliers’ monitoring of LHPs, such as inadequate processes to verify workers’ wage payments and right-to-work checks, and miscalculation of overtime rates. See [page 21](#) for further information on our approach to LHPs.

Underpayments: In F25, audits identified wage underpayments at 28 F&V sites. This year, ~\$115,000 has been repaid to 148 workers in our Australian F&V supply chain, with repayments validated by auditors. One hundred and eighteen underpaid workers identified across these sites were employed directly, and the remaining 30 were employed by a LHP. Reasons for underpayments included incorrect classification of workers under the relevant industrial instrument, failure to adjust pay rates based on employment timeframes, and miscalculation of night-shift and overtime hours. The largest single repayment at one site was to five directly employed workers who were repaid an average of ~\$8,950 each for unpaid night shift work.

For smaller F&V suppliers, we continued to trial alternate due diligence approaches which include scheme self-assessment and training, and worker voice options. Currently, 15 F&V small suppliers are in scope for the

alternative due diligence approach. Outcomes from worker voice at small-supplier sites in Australia can be found on [page 32](#).

Australian meat

There are 25 direct suppliers, with 55 sites, that supply fresh meat to Greenstock, our Australian meat business. These sites are classified as specialised risk and are on a regular audit cycle.

Of the 38 audits conducted in Australian meat in F25, 12 audits, or ~31%, had 16 critical NCs in total. Of these, four critical NCs related to our suppliers’ inadequate monitoring of LHPs management systems such as verifying right to work, four related to non-compliant or blocked fire doors, and three related to missing fire safety documentation. Through their audit, one site identified and repaid a total of ~\$85,000 across 14 migrant workers for recruitment fees paid to an agency in the Philippines. Given the recruitment agency’s practices had not been identified by the supplier until their audit, they have since reviewed their contractual agreements and uplifted their processes to monitor recruitment agencies going forward.

New Zealand horticulture and meat

Deployment of baseline audits continued among New Zealand F&V suppliers. To date, 131 F&V supplier sites in New Zealand have completed audits, which represents 97% of the target group.² In F25, 63 audits for in-scope New Zealand F&V suppliers were completed in F25, with the remaining 3% having their baseline audits planned in F26. Once their baseline is completed, sites then move onto a regular audit cycle.

In F25, 90 NCs were identified across 19 F&V sites in New Zealand. One of the most common NCs related to instances of unsigned, incomplete or missing employment agreements or payslips. Nine critical NCs were identified in four sites, with NCs including lack of due diligence into a LHP, inadequate grievance mechanisms, and fire safety lapses in worker accommodation.

In F25, we mapped fresh meat processing sites in New Zealand, including 33 sites across 10 suppliers. We reviewed the existing due diligence measures, including the latest social compliance audits reports available. These findings have informed the initiation of a prioritised audit rollout plan for due diligence in the New Zealand meat supply chain in F26.

1 Or an agreed alternate RS due diligence approach in place, discussed further on [page 32](#). Where a direct supplier does not have a growing or packing site, the audit requirement extends to one of their strategic grower/packer sites.
2 ‘Target group’ refers to New Zealand fresh produce suppliers in scope of the current phase of the RS Program audit rollout in NZ with a specialised risk rating. It currently excludes international suppliers, and agents/importer sites with administrative facilities only.

Labour hire

The seasonal nature of horticulture presents unique hiring challenges. Whilst LHPs play an important role in securing and managing workers, employers utilising LHPs can often have limited visibility of the labour hire workforce.

As a result, implementing effective controls to manage risks where LHPs are used in our F&V supply chain continues to be a priority. A key control is our Requirements for Labour Hire Providers in our Australian Horticulture Supply Chain (Labour Hire Addendum), which requires that our direct suppliers in horticulture work with LHPs who meet stipulated compliance criteria. We monitor our direct suppliers’ compliance with the Labour Hire Addendum on an annual basis using information available on the Fair Farms and Sedex platforms, and through insights from audits.

In F25, in our Australian horticulture supply chain, we have identified 584 horticulture sites using LHPs with 331 individual LHPs identified. Eighty-three percent of suppliers are compliant with our Labour Hire Addendum, an increase of 13% from F24. We are working with the remaining 32 suppliers to improve compliance with our requirements.

Beyond horticulture, we estimate that over 80% of suppliers in our Australian meat supply chain work with LHPs. In F26, we will explore options to expand the Labour Hire Addendum to include Australian meat suppliers. This may include adding the Australian

Meat Industry Council’s (AMIC) Voluntary Code of Conduct for Migrant Workers as an option for LHPs to join in order to demonstrate compliance with our Addendum requirements. This independently audited certification program is for livestock processors and employers in the industry to demonstrate compliance with regulation and industry best practice. This step taken by AMIC demonstrates positive progress by the meat industry to address risks to migrant workers associated with LHPs.

While we continue to monitor for compliance with our Labour Hire Addendum, we recognise that the labour hire licensing regime across Australia is fragmented. Only four jurisdictions have labour hire licensing schemes, leading to a regulatory patchwork which can increase risk to workers and present opportunities for unscrupulous operators. In collaboration with the Retail Supply Chain Alliance (RSCA), in F24 we funded research by the McKell Institute to explore key elements for consideration in the development of a national labour hire licensing regime that both protects workers and assists horticulture businesses to manage risk. The report – [Licensing Labour Hire: Promoting a National Labour Hire Licensing Scheme](#) – was released in F25 and recommends that, in order to prevent labour hire regulation loopholes, a National Labour Hire Licensing Scheme should be implemented by the Federal Government. We support the recommendations of the report, and in F26 we will continue to advocate for a National Labour Hire Licensing Scheme.



Engaging with our team and trade suppliers

Using Responsible Sourcing data to inform our teams’ sourcing decisions

In F25, 203 sites were pre-screened as part of supplier selection processes in Asia. Pre-screening may include reviewing audits, site visits and meeting suppliers to understand their approach to managing modern slavery risks. Of these, 20 sites (~10%) were not approved to trade with the Group for reasons including invalid social audit reports and inconsistent record keeping. Once sites are approved to trade, they are onboarded and move onto a regular audit cycle.

This year, the Human Rights team partnered with the Woolworths Food Company team in Asia to embed responsible sourcing data into supplier ‘scorecards’ for 106 suppliers. Scorecards provide Commercial teams with a holistic view of a supplier’s performance across a range of financial and non-financial metrics. This further centres suppliers’ commitment to responsible sourcing as a component of commercial team decision making. In F26, we will explore opportunities to expand this approach.

Site visits

Responsible sourcing site visits may be conducted for multiple reasons, including but not limited to: supplier pre-screening, validation of corrective actions, supplier capability-building and to gain first hand insights by speaking with our suppliers directly. We use the findings from these visits to inform our approach.

This year, our team conducted 49 on-site visits across Australia and Asia. Outcomes of these site visits include:

- feedback from a supplier on potential audit duplication issues informed our ongoing review of audit schemes during a site visit in Thailand
- a visit to support a semi-announced audit at an EV supplier aided the identification of multiple non-conformances (see [page 10](#))
- twenty-three visits in China focused on risk assessments for new sites and non-conformance follow-up to build suppliers’ understanding of issues like the importance of maintaining building licenses and health and safety risks from shared facilities
- a visit in Vietnam assessed our supplier’s handwoven basket raw material supply chain, including processes to monitor working conditions, oversee wage payments and promote access to grievance mechanisms for workers at lower supply chain tiers.

Responsible Sourcing training

To build capability for site visits and supplier engagement, in F25 members of the Human Rights team undertook social compliance auditor training delivered by Dignity in Work for All (DIWA). In addition, we developed a capacity building approach for the Human Rights team with modules for onboarding training and continual learning. We periodically train Woolworths Group teams on responsible sourcing. For example, in F25 we trained our Commodities Sourcing team on due diligence requirements, our Asia Sourcing team on shared facilities risk and our Woolworths Supermarkets Sourcing team on incorporating responsible sourcing considerations into new-product development processes.

In addition, we trained over 130 suppliers on their RS Program responsibilities, our requirements and common risk areas in live interactive sessions. Participants reported increased understanding of our approach to ZT issues and the RS program requirements. We also have a suite of guidance materials available for suppliers on specific topics including developing and maintaining effective grievance mechanisms, managing overtime and guidance on complying with our LHP and Responsible Recruitment requirements.

Audit quality improvement

Audits are a key tool in our human rights due diligence approach, and therefore it is important that we monitor opportunities for improvement. In F25, we escalated 19 audit quality issues to the relevant audit schemes for investigation and action. These included failure to identify shared facilities, findings being recorded against the wrong ‘issue titles’ and issues raised through site visits and worker voice that had not been identified by auditors.

Additionally, we conducted region-specific certification body (CB) engagement to highlight the importance of audit quality. Representatives across 10 CBs attended sessions with our team, raising awareness of our RS Program requirements, to provide and receive feedback on our respective programs and to discuss opportunities to strengthen audit quality.

