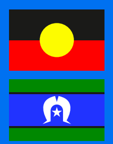
Woolworths Group

2026 Modern Slavery Statement

Respecting **Human Rights**

Contents

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.

This Statement includes information derived from publicly available and third-party data sources which have not been verified by the Group (for example third-party audit platforms and external intelligence tools). The Group makes no representation or warranty as to the currency, accuracy, reliability or completeness of such information in this Statement.

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's registered office is at 1 Woolworths Way, Bella Vista NSW 2153, Australia. This Statement has been published in accordance with the *Modern Slavery Act 2018* (Cth) (MSA 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 3 on page 48) took to identify, assess, mitigate and remediate modern slavery risks in their operations and supply chains during the year ending 28 June 2026 (F26). Woolworths Group Limited makes this joint Modern Slavery Statement on behalf of itself and the reporting entities listed on page 48 (other than The Quantium Group Holdings Pty Limited, Statewide Independent Wholesalers Limited and Petstock Pty Ltd (Petstock) who will prepare separate reports for F26). Data expressed in this report relating to supplier, site and audit numbers does not include the suppliers of PFD Food Services Pty Ltd (PFD) or The Kitchenary Holdings Pty Ltd (The Kitchenary) (or their wholly owned entities) for the F26 period. All amounts are expressed in Australian dollars unless another currency is indicated. This report 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 48
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 12–39
Describe how the reporting entity assesses the effectiveness of these actions	Pages 42–43
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 40–41, 44–47

CEO message

We have the opportunity to improve the livelihoods of workers by advancing human rights in our supply chain. This year's Modern Slavery Statement reflects our continued action to create meaningful impact.

Our Human Rights Program has continued to reach deeper into our supply chains this year, working to embed safeguards that help protect workers. With more than 27 million people worldwide estimated to be in forced labour,[1] the confronting reality is that it can be found in any complex global supply chain. The best measure of our commitment, and indeed effectiveness, to human rights is that we find these situations and bring them into the light, so we can address them.

This year, we identified a potential case of modern slavery in our extended international supply chain. This is always deeply concerning, but it tells us that our due diligence is working. Through advanced screening, we identified a site where more than 30% of workers lacked basic social safety nets, and we confirmed their involvement in high-risk, state-sponsored employment activities. This circumstantial evidence suggested a risk profile outside of our tolerance levels, and as a result we took appropriate action, see page 11.

Modern slavery and the exploitation of workers is a complex and interconnected shared challenge. This year I had the privilege of joining the Board of the Consumer Goods Forum (CGF), a global organisation that unites retailers and manufacturers to deliver positive impact across the world. These global networks and partnerships help maximise the ripple of positive progress across the industry. Our continued work on the Ethical Recruitment Marketplace, together with CGF and the Human Rights Coalition, is just one example of what our collaboration can achieve. To establish shared standards across more of our supply chain, we have also broadened our Responsible Sourcing Program. This year, we expanded into the second tier of our Australian horticulture supply chain and piloted our Responsible Sourcing Program in our non-trade supply chain.

While we're proud of the progress we've made, there's still more work to do. Our approach is now maturing from a lens of harm minimisation to one of actively contributing to the improved livelihoods of the workers. In the year ahead, we'll continue to deepen our focus on the next layers of our supply chain and collaborate to scale the collective effort needed to drive real change.

As a purpose-led business, we're committed to action on human rights that builds a more resilient supply chain and tangibly improves the lives of workers – for today, and for the generations that come after.

This Statement was approved by the Woolworths Group Board on 25 August 2026 on behalf of all reporting entities covered by this Statement.

Amanda Bardwell
Chief Executive Officer

Key progress in F26

- Utilised Sayari Graph to conduct a deep dive on specific high-risk supply chains which, in conjunction with other data points and supported by an investigation, led to the identification of a potential case of modern slavery and the Group took appropriate action, see page 11.
- 1,087 total audits reviewed, 195 critical non-conformances remediated, 37 site visits conducted, over ~$236,000 returned to more than 517 workers in our supply chain.
- Conducted our third forced labour risk assessment (FLRA) to validate that our strategic priorities remain appropriate to manage the highest areas of inherent forced labour risk in our supply chain, see pages 8–9.
- Ranked #1 by KnowTheChain's 2026 Food and Beverage Benchmark for our Human Rights Program, marking the second consecutive ranking of Woolworths Group at #1.
- BIG W became the first retail brand independently audited to Better Cotton's traceable cotton standard and to join Oritain's verification program, strengthening our efforts on responsible cotton sourcing, see page 29.
- Progressed multiple initiatives as part of the Ethical Recruitment Marketplace, in collaboration with the CGF and key members of the Human Rights Coalition Working Group, see page 33.
- Updated our Human Rights Policy and Responsible Sourcing (RS) Standards, strengthening our human rights commitments and providing suppliers with greater clarity on our expectations.
- Enhanced our Human Rights Program governance to provide robust, structured oversight and practices, and piloted the expansion of our Responsible Sourcing Program in our non-trade supply chain, see page 26.

1 International Labour Organization, Walk Free and International Organization for Migration, *Global Estimates of Modern Slavery: Forced Labour and Forced Marriage* (Report, September 2022) 2.

Our structure, operations and supply chain

Our structure

Woolworths Group is one of Australia and New Zealand's largest food and everyday needs retailers with a wide-reaching store network and eCommerce business anchored in the strength of our cornerstone food business.

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.

BIG W and Petstock are the Group's speciality retail businesses, meeting more of our customers' everyday needs. PFD is our business-to-business (B2B) food business, extending our strengths and scale in food.

Service Businesses

Service businesses leverage the strength of the Group, complementary to our retail businesses and accelerate sales and profit growth. They include Primary Connect, the Group's distribution and fulfilment network, Cartology, the Group's retail media business, and Everyday, the Group's leading rewards, loyalty and services business.

Network, Digital and Capabilities

The scale of the Group's supply chain network and capabilities provides competitive and cost advantages to better serve customers in-store and online.

Our operations

People are the core of our business, and our commitment to embedding respect for human rights starts with our team, across all areas of the Group.

Our operational footprint centres on our retail store networks and digital platforms across Australia and New Zealand, supported by global sourcing capabilities. Our core food businesses encompass 1,130 Australian Woolworths Supermarket and Metro locations alongside 181 New Zealand Supermarkets. Digital orders are fulfilled directly through this physical store network and within our seven dedicated customer fulfilment centres (CFCs), which manage both business-to-consumer (B2C) and B2B online operations.

Primary Connect, the Group's supply chain and logistics business, supports our retail infrastructure through its 27 Group-owned distribution centres (DCs) across Australia and New Zealand, moving products by road, rail, and sea via primary fleets and carrier partners. Our specialty retail brands, BIG W – which includes 178 physical locations – and Petstock provide customers with everyday needs both in-store and through digital marketplaces that feature extended third-party seller ranges. PFD is our B2B food business, which includes seven directly owned and operated food processing facilities. These operations are enabled by Group platforms including loyalty through Everyday, retail media through Cartology, data analytics through wiq, and third-party logistics via Primary Connect+.

In late F25, the Group also acquired The Kitchenary, a chilled and frozen convenience meals manufacturer. The Kitchenary produces products at two directly owned manufacturing sites – one in Australia and one in New Zealand – incorporating manufacturing and food processing into the Group's direct operations.

The vast majority of our frontline, supply chain, manufacturing and corporate team members are directly employed, including professional support functions based in offices across Australia, New Zealand, Hong Kong SAR, Thailand and Bangladesh. We also engage indirect workers to manage variable operational demand and provide specialised facilities services. 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

Our supply chain is complex and geographically diverse, comprising over 14,500 direct suppliers across at least 48 countries, and includes small family-run businesses through to global multinational companies.

Trade: We partner with 9,794 direct trade suppliers encompassing proprietary vendor brands, own brands, and fresh produce across an array of categories including apparel, long-life food, fresh food and general merchandise. While vendor brand partners provide widely recognised third-party products, own brand suppliers manufacture goods exclusively for the Group, with some suppliers providing both vendor brand and own brand products. For our own brand products, approximately 81% of food manufacturing sites are located within Australia and New Zealand. Non-food supermarket categories, such as general merchandise, health and beauty, are predominantly sourced from China (~78%) and India (~6%).

Our commitment to local sourcing is reflected in our fresh categories. In F26, approximately 96% of all fresh fruit and vegetables and 100% of fresh meat for Australian supermarkets came from Australian farmers and growers, while 100% of own brand fresh meat and ~81% of fresh fruit and vegetables for Woolworths New Zealand was sourced within New Zealand. Of the 491 manufacturing sites supplying own brand products to BIG W, ~94% are located across China, Bangladesh and India.

Non-trade: We procure goods, equipment and services from 5,200 direct non-trade suppliers. Non-trade suppliers provide branded corporate items, such as shopping baskets, trolleys and team member uniforms, alongside unbranded operational items like packaging materials and IT infrastructure. The majority of non-trade service providers – including cleaning, trolley collection, security, warehousing and logistics – are executed directly within Group-owned and operated facilities, including our retail stores, DCs and CFCs.

Beyond these direct engagements, tens of thousands of indirect suppliers contribute to our extended supply chain at tier two, tier three, and lower levels. We recognise that human rights risks are inherently higher within these lower supply chain tiers, however establishing complete transparency across these lower tiers presents a persistent industry challenge. An outline of our progress on improving supply chain visibility is on page 25.

For clarity across this Statement, 'suppliers' are defined as commercial entities directly engaged by the Group, whereas 'sites' represent the physical facilities utilised by those suppliers to manufacture goods, noting that a single supplier may operate multiple sites across different geographic locations.

Our operations and supply chain

With relationships that extend far beyond our direct team members, our operations and supply chain are made up of multiple entities, each playing a role in bringing our ambition of advancing human rights to life.

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 network includes primary producers of fresh products such as fruit, vegetables, meat and seafood, which are either supplied to the Group for retail sale or used as ingredients in our own brand food range. Beyond food, this also encompasses suppliers of agricultural raw materials, such as cotton, which are used in non-food products.

466	direct horticulture suppliers
24	direct Australian meat suppliers
31	direct seafood suppliers
571	approved suppliers of BIG W cotton products

Supply chain intermediaries

Before reaching the direct suppliers responsible for processing or manufacturing, raw materials and ingredients often pass through numerous sub-tier intermediaries, 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 long and 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.

69	agents/ brokers in tier one of our supply chain
9,000+	estimated ingredient suppliers to tier one suppliers

Manufacturing

Through PFD and The Kitchenary, the Group directly operates manufacturing and food processing sites across Australia and New Zealand that produce own brand food products. We also 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. 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.

1,293	own brand suppliers and
2,033	own brand supplier sites across
48	countries
9	direct manufacturing and food processing sites owned by PFD and The Kitchenary

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 Primary Connect team, based primarily in DCs, are responsible for picking and packing products which are then transported by road, rail and sea to our network of Woolworths Supermarkets, Metro and BIG W stores, as well as to our CFCs.

The Group does not directly employ team members to conduct delivery work; rather we use carrier partners to facilitate the transport of goods across our network. We also extend this capability to other businesses through our commercial third party business, Primary Connect+.

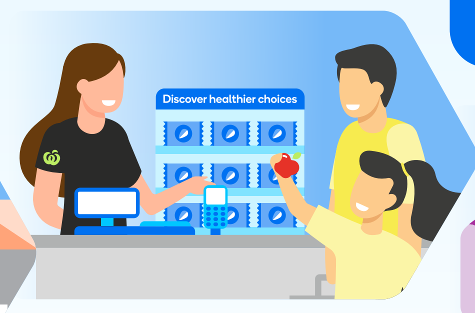
27	Group-owned DCs
~1,200	road trailers
~70	carrier partners

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.

~213K	team members[1]
1,130	Australian Supermarkets and Metro
181	New Zealand Supermarkets
178	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.

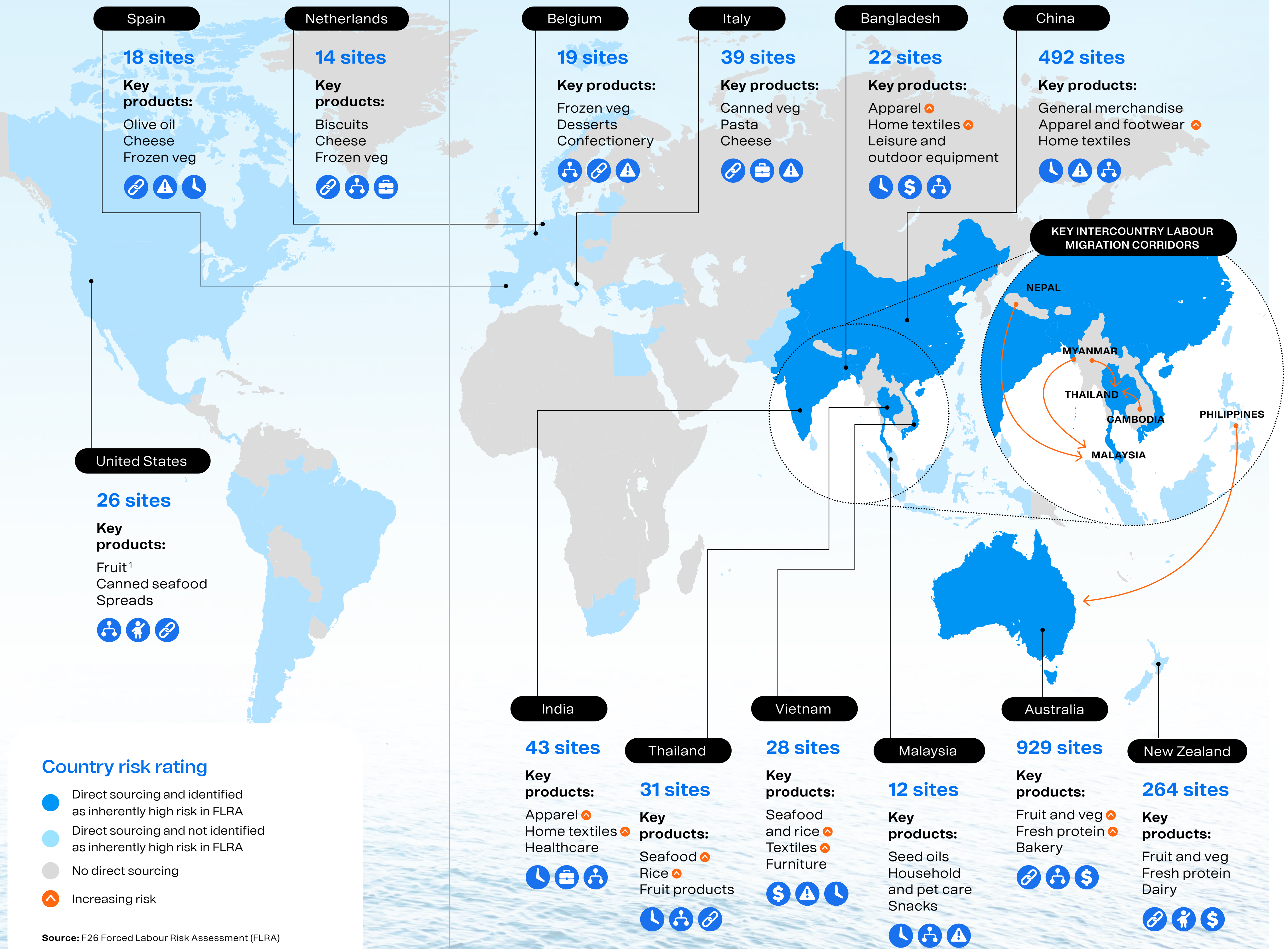
26.1M	customers served per week on average in store
7	CFCs
7	home delivery partners

1 Including 8,940 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, the top three labour rights risks in those countries, and the countries with the highest levels of risk.

This map also highlights the top 13 countries by site number where suppliers covered by our RS Program are located, the number of in-scope supplier sites in those countries and the top three categories of products sourced from those countries. We have also indicated 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 (2026).

Country risk rating

- Direct sourcing and identified as inherently high risk in FLRA
- Direct sourcing and not identified as inherently high risk in FLRA
- No direct sourcing
- Increasing risk

Source: F26 Forced Labour Risk Assessment (FLRA)

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

Human rights risks are dynamic and no global retailer is immune to the risks of modern slavery. As one of the largest retailers in Australia and New Zealand, we strive to have the right people, processes and systems in place to continuously monitor our operations and supply chain for human rights risks.

Tools used to identify risk

Forced labour risk assessment

Forced labour remains the most salient modern slavery risk in our supply chain. Accordingly, we conduct periodic forced labour risk assessments (FLRAs) to identify categories and geographies with a higher risk of worker exploitation. We assess risk against the Group's specific supply chain data to support prioritisation and targeted interventions. Our last assessment, conducted in F23, validated cotton, seafood and horticulture as our highest trade-related risks, and uniforms, construction, waste management, transport and storage as our highest non-trade risks.

In F26, we partnered with external human rights experts, Humantics, to conduct a broader FLRA to identify where risks and potential control gaps are visible today. Through data analysis, we also tested areas where audit methods may not fully surface risk. The assessment combined quantitative analysis of our responsible sourcing and grievance data with qualitative analysis of workforce and recruitment models, emerging human rights trends, and broader supply chain dynamics. This exercise pressure-tested whether our current strategic priorities remain appropriately targeted to capture evolving risk profiles in our supply chain, and identified emerging areas where additional due diligence may be required.

Whilst the FLRA confirmed that our core high risk categories remain consistent, it surfaced changing risk patterns across our supply chain. Importantly, this validates that our strategic focus and existing Human Rights Program (HR Program) priorities continue to align with underlying risk data, making sure our investment and due diligence activities remain targeted where they deliver the greatest impact. Summary findings of our F26 FLRA are as follows:

Trade

Cotton, seafood and horticulture remain our highest inherent forced labour risk commodities due to vulnerable migrant workforces, complex recruitment practices and known sector-specific exploitation risks. While these core priorities remain unchanged, the FLRA identified emerging risks requiring increased attention. Though we have a small number of direct meat suppliers, we are observing elevated forced labour risks within our meat supply chain, specifically concerning the payment of recruitment fees by migrant workers to foreign agents in order to secure employment. This concentration of potential forced labour indicators in a small number of suppliers has resulted in meat processing being deemed higher risk than in previous FLRAs (see page 30).

Notably, the FLRA identified Australia and China as the Group's two highest priority countries – taking into account how potential risks are being surfaced via social compliance audits. This takes into account how potential risks are being surfaced (or not surfaced), as well as the scale of our sourcing in these two countries and audit findings. We have long acknowledged audits are not a silver bullet, and therefore we continue to prioritise additional due diligence and complementary controls.

The FLRA also identified areas where risk was not reflected in audit outcomes. For example, recruitment systems within seafood processing continue to present elevated inherent forced labour risks despite comparatively lower levels of risk being identified through social compliance audits. This may reflect stronger supplier controls, but may also indicate areas where additional visibility and complementary due diligence mechanisms are required. This reinforces the importance of continuing to test assumptions and validate risk using multiple sources of evidence and triangulation. To support this, Humantics developed an interactive forced labour risk model that enables risk to be analysed across countries, product categories, audit schemes and forced labour indicators continually. This provides greater insight into where risk is emerging, where assurance mechanisms may have limitations and where additional validation or due diligence activities should be prioritised.

Non-trade

The FLRA identified that our higher risk non-trade categories include transport and logistics, security services, renewable energy equipment and electric vehicles (EVs). While these priorities remain broadly consistent with our previous assessment, the findings highlighted an important shift in how forced labour risks are manifesting. Rather than being driven primarily by product categories or supplier compliance, many emerging risks are increasingly associated with workforce models. Labour hire arrangements, subcontracting, fatigue management, and the use of temporary migrant workers are shifting potential risk into more complex employment structures that may sit beyond the visibility of direct suppliers.

Transport and logistics remains a key area of focus given our large outsourced workforce footprint and the operational factors influencing worker outcomes, including subcontracting, scheduling pressures and insecure work. The FLRA also identified renewable energy infrastructure and EV supply chains as emerging priorities. As they grow rapidly, complex supply chains, upstream traceability challenges and limited commercial leverage mean human rights risks may increasingly sit beyond direct supplier relationships. Building capability here will require continual review of existing due diligence processes, including stronger industry collaboration and targeted engagement beyond direct suppliers.

Across both trade and non-trade, the assessment indicates that future human rights risks will increasingly be shaped by how work is organised, recruited and managed, rather than solely by where products are sourced. This reinforces the importance of continually reviewing our due diligence to make sure it evolves alongside changing workforce and supply chain models.

Evolving our due diligence approach

While our HR Program operates on the basis that audits are not a silver bullet, the FLRA confirms that audit-surfaced risks do not always correspond with inherent forced labour risk. As workforce arrangements become more complex and risks increasingly sit beyond direct supplier relationships, traditional social compliance audits alone cannot provide a complete picture of worker vulnerability.

The FLRA therefore reinforces the importance of a triangulated approach to human rights due diligence. By combining audit findings with grievance data, external intelligence, and other beyond-audit tools (see page 10), we can develop a more nuanced understanding of where forced labour risks are emerging and better target our due diligence activities. In F27, we will consider where audit detection may be weakest, and overlay additional complementary controls to test due diligence robustness.

Overall, the FLRA largely validated the strategic direction of our HR Program, confirming that our existing priorities focus on the areas of greatest risk. The primary opportunity identified by the FLRA is to strengthen visibility, validation and capability where controls may be weakest and where emerging workforce models and changing supply chain dynamics alter how forced labour risk manifests. The findings of the FLRA will be embedded into our F27–F30 priorities and will inform the continued evolution of our HR Program.

Priority categories for human rights due diligence based on inherent risk

PRIORITY INDUSTRY	FOCUS COUNTRY(IES)	READ MORE
Fresh produce and horticulture	Australia	Page 22
Red meat processing	Australia	Pages 23; 30
Security services	Australia	Page 27
Logistics	Australia	Page 31
Seafood processing	Thailand, China	Page 30
General merchandise manufacturing	China	Page 21
Cotton and fibres	China	Page 29
Renewable energy equipment	China, South-East Asia	Page 31
Apparel manufacturing	Bangladesh, Vietnam	Page 29

Other tools

Third-party screening

Sayari Graph (Sayari): a risk investigation and analysis platform that leverages trade and beneficial ownership data from official sources, allowing us to uncover complex supply chain connections and flag potential links to forced labour at multiple tiers.

Following its initial rollout, we have embedded Sayari deeper into our due diligence workflows to execute pre-screening on suppliers and validate supplier ownership structures in high risk categories. While tools like Sayari surface potential links to forced labour, our HR Program is based on triangulating findings through multiple sources to verify information. Therefore when potential links are raised, we do manual checks through engagement with our business and suppliers to validate findings.

Control Risks' geopolitical risk monitor: provides insights into geopolitical dynamics, potential supply chain disruptions and regulatory developments. From July 2025–May 2026, reports were issued monthly and we monitored these for both general trends and specific incidents related to our supply chain.

Internal geopolitical risk reports (supported by Seerist): in F26 the Group Intelligence team began creating periodic internal reports on relevant geopolitical risks, supported by Seerist, an automated risk and intelligence mapping platform. The Human Rights team monitors these reports for relevant geopolitical issues that may impact workers in our supply chain.

Responsible Sourcing Program tools

Audits: third-party audit findings are monitored via a custom-built, centralised dashboard that supports day-to-day due diligence. This dashboard enables our team to identify emerging non-conformance trends, prioritise supplier engagement and capability building, and monitor remediation progress and risk trajectories across our supply chain.

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.

Issara Institute's 'Inclusive Labour Monitoring' dashboard: a dashboard that provides real-time visibility of worker-reported issues across our South-East Asian supply chain, including grievance trends, severity, affected workers and remediation progress. In F26, 52 worker-reported issues were recorded. These insights are complemented by regular strategic partnership meetings with Issara to monitor emerging risks, recruitment trends and remediation outcomes, while also supporting suppliers through access to approved recruitment agencies and responsible recruitment capability building resources.

Listening to workers, suppliers and industry

Worker forums: as part of our Memorandum of Understanding (MOU) with the Retail Supply Chain Alliance (RSCA), we hold regional worker forums annually to engage directly with horticulture workers, better understand their experiences on-farm, and raise awareness of available grievance mechanisms, including our Supplier Speak Up Program. In F26, we targeted regions identified as having high non-compliance rates, including the Mornington Peninsula and the Riverina, informed by findings from the Fair Work Ombudsman's Horticulture Compliance Report.

Worker attendance varied across both forums due to a range of factors, including operational and logistical challenges. Forums were also attended by industry, union, government and community stakeholders, providing additional insights into human rights risks and challenges in these regions. Learnings from these engagements are informing a review of our worker forum approach to strengthen worker accessibility and support the ongoing effectiveness of our worker engagement activities.

Suppliers and industry collaboration: throughout F26, we continued working closely with suppliers on the outcomes of due diligence activities, including audit findings, management action plans, and capability-building. Our Human Rights team reviews reports and insights from non-government organisations, regulators and industry publications. We also regularly engage with audit schemes, certification bodies and broader industry initiatives to understand emerging human rights risks and evolving audit practices.

In F27, we will review each of our risk identification tools to determine if they continue to be fit for purpose.

Case study

Using Sayari Graph to identify potential modern slavery in our supply chain

Recognising the inherent risks within our international sourcing footprint, we significantly strengthened our due diligence across our specific high-risk own-brand supply chains during F26. In addition to audits, we expanded our use of Sayari to screen 294 active suppliers and their supply chain connections for potential indicators of forced labour, mapping risks beyond our direct, tier-one relationships. Screening results were evaluated using a comprehensive risk-based methodology. This framework considered the nature of the potential risk, source credibility, proximity to our direct suppliers, and our leverage to drive positive outcomes.

Through this enhanced process, a subset of 85 total entities (including both suppliers and their sites, noting some suppliers have multiple sites) were flagged for further assessment. Of these, one site was further escalated for a deep-dive investigation due to compounding red flags, including complex ownership structures and structural links to regions with known, extreme human rights risks. Our internal Human Rights team conducted enhanced due diligence, which identified:

- significant gaps in worker protections: more than 30% of the workforce lacked access to foundational social safety nets and protections. In contexts where minority groups face systemic persecution, this lack of protection is a recognised indicator of potential exploitation.
- participation in high-risk labour schemes: the investigation revealed the site's involvement in state-sponsored employment initiatives. Within certain high-risk jurisdictions, this language is widely reported to be associated with the forced labour of vulnerable groups.