Improving transparency and visibility in our supply chain

We take a risk-based approach to determining which categories we prioritise to work towards improved transparency beyond tier one. We acknowledge there are multiple global challenges to achieving supply chain transparency which require holistic solutions.

Despite these challenges, we are progressing our efforts to improve transparency and visibility in categories that have been prioritised for supplier mapping beyond tier one. In this context, increasing visibility refers to the Group being able to progressively identify suppliers and sites end-to-end, from ‘farm (or vessel) to fork’. Key updates include:

Australian horticulture: We have visibility of all 342 direct (tier one) suppliers in our Australian horticulture supply chain. Our membership of certain social audit scheme platforms allows us to have an increasingly transparent view of tier two or three suppliers. Whilst this visibility is not comprehensive, it is improving year-on-year. We now have visibility of 1,360 supplier sites used in our fresh produce supply chain, a 26% increase from F24. This includes all direct (tier one) sites, and some tier two and tier three sites (our suppliers’ suppliers’ sites).

Cotton: We continue to increase transparency of our cotton supply chain with the ongoing rollout of a supplier SAQ to eight potential suppliers in F25. The SAQs have expanded our visibility to include 32 tier two cotton sites (see our [2025 Sustainability Report](#) for more information).

Seafood: We have 48 direct (tier one) seafood suppliers in our own brand and fresh supply chain, all of whom we work with through our RS Program. Similar to our efforts in horticulture, we continue to work on gaining visibility beyond our direct suppliers, as we know that the greatest risk can lie further down the supply chain. This year, an end-to-end traceability technology solution was piloted within our seafood supply chain. The pilot included:

- seventy-six products from eight fresh and own brand processed seafood suppliers located in Australia, China, Thailand, and Vietnam

- fifty-six second-tier suppliers, one third-tier supplier, and three vessels involved in the supply chain being identified
- integration with nine audit schemes and third-party databases.

During the pilot we faced challenges with data discrepancies due to a lack of standardised data entry processes used by different parties to record and store their data. We also identified challenges with integration – any future traceability project will require integration with our third-party logistics providers and connectivity with internal data systems already used by ourselves and our suppliers. Based on these findings, we are considering a proprietary approach for an integrated platform to achieve scalable supply chain transparency. See [page 27](#) for more information on our approach to managing our seafood supply chain.

Renewable energy equipment: Given the inherently higher risk in both the geographies where renewable energy equipment is manufactured and where the raw materials used in the products are sourced, we have focused on improving visibility beyond tier one in this category. We contractually prohibit EV suppliers and our largest solar panel provider from sourcing from entities that are subject to United States Withhold Release Orders or that are on the *American Uyghur Forced Labour Prevention Act* (UFLPA) Entity List. We meet with our largest supplier of solar panels every six months for an update on which tier two suppliers provide goods that are then provided to the Group. For more details on our approach to working with our EV suppliers, see [page 10](#).

Challenges

Our commitment to transparency acknowledges the wider industry challenges in securing visibility and transparency beyond direct tier one suppliers. There are multiple, common global challenges to achieving supply chain transparency:

- the Group typically does not hold the legal relationship with suppliers beyond tier one, so we rely on our direct suppliers working with their suppliers to improve visibility
- there are often intermediaries in the supply chain that take a mass balance approach to raw materials, making transparency more challenging
- we rely heavily on suppliers to provide us with accurate data, which can be challenging due to different systems used across industries
- investment is needed to create systems and processes that are scalable, as currently buyers have different traceability requirements and data collection formats, posing a major barrier to entry. We are also cautious not to duplicate requirements and create additional burden for suppliers.



Non-trade

Our non-trade supply chain comprises the 5,459 direct suppliers of goods not for resale and service providers required for the operation of the Group’s core businesses. Some categories of non-trade products and services carry unique risks, including in relation to modern slavery, and we take a risk-based approach to partnering with our non-trade suppliers to manage these risks.

Policies, contracts and targeted approaches for areas of higher risk are the key controls we have implemented to mitigate modern slavery risk in our non-trade supply chain. Workers in our non-trade supply chain also have access to our grievance mechanism, Supplier Speak Up. As the RS Program matures, these controls will expand to include ongoing due diligence for certain risk prioritised categories of non-trade suppliers (see below).

The sourcing of non-trade goods, equipment and services where spend is over \$1 million per annum is managed by our Non-trade Procurement team and governed by our Woolworths Group Procurement Policy. All non-trade suppliers are in scope of our RS Policy, and we aim for all non-trade template contracts and purchase orders to include modern slavery clauses and mandate compliance with our RS Policy.

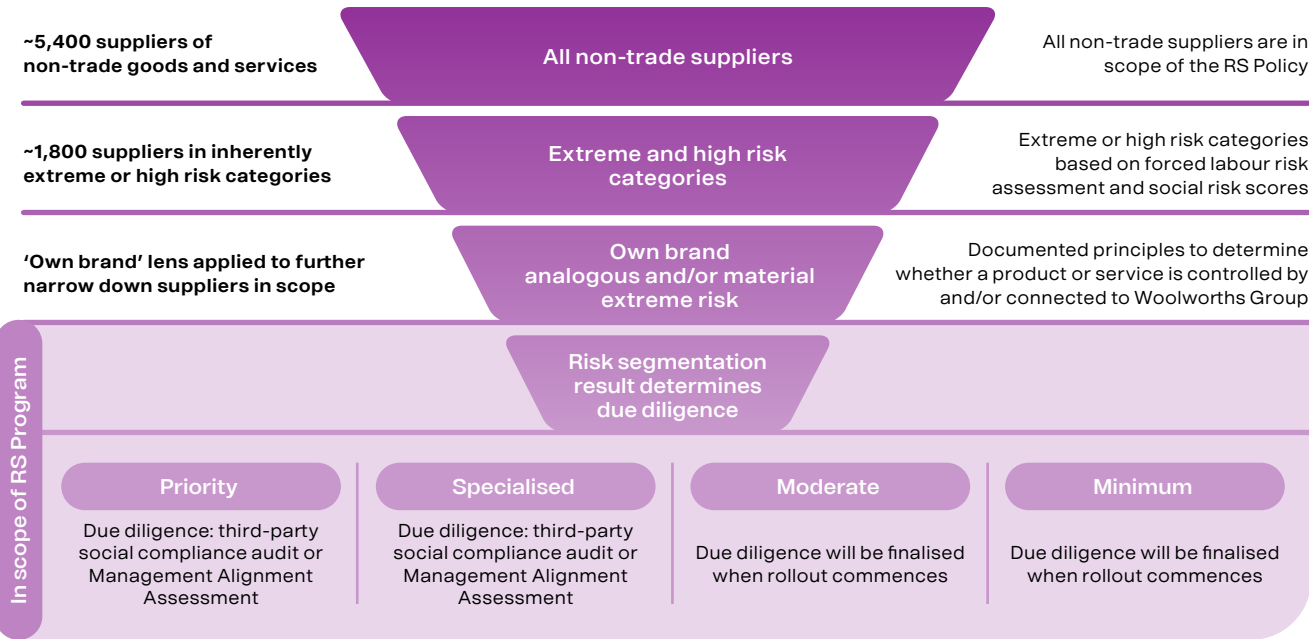
Expanding our RS Program in non-trade

We recognise that a modern slavery event could occur anywhere in our supply chain, and we continue to review our Program to make sure our interventions remain fit for purpose with both our trade and non-trade suppliers.

In line with this, while we have controls in place to manage risk with non-trade suppliers, we identified an opportunity for a programmatic uplift to our RS Program to provide a consistent approach to managing labour rights risk across our non-trade supply chain. In F24, we developed a risk segmentation approach for non-trade suppliers to determine which suppliers will be in scope of the RS Program, and how to further risk-segment in-scope suppliers. Non-trade suppliers that are in an inherently extreme or high risk category, and who are assessed as being sufficiently connected to the Group, will be in scope of the RS Standards. In-scope non-trade suppliers will then be subject to further risk segmentation, with proportionate human rights due diligence depending on their risk segment.

In-scope non-trade suppliers who are segmented as priority or specialised risk will be required to undertake further due diligence, such as a third-party social compliance audit or a management compliance assessment. In order to prepare to implement this due diligence, we have partnered with our external audit schemes to advocate for the development of a service provider audit framework, and have developed a bespoke management compliance assessment (see page 25). Rollout will commence with a pilot for select categories of non-trade suppliers in F26.

Non-trade supplier risk segmentation process¹



1 This diagram displays the work that has been done to date. This approach may be updated depending on the findings of the pilot as we continue to take a risk prioritisation approach.