Taken together, alongside the inherent geographic risks, these findings raised severe concerns regarding the potential presence of state-imposed forced labour (SIFL). While the opaque nature of the operating environment and a lack of independently verifiable data prevented a definitive, conclusive finding of modern slavery, the circumstantial evidence indicated a risk profile outside our tolerance levels, so we took appropriate action.

State-sponsored forced labour represents a severe, systemic human rights violation. Because typical remediation and supplier engagement strategies are ineffective – and potentially harmful – when the state itself mandates such practices, continued sourcing inherently supports the abuse.

Having confirmed there was no active production or pending orders at this facility, we could responsibly exit this site from our supply chain network immediately.

This case has validated the necessity of our expanded due diligence approach. We have since integrated this advanced, technology-led screening into the onboarding process for all new suppliers in this category. In F27, we will continue to roll out the same screen for relevant supplier categories in our supply chain.

Taking action to address risks

Our Human Rights (HR) Program is the way we seek to identify, prevent and mitigate key modern slavery risks to people across our supply chain. Due to the complex, dynamic nature of human rights risks, we recognise that one size does not fit all, and our HR Program therefore consists of five pillars that provide complementary and compensating controls.

Our Human Rights Program

Our HR Program is informed by the United Nations Guiding Principles on Business and Human Rights (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 for the sourcing of own brand products and services, meaning we aspire to eliminate this risk. The HR Program does not directly govern risks to people in our operations. Risks to our direct team members are primarily managed by the Group's People team.

In F26, we updated our Human Rights Policy (formerly Responsible Sourcing Policy) to better reflect the evolution of our HR Program, clarify our overarching human rights commitments and strengthen supplier due diligence expectations.

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 roll-out of the RS Program for own brand and fresh suppliers, while the second phase (2021–2025) maintained the RS Program as a core operational control, whilst also expanding bespoke human rights due diligence to strategically address modern slavery risks.

As we begin the third phase of our HR Program (2026–2030), we aim to move beyond risk mitigation to proactive risk prevention by advancing human rights to address exploitation and modern slavery risks, with the ambition of contributing to improve the livelihoods of workers in our supply chain. From a governance perspective, this evolution has also necessitated adding an additional pillar to our HR Program (see page 18). Our HR Program now comprises five operational pillars which are designed to act as complementary and compensating controls. In line with our commitment to continuous improvement, each year we continue to mature our approach across each pillar. F26 outcomes for each pillar are described throughout this Statement:

1 Own operations
Managing relevant human rights risks associated with our direct internal activities, entities and facilities.

2 Responsible Sourcing Program
Trade | Non-Trade
Our foundational social compliance program with due diligence for suppliers in scope of the Responsible Sourcing Standards.

3 Bespoke interventions to address modern slavery risks
Recognises that systemic geographic or commodity-based risks require bespoke, strategic interventions.

4 Effective grievance mechanisms
That are trusted and effective so we can support access to remedy for impacted workers.

5 Partnerships and advocacy
With key external organisations and with majority-owned businesses, recognising modern slavery can only be ended by working with others.

Understanding our involvement in human rights risks

It is a foundational principle of our HR Program that where we identify issues in our supply chain, we will seek to work with our suppliers to remediate the issues for workers and uplift capability where required. In identifying and assessing issues in our supply chain, we use the UNGPs continuum of involvement to determine whether we may cause, contribute or be directly linked to harm.

Assessing our relationship to the risk

Where we identify issues in our supply chain, we use the continuum of involvement to determine our level of involvement in the harm that has occurred. In line with the UNGPs, we use our leverage to support our suppliers to remediate the harm and put systems in place to mitigate and prevent future harm. Where the supplier is not willing to remediate the harm, or where factors like geographic location make remediation impossible, we are guided by responsible exit principles.

The table below outlines examples of high-risk categories in our supply chain, and how we may cause, contribute or be directly linked to those risks.

Cause	Contribute	Directly linked
As a retailer, we have direct control over our retail stores, corporate offices and DCs and CFCs, and refer to these as 'our operations.' We may cause modern slavery or other human rights harms if our own acts or omissions directly result in the modern slavery occurring in our operations. For example: • engaging an employee who is a child and requiring them to perform hazardous work. • requiring an employee to work excessive overtime, and threatening retribution if the employee raises concerns.	We may contribute to modern slavery or other human rights harm if our own acts or omissions are significant in facilitating, encouraging or enabling another party to cause a situation of modern slavery. For example: • purchasing practices may put significant cost and time pressures on own brand manufacturing suppliers that they can only meet through the use of forced labour. • outsourcing services to external contractors at rates that would require excessive overtime without pay.	We may be directly linked to modern slavery or other human rights harm by our operations, products or services through a business relationship. For example: • purchasing a product that was harvested by migrant workers working on an established visa with an approved employer who becomes disengaged from work, leaving them at higher risk of exploitation. • procuring services that are performed by workers in entry level positions on student visas who exceed visa working hour limits.
Potential risk area or category		
• Stores • DCs • CFCs • Support offices	• Horticulture • Seafood • Logistics • Security services • Cotton • Meat • Renewable energy equipment	• Horticulture • Seafood • Logistics • Security services • Cotton • Meat • Renewable energy equipment

Governance

Board

The Woolworths Group Board (the Board) retains ultimate responsibility 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 our human rights initiatives and due diligence through updates provided at each Committee meeting and an annual Human Rights Program deep dive. Through this forum in F26 we continued to provide visibility over HR Program governance and material incidents, as well as providing a fulsome update on the risks in our supply chain, the potential drivers and root causes of these risks, challenges to our HR Program and visibility of our forward plans.

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 accountable for its execution and the effective management of human rights risks across the Group. The Human Rights Steering Committee (SteerCo) has visibility of and provides strategic input into management and remediation of modern slavery risks, and is composed of senior leaders from key business units and Group functions. The 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, Thailand, Hong Kong SAR and China.

Woolworths Group Board

Responsible for approving the Group's risk management framework, Group risk appetite and sustainability strategy and disclosures, including the Modern Slavery Statement

SUSTAINABILITY COMMITTEE

Oversees development, monitors execution and reviews effectiveness of the Group's sustainability strategy. SUSCO is also responsible for reviewing and recommending the Modern Slavery Statement to the Board for approval.

RISK COMMITTEE

Oversees the identification, assessment and integration of sustainability risks (including human rights risks) into the Group risk management framework, and recommends adjustments to the Group's risk appetite and framework to the Board.

CEO AND EXECUTIVE COMMITTEE, INCLUDING THE CSO

Accountable for the overall implementation of the Human Rights Program and strategies to manage human rights risks across the Group. Progress is reported to SUSCO at least three times a year.

Supported by external human rights advisory partners, Humantics, LRQA and Dignity in Work for All.

HUMAN RIGHTS STEERING COMMITTEE

HUMAN RIGHTS INVESTIGATION SQUADS

GROUP FUNCTIONS AND BUSINESS UNITS

Our policies

Our policies, standards and addendums articulate our human rights commitments and expectations to our team and suppliers, and set the foundations for how we operationalise our HR Program across the Group and throughout our supply chain.

Our policy framework is supported by publicly available supplier guidance on key risk areas including grievance mechanisms and overtime hours. The following policies are the most relevant to managing human rights risks across our team and supply chain:

Team member policies

POLICY	PURPOSE AND IMPLEMENTATION
Code of Conduct	Outlines behavioural expectations for team members and contractors towards colleagues, customers and the community, including HR Policy compliance. Updated in F26 with psychosocial safety and responsible AI guidance, the Code training is delivered at induction and refreshed on a regular basis.
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.
Right to Work Policies	Requires compliance with Australian and New Zealand laws with respect to team member working rights.
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. Outlines the support and protections available for eligible reports.

Supply chain policies

POLICY	PURPOSE AND IMPLEMENTATION
Human Rights Policy	Replaces the former RS Policy and sets the commitment that we will respect all internationally recognised human rights of the people supporting our business activities. Renamed to clarify the document's purpose and clearly articulate our commitment across our own operations, businesses, sellers and suppliers. See page 12.
Responsible Sourcing Standards	Requirements for all direct suppliers of own brand and fresh products. Addresses the ILO core conventions, including forced or compulsory labour, and underpinned by the UNGPs. Updated in F26 to provide further clarity on in-scope suppliers and categories, including the progressive expansion to include suppliers in tier two of our supply chain.
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. See page 23.
Responsible Recruitment Addendum	Developed in response to our findings that recruitment is one of the highest labour risks in our supply chain, this Addendum sets out supplier requirements to strengthen oversight of labour recruiters and reduce modern slavery risks associated with the recruitment of migrant workers. In F26, we continued implementation with Thai and Malaysian suppliers, see page 32.
Child Labour Addendum	Sets out supplier expectations and remediation protocols relating to the respect for children's rights in our supply chain.
Sustainable Cotton Policy	Sets out the minimum social and environmental requirements that apply to Group own brand products containing cotton. See page 29.
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. In F26, we translated our 'Speak Up' poster into six commonly spoken languages to improve accessibility across our diverse supply chain.

Managing risk in our own operations

Direct

Over 200,000 team members work across the Group every day to deliver value to our customers, and putting in place appropriate controls to mitigate human rights risks is integral to embed respect for human rights in our own operations.

200,000+

directly employed team members

88%

of Australian team covered by 29 enterprise agreements

88%

of New Zealand team covered by 12 collective agreements

Directly employed team locations[2]

Australia	89%
New Zealand	10%
Asia	1%

The majority of the Group's approximately 213,000 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, New Zealand and other applicable employment laws. 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. Approximately 88% of Australian team members are covered by 29 enterprise agreements and 88% of New Zealand team members are in roles that are covered by 13 collective agreements. 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 33% of Australian team members and 49% of New Zealand team members are members of a registered trade union.[1]

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 192 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 meet 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.

We continue to monitor our operations for evolving or emerging areas of human rights risks. For example, in F26 we participated in a CGF lead project to understand the specific labour rights risks for workers performing merchandising work in our supermarkets. Facilitated by the Fair Labor Association, and with partners like Mondelez and Unilever, the study aims to review the working conditions of merchandisers, including recruitment, pay and safety processes. The results of this study will be available in F27, and we will review the findings to identify any opportunities to continue to strengthen human rights controls for workers in our own operations.

1 Union membership numbers exclude PFD and The Kitchenary.
2 Number of directly employed team in this diagram excludes PFD and The Kitchenary.

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.

We have put in place controls to manage the inherently higher risk with indirect workers, including:

- contractual controls in our contracts with suppliers of indirect workers on our sites, including compliance with our HR Policy and a modern slavery clause
- continuing work on a labour hire framework to be applied to LHPs engaging workers on Group owned and operated DCs and CFCs
- ongoing internal and external monitoring of cleaning and trolley collection suppliers at Group trading sites in Australia (see below).

Our commitment to effective governance and monitoring of the trolley collection and cleaning contracting supply chain continues. In F26, 47 (~5%) Australian trading sites were externally audited, and 32 sites were internally audited by the Group's Facilities Management Compliance team. 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 closed in F26, ~$82,076 was repaid to 88 workers at 46 sites. Once all issues, including underpayments (if any), were rectified, three primary contractors were terminated from 10 sites, and 24 subcontractors were terminated from 195 sites. Of the 24 subcontractors, 23 were also prohibited from any future engagement. The remaining subcontractor was terminated and not prohibited from future engagement as their issues were limited to a single site and were not found to be intentional or widespread.

The Group is currently transitioning trolley collection and cleaning services to an in-sourced model across its Australian operations. To date, 840 (80%) Woolworths Supermarkets sites have successfully migrated to this internalised service structure. It is anticipated that this direct employment framework will progressively mitigate inherent human rights risks within the cleaning and trolley collection supply chains. Notwithstanding this transition, certain specialised or non-routine service components, including trolley street runs, floor polishing, and ad-hoc cleaning requirements, may continue to be provisioned through external providers and will be subject to compliance monitoring.

Case study

Responding to worker grievances in our own operations

This year we investigated a Supplier Speak Up complaint from a worker engaged by an outsourced food canteen supplier at one of our DCs. This worker alleged underpayment, a lack of regular payslips, non-payment of penalty rates, superannuation and income tax, and the falsification of payslips to omit overtime hours.

In response, we requested that the supplier engage a third-party payroll specialist to conduct an independent pay and entitlements review. Despite our repeated reminders that compliance was a condition of their ongoing engagement with the Group, the supplier failed to schedule the audit. During this time, we also learned the worker was allegedly receiving threats from the supplier for raising these concerns. Consequently, we terminated our contract with the supplier.

When exiting a supplier, our HR Program dictates a set of 'responsible exit' principles. These principles are underpinned by the UNGPs which require us to take necessary steps to remediate harm where we have 'contributed' to it. This involves assessing the potential adverse impacts of an exit on workers, the scale of those impacts, and the feasibility of remediation. In line with these principles, we accepted that although the worker was not directly employed by us, they were closely connected to the Group through their work on our site servicing our team. As such, the Group directly paid the worker ~$5,460 to remediate the underpayments allegedly withheld by their employer.