Case study

Taking a partnership approach to due diligence with non-trade suppliers

Our non-trade supply chain is comprised of a diverse range of suppliers, including suppliers that are in inherently extreme or high risk categories. While we recognise these risks, we also acknowledge that these suppliers may be large companies that are reporting entities under the MS Act and, accordingly, are likely to have due diligence processes in place to monitor their operations and supply chains.

To address these situations, in F25 we developed a Non-Trade Management Alignment Assessment (Assessment) with an external provider. The Assessment is a practical tool designed to promote good practice and foster collaborative engagement with suppliers. Its purpose is to facilitate risk-based due diligence for non-trade suppliers in scope of the RS Program and reporting under the MS Act. The Assessment evaluates the maturity of these suppliers’ labour rights commitments, establishing a framework for a collaborative approach focused on transparency and capability building. It assesses how suppliers integrate the UNGPs, conduct and manage labour rights risk assessments in their operations and supply chains, and implement grievance mechanisms.

The Human Rights team will grade the assessments to identify gaps and opportunities for improvement with selected suppliers. They will then proactively partner with them to support the uplift of their labour rights processes across operations and supply chains. The Assessment will be piloted in F26.



Bespoke interventions

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

Our frameworks

In order to respond to the dynamic nature of human rights risks, we regularly review our interventions to make sure they remain effective. In F24, we identified the opportunity to develop new guidance frameworks in response to emerging key risks, including an Extreme-Risk Due Diligence Framework (ERDD Framework) and an approach for meaningful engagement with impacted stakeholders. In F25, we have continued to implement these frameworks through targeted pilots.

Extreme-risk Due Diligence Framework

We recognise that in some locations or sectors, the human rights risks might be particularly severe, making remediating issues harder to influence. In these circumstances, the nature and context of the human rights risks, for example state-sanctioned forced labour, may make working with suppliers in line with our HR Program principles challenging. This requires a tailored approach; therefore in F24 we developed the ERDD Framework.

The ERDD Framework involves using bespoke technology and tools such as Sayari and EIQ Sentinel to conduct screenings to identify network connections and extreme-risk exposure through trade or company ownership data. This enables us to unravel otherwise complex and opaque scenarios – supporting investigations, intelligence gathering and risk-specific due diligence to inform our sourcing approach.

In F25, we continued to rollout our approach on a risk prioritisation basis, including into tomato products (including tomato paste, concentrates and purées) by screening 15 new and existing suppliers. This deeper assessment was informed by quantitative risk data from EIQ, as well as qualitative data, such as government sanctions, UN agency reports, civil society reports and regulatory action like the UFLPA. Through our due diligence approach to identify exposure through multiple tiers, links to extreme risk were identified for four proposed new ingredient suppliers. Where required, we worked with suppliers to find alternative sourcing pathways. Another use case for the ERDD Framework has been the screening of electric vehicle suppliers (see [page 10](#) for further information).

Guidance Framework for Meaningful Engagement with Affected Stakeholders

We are committed to engaging with affected stakeholders to learn from their experiences and inform our ongoing strategies. Aligned with the UNGPs, ‘affected stakeholders’ in this context refers to individuals and groups whose human rights may be the most severely impacted in our operations and supply chain.¹ In F24, we partnered with Shift, a business and human rights non-profit organisation, to design a *Guidance Framework for Meaningful Engagement with Stakeholders Impacted by Woolworths Group’s Operations or Value Chain* (Engagement Framework). The Engagement Framework has nine principles to guide our engagement with potentially affected stakeholders, and aims to help our Human Rights team continue to embed a ‘risk to people’ lens rather than leading with ‘risk to business’ when designing and evaluating key activities.

In F25, we utilised the Engagement Framework’s principles when designing and delivering the worker surveys that helped validate our salient issues for our HR Program, which is discussed in more detail on [page 11](#). Through this engagement, workers in our Australian supply chain reported living conditions and accommodation as their highest area of concern, whereas workers in our Thailand supply chain reported wages and job stability as the areas of greatest concern. These findings challenged our perception that recruitment fee issues would be ranked of greatest importance to workers in our supply chain, reinforcing the importance of incorporating worker perspectives in our HR Program so that our interventions address the areas of highest concern for workers.

1 United Nations Guiding Principles on Business and Human Rights (2011), Principle 18.

Category specific due diligence

We have targeted workstreams to address specific modern slavery risks in certain high risk categories.



Seafood

Based on our F23 forced labour risk assessment, seafood is the top modern slavery risk area in our food supply chain. Within the seafood category, tuna is the top species risk as identified in a third-party seafood risk assessment conducted in F23.

We have continued to focus on tuna suppliers in F25. This included visiting tuna suppliers operating in our supply chain in Thailand. One of our priorities during site visits is to identify ways to improve our HR Program through open discussion with our suppliers about both challenges and opportunities. Suppliers have anecdotally reported that they can spend over half of the year preparing for audits and indicated the significant resource burden that accompanies this. To support suppliers to focus on the issues that matter most, such as remediation and strengthening human rights controls, we are working both to identify how we can strengthen our mutual recognition approach to social audits (see [page 18](#)) as well as advance collaborative efforts with other companies in this space, such as the Ethical Recruitment Marketplace (see [page 29](#)).

Transparency and traceability is an important aspect of our work in seafood. Tuna suppliers in our own brand supply chain are required to maintain relevant traceability information, back to the vessel, for each batch of processed tuna. As per the Group’s Seafood Sourcing Policy requirements, this information should be available by request. Spot checks, including screening for exposure to illegal, unregulated and unreported (IUU) vessels, were conducted in F25. To gain better visibility in seafood beyond tuna, this year we piloted a traceability technology solution. For details and learnings from this pilot, see [page 23](#). As found in this pilot, beyond direct trading relationships we continue to face challenges in gaining transparency, particularly where intermediaries such as traders, agents and brokers are prevalent. This is a shared challenge with many of our direct seafood suppliers, which we will continue to focus on in F26.



Cotton

Cotton is the top non-food risk in our trade supply chain and we remain vigilant in monitoring global cotton-growing regions that are the subject of allegations or known cases of child or forced labour. Cotton is used across the Group, particularly in BIG W clothing and home products, and we are actively working to address risk through a focus on cotton traceability and the identification of labour abuses in the cotton supply chain.

Our approach to addressing risk in the cotton supply chain is supported by the Group Sustainable Cotton Policy. BIG W utilises the vast majority of the Group’s cotton consumption, and accordingly leads the development and implementation of our tools to mitigate this risk.

In order to validate the source of cotton in our supply chain, BIG W is strategically focused on organic, recycled and Australian cotton, and has established procedures for verifying the origin of raw materials. This includes a desktop traceability system supported by Cotton Australia, and a fibre testing program delivered in partnership with Oritain, a global leader in applying forensic and data science to verify the origin of products. In F25, BIG W conducted 79 Australian cotton origin tests, achieving a 97% positive verification result. The product that did not meet the verification standard was not labelled as Australian cotton.

Also in F25, following a successful pilot, we identified an opportunity to convert conventional cotton items to Better Cotton Initiative (BCI)’s physical traceable cotton through its traceability model. In F26, we plan to introduce BCI cotton into our supply chain.



Partnering to promote responsible recruitment in South-East Asia

Following the identification of modern slavery at a supplier site in Malaysia in F22, we developed our Responsible Recruitment Addendum (RR Addendum). The RR Addendum outlines requirements and guidance for supplier sites in Malaysia and Thailand to embed the Priority Industry Principles, which are considered core standards to address key drivers of forced labour, in their operations. The Priority Industry Principles are: every worker should have freedom of movement; no worker should pay for a job; and no worker should be indebted or coerced to work.

In F25, we continued to embed our responsible recruitment requirements in Thailand and Malaysia via audits, site visits and worker voice activities.

Thailand

We source from 29 sites in Thailand, employing ~29,000 people, ~75% of which are migrant workers, mainly from Myanmar and Cambodia. Total elimination of recruitment fees can be impractical given common challenges and drivers that lie outside ours and our suppliers’ direct control, such as bribery and corruption. Working with suppliers, we encourage fee remediation, but complement this with issue-focused projects (see [page 29](#)).

Two audits identified ~\$25 paid by individual workers, which suppliers are investigating in line with their policies. One supplier chose to repay historic fees which occurred before the Priority Industry Principles were in place. One site has a MAP in place due to 167 Burmese workers each paying ~11,000 THB (\$520) in fees to a local agent.

Conflict in Myanmar is leading to increased risks. The International Organisation for Migration (IOM) has reported on migrants relying on irregular migration to avoid mandatory military conscription.¹ This may involve paying high fees to third parties. We monitor these risks through supplier visits and local partner engagements, as well as our RS Program tools.

Malaysia

We source from 13 sites in Malaysia, employing over 3,000 workers, of which approximately 30% are from Nepal and Bangladesh.

Malaysia has frozen new migrant worker applications since March 2023. Workers coming into Malaysia have historically been found to pay very high recruitment fees compared to other countries, perpetuated by the common use of recruitment agents within Malaysia and overseas. This risk is anticipated to resume once the freeze is lifted and new migrant worker applications resume. As part of ongoing actions addressing previous zero-tolerance recruitment issues, one supplier has chosen to cease working with recruitment agencies in Malaysia moving forward, choosing to work directly with an agency in the worker source country, Nepal, instead. They are now also working with our NGO partner Issara to review their migrant worker recruitment processes, update contract terms to use with the newly engaged Nepalese recruitment agency and develop training, in preparation for future recruitment.

1 International Organisation for Migration, Myanmar Crisis Response Plan 2025 (2025), 5.

The Ethical Recruitment Marketplace

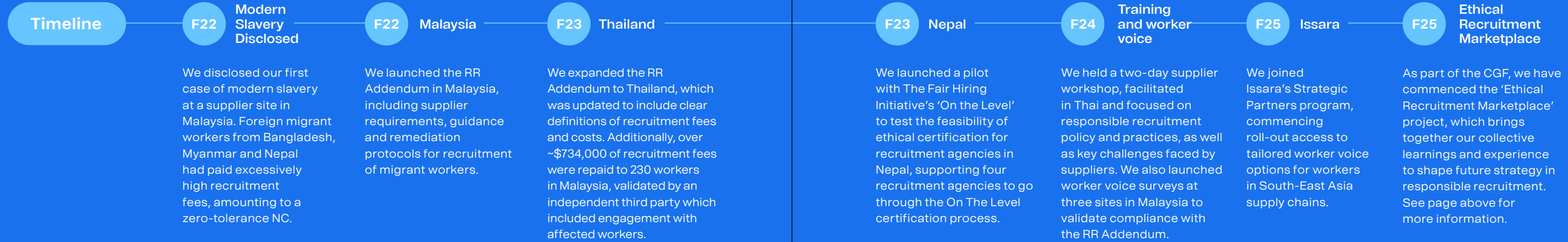
Forced labour is a complex issue, perpetuated by unethical recruitment at multiple points in the recruitment supply chain. Forced labour will remain a pervasive global challenge without dedicated, collaborative and multi-faceted approaches which consider fundamental economic principles that drive supply and demand in these situations.

Based on our experience over the last several years, we have identified the inherent limitations to our ability to solve for ethical recruitment alone. We recognise that in order to successfully embed ethical recruitment practices, a holistic, end-to-end approach is necessary. In F25, in our role as a co-chair of the Consumer Goods Forum’s (CGF) Human Rights Coalition (HRC), we initiated a new concept – the ‘Ethical Recruitment Marketplace’ (Marketplace) – to seek to bring scale by bringing together multiple partners through multiple capabilities and project streams as they touch upon the migrant worker recruitment journey.

Migrant worker recruitment risks often originate beyond the direct control of retailers, manufacturers and suppliers. In particular, remediation and fee repayment efforts alone cannot solve the systemic problems that drive exploitative practices as they do not consider nor respond to the grassroots drivers and risks, whilst current initiatives may lack long-term sustainability due to cost barriers and lack of market incentives.

The ambition of the Marketplace is to move beyond the ‘first mile’, seeking to connect the end-to-end (‘100 mile’) recruitment journey, applying supply and demand principles to make ethical recruitment sustainably viable as part of a virtuous circle of levers. The foundational pillars of action will include: mutual recognition; ethical certification pathways; training and capacity building; and research, policy development and advocacy.

In line with our Group value of listening and learning, when developing the Marketplace project the Human Rights team spent time in Bangkok consulting multiple stakeholder groups including suppliers, civil society, recruitment agencies, United Nations agencies and human rights defenders. We intend to embed continual stakeholder listening sessions as we build out the Marketplace approach.



The Virtuous Circle

The Ethical Recruitment Marketplace seeks to apply supply-demand principles to the virtuous circle of ethical recruitment.

The below illustrative diagram outlines at a high level the supply and demand factors as they relate to ethical recruitment. This is the preliminary principle underpinning the creation of the Marketplace, however this will expand and mature as the project develops and as we continue to bring additional perspectives and voices into the project.

The core objective is to recognise that the migrant worker recruitment journey is not linear, and fundamentally that global supply chains are all interconnected, thus fostering a virtuous cycle of ethical recruitment guided by continuous learning and improvement, and supported by supply and demand levers to embed a normative approach.

The project initially targets South-East Asian supply chains, aiming to build a minimum viable product which can be scaled globally. Progress and lessons learned from this initiative will be shared in F26.



Responsible Purchasing Practices

‘Responsible Purchasing Practices’ (RPP) is a widely accepted term modelled on an inherent recognition of the role a business can play in supporting the conditions for decent work and respect for human rights in a supply chain. The concept seeks to embed responsible business through five key areas which can have the biggest impact on working conditions, including strategic planning and forecasting, sourcing and lead times, and buying, and includes principles such as sustainable costings.¹

Sustainable procurement can also sit alongside RPP by creating opportunities to prioritise sourcing from suppliers who themselves prioritise a commitment to human rights, rewarding sustainable labour practices and creating a virtuous feedback loop across the supply chain.



Progress in F25

We recognise that responsible purchasing and sustainable procurement initiatives must take into account and appropriately balance the costs and compliance burden on suppliers of all sizes through the supply chain.

We strive for healthy good faith relationships with our suppliers in accordance with the purpose and provisions of the Food and Grocery Industry Code. We support initiatives that genuinely improve compliance efficiency for our suppliers and reduce audit duplication, while maintaining necessary responsible sourcing standards. In its Supermarkets Inquiry Final report², the Australian Competition and Consumer Commission (ACCC) recommended that Aldi, Coles, Metcash and Woolworths Group should consider ways to harmonise minimum supplier accreditation and auditing requirements. We support this recommendation and the establishment of an industry working group, with ACCC authorisation if necessary, to develop a roadmap for harmonising opportunities focusing on key areas of audit and due diligence duplication.

In F25, we continued building on the RPP workshops conducted in F24 with our internal team, conducting six more team meetings and listening sessions as we work towards developing a more formal and documented approach for RPP and sustainable procurement in F26. Alongside our integration of responsible sourcing data into supplier scorecards in Asia (see page 22), our commercial sourcing teams in Woolworths Food Company also began trialling the Opticost tool to better identify and inform costing considerations, including wage inputs, enabling the cost of labour to be factored into the proposed cost of goods. Collaboration with our commercial sourcing teams will be a key lever in our work in RPP moving forward.

BLG W commissioned an independent assessment in F25 of four prominent Bangladeshi garment factories, highlighting opportunities to further align workers’ wages with established living wage benchmarks. While wages at these factories meet or slightly exceed the national minimum wage, we identified opportunities to support workers receiving fair compensation. In response, we are refining our Purchasing Practice Methodology under the Action Collaboration Transformation on Living Wages (ACT) commitment to work towards reflecting the true cost of fair wages in the cost of goods and supplier agreements. This has included a comprehensive review of living wage analysis in select key markets. Ultimately, our goal is to incentivise those suppliers who demonstrate strong compliance with ethical labour standards, with the belief that this will drive longer-term invested partnerships and enable better efficiencies, lower overheads and related benefits to workers.

¹ Ethical Trading Initiative, *Common Framework for Responsible Purchasing Practices in Food* (2024).
² Australian Competition & Consumer Commission (ACCC), *Supermarkets Inquiry – Final Report* (February 2025).



Worker voice

Although audits are an important tool in our HR Program, we recognise that they are not a silver bullet and benefit from the addition of compensating controls. Worker voice is one such tool that we use to gather sentiment, concerns and complaints directly from workers in our supply chain. In F25, we have continued to expand our worker voice activities.

Listening to workers through worker voice

In F25, we commenced a partnership with Issara to implement worker voice at scale. Issara operates a multi-lingual helpline, supporting remediation of issues raised. As expected, we have found that worker voice supports the identification of issues not identified in social compliance audits and serves as an important triangulation tool.

Issara recorded 60 issues reported across 12 sites in our supply chain in Thailand. Forty-nine have since been validated as closed using worker voice and the remainder are being addressed in partnership with suppliers. Forty-five percent related to working conditions, 25% to labour recruitment including recruitment fees and language barriers, and 23% to communication issues including allegations of harassment. The remainder related to unclear payment systems and canteen and dormitory conditions.

In F25, we conducted two worker surveys in Malaysia to validate compliance with our RR Addendum. Four hundred and twenty-nine workers across two sites participated and both sites’ results showed improvements in working conditions compared to the six months prior, particularly in the areas of discrimination and access to grievance mechanisms. The surveys were able to validate that the implementation of the RR Addendum had been successful, serving as a triangulation mechanism for how we embed it with suppliers.