Own operations (manufacturing)

Human rights risks are not static, and as the Group evolves we continue to review our HR Program to make sure it remains fit for purpose. As the Group owns manufacturing and food processing facilities, we have introduced a new pillar to our HR Program to address the inherent human rights risks in manufacturing.

Manufacturing is characterised by labour-intensive activities, often performed by low and medium-skilled migrant workers who may be less aware of their workplace rights. Due to these factors, we recognise that workers in a manufacturing facility may face an inherently higher risk of modern slavery or exploitation, and we are cognisant that we must implement proportionate controls to mitigate the risk of harm occurring.

Risks to our direct team members are primarily managed by the Group's People team. Through our RS Program, in-scope suppliers who manufacture products for the Group are required to undergo further due diligence, including third-party social compliance audits at manufacturing and food processing sites. Given our proximity and level of control over directly owned manufacturing facilities, and guided by the UNGPs,[1] we considered that conducting social compliance audits at our wholly owned manufacturing and food processing facilities was a proportionate and appropriate control to monitor the conditions of workers in these facilities and make sure we were meeting the same requirements that we have for in-scope suppliers.

We have codified this approach in the Own Operations (Manufacturing) Standard Operating Procedure (Manufacturing SOP). The Manufacturing SOP outlines requirements for managing relevant human rights risks in our wholly owned manufacturing and food processing facilities and requires, amongst other things, that:

- all in-scope entities obtain an acceptable third-party social compliance audit within six months of onboarding (unless mutually agreed in writing by Woolworths Group Human Rights team)
- audit non-conformances will be addressed and closed within the timeframes specified by the relevant audit scheme
- an accessible, confidential and effective grievance mechanism is maintained to enable workers and other relevant stakeholders to raise human rights-related concerns without fear of retaliation.

We have commenced roll-out of the Manufacturing SOP (see below), and will continue to implement the process throughout F27.

Case study

Outcomes from monitoring manufacturing facilities

In line with the Manufacturing SOP, in F26 SMETA audits were conducted at five of the eight Group owned manufacturing and food processing facilities across Australia. These five sites were selected for the first phase of audits as they have a higher number of workers and were all operational.

Across these five sites, a total of 27 non-conformances (NCs) were identified. The vast majority of these were graded major[2], with only one being considered a critical NC. The critical NC related to a discrepancy between the labour hire agency named in a contract and the labour hire agency that was being paid, which has since had corrective actions implemented. Other common NCs related to health and safety issues, such as the need for improved machine guarding and electrical safety, and lack of processes in place to monitor the compliance of labour hire agencies.

To date, corrective actions have been implemented for 20 of these NCs, with the remaining seven currently awaiting follow up from the auditor. Corrective actions included creating compliance training calendars to support employee and leader education regarding human resource policies and introducing compliance checklists for labour hire agencies to verify the validity of documents such as payslips and VEVO checks.

These audits also highlighted examples of good practice including the provision of on-site wellness and mental health support programs, equitable recruitment practices, and strong environmental initiatives. We expect these manufacturing facilities to be audited on the same audit cycle we expect of our suppliers. In F27, we will continue to roll out the Manufacturing SOP, with an additional PFD seafood processing site and two PFD meat rooms, along with another food manufacturing facility operated by The Kitchenary, scheduled to be audited.

1 UN Guiding Principles on Business and Human Rights (2011), Principle 14.
2 A 'major' audit grading means a non-conformance is serious, but not a critical or zero-tolerance issue.

Integrating new businesses into our Group

Our approach

This year, we continued to implement our approach to assessing risk across the Group's newly wholly owned and majority owned businesses and partnered to integrate these businesses based on our level of control and influence. We have delivered two key frameworks to support this integration: the Mergers and Acquisitions (M+A) Human Rights Framework and the Human Rights Marketplace Framework. Under these frameworks, wholly owned and majority owned businesses are required to have their own brand suppliers onboarded to the RS Program.

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 business' capability and maturity. In F25, we clarified this approach by adopting the principle that new businesses must be wholly owned by the Group for the whole reporting period before they are reported on as part of the Group's Statement.

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

- using our RS Program principles, we identified which own brand suppliers from The Kitchenary and PFD Food Services are in scope of the RS Program, with over 100 suppliers prioritised for onboarding to the RS Program in F27
- supported a majority owned business in monitoring compliance of its own brand suppliers with the Group's RS Program
- delivered modern slavery training to a majority owned business' procurement and finance teams, uplifting their knowledge of modern slavery risks
- reviewed the modern slavery statements for majority owned businesses, resulting in uplift in their disclosure.

In F27, we will continue to implement the M+A Human Rights Framework and review it so that it remains fit for purpose as the Group continues to evolve.

M+A Human Rights Framework

Pre-acquisition

Due diligence

Conduct due diligence to understand the business' level and materiality of human rights (including modern slavery) risks, including reviewing relevant policies, their implementation and disclosures. Results conveyed to decision makers.

Determine risk level

Based on the materiality of human rights risks, determine what actions need to be taken as a priority to manage the risks once the new business becomes part of the Group.

Integration planning

Plan for the new business to adopt, or align with, the Group's Human Rights Policy. Plan for own brand suppliers to be onboarded to the Group's Responsible Sourcing Program, including risk-based segmentation and relevant due diligence.[1]

Post-acquisition

Engagement

Wholly owned: Regular engagement via Human Rights SteerCo, working groups and senior leader briefing sessions.

Majority owned: Engage with executive to set expectations, and with operational teams to monitor progress.

Ongoing monitoring

Wholly owned: Business unit accountable for ongoing monitoring, supported by Group.

Majority owned: Business provides progress reports as requested by Group and is responsible for ongoing due diligence of suppliers.

Ongoing support

Wholly owned: Business embedded in Group Human Rights Program governance.

Majority owned: Group Human Rights team supports and provides guidance.

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 business' capability and maturity.

Responsible Sourcing Program

Our Responsible Sourcing (RS) Program is the second pillar of our HR Program and is integral to how we manage human rights risks with suppliers. The RS Program consists of two main documents – the HR Policy and RS Standards. Our HR 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 human rights risks in our trade supply chain. All trade suppliers, including those of vendor branded goods, are in scope of our HR Policy and are expected to have established controls and processes in place consistent with our commitment to responsible sourcing and upholding respect for human rights.

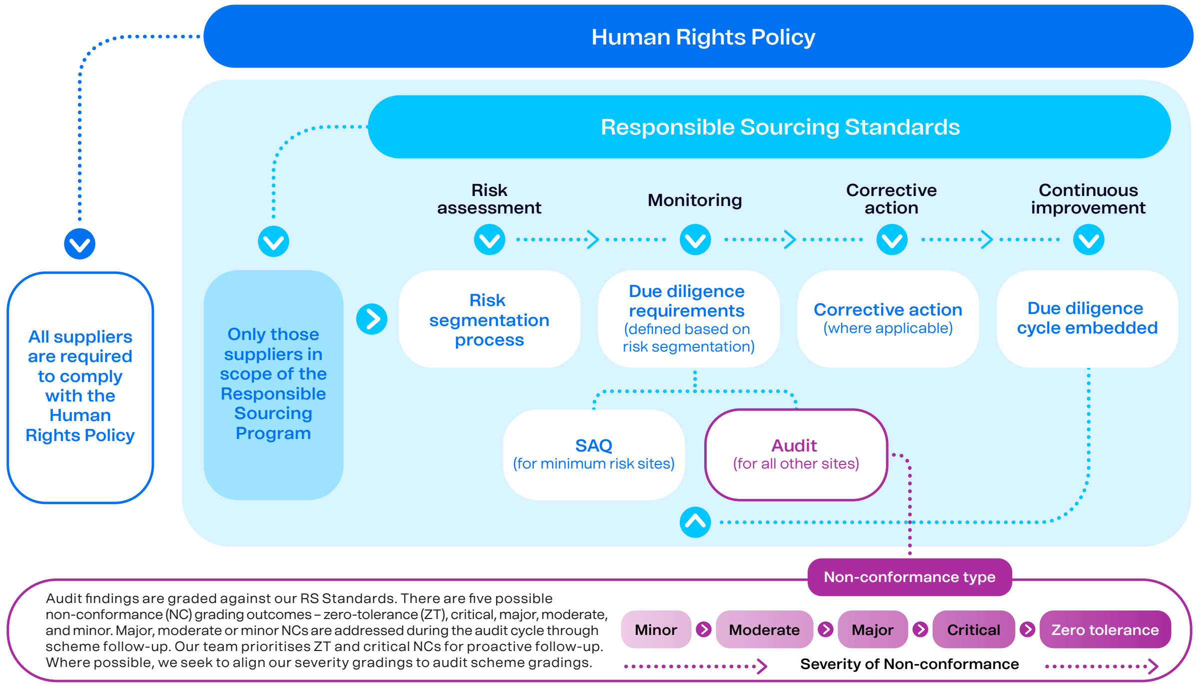
In addition to being in-scope of the HR Policy, sites producing Woolworths Group own brand and fresh products are also in-scope of our RS Standards (referred to as 'in-scope suppliers'). For these products, suppliers are producing, manufacturing and packing products directly for our businesses, so we have greater connection to the workers and influence to remediate issues.

In-scope trade suppliers are subject to risk-based due diligence requirements designed to identify, assess and address human rights risks within our supply chain. Suppliers are assessed through our biennial risk segmentation process and categorised into one of four risk segments: priority, moderate, specialised or minimum risk. A supplier's risk segment determines the level of due diligence required and is informed by a range of internal and external data sources, including the findings of our FLRA, country and sector risk, historical audit outcomes and other supplier risk indicators. During F26, we commenced a review of our risk segmentation framework to simplify the approach for both suppliers and our internal teams, while making sure our due diligence remains focused on areas of greatest inherent risk.

Due diligence requirements may include self-assessment questionnaires (SAQs), third-party audits and other targeted activities. These activities are complemented by worker voice, our Speak Up grievance mechanism, technology tools that support the identification of otherwise opaque risks through multi-layer supply chain mapping, and ongoing efforts to improve supply chain transparency.

To reduce duplication and minimise the compliance burden on suppliers, we continue to apply a mutual recognition approach, allowing suppliers to rely on eligible audits and SAQs completed for other customers where they meet our RS Program requirements[1].

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 Program (ESCP); Worldwide Responsible Accredited Production (WRAP); Global Good Agricultural Practice Risk Assessment (GAP, GRASP) and LRQA ERSA.

Outcomes for audited sites

In F26, we reviewed 1,087 audits that were conducted at in-scope sites in our trade supply chain[1]. Of these audits, there were no zero tolerance NCs identified. One hundred and eighty-two identified at least one critical NC, 811 identified major or moderate NCs, and 94 identified minor or no NCs.

The proportion of audits identifying critical NCs decreased slightly, from 19% in F25 to 17% in F26. Health and safety accounts for over 30% of all NCs identified across audits. While remediating these remains a priority, we recognise – consistent with our FLRA – the limitations of audit methodologies in capturing the most serious labour rights issues. In F27, we will review audit effectiveness to strengthen due diligence and continue to expand our beyond audit approaches.

Audit activity aligned with our sourcing footprint, with ~40% of all audits conducted in China and approximately one-third in Australia. Australia accounted for the largest share of critical NCs or ~57% of the global total, 96 of which were in our horticulture supply chain.

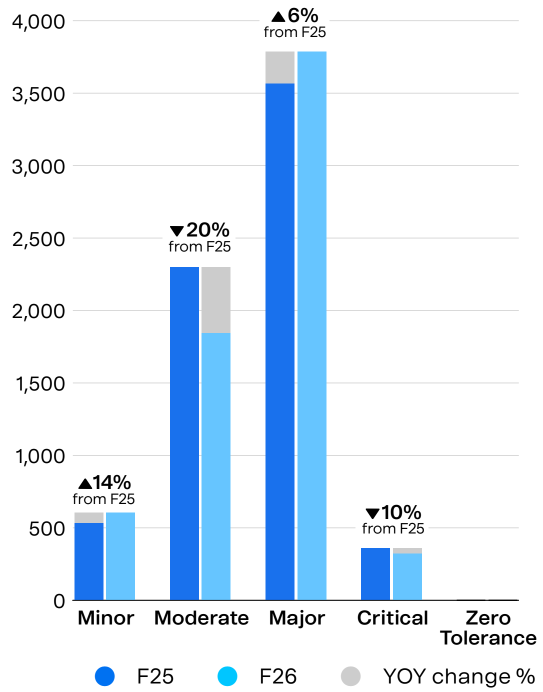
Audit trends

Australia: Reflecting our large domestic footprint and industry reliance on temporary migrant, seasonal and labour-hire workforces, Australia showed a higher prevalence of labour exploitation indicators in audits than other countries – validated by our F26 FLRA. Wages and benefits remained the top critical NC category, with 59 NCs in 46 audits identifying an issue. Consistent with our FLRA, LHPs present heightened human rights risks due to complex recruitment and oversight. We also identified instances of migrant workers working outside visa conditions and recruitment fee practices requiring further investigation.

China: Health and safety NCs remain prevalent, with 84% of audits identifying at least one NC, although the majority of these were not graded critical. Following remediation, critical findings in China fell substantially, with China accounting for 5% of total critical NCs in F26, down from 19% in F25. Besides health and safety, remaining critical findings primarily related to document and licensing discrepancies.