Australia

In F25, we conducted worker voice surveys in our Australian horticulture supply chain at 11 small supplier sites. These were all follow-up surveys to baseline surveys conducted in F24. The purpose of this approach is to track improvements over time. We saw an increase in engagement from workers from F24 to F25, with more detailed responses provided, particularly to open ended questions. Surveys at all sites either saw a continuation in standards or improvements, based on worker feedback between the baseline survey and endline surveys. At one site, deductions made by an LHP for transport and accommodation were identified and addressed. Another site worked to add migrant worker languages to their training materials, based on the feedback from workers.

“We believe it firstly gave our staff a sense of ‘comfort’ being that it gave them an outlet to speak up on work conditions, wages, and operations. Worker voice has

enabled us to make some adjustments to the next year’s procedures and operations.” – Australian Horticulture supplier on using worker voice.

Worker forums

In F25, we participated in two worker forums in regional Australia under our memorandum of understanding (MOU) with the RSCA. Worker forums provide us with the opportunity to engage directly with workers in our supply chain to understand their experiences. Grievances subsequently investigated from worker forums this year involved unclear payslips and lack of clarity on piece rate calculation; as well as grievances related to living and working conditions. Subsequent actions included a review of piece-rate calculation and payslip processes and communication with suppliers to reiterate our LHP Addendum requirements.



Case study

Beyond audit in our Thailand supply chain

Through our partnership with Issara, we were alerted to 17 worker-reported issues raised through Issara’s grievance hotline at a supplier site in Thailand. The site had a recent social audit report which had not identified any critical findings. This reiterates that audits, while an important control, are not a silver bullet; and that complementary controls are important to identify and triangulate human rights issues. The worker-reported issues included allegations of recruitment fees charged to workers by brokers, excessive working hours, accusations of bullying by supervisors, leave and benefits not meeting local legal requirements, inadequate transportation and insufficient communication of key labour rights policies to workers.

In order to investigate the issues raised, Woolworths Group joined a collective remediation approach, coordinated by Issara. Next steps involved communicating with the supplier to reiterate our Responsible Sourcing requirements as well as encouraging the supplier to work proactively with the Issara team to identify and mitigate the root causes of the worker reported issues.

Since this process began, 16 worker-reported issues have been closed and validated via worker voice feedback. Actions taken by the supplier include:

- investigating and supporting reimbursement of ~12,000 THB (\$570) to one worker who had paid fees to an employment agency in Myanmar
- training line supervisors on expectations regarding respectful communication and behaviour towards workers
- improving transport arrangements to prevent overcrowding
- removing pay deductions from workers for new personal protective equipment
- translating payslips into relevant migrant worker languages.

One worker-reported issue remains outstanding and relates to alleged recruitment fees reportedly paid to a broker in Myanmar. Issara and Woolworths are engaging with the supplier to further investigate this issue.

In addition, the supplier was prioritised for a site visit from the Woolworths Group team. During this session we collected feedback from the supplier on Issara’s approach in order to facilitate ongoing continuous improvement. As part of our ongoing audit quality improvement approach, we have also escalated these issues to the audit scheme that conducted the initial social compliance audit to determine why they weren’t picked up.



Bespoke interventions to managing risks in logistics

There is an inherently higher risk of labour rights issues in the logistics and transport industry due to key risk factors including a high proportion of migrant workers who may be less aware of their workplace rights and business models that rely on subcontracting. Going forward, some of these suppliers will be in scope of the RS Program, but given the level of heightened risk we have developed a bespoke approach with a key supplier to manage labour rights risks, which will inform our approach to RS in non-trade.

Case study



Partnering to uplift supplier standards

The Group engages suppliers to deliver products to customers, with some deliveries made in Woolworths Supermarkets branded trucks. Given this service’s close connection to the Group and the inherent labour rights risks in logistics, we partnered with a last mile delivery supplier to uplift their management of subcontractors. This multi-year project included the following milestones:

- **June 2022 – March 2023: Supplier Speak Up Grievances:** In F23, the Group received multiple reports through Supplier Speak Up from subcontractors to the same supplier. Allegations included underpayments, unauthorised deductions, unauthorised subcontracting and non-provision of payment records.
- **May 2023: Social Compliance Audit:** Given the volume of grievances raised, the Group required the supplier to undergo a third-party social compliance audit at multiple sites across the country.
- **July 2023 – March 2025: Management Action Plan:** The audits found non-conformances including underpayments, unauthorised subcontracting, lack of record keeping and an absence of grievance mechanisms available to workers. We entered into a MAP with the supplier to rectify non-conformances as a matter of priority, and then to work with the supplier to improve their controls to mitigate the risk of non-conformances recurring. Completion of the MAP was a prerequisite to any future partnership agreement between the Group and the supplier.
- **March 2025: Implementation:** As a result of this partnership, our supplier has now introduced a Social Responsibility and Compliance Code specifically for subcontractors who perform last mile delivery services for the Group. They have also developed auditable standards that will be used to monitor their subcontractor’s compliance with the Code, created a dedicated audit team to conduct internal audits and trained these auditors in the standards, and issued new contracts to all engaged subcontractors which include uplifted standards.
- **April 2025: Ongoing transparency:** The Group Commercial and Human Rights teams monitor results from the supplier’s new audit program through regular business reviews with the supplier.

This model has provided the Group with visibility of how our supplier is managing their human rights risks, while also requiring the supplier to be accountable for their supply chain and mature their approach to managing risk. In F26, we will continue to monitor the supplier’s progress in implementing their audits of subcontractors.

Grievances and investigations

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

This year, we investigated a total of 43 human rights-related grievances raised by workers across our supply chain. Grievances were raised through numerous channels, including our grievance mechanism – Supplier Speak Up (65%), referrals from other business units or direct contact from workers (30%) and media reports (5%). In F25, there was a 41% decrease in investigations when compared to F24. This is due largely to a decrease in grievances raised in the Australian trolley collection and cleaning supply chain. The Group is in the process of insourcing trolley collection and cleaning work across Australia. To date, 473 Woolworths Supermarkets across Australia have moved towards insourcing cleaning and trolley collection. Over time we expect that this direct employment model will continue to reduce the number of grievances received from workers in our trolley collection and cleaning supply chain.

Cleaning and trolley collection suppliers

In F25, our Australian Facilities Management Compliance team investigated 15 matters in the trolley collection and cleaning supply chains, including 13 grievances raised through Supplier Speak Up and two through direct contact. The most common allegations included underpayments (67%) and subcontractor issues (27%).

Where non-compliances were identified, we partnered with our suppliers to remedy breaches and provide outcomes for affected workers. Where appropriate, including cases where the supplier did not cooperate in remediation, further action, including supplier termination, was taken. As a result of investigations concluded in F25, a total of ~\$174,600 was paid to eight workers at 14 sites. Once all issues, including underpayments, were rectified, three direct suppliers were terminated from four sites and one subcontractor was terminated from six sites. Additionally, consent to engage a further seven subcontractors was withdrawn, resulting in them being terminated from all 114 Woolworths Group sites they serviced.

In New Zealand, we received two complaints related to a cleaning contractor and a subcontractor, through direct contact with our store teams. These complaints included allegations of non-payment, workers without the appropriate visa and working hours being changed without consultation. One of the investigations substantiated the allegations and resulted in an improvement plan being deployed with our head contractor, including financial remediation for the two impacted workers; while the second investigation is ongoing.

If you have any of these problems at work...

Forced to work

Underpaid

Bullied, abused or treated badly

In danger

Speak Up.
Speak Up is Woolworths Group's independently hosted complaints mechanism. Suppliers and their workers can report issues confidentially and, if preferred, anonymously through Speak Up. Issues are then referred to Woolworths for investigation.

Speak Up 是一个独立于 Woolworths Group 之外的投诉机制。供应商及其员工可以通过 Speak Up 以保密或匿名的方式报告问题。问题将由 Woolworths 进行调查。

Speak Up adalah mekanisme aduan Woolworths Group yang dikelola secara independen. Pemasok dan pekerja mereka boleh melaporkan isu secara sulit dan, jika mahu, teras memberikan nama melalui Speak Up. Isu tersebut akan diarahkan kepada Woolworths untuk disiasat.

Speak Up là cơ chế khiếu nại độc lập của Woolworths Group. Các nhà cung cấp và nhân viên của họ có thể báo cáo các vấn đề một cách kín đáo và, nếu muốn, ẩn danh thông qua Speak Up. Các vấn đề sau đó sẽ được chuyển đến Woolworths để điều tra.

Contact Supplier Speak Up Here

AU 1800 772 173
NZ 0800 393 76736
WoolworthsGroup.com.au/SpeakUp
Scan the QR code for more information

Woolworths Group

Woolworths

2025_05_Supplier Speak Up Poster_AUS_ENG

Supplier Speak Up poster.

Supply chain

In F25, our Human Rights team investigated 26 complaints regarding alleged breaches of our RS Policy and/or Standards, 15 of which were raised through Supplier Speak Up. Allegations ranged from unauthorised subcontracting, safety concerns and underpayments, through to illegal phoenixing activity and excessive overtime. Seventeen of these investigations are now closed, with nine ongoing.

Our Human Rights Grievance Process articulates our approach to conducting investigations and is based on international best practice for managing human rights grievance investigations, specifically UNGP 31. When allegations are substantiated, we seek to make sure the worker is remediated, as well as supporting the supplier to put in place controls to prevent recurrence. For example, we have active MAPs in place with five suppliers in our horticulture supply chain as a result of investigations. These action plans are monitored by our team to make sure suppliers close out issues identified during the investigation and, where required, remediate workers.

In F25, we saw an increase in grievances raised in our non-trade supply chain, with 14 grievances arising from workers in our non-trade service supply chain. There are various potential explanations for this, including but not limited to increased visibility of the Supplier Speak Up program, and workers increasingly trusting our grievance mechanism. The most common grievances raised by workers in our non-trade services supply chain are underpayments and unauthorised subcontracting.

Five of these grievances related to the same supplier, and as a part of our investigation we are requiring that the supplier undergo a third-party review of their management systems and the necessary controls required to manage labour rights risks.

In F24, we developed a process to test the Group’s international hotlines every quarter for functionality, quality and effectiveness. In F25, we implemented these tests for our Bangladesh, Hong Kong, India, Malaysia, Philippines and Thailand phone lines from both landline and mobile phone, with all tests from November onwards confirming the lines were operational. We are committed to further developing our grievance process to improve accessibility for workers in both our local and global supply chain and will review opportunities for improvement in F26.

Breakdown of business units in our supply chain that received grievances in F25



Case study

Investigating labour rights allegations with a store delivery supplier

This year we received a Supplier Speak Up complaint from a subcontracted driver in our store delivery supply chain. The driver was engaged as a contractor by a subcontractor to our direct supplier, and alleged that they had wages withheld for work they had completed and their contract was terminated. These allegations also raised concerns that our direct supplier was engaging in unauthorised subcontracting by subcontracting work to more than one level, which is contrary to the Group’s contractual expectations.

This triggered an investigation which substantiated the underpayment and unauthorised subcontracting, but was unable to substantiate any wrongful termination. We worked with the supplier to facilitate the repayment of ~\$1,000 for wages that were withheld from the worker, and communicated this outcome to the worker who confirmed that payment had been made and that they were satisfied with the outcome. We also partnered with the supplier to uplift their management systems to better monitor their operations for subcontracting to avoid a similar breach in the future. This uplift included:

- overseeing the process of converting all workers of their subcontractor to be directly employed
- completing audits of existing subcontractors to make sure they meet all compliance requirements
- hiring a full-time Subcontractor Compliance Manager to monitor subcontractors’ compliance with safety and labour rights requirements.

We will continue to work with the supplier and monitor the supplier’s progress in implementing these changes in F26.



Case study

Grievances in our horticulture supply chain

In F25, we continued an investigation related to an anonymous complaint received in F24, alleging underpayments and excessive working hours at a second tier grower’s site in Australia, supplying fresh products to a direct supplier of the Group. The allegations were linked to two unlicensed LHPs at the site. As part of our investigation, an unannounced audit found multiple issues with the LHPs. This included missing and/or incomplete documents related to piece work pay rates and working hours. Additionally, employment agreements lacked wage information and payslips were missing superannuation details.

As a result, we suspended supply from the site whilst a MAP was put in place in collaboration with our direct supplier. This MAP required that all issues identified in the audit were closed and verified by an auditor, which has since occurred. Going forward, the site will be required to comply with our Labour Hire Addendum requirements, and the supplier has worked with the growing site to remove the non-compliant LHPs from their operations. Our supplier has cascaded the Addendum requirements to their wider group of growers as part of their own follow-up to this investigation. Compliance with the Labour Hire Addendum will be validated in order to reinstate supply to Woolworths Group.

Case study

Investigating risk in our ingredients supply chain

In F25, we worked with a direct supplier in New Zealand to investigate an ingredients supplier in our shared supply chain. The ingredients site is owned and operated by a community group that has been the subject of multiple serious allegations including child labour, lack of wage payments, exploitation, coercion, dangerous working conditions and other modern slavery indicators.

A third party audit conducted on the ingredient supplier site as part of our direct supplier’s ongoing due diligence identified the following zero-tolerance NCs with our RS Standards:

- restriction on workers’ freedom of movement, in particular in relation to the choice of type and location of work undertaken
- failure to pay wages to female workers on the site, arguing they were ‘volunteers’ under the management system
- absence of time records, causing inability to verify compliance of wages and entitlements.

In light of the structural long-term changes needed, the risk exposure identified and the ingredient supplier being unwilling to address some of the serious concerns, we engaged with our direct supplier to successfully request the removal of the ingredient supplier from our supply chain.



Partnerships and advocacy

The fourth pillar of our HR Program recognises the importance of working collaboratively to create change that addresses modern slavery risks. We seek partnerships where we can collaborate to drive strategic initiatives, add value to existing approaches, leverage collective action and learn from others. We also acknowledge that the insights from our HR Program can help play a role in understanding and advocating for changes or enhancements to policy settings.

Human Rights and Responsible Sourcing Program partners

We continue to partner with human rights specialists at our external advisors LRQA and Dignity in Work for All (formerly Verite South-East Asia) for strategic input. Within our RS Program, third-party social compliance schemes continue to play a fundamental role in supplier risk management. As part of our objective to influence industry-wide change, one of our Human Rights team members holds a board position at amfori and another holds a position on Sedex's Strategic Advisory Committee.



Agreements

We enter into multi-party agreements where we identify strategic opportunities to work towards delivering agreed objectives with different stakeholders. In F25, we entered into a new MOU with the RSCA, and continued to hold worker forums to engage horticulture workers in partnership with the RSCA. BIG W continued its work to implement the International Accord and its Bangladesh and Pakistan Country Specific Safety programs, and Action Collaboration Transformation on Living Wages (ACT).



Industry collaborations and advocacy

Modern slavery can only be ended by working with others, and collaborating across industry helps us unlock opportunities to tackle shared challenges. Members of the Human Rights team hold leadership positions at the Consumer Goods Forum Human Rights Coalition, and the Australian Government's Modern Slavery Expert Advisory Group. We aim to take a leadership role in advocating for improvements and change where relevant, including our advocacy for a National Labour Hire Licensing Scheme to mitigate labour rights risks for workers in our horticulture and meat supply chains (see [page 21](#)).



Integrating new businesses into our Group

Our approach

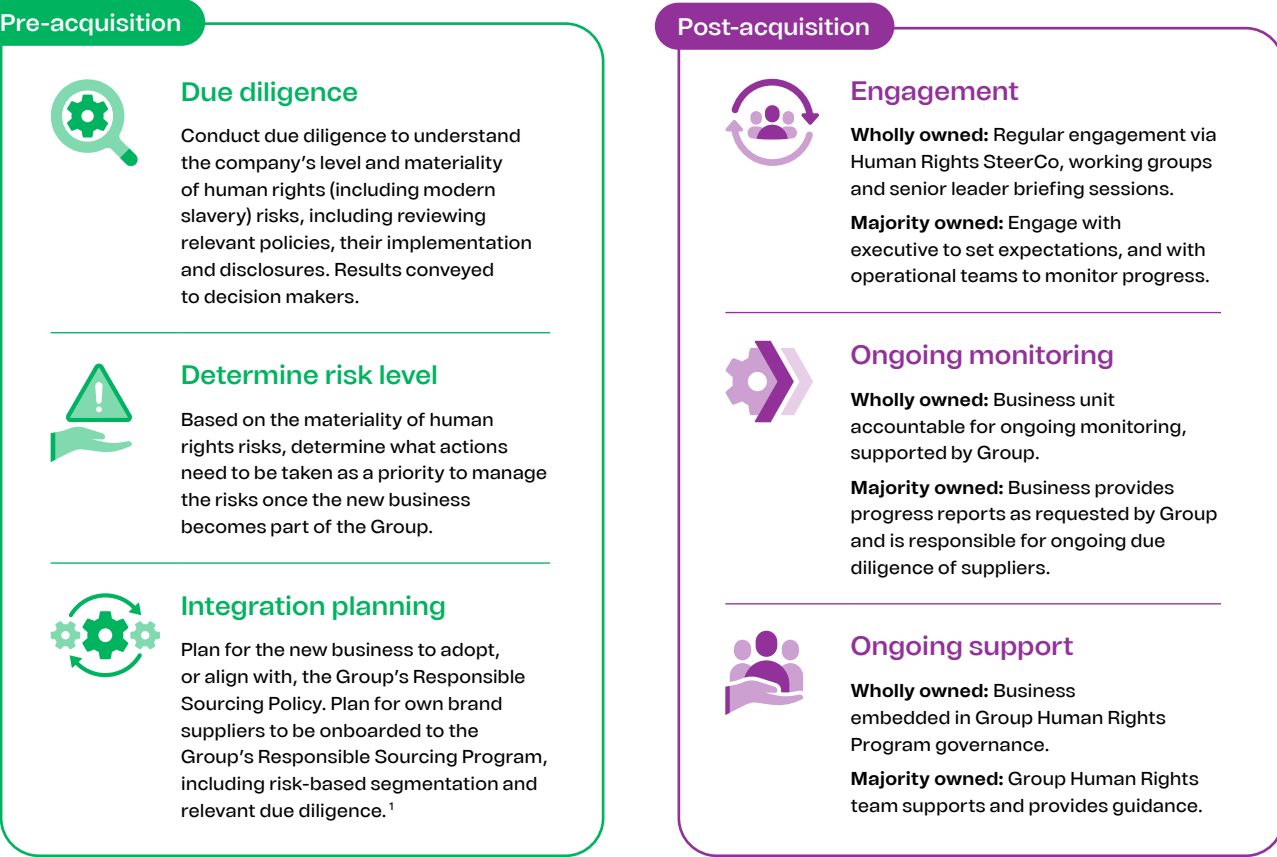
We are conscious that new businesses that become majority or wholly owned by the Group have different modern slavery risks in their operations and supply chains, and are at varying levels of maturity in managing these risks. We therefore partner with new businesses to support them to integrate into the Group and adopt human rights processes that align with the Group's expectations. In F23, we delivered two key frameworks to support this: the Mergers and Acquisitions (M+A) Human Rights Framework; and the Human Rights Marketplace Framework.