South-East Asia and Indian Subcontinent: Health and safety remained the most common critical NC category in India and across the region, despite elevated inherent forced labour risks identified for countries across these regions in the F26 FLRA. These findings suggest audits are more effective at identifying structural health and safety issues than complex forced labour indicators. Consequently, in F27 we will review the effectiveness of audit schemes alongside other controls across our highest-risk sourcing categories.

NCs identified across audits



Remediating persistent critical issues in Asia

Our RS Program continues to support suppliers based in Asia to strengthen their management systems and effectively remediate issues identified through our due diligence activities. In F26, our remediation support contributed to an overall reduction in critical NCs across suppliers in China, India, Thailand and Bangladesh. This is achieved through one-to-one multilingual supplier engagement, site visits, training and strategic partnerships.

In F26, we continued to prioritise supporting suppliers to remediate critical NCs that were repeatedly found in their audits, recognising that these consecutive NCs often reflect complex, systemic issues requiring sustained engagement. With our support, this year 15 sites closed consecutive critical NCs related to environmental, building and fire safety permits across Asian countries.

In China, missing or incomplete building and fire safety licensing has consistently been a common cause of consecutive audit NCs. This is primarily due to bureaucratic challenges in China leading to long delays for our suppliers to obtain the required documentation with their local government bodies. To strengthen remediation outcomes, we expanded our partnership with QIMA, a professional compliance company, combining desktop reviews, onsite remediation support and fire safety verification activities to help suppliers resolve these complex licensing issues. In F26, 12 suppliers in China successfully addressed their consecutive building licensing NCs, with QIMA's engagement continuing with one remaining supplier in China at a site under construction.

1 The 1,087 audits covers audits conducted in F26 with results available to Woolworths Group as of 23 July 2026.

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 inherent risks present in industries that rely on third-party labour hire providers (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

Australian horticulture presents one of the highest inherent human rights risks due to structural vulnerabilities: reliance on seasonal/temporary migrant workers, extensive LHP usage, fragmented multi-tiered supply chains and commercial pressures from seasonal, perishable production.

There are 342 suppliers providing fruit and vegetables (F&V) to Australian supermarkets, and all have completed baseline social compliance audits and are on a regular audit cycle.[1]

In F26, 204 audits were conducted. Of these, 27% had at least one critical NC, up from 25% in F25 and higher than the average (17%) comparative across our global trade supply chain. In F26, audits across F&V identified the most critical NCs in the following categories:

- **Wages and benefits:** Fifty-one percent of critical NCs in F&V related to wages and benefits issues, a 23% increase compared to F25, with most issues relating to wage miscalculations. While there has been an increase in the number of wage underpayment issues identified, the average quantum of underpayments has decreased compared to F25. Issues identified included incorrect worker classification, unadjusted pay rates, and miscalculated night-shift/overtime hours across 37 sites. This year, ~$100,600 has been repaid to 196 workers in our Australian F&V supply chain, with repayments validated by auditors. The largest single-site repayment saw four directly employed workers receive an average of ~$10,447 each.
- **Working hours:** This year, there was a 27% increase in working hour NCs when compared to F25. Working hour issues primarily related to inadequate timesheet processes to confirm workers' overtime is being recorded and correctly remunerated for both direct and LHP workers, as well as inadequate oversight of LHP workers' break-times. These findings are often linked to the wage underpayments detailed above.
- **Health and safety:** Despite being the third most common category of critical NCs, health and safety findings fell by 52% compared to F25. Since rolling out F&V audits, we have observed a continued reduction in these critical NCs, as sites resolve issues identified in their baseline audits. While structural issues (like obstructed fire exits) have reduced year-on-year due to regular audit cycles, some transient issues (such as annual safety inspections expiring between audits) persist.
- **Foreign migrant workers:** Foreign migrant worker management remains a key audit theme, driving at least 17% of critical F&V NCs this year (compared to 20% in F25). Specific NCs directly attributed to management of foreign migrant workers included missing Pacific Australia Labour Mobility (PALM) scheme deduction records, inadequate right-to-work checks, and incorrect visa classifications. Given high sector prevalence, the overall impact on foreign migrant workers is likely much broader.
- **Labour hire providers:** Lack of supplier oversight of LHPs remains a prevalent theme across critical NCs. As most LHP employees are foreign migrant workers, these risks are heavily interconnected. This year, 40% of all critical NCs in Australian F&V – spanning wages, working hours and safety – involved LHP workers. This is a growing trend, increasing from 26% in F25.

With baseline audits complete, the RS Program entered its next phase of maturity in F26, expanding scope to F&V sites (tier two suppliers to the Group) operating through agents and brokers (our tier one suppliers), and prioritising transparency projects (see page 25). As F&V supply chains often have a reliance on agents and brokers to consolidate supply sources, this reflects our increasing focus on the areas of our supply chain where the most salient human rights exist, beyond our direct trading relationships.

1 Or an agreed alternate RS due diligence approach in place, discussed further on page 35. Where a direct supplier does not have a growing or packing site, the audit requirement extends to one of their strategic grower/packer sites.

Australian meat

Our Australian meat supply chain comprises 24 direct suppliers operating 50 sites. Classified as specialised risk, these facilities are subject to a regular audit cycle. The sector is characterised by high inherent risks, driven by labour-intensive processes, physically demanding production roles and an increasing reliance on temporary migrant workers and labour hire arrangements. Audit trends in F26 aligned closely with our FLRA findings, showing an increase in instances where workers paid recruitment fees to agents in Asian sending countries. Accordingly, responsible recruitment practices and improved controls will remain a priority area of focus in F27.

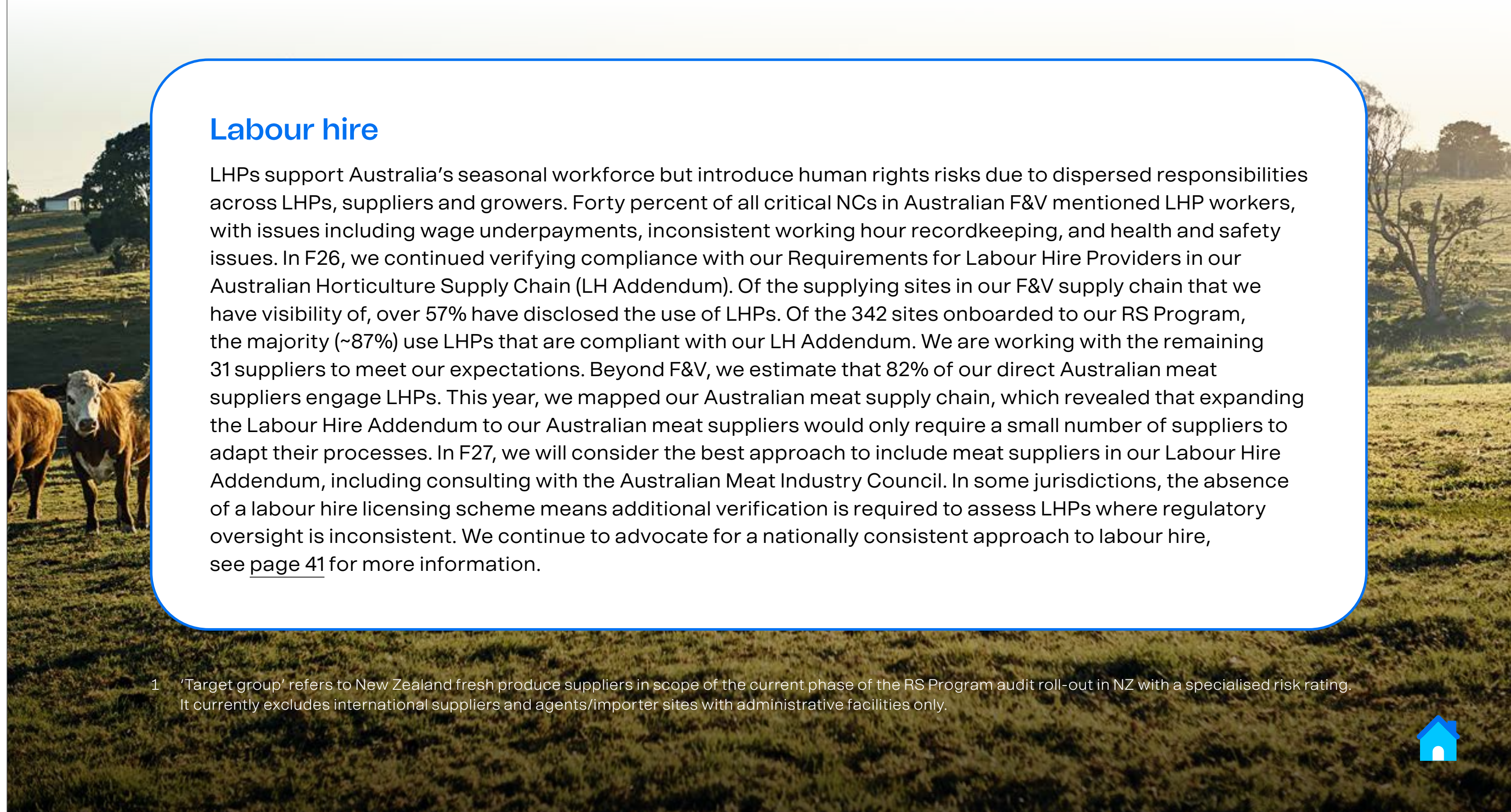
During F26, 34 audits were completed across our 50 in-scope domestic meat sites, with remaining sites subject to a two-year audit cycle. These audits identified 30 critical NCs across 15 sites, with 10 relating to responsible recruitment practices. Of these, four directly related to the payment of recruitment fees by foreign migrant workers, while six related to gaps in supplier controls designed to prevent recruitment fees imposed through labour intermediaries. Across three separate suppliers, 119 workers were confirmed to have paid up to ~$5,000 each to local agents to secure their Australian employment. Reaffirming our commitment to the Employer Pays Principle, these findings underscore the complexity of international recruitment corridors and the broad spectrum of hidden charges workers can incur. These findings have prompted enhanced due diligence to strengthen supplier guidance, improve remediation frameworks and enhance oversight of labour intermediaries (see page 30).

New Zealand horticulture

While roll-out of the RS Program in Australia commenced in 2018, due to the size and scale of our horticulture supply chain deployment in New Zealand (NZ) has been phased over time, and therefore we are still in the process of building NZ suppliers' maturity in meeting our RS requirements. To date, 125 F&V supplier sites based in NZ have completed audits, representing 100% of the target group.[1] While 96% of Australian horticulture suppliers are based in Australia, NZ sources ~19% of its fresh fruit and vegetables from 25 international suppliers.

Aligned to our approach in Australia, we have taken a phased approach to the roll-out of our RS Program in NZ. We commenced with NZ based F&V suppliers, and are now reviewing international suppliers. To date, 74% of direct F&V supplier sites overseas have completed the relevant responsible sourcing due diligence, with 39% completing a social compliance audit and 35% completing a SAQ. In F26, 178 NCs were identified across 19 F&V sites supplying to NZ. The majority of these NCs were related to health and safety.

Our F26 FLRA identified that social compliance audits in NZ are not surfacing as many critical NCs as audits in Australia, despite the NZ F&V supply chain having similar inherent risk characteristics to Australia. We recognise multiple audit schemes, including NZ-specific schemes, to reduce compliance burden on our suppliers; however, we are conscious these schemes have some limitations, such as not including worker interviews and using a three-year audit cycle. In F27, we will review all schemes, along with considering complementary controls such as worker voice, to support in identifying and mitigating human rights risks for F&V suppliers to NZ.



Labour hire

LHPs support Australia's seasonal workforce but introduce human rights risks due to dispersed responsibilities across LHPs, suppliers and growers. Forty percent of all critical NCs in Australian F&V mentioned LHP workers, with issues including wage underpayments, inconsistent working hour recordkeeping, and health and safety issues. In F26, we continued verifying compliance with our Requirements for Labour Hire Providers in our Australian Horticulture Supply Chain (LH Addendum). Of the supplying sites in our F&V supply chain that we have visibility of, over 57% have disclosed the use of LHPs. Of the 342 sites onboarded to our RS Program, the majority (~87%) use LHPs that are compliant with our LH Addendum. We are working with the remaining 31 suppliers to meet our expectations. Beyond F&V, we estimate that 82% of our direct Australian meat suppliers engage LHPs. This year, we mapped our Australian meat supply chain, which revealed that expanding the Labour Hire Addendum to our Australian meat suppliers would only require a small number of suppliers to adapt their processes. In F27, we will consider the best approach to include meat suppliers in our Labour Hire Addendum, including consulting with the Australian Meat Industry Council. In some jurisdictions, the absence of a labour hire licensing scheme means additional verification is required to assess LHPs where regulatory oversight is inconsistent. We continue to advocate for a nationally consistent approach to labour hire, see page 41 for more information.

1 'Target group' refers to New Zealand fresh produce suppliers in scope of the current phase of the RS Program audit roll-out in NZ with a specialised risk rating. It currently excludes international suppliers and agents/importer sites with administrative facilities only.

Building capability with our team and suppliers

We aim to work with suppliers, partners and team to uplift capability in identifying and mitigating human rights risks. Key areas of focus to achieve this include site visits, training, and partnership with audit schemes.

Using Responsible Sourcing data to inform our teams' sourcing decisions

This year we continued partnering with the Woolworths Retail team to integrate responsible sourcing performance metrics into supplier scorecards. Updated monthly, the scorecards combine suppliers' responsible sourcing performance, including audit ratings, critical NCs and remediation progress with broader commercial performance metrics. This consolidated view creates a shared view of supplier performance, enabling earlier identification of suppliers requiring additional engagement and embedding human rights considerations into commercial decision making.

During F26, we also used responsible sourcing data to inform supplier onboarding decisions across Asia. Eighty-one sites were pre-screened for human rights risks, with nine sites not approved to trade due to identified compliance gaps. Building on the successful roll-out across Woolworths Retail suppliers, we are expanding our onboarding approach across additional sourcing categories, further embedding responsible sourcing performance as a core component of supplier performance management.

Site visits

Site visits are an important part of our supplier engagement and due diligence framework, informing supplier onboarding and sourcing decisions, validating audit findings, strengthening supplier capability and supporting remediation. They also provide first-hand insight into working conditions and emerging human rights risks that may not be evident through audits alone.

During F26, we conducted 37 site visits across Australia and Asia. Outcomes included:

- agreeing remediation pathways for complex responsible recruitment and health and safety issues with three suppliers in Thailand;
- validating audit findings and investigating root causes of NCs through 11 supplier visits in China, strengthening suppliers' understanding of Woolworths' expectations;
- engaging directly with Australian horticulture suppliers and unions and civil society representatives participating in the PALM Scheme to better understand effective recruitment, pastoral care and worker wellbeing practices, providing practical insights to inform our ongoing supplier engagement and due diligence
- testing the effectiveness of our due diligence processes by comparing on-site observations with audit outcomes, helping identify issues requiring further investigation.

Responsible Sourcing training

To better integrate suppliers' human rights performance into commercial decision making, we delivered targeted training to internal stakeholders on our new responsible sourcing dashboards. These sessions enabled commercial teams to track and interpret key human rights metrics, leveraging these insights to inform their ongoing supplier engagement.

Responsible sourcing onboarding and capability training was delivered to 62 suppliers in multiple languages, including English, Mandarin and Thai, helping suppliers understand our RS Standards, due diligence requirements and remediation expectations. We also promoted awareness of our Supplier Speak Up Program, educating suppliers on our expectation that they display Speak Up materials at their sites during onboarding. Additionally we engaged 20 supplier participants at our annual non-trade Shanghai roadshow to share common audit findings and practical remediation strategies.

We also updated our RS Standards to clarify scope requirements and expand their progressive application across lower-tier suppliers. Simultaneously, we refreshed our RS Supplier Guidelines to recognise additional social compliance industry programs for mutual recognition. We communicated these changes broadly to suppliers to support clear understanding and seamless implementation across our supply chain.

Enhancing audit quality

Strengthening audit quality improves the reliability of one of our key due diligence controls, and we partner with audit schemes and certification bodies (CBs) to escalate concerns and advocate for improvements that strengthen the consistency and effectiveness of audits.

In F26, we escalated seven audit quality issues and worked directly with schemes to investigate root causes and reinforce expectations. For example, we escalated concerns where multiple CBs had applied inconsistent approaches to audit scope, overtime calculations and NC closure, as well as governance weaknesses within audit schemes that affected oversight, escalation and confidence in audit outcomes. Addressing these issues helps improve the consistency, integrity and effectiveness of supplier due diligence.

Beyond individual cases, we continued engaging with audit schemes, CBs and industry initiatives, including the Social Sciences Citation Index (SSCI), through regular working groups, member forums and consultations to support greater consistency in audit quality and the identification of human rights risks. During the year, we also contributed to Sedex's consultation on improvements to the SMETA methodology, including issue titles and corrective action reporting, helping drive a more consistent framework for identifying, classifying and reporting issues across audit schemes.

Improving transparency and visibility in our supply chain

For high-risk commodities, the most serious challenges to human rights often sit deep within the supply chain, far beyond the partners we deal with directly. To protect the people who make our products, we are committed to improving transparency beyond our direct suppliers.

While we maintain strong visibility over our direct, tier one suppliers, our FLRA confirms that the most severe human rights risks – such as forced labour, debt bondage and worker exploitation – often occur deep within the supply chain, sometimes multiple layers removed from our direct control. These risks are largely caused by the complexity of global sourcing, heavy reliance on informal or third-party labour hire, and geographic vulnerabilities where systemic issues make exploitation easier to conceal. Crucially, Australian audits are revealing a higher prevalence of exploitation indicators – including abuse of vulnerability, debt bondage, and deception. This finding reflects our domestic exposure to vulnerable migrant, seasonal and third-party labour hire arrangements.

We are committed to improving end-to-end transparency, with an objective of mapping the journey of our products from the farm or vessel. By illuminating these hidden tiers, we can accurately identify the root causes of risk and provide that every person who contributes to our products be treated with dignity and respect. We take a risk-based approach to determining which categories we prioritise to work towards improved transparency beyond tier one. 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 visibility of some tier two or tier three suppliers, and we now have visibility of 1,070 supplier sites in our fresh produce supply chain. This includes all direct (tier one) sites, and some tier two and tier three sites (our suppliers' suppliers' sites). This is a 21% reduction in visibility compared to F25, due to a change in permission settings on the Fair Farms platform. We are working with Fair Farms to identify sites where visibility has been impacted and restore access to this information. We are also progressively expanding the scope of the RS Standards to include suppliers in lower tiers of our supply chain, such as requiring all supplying sites (tier two) of a packer or distributor to have an audit. We will work with our suppliers to progressively roll out this requirement. Additionally, we are seeking to strengthen our oversight of tier two and tier three sites without the reliance on external scheme data, and as such we have invested in the implementation of a new system for the Group called 'SpecRight' to build our own direct supply chain mapping. This will establish the multi-tiered visibility we need to actively manage human rights risks across our horticulture supply chain, beyond our direct supplier relationships. While we are currently early in the onboarding phase, our investment in SpecRight marks a shift to a direct-visibility model; in only several weeks, this has already enabled 157 of our tier one F&V suppliers to map and share insights from 787 upstream supplying sites.
- **Seafood:** We have 31 direct seafood suppliers in our own brand and fresh supply chain. In our FLRA, seafood showed lower-than-expected forced labour indicator detection via audits despite known structurally high inherent sectoral and geographic risk. This is possibly influenced by either strong visibility over our tier one suppliers and strong supplier relationships or audit quality. See page 30 for more information on our F26 progress with seafood suppliers.
- **Cotton:** BIG W has continued to increase transparency in its cotton supply chain beyond tier one, enabled by conversion of conventional cotton to BCI traceable cotton. See page 29 for more information.

Challenges and Insights

Our commitment to transparency acknowledges the wider industry challenges. There are multiple, global challenges to achieving supply chain transparency:

- **Visibility gaps are increasing:** Highest risks often sit beyond direct suppliers or core workforce structures.
- **Contractual relationships:** As our direct leverage and visibility naturally decreases the further down the chain we go, we rely on our direct suppliers working with their suppliers to improve visibility.
- **Operational decisions matter:** Forecasting, pricing, staffing, subcontracting and technology design now shape human rights outcomes.
- **Assurance must evolve:** Audits alone are insufficient; stronger use of worker voice, analytics, technology, mapping, and targeted interventions, is needed.
- **Future resilience is linked to people systems:** Supply continuity increasingly depends on fair, stable and sustainable workforce models.

Non-trade

We source products from 5,200 direct suppliers of goods not for resale and service providers required for the operation of the Group's core businesses. Recognising that certain non-trade products and services carry distinct human rights risks, we proactively partner with our suppliers using a risk-based approach.

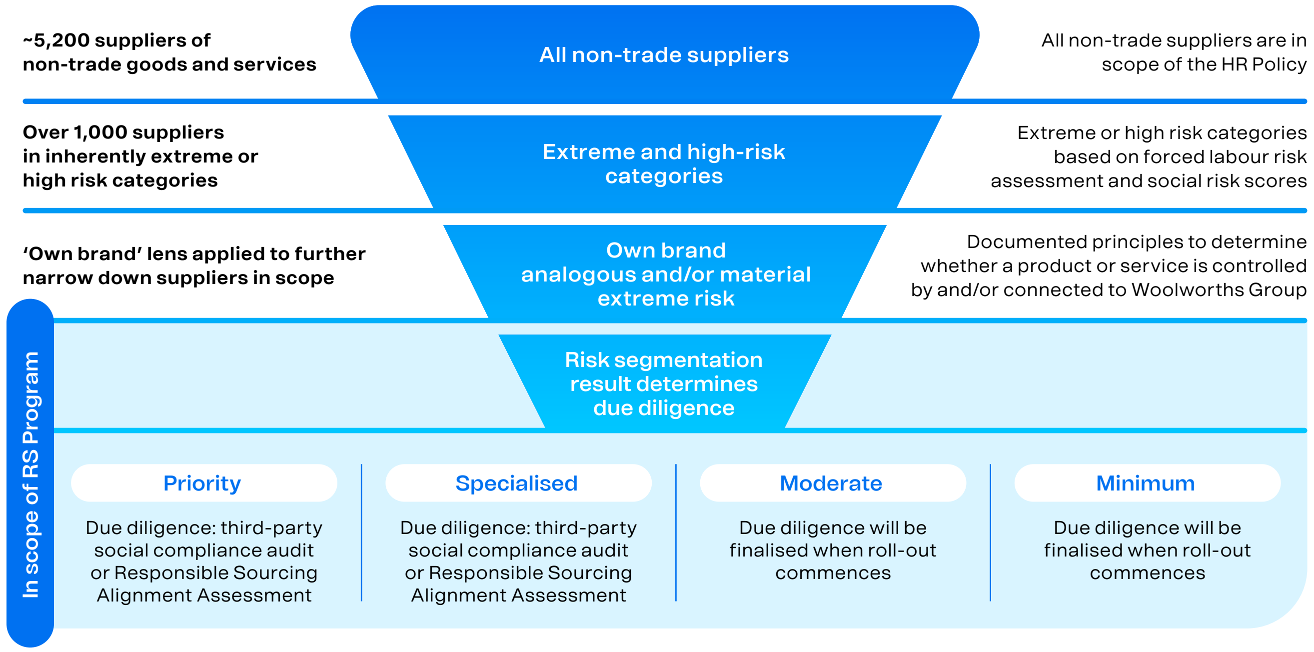
To mitigate human rights risks within our non-trade supply chain, we rely on key controls including policies, template contracts and targeted risk-based approaches. Furthermore, all non-trade suppliers fall under our Human Rights Policy, with standard contracts mandating compliance with this policy. We continue to prioritise due diligence in inherently higher-risk categories, while requiring that all supply chain workers have access to our 'Supplier Speak Up' grievance mechanism. As our RS Program has matured, this has included formally expanding the RS Program to include certain segmented categories of non-trade suppliers.

Expanding our RS Program in non-trade

Human rights risks are dynamic and a modern slavery event may occur anywhere in our supply chain. This has been re-validated by our F26 FLRA, which found that the Group has material risk exposure across both trade and non-trade supply chains. As such, since F23 we have been developing and refining an approach to expand our RS Program to cover key categories of non-trade suppliers. We have taken a number of actions to operationalise this uplift. This has included in-scope supplier risk segmentation to identify which supplier categories are the most inherently high-risk and have sufficient proximity to the Group's activities, followed by developing the appropriate due diligence required for those in-scope non-trade suppliers.

Recognising the limitations of a one-size-fits-all approach, in F25 we developed an approach to assigning appropriate due diligence requirements for non-trade suppliers in each risk segment. Those suppliers considered highest risk, in our priority or specialised risk segments, will be required to undertake either a third-party social compliance audit or a Responsible Sourcing Alignment Assessment (RSAA). In order to implement these different approaches, we collaborated closely with external auditing schemes for the development of a service provider audit framework, and external providers for the development of the RSAA. We piloted both of these new due diligence approaches with non-trade suppliers in F26, with results reported on page 27.

Non-trade supplier risk segmentation process[1]



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, in line with the UNGPs. The segmentation approach for non-trade suppliers is largely consistent with that taken for our trade supply chain, see page 20 for more information.

Piloting the RS Program in non-trade

In F25 we developed the RSAA with a consultancy team specialising in human rights. The RSAA is the required due diligence for non-trade suppliers in-scope of our RS standards who are also reporting entities under the Act. It provides an alternative due diligence approach to a third-party audit for those suppliers who are mandated by legislation to report on how they identify, mitigate and remediate modern slavery risks in their operations and supply chain. This recognises that these suppliers are large reporting entities who likely already have processes in place to manage human rights risks in their businesses, while also giving the Group a level of assurance over inherently higher-risk suppliers' processes.

The RSAA evaluates the maturity of a supplier's human rights related commitments, management systems and controls, and grievance mechanisms and remediation measures. In F26, we piloted the RSAA with 13 strategic suppliers in store delivery logistics, grading them either developing, progressing or established. For each of the questions, suppliers were asked to self-grade themselves, provide written justification and supporting evidence to validate their responses (such as policies or frameworks). The Human Rights team reviewed and graded each question, providing the supplier with a written justification for our grading, how their response aligned with our RS Standards, the UNGPs and the Act, any gaps identified in their management systems, and our suggested actions to uplift these gaps.

Of these 13 suppliers, three were graded as established, 10 as progressing and none as developing. Common gaps identified included measuring and reporting on the effectiveness of actions taken, proactive supply chain management, targeted training, and grievance mechanism and remediation pathways. In H1 F27, we will communicate the results back to suppliers and meet with them to assess how they are progressing on addressing any gaps identified. We will also use these meetings as an opportunity to gather feedback on the RSAA to help inform any future changes before rolling it out more widely.

Case study

Piloting service provider audits

As validated by our F26 FLRA, security service suppliers have an inherently higher risk for modern slavery and human rights issues due to the large outsourced frontline workforce footprint across our retail and DC operations, combined with layered subcontracting, labour-hire exposure and migrant worker vulnerability. To mitigate this risk, we developed an end-to-end labour governance framework explicitly designed to manage legal compliance and safeguard human rights across our security services supply chain.

As part of operationalising this framework, in F24 we conducted social compliance audits of all six key security providers utilising a tailored proprietary audit methodology. Whilst these initial audits successfully identified specific non-conformances against our standards, consequently uplifting our suppliers' internal management systems and processes, they lack mutual recognition across the broader industry. Mutually recognised audit schemes are important for suppliers in helping to reduce compliance burdens and can be implemented at scale, and accordingly our ambition is to use a mutually recognised audit scheme to conduct audits for in-scope non-trade suppliers. In F26 we participated in Sedex's pilot of 'SMETA for Service Providers'; a new service provider audit framework. This framework was piloted with a strategic security provider and a member of our Human Rights Team shadowed the audit process across three Woolworths Supermarket sites, where security guards were directly interviewed by independent auditors.

The audit raised four non-conformances, resulting in the closure of three items, with the final item undergoing further corrective action review. Following the conclusion of the audit, we held feedback sessions with both our security supplier and Sedex to help identify areas for improvement to help make the framework fit for purpose for service providers on an ongoing basis. Recognising the financial burden of per-site social compliance audits, our pilot confirmed that audits can be cost-prohibitive for service providers providing services across multiple sites. The pilot also exposed logistical difficulties in interviewing workers who are based across different locations, as well as getting a large enough sample size of workers to be interviewed. Consequently, we will explore alternative due diligence options for service providers in F27.

Pillar 3 Bespoke interventions

Bespoke interventions

Expanding on the due diligence for in-scope suppliers provided by our RS program, the third pillar of our HR Program encompasses the bespoke interventions we implement to enable us to specifically address the different and more complex types of risks that may arise in different sectors or geographies.

Our frameworks

We have developed specific governance frameworks to structure and guide our approaches to the following two areas of bespoke intervention. While initially developed in F24, we continue to update these frameworks to respond to an ever-shifting risk landscape and to align their governance with our HR Program.

Extreme-risk Due Diligence Framework

Developed in F24, the Extreme-risk Due Diligence Framework (ERDD Framework) addresses human rights risks in some locations or sectors where the risk may be so severe that our program principle of working with suppliers to remediate harm may not be possible. Such risks are often found deep in the supply chain, so the ERDD Framework applies tools like Sayari (see page 10) to identify and mitigate risk beyond immediate tier one relationships.

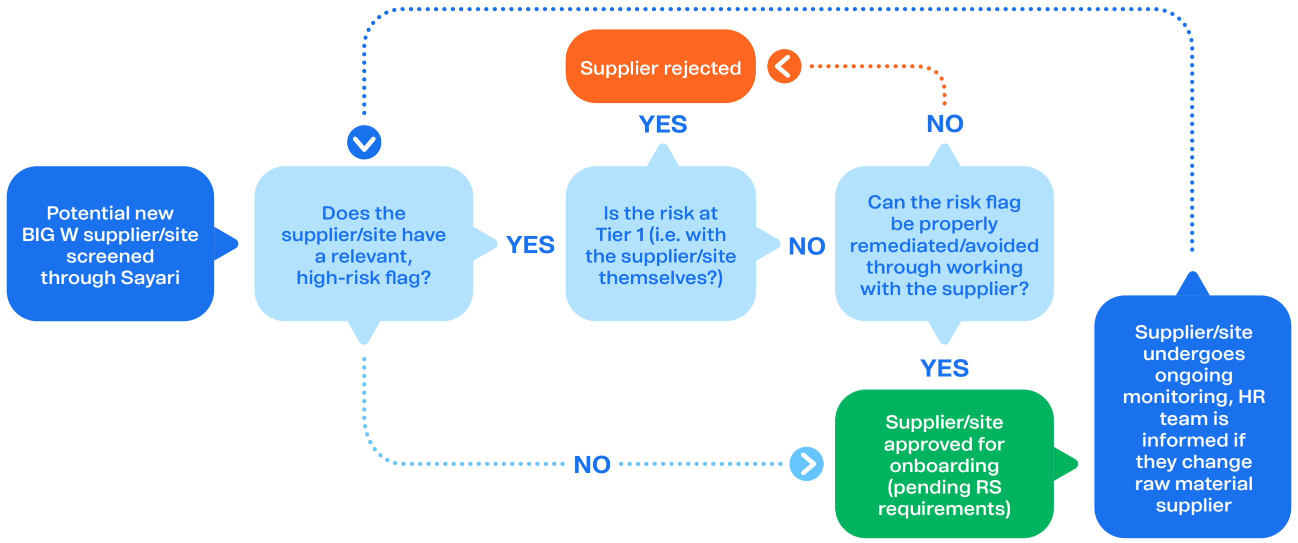
In F26, we updated the ERDD Framework to pre-screen new own brand BIG W suppliers and sites as part of broader onboarding governance updates. Potential new suppliers and sites are screened through Sayari prior to onboarding and rejected if identified risks meet our risk matrix threshold. Consequently, 23 potential new sites and suppliers were screened in F26. In F27, we intend to expand this screening to select Woolworths Retail suppliers.

Guidance Framework for Meaningful Engagement

In F26 we refined our Guidance Framework for Meaningful Engagement with Stakeholders Impacted by Woolworths Group's Operations or Supply Chain (Engagement Framework), to be published in early F27. This framework focuses attention on those whose human rights may be most at risk, and outlines steps we may take to design meaningful engagement approaches to hear, understand and respond to their concerns.

Further, in F26 we continued to deploy a Worker Experience survey supported by the Engagement Framework, to capture workers' experiences in our supply chain, including what matters most to them at work and issues relating to their wellbeing and livelihoods. The survey was rolled out to workers at our worker forum in Koo Wee Rup, Victoria, with results reinforcing wages and safety as key concerns.

Integrating Sayari into the BIG W onboarding process



Category specific due diligence

Tools and strategic approaches like our FLRA help us identify and prioritise particular supply chains, products or regions which may require tailored interventions to better manage their human rights risks. Aligned to our FLRA, below we outline key risk areas in our supply chain and our approach to mitigating human rights risks in that category.

Cotton

Cotton remains one of the highest-risk materials in our supply chain. While traditional due diligence focuses on tier one garment manufacturing, the FLRA validated that forced labour risks have a higher concentration in cotton production, spinning and processing factories, and subcontracted manufacturing, where visibility is more limited. Cotton is used across the Group, particularly in BIG W clothing and home products. Therefore, our interventions are embedded into BIG W procedures and supported by the Human Rights team. This work is guided by our Sustainable Cotton Policy, which supports our commitment to the sustainable and traceable sourcing of cotton.

In F26, BIG W became the first Australian retailer to achieve full Better Cotton certification with the Better Cotton Initiative (BCI). Verified to an auditable standard by independent auditors, over 12.5 million garments were sourced using traceable Better Cotton in F26. We will continue to scale these efforts in F27.

Simultaneously, BIG W became the first Australian retailer to achieve Gold Member status in Oritain's global cotton verification program, strengthening our ongoing partnership. While digital platforms (such as the Better Cotton Platform) track documentation and chain of custody, Oritain provides the ultimate layer of physical validation by confirming the origin of the product. Oritain uses forensic traceability technology to independently verify the origin of our Australian cotton.

In F26, BIG W conducted 221 cotton origin tests, achieving a 90% positive verification result. Where a supplier's products do not meet the verification standard, the product is not labelled as Australian cotton, and the supplier is subjected to a thorough internal investigation and audit to determine the cause of the issue. To deepen our understanding of the Australian cotton manufacturing process and the impact of our traceability programs, our team undertook over 20 factory site visits in F26, including participating in Cotton Australia's 'Camp Cotton' farm tour in the Namoi Valley, further strengthening relationships with our supplier partners.

Enabling responsible cotton activities

Tiers within our cotton supply chain:

Farming and ginning: We are increasingly sourcing our cotton through certified schemes like BCI that support global farmers with training in sustainable growing practices and address human rights risks throughout the supply chain.

Yarn production: Cotton's identity must be maintained during yarn production. The BCI's Better Cotton Platform digitally tracks global cotton transactions from spinner-to-mill, supporting integrity along the cotton supply chain.

Fabric production: As a certified BCI partner, we uphold their Chain of Custody Standard, which provides visibility and helps maintain integrity throughout manufacturing.

Suppliers: We invest in on-the-ground teams in our major product manufacturing countries to foster strong, collaborative partnerships with suppliers.

Retail (BIG W): We are delivering on our commitment to a sustainable and transparent cotton supply chain through our longstanding support for Australian cotton and our expanding adoption of Better Cotton fibre. Today more cotton than ever in BIG W products is sustainable and traceable to its country of origin.

Seafood

Like cotton, seafood is one of our most complex supply chains, often spanning multiple countries, intermediaries and processing stages. The sector relies heavily on migrant labour and recruitment intermediaries, and work is frequently undertaken in isolated environments, often for extended periods of time and at lower tier operations where visibility is limited. These structural characteristics increase workers' vulnerability to exploitation and make forced labour risks more difficult to detect through traditional social compliance audits conducted at direct supplier sites.

Our F26 FLRA reinforced seafood as a priority category and identified that, despite its inherently elevated risk profile, forced labour indicators identified through traditional audits remain lower than expected. While this may reflect stronger supplier controls and performance, it may also indicate that some of the most significant risks are occurring outside the areas currently visible through standard audit mechanisms. In particular, the FLRA highlighted that recruitment-related risks are increasingly situated beyond direct supplier visibility, particularly across migrant recruitment pathways, labour contractors and pre-processing operations.

These findings align to our due diligence approach. While our RS Program provides oversight of direct suppliers, we are increasingly focusing on strengthening visibility beyond tier one to better understand the recruitment systems, labour intermediaries and workforce arrangements that influence worker outcomes before products enter our immediate direct supply chain. This recognises that traditional audits alone cannot provide a complete picture of risk in complex seafood supply chains and additional methods of triangulation and deeper visibility are necessary.

In F25, we conducted a targeted analysis of over 60 direct seafood suppliers/sites and in F26, we built upon this with 44 direct processed seafood suppliers/sites screened using Sayari to identify potential exposure to human rights risks beyond audit data and at deeper levels of the supply chain. We will continue this work in F27. To test our own effectiveness, we also conducted an internal review of our RS Program systems data to identify and rectify system gaps across several seafood sites. These initiatives are strengthening our ability to identify and address risks that may not be visible through traditional audits alone.

Meat processing

While Australia's meat processing sector operates within a relatively strong regulatory environment, structural workforce characteristics continue to create elevated risks of labour exploitation. Regional labour shortages, high workforce turnover and increasing reliance on temporary migrant workers, LHPs and recruitment intermediaries can create worker dependency through employer-arranged accommodation, transport and visa arrangements. These practices can reduce visibility over recruitment practices, including the payment of recruitment fees to secure employment and other employment conditions.

Our F26 FLRA identified Australian meat processing as a targeted focus area for enhanced due diligence. While our supplier footprint in this category is relatively small and we have good visibility of direct supplier sites, the FLRA identified a disproportionately high concentration of potentially severe forced labour indicators in audit results, suggesting risk is driven less by supplier scale and more by the structural workforce arrangements that characterise the sector.

During F26, audits across our meat supply chain identified an upward trend in recruitment fee findings, predominantly affecting migrant workers recruited from the Philippines. This risk is materialising prior to workers entering the supply chain, however it reinforces the need for strong controls and improved visibility of the recruitment conditions of migrant workers.

More broadly, major Australian meat processors are increasingly relying on PALM Scheme workers to address regional labour shortages, which reinforces that recruitment systems and labour mobility can be critical drivers of human rights risk.

In response, we are strengthening our due diligence approach in our meat supply chain. We have identified the opportunity to expand our Responsible Recruitment Addendum to formally extend its requirements to Australian operations so that domestic LHPs and migrant worker pathways are subject to the same rigorous expectations as our international supply chains and will progress this in F27. We also engaged an independent human rights consulting firm to undertake a targeted assessment of recruitment fee risks specific to Australia. The findings will inform the development of a practical responsible recruitment toolkit to strengthen our approach to expanding our Responsible Recruitment Addendum requirements and identifying, investigating and remediating worker-paid recruitment fees across our supply chain (see page 32 for more information).

Renewable energy equipment

We recognise raw materials used to manufacture renewable energy equipment, such as polysilicon and cobalt for lithium-ion batteries, present an inherently higher risk of modern slavery. Our sustainability goal to reduce Scope 1 and 2 emissions by 80% by F30, and over the longer term achieve net emissions, has involved the ongoing procurement of solar panels and electric vehicles (EVs). This growing renewable energy and EV transition, combined with the inherent risk factors, has seen renewable energy equipment identified as a high-risk category in the F26 FLRA. The following controls are in place to mitigate this risk:

- we have strong contractual controls, including sourcing restrictions that contractually prohibit suppliers from procuring goods from certain entities
- all potential suppliers of solar panels and EVs are required to undergo Sayari pre-screening, with results used to inform sourcing decisions
- as a precondition prior to purchase, it is mandatory for potential EV suppliers who will supply EVs to the Group on an ongoing basis and carry Group branding on the vehicle to undergo a social compliance audit at the manufacturing facility.

In F25, we disclosed that we had remediated a forced labour indicator at a site in our EV supply chain. In F26, this site was required to undergo an unannounced social compliance audit to verify that they were continuing to adhere to our RS Standards, which encouragingly confirmed that the site continues to maintain a high standard of compliance with our expectations. We are cognisant that this is an evolving risk area, with increasing forced labour scrutiny linked to ownership opacity and network traceability. We recognise that the highest risks in this supply chain are at lower supply chain tiers, and accordingly our focus is on improving supply chain visibility.

Logistics

As confirmed by the F26 FLRA, there is an inherently higher risk of human rights issues in the logistics and transport industry due to key risk factors such as a high proportion of migrant workers who may be less aware of their workplace rights and disaggregated business models that rely on subcontracting and outsourcing. The Group engages logistics suppliers to deliver products either to our retail stores and CFCs, to business customers, or directly to customers' homes. Each method of delivery has its own risks – home delivery is less predictable and therefore more challenging to schedule in advance, leading to a reliance on subcontracting to provide the required flexibility, whereas store delivery involves delivering products in larger trucks for longer distances, which may involve higher safety and fatigue risks.

To balance inherent risk with the unique nature of how the service is provided across the Group, we have developed the following controls:

- implementing a Fair Pay and Entitlements Framework in Australia to outline our minimum expectations of on-demand platform partners regarding rates of pay, working conditions and access to dispute resolution for drivers who are delivering on behalf of the Group
- partnering with a key home delivery supplier to uplift their management of subcontractors, leading to them implementing a Social Responsibility and Compliance Code for subcontractors who perform home delivery services for the Group, as well as auditable standards that every subcontractor is audited against annually, with results reported back to the Group
- piloting the RSAA with 13 of our largest store delivery suppliers who are also reporting entities under the MSA, to assess their maturity in managing human rights risks and partner with them to uplift that maturity where required.

Going forward, some of these suppliers will be in scope of the RS Program (see page 26), but given the level of heightened risk we recognise that logistics will continue to require bespoke interventions. This work will progress in F27.

Pillar 3 Bespoke interventions

Partnering to promote responsible recruitment

Over the last five years, responsible recruitment has emerged as a key issue in our supply chain. While we continue to build upon our work promoting responsible recruitment in South-East Asia through our Responsible Recruitment Addendum and now with the Ethical Recruitment Marketplace, we also recognise that this issue is not localised to this region.

Malaysia

In Malaysia, although previous restrictions on foreign worker permit quotas have been lifted, new regulations raising the minimum salary requirements for foreign work visas aim to reduce the country's reliance on foreign migrant workers. This could potentially reduce the risk of unethical recruitment at supplier sites in Malaysia, however we continue to monitor best practice approaches and improved controls, as well as any NCs relating to recruitment fees and similar issues.

In F26, no new NCs relating to recruitment issues were identified through audit reports for supplier sites in Malaysia. This is a positive sign of the maturity and efforts by our Malaysian suppliers to build their responsible recruitment initiatives.

In addition, in F26 one supplier in Malaysia repaid historical recruitment fees paid by nine Nepalese workers, totalling ~$14,200. These fees were identified by audit in F23. As part of their due diligence, the supplier interviewed the affected workers and secured signed consent forms to facilitate the repayment process. Despite these fees being charged before we launched the Responsible Recruitment Addendum (RRA) in 2022, the supplier has repaid regardless, again signalling an increased maturity in our Malaysian supply chain.

Thailand

Human rights risks for migrant workers in Thailand, particularly those fleeing conflict from neighbouring Myanmar and Cambodia, remain high. Although new policies from the Thai government allowing refugees in border camps to work legally and extending the expiry dates of migrant worker permits have alleviated some issues, we are still monitoring our Thai supply chain closely for issues of excessive recruitment fees and debt bondage.

Minor recruitment fees (<~$10AUD per worker) were identified through audit at one supplier site in Thailand in F26. However, responsible recruitment issues were identified at six other Thai sites through our partnership with Issara, including illegal recruitment fees, legal documents not being provided to workers and workers' own documents being unreasonably retained. In these cases we continue to monitor remediation with both Issara and the supplier, confirming a total of THB40,000 repaid to five workers at one site where fees were charged so far. The fact that these issues were not raised by social compliance audits at the corresponding sites 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.

Reviewing trends in responsible recruitment across our supply chain

While the perceived risk of responsible recruitment issues outside South-East Asia is lower, our RS Program data reveals an increasing severity of recruitment issues in other countries. Notably, our F26 FLRA identified Australian meat processing as an emerging forced labour risk, driven by a growing reliance on temporary migrant workers, LHPs and complex recruitment pathways. During F26, this risk materialised within our supply chain when audits identified 119 workers across four Australian meat processing sites who reported paying up to ~$5,000 each in recruitment fees. All cases involved individuals recruited from the Philippines via third-party agents. While our extensive engagement with the regulated PALM scheme grants strong oversight, recruitment mechanisms outside this framework are less transparent, making worker-paid fees significantly harder to detect and investigate.

We are partnering closely with affected suppliers to manage ongoing investigations and remediation. Immediate supplier responses include terminating contracts with non-compliant LHPs, engaging legal counsel to recover fees from agents and expanding worker interviews to uncover the full extent of exploitative charges. Looking ahead to F27, we will review and adapt our RRA to expand its application outside South-East Asia, prioritising a broader roll-out across Australia.

An update on the Ethical Recruitment Marketplace

Addressing the root cause of modern slavery issues remains core to our approach. In F25, we initiated the 'Ethical Recruitment Marketplace' through our partnership with the Consumer Goods Forum and members of the Human Rights Coalition.

The Ethical Recruitment Marketplace (Marketplace) adopts learnings from our finding – and remediation – of modern slavery and our previous work on responsible recruitment, and seeks to bring scale by building an ecosystem of multiple partners across the migrant worker recruitment journey.

No worker should pay for a job. It is a simple principle, but a major hidden challenge in global supply chains is migrant workers paying excessive or illegal fees to get a job, potentially trapping them in debt bondage. Tackling such a deeply rooted problem requires a systems-based strategy that connects multiple initiatives. Together with international leaders like Unilever, Nestlé and Mondelēz International we are working to build a system that moves beyond the 'first mile'. The Marketplace seeks to connect the end-to-end ('100 mile') recruitment journey, applying supply and demand principles to make ethical recruitment economically sustainable as part of a virtuous circle of levers.

There are a considerable number of programs in place, however the current landscape of responsible recruitment initiatives often falls short of achieving systemic change because they operate in silos and are only one part of a complex puzzle. Many efforts to date have centred on often isolated compliance-driven approaches – focused on identifying and remediating recruitment fees through audits, isolated capability building or certification programs. Siloed efforts alone cannot solve the systemic problems that drive exploitative practices as they do not consider nor respond to the grassroots drivers and risks which are economic in nature. The Marketplace seeks to overcome this barrier by building the framework which connects all of these interventions into a systems-based cumulative response. Rather than tackling the 'first mile' we will seek to tackle the '100 mile' recruitment journey from brands at one end to the workers in sending countries at the other.

In F26, the Marketplace has focused on:

- the co-development of a progress model with a pathway towards certification for Ethical Recruitment Agents, supported by expert input from a number of key partners including International Organization of Migration, Clearview, Equitable Food Initiative and Humantics
- developing the foundational web platform for the Ethical Recruitment Marketplace, designed to serve as the digital 'front door' for fair hiring. Rather than having a fragmented landscape of standalone tools, this platform centralises the collective ecosystem of initiatives under one roof. By building this central hub, it will be easier for the industry to adopt transparent recruitment practices
- initiated a request for proposals to fund research that quantifies the business case for ethical recruitment. Historically, ethical recruitment has been viewed by many as a compliance cost or a moral obligation. We know it is much more than that – it is a driver of deep organisational resilience. Looking at the end-to-end supply chain, this research will measure the commercial benefits of holistic, ethical hiring programmes. It seeks to capture the hidden value of doing things right – such as reduced worker turnover, lower recruitment and retraining costs, higher productivity, the mitigation of supply chain disruptions as well as the comparison of opportunity cost of recruiting unethically. For the Marketplace to succeed globally, more businesses need to come on board. By providing verified data that ethical recruitment delivers a strong commercial return, we empower other businesses to prove that protecting workers is not just the right thing to do – it is good for business too.

Historically, the true cost of global recruitment has been a 'black box', allowing exploitative fees to remain hidden. To help solve this, the Consumer Goods Forum Human Rights Coalition (CGF HRC) has contributed funding to Impactt (an expert human rights advisory group) to support the development of the *Ethical Recruitment Atlas* – an interactive, public database built on interviews with over 17,000 migrant workers across 119 migration corridors. You cannot fix what you cannot measure and providing businesses with access to reliable, verified data showing exactly what it costs to recruit a worker safely and legally across different global corridors can be a catalyst for change.

Clear visibility into real recruitment costs allows the Marketplace to provide businesses with shared-cost calculations, enabling brands and suppliers to progress shared-cost models of ethical recruitment. By making true costs transparent, we aim to realign financial incentives across the supply chain and level the playing field. In F27, we hope to launch the Marketplace Minimum Viable Product (MVP) and invite other brands and organisations to join.

Pillar 3 Bespoke interventions

The 100 mile recruitment journey

Often referred to as the 100 mile recruitment journey, a worker will go through multiple steps before arriving at their eventual workplace. The Marketplace aims to connect the 100 mile recruitment journey, applying supply and demand principles to make ethical recruitment economically sustainable.

Recruitment

Local worker sees a job advert through a local recruitment agent for an opportunity abroad. Recruitment agent charges worker a fee to be considered for the role.

Interventions for recruitment agents

- Mutually recognised maturity pathway for labour agents
- Mutual recognition of recruitment agency audits
- Tools and technical support to facilitate adoption and progression towards ethical business

Migration

Worker is put forward to recruitment agent in destination country to be interviewed for the role. Worker pays a fee for the opportunity.

Interventions for workers

- Identification and adoption of shared grievance and inclusive labour monitoring
- Promotion and sharing of transparent information and education on ethical recruitment
- Support for services to facilitate direct recruitment by suppliers

Employment

Worker is employed with manufacturer, who does not have processes to check that workers have been recruited ethically. Worker is already indebted before even commencing and will spend years repaying for the privilege of a job.

Interventions for suppliers

- Directory of end-to-end service providers to support ethical recruitment activities
- Development of tools/resources where gaps in existing materials exist (e.g. responsible contracting and procurement)
- Sharing transparent data on true recruitment costs

Buying companies

Buying company has a global supply chain footprint, sourcing products from multiple countries. Extends its orders with manufacturer who then expands its employment needs.

Interventions for buying companies

- Tools and methodology for labour and recruitment cost ring-fencing
- Harmonisation of due diligence approaches
- Measurement of ROI on ethical recruitment

Governments

Governments and policymakers set regulations on migrant worker recruitment in both sending and receiving countries.

Interventions for advocacy

- Identification of key policy and legal barriers to ethical recruitment markets
- Advocacy to address policy and regulatory barriers to ethical recruitment.

Evolving our beyond audit approach

While social compliance audits remain a core component of our due diligence, we recognise their inherent limitations as point-in-time assessments. To complement audits, we utilise worker voice tools to capture real-time sentiment and direct grievances from workers. We are also continuing to lay the groundwork for a comprehensive Responsible Purchasing Practices strategy.

Listening to workers through worker voice

In F26, we refined our worker voice approach as part of our broader beyond-audit strategy. Building on previous pilots, we assessed scalable solutions across Australia and Asia to enhance worker engagement, validate supplier remediation, and strengthen overall risk visibility.

Our partnership with Issara continued to provide an additional source of insights into worker experiences. Over the past two years, workers from 20 sites raised 103 grievances through Issara's multilingual helpline, with 98 now collaboratively remediated. During F26, commonly reported issues included recruitment fees, unpaid entitlements, overtime, and unfair dismissal. Recruitment fees ranged from TBH~100 to TBH~18,000; while financial impacts varied, it is estimated that more than 500 workers may have been impacted by paying these fees, demonstrating system scale across corridors.

Learnings from our Australian horticulture pilot also informed our approach. While worker voice successfully identified and addressed incorrect transport and accommodation deductions, broad sentiment surveys proved less effective for smaller suppliers where preserving worker anonymity can be difficult. Additionally, unstructured feedback frequently surfaced highly individualised grievances rather than systemic risks. Consequently, we are transitioning worker voice into a targeted verification tool, focusing explicitly on specific high-risk areas – such as recruitment fees, overtime and wage deductions – to verify supplier corrective actions are effectively embedded in practice.

Continued progress on Responsible Purchasing Practices

Responsible purchasing practices (RPP) continues to form an important part of how we monitor whether our commercial actions inadvertently incentivise unethical labour practices. Simultaneously