This year, we have progressed implementing these frameworks with the following key results:

- over 20 1:1 engagements with senior leaders of new businesses in relation to human rights
- developed a labour rights risk assessment for a new wholly owned entity's operations and supply chain
- onboarded over 20 own brand suppliers from a majority owned business to the Group's RS Program.

We recognise that the M+A Framework has been in place for two years and we have undertaken multiple due diligence processes for new business since then. In F25, we applied our learnings and updated the M+A Framework to make sure it remains fit for purpose and an accurate representation of how we are assessing risks with new businesses. This included updating the M+A Framework to reflect the additional due diligence for when the Group is considering purchasing a business with directly owned and operated manufacturing facilities (including the requirement of a social compliance audit at the facility), aligning the M+A Framework to the Group Sustainability integration requirements and updating integration timelines.

M+A Human Rights Framework



¹ Given the complexity and scale of integrating new businesses into the Group, the onboarding of a new business' own brand suppliers is phased over time based on inherent risk and the new businesses capability and maturity.

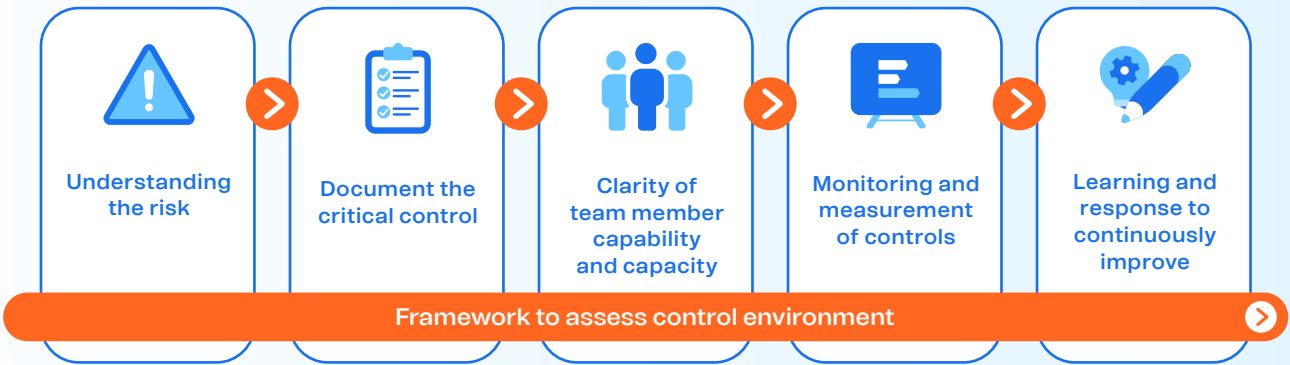


Assessing the effectiveness of our actions

Effective identification, mitigation and remediation of modern slavery risks for the Group means that we can contribute positively through our operations and supply chain, including supporting remediation for impacted workers where appropriate and taking steps to address root causes and put in place mitigating measures.

We are committed to maintaining effective systems to identify, assess, respond to and proactively manage modern slavery risks in accordance with relevant legislation, international human rights standards, regulatory obligations, shareholder expectations and good corporate governance principles. Throughout the Statement, where different activities are described, and where data is available, we have reported on the outcomes of our activities or actions.

Our Group Risk Management Framework



Our Group Risk Management Framework is based on the ISO 31000 (2018) Risk Management Standard and outlines our commitment to ongoing, integrated and consistent risk management across the Group. As agreed with our Board, modern slavery is considered to be a material risk that we proactively manage in line with the Framework. We have minimal appetite for this material risk, and take all reasonably practicable steps to work ‘towards zero’ to achieve risk elimination.

Our risk approach guides how we identify, understand and assess key modern slavery risks and supports us to reduce the likelihood of negative impacts, and make risk-informed choices with confidence. Guided by Group Risk’s control environment maturity assessment tool, we are able to assess how confident we are that the material risk of a modern slavery event is being managed within the Group risk appetite. The image above outlines the five pillars of the approach.

In F25, the Human Rights team worked closely with the Group Risk team to review and update our human rights risk profile, with a particular focus on modern slavery risks. This included a series of facilitated workshops to reassess our risk exposure against our defined risk appetite to determine whether risk levels remain within acceptable parameters. As part of this process, we refreshed our risk metrics to strengthen how we assess the effectiveness of our controls and established both qualitative and quantitative risk tolerances specific to modern slavery and broader human rights risks. In F26, we will re-assess our key modern slavery risks and controls with cross-functional stakeholders from across the Group to confirm whether our approach to managing modern slavery risks remains in line with the Group’s risk appetite.

Key effectiveness indicators for F25

We consider that an effective approach to modern slavery due diligence is one that enables us to identify actual or potential situations of modern slavery in our operations and supply chain, remediate these appropriately and take steps to address root causes.

Aligned to our Program Pillars, the below table outlines how we assessed our effectiveness and the key outcomes for F25. Credibly tracking the effectiveness of our actions is complex, and we are committed to continuing to refine our approach to assessing effectiveness, including through collaboration with partners that enables us to tackle the root causes of modern slavery risk.

Pillar 1 Responsible Sourcing Program	
HOW WE ASSESS OUR EFFECTIVENESS	EXAMPLES OF F25 OUTCOMES
Identifying instances of modern slavery, or other forms of worker exploitation, in our supply chain and where possible working with the supplier to remediate those issues	- Identified and remediated 184 critical NCs - Identified and remediated a case where modern slavery indicators were present
Monitoring trends in audit results to identify where there have been changes and whether our interventions led to those changes	16% reduction in critical health and safety NCs across Australia, China and India compared to F24
Periodic reviews of the RS Program, including reviews by third parties, to assess whether the RS Program remains fit for purpose	Commenced actioning the recommendations from an external review of our HR Program governance
Examining findings to determine what root causes are contributing to repeated issues	Three projects commenced to address root causes, including ethical recruitment, labour hire licensing and closing repeated building management NCs

Pillar 2 Bespoke Interventions	
HOW WE ASSESS OUR EFFECTIVENESS	EXAMPLES OF F25 OUTCOMES
Periodical review of risk identification tools to make sure we are considering the dynamic nature of human rights risks	Added Issara Institute’s Inclusive Labour Monitoring dashboard to the existing suite of tools that we use to assess for risk
Ongoing review of whether our frameworks to manage bespoke areas of risk are fit for purpose	Four frameworks updated in F25
Incorporating worker perspectives into our HR Program	Over 580 workers engaged through worker voice, and 75 workers’ perspectives used to inform the salient issues of our HR Program

Pillar 3 Grievance Mechanisms	
HOW WE ASSESS OUR EFFECTIVENESS	EXAMPLES OF F25 OUTCOMES
Monitoring the number of human rights complaints received to understand if grievance mechanisms are trusted and accessible	43 grievances investigated, with an increase in grievances from workers in our non-trade supply chain compared to F24
Reviewing the operation of Supplier Speak Up, including through testing the hotline and provided feedback to the third-party host	Tested the Bangladesh, Hong Kong, India, Malaysia, Philippine and Thailand phone lines

Pillar 4 Partnerships	
HOW WE ASSESS OUR EFFECTIVENESS	EXAMPLES OF F25 OUTCOMES
Considering feedback from suppliers, investors and other stakeholders to identify opportunities for improvement	49 supplier site visits conducted, with feedback used to inform our HR Program.



Progress against objectives

The following table outlines our progress against the key objectives we set to deliver our 2025 plan. As our HR Program continues to mature, in F26 we will set new objectives to monitor our progress as we work towards our 2030 goals.

Operations

OBJECTIVES	PROGRESS AGAINST OBJECTIVES
Undertake a salient human rights issue assessment	Complete: assessment completed, full assessment to be released in F26.
Partner with entities in the Group to strengthen their modern slavery due diligence	Progress made, continue in F26: continue to embed M+A Human Rights Framework with new businesses to the Group.
Team member training on modern slavery and human rights, prioritising those managing higher risk categories	Progress made, continue in F26: developed a strategy for Human Rights team training, including ongoing team learning. In F26, this strategy will be expanded to include training for some Commercial teams.
Design and pilot a mechanism to engage potentially affected groups	Complete: delivered the <i>Guidance Framework for Meaningful Engagement with Stakeholders Impacted by Woolworths Group's Operations or Value Chain</i> , piloted the Framework when completing the Group Saliency Assessment and developed a tool to support the Framework's implementation.

Supply chain

OBJECTIVES	PROGRESS AGAINST OBJECTIVES AND F25 PLANS
Introduce modern slavery e-learning to targeted suppliers	Complete: Over 390 representatives from 314 suppliers have completed one or more Woolworths Group e-learning courses on aspects of our HR Program.
Pilot opportunities to embed worker voice in our Responsible Sourcing Program	Complete: pilot completed with 14 worker voice surveys deployed in Australia, Malaysia and Thailand. Ongoing worker voice launched in Thailand through our partnership with Issara.
Conduct a forced labour risk assessment	Progress made, continue in F26: forced labour risk assessments completed in F20 and F23. Next forced labour risk assessment to be completed in F26.
Continue to prioritise due diligence of labour hire providers (LHPs) in our Australian horticultural supply chain	Progress made, continue in F26: ongoing review of LHPs in our horticulture supply chain for compliance with the Labour Hire Addendum. We will explore opportunities to expand the Labour Hire Addendum to cover meat suppliers in F26.
Design and deliver due diligence for identified high-risk commodities	Progress made, continue in F26: ongoing implementation of the RS Program in direct-sourced bulk commodities used in own brand products. Continue programs to enhance supply chain transparency and implementation of extreme risk due diligence in certain commodity areas (e.g. tomatoes).
Design and deliver a due diligence approach for non-trade suppliers based on category risk segmentation	Progress made, continue in F26: designed and delivered a supplier risk segmentation and due diligence approach for in-scope non-trade suppliers, with the aim to pilot the approach in F26.

Delivering on impact – next steps and future priorities

We have an ambition to play a leading role in advancing the most salient human rights issues in our supply chain. Since launching our RS Program in 2018, we have sought to identify, mitigate and remediate risks of modern slavery and worker exploitation, prioritising labour rights in our supply chain. Whilst labour rights remain our most material risk, our program has steadily matured alongside evolving stakeholder and regulatory expectations.

We seek to move beyond avoiding harm, and aim to take a proactive approach to promote and improve worker experiences. Our next chapter focuses on scalability, driven through our partnerships. The ambition of our program is to move to 'offence rather than defence' by working towards understanding the patterns and root causes of recurring issues. To achieve these goals, we have short-term F26 priorities, and longer term horizon ambitions:

F26 priorities

- Advancing our work on 'beyond audit' tools, including worker voice, in recognition that a 'one-size-fits-all' approach is not fit for purpose for our diverse supply chain
- Continuing our efforts to increase supply chain transparency beyond tier one in inherently higher risk categories across our trade and non-trade supply chain
- Formalising our approach to responsible purchasing practices and sustainable procurement in collaboration with our commercial sourcing teams
- Expanding our RS Program to include select categories of non-trade suppliers, including piloting due diligence for suppliers in three service and three product categories.

Horizon priorities

- Supporting the delivery of our RS Program with 'beyond audit' controls such as worker voice, traceability and other tools. Improving our complementary and compensating controls will improve risk coverage and enhance monitoring of the conditions for decent work in our supply chain
- Leveraging partnerships and collaboration initiatives through to scale, working to solve some of the most complex problems in our supply chain, including our work on responsible recruitment and the Marketplace with the CGF
- Once these initiatives are brought to scale, we aim to move to proactive initiatives to play a role in improving the livelihoods of workers in our value chain. In line with our current program approach, we will take a risk-based approach, prioritising high risk supply chains.

We operate in an increasingly complex environment which necessitates not just ambition, but also adaptability, long-term thinking and integrated execution. The path ahead may not be linear, but throughout this next phase of our program we remain as committed as ever to mitigating human rights risks in our supply chain.



List of reporting entities

Woolworths Group is a food and everyday needs business that includes some of Australia and New Zealand’s most trusted retail brands, unified by our purpose of creating better experiences together for a better tomorrow. Woolworths Group Limited is the parent entity, with other subsidiary reporting entities. Details of each reporting entity covered by this Statement and a description of their overall activities and key brands are set out below.

Woolworths Retail

REPORTING ENTITY	ACTIVITIES
Woolworths Group Limited (ACN 000 014 675)	Woolworths Retail is the Group’s cornerstone food retail businesses located in Australia and New Zealand comprising over 1,000 Supermarkets and Metro and B2C eCommerce channels.
Woolworths (South Australia) Pty Limited (ACN 007 873 118)	
Progressive Enterprises Holdings Limited (ACN 113 919 878)	
Leasehold Investments Pty Ltd (ACN 009 237 932)	
Drumstar Pty Ltd (ACN 085 415 032)	
PFD Food Services Pty Ltd (ACN 006 972 381) ²	
Statewide Independent Wholesalers Limited (ACN 009 519 546) ^{1,3}	
Woolworths (Victoria) Pty Limited (ACN 004 177 155)	

W Living

REPORTING ENTITIES	ACTIVITIES
Woolworths Group Limited (ACN 000 014 675)	W Living comprises the Group’s specialty retail businesses BIG W, Petstock and Healthylife.
Petstock Pty Ltd ^{1,5} (ACN 098 394 588)	

Retail Platforms

REPORTING ENTITIES	ACTIVITIES
Woolworths Group Limited (ACN 000 014 675)	Woolworths Group’s platforms and services work to support our retail businesses and include our distribution and fulfilment network, Primary Connect; data and advanced analytics company, Quantum; and retail media business, Cartology.
Fabcot Pty Ltd (ACN 002 960 983)	
The Quantum Group Holdings Pty Limited ^{1,4} (ACN 121 842 957)	
The Quantum Group Pty Limited ^{1,4} (ACN 102 444 253)	
Cartology Pty Limited (ACN 009 671 149)	
Woolworths Group Payments Pty Limited (ACN 646 516 001)	
Wpay Pty Limited (ACN 646 547 908)	

1 Controlled, but not wholly owned, entity of Woolworths Group Limited, to lodge its own Modern Slavery Statement for F25.
2 Controlled and wholly owned entity of Woolworths Group Limited, to lodge its own Modern Slavery Statement for F25.
3 Statewide Independent Wholesalers Limited registered office is 8 Translink Avenue, Western Junction TAS 7212.
4 Quantum Group Holdings Limited and The Quantum Group Pty Ltd registered office is Bay 12, 2 Locomotive Street, Eveleigh NSW 2015.
5 Petstock Pty Ltd registered office is 1–3 Humffray Street N, Bakery Hill VIC 3350.
Except as described in footnotes 3, 4 and 5, the registered office of each of the reporting entities within Woolworths Group is 1 Woolworths Way, Bella Vista NSW 2153.

Reporting suite

Woolworths Group is pleased to share how we’re building a better tomorrow and encourages you to explore this report in addition to our full reporting suite detailing our performance.

Woolworths Group’s 2025 annual reporting documents include:



Annual Report

For a consolidated summary of Woolworths Group’s financial, operational and climate performance in F25.



Sustainability Report

For detailed information on our progress against the Group’s Sustainability Plan 2025.



Sustainability Data Pack

For detailed data on key sustainability metrics, basis of preparation and glossary.



Modern Slavery Statement

For detailed information on our progress made to identify, manage and mitigate the specific risks of modern slavery in the Group’s operations and supply chain.



Corporate Governance Statement

Describes the Group’s corporate governance framework, policies and practices as at 28 August 2025.

The 2025 reporting suite can be found at www.woolworthsgroup.com.au/reports

Company directory

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Woolworths Group Sustainability

Simon Lowden
Chief Sustainability Officer

We encourage you to contact us if you have feedback or questions at sustainability@woolworths.com.au

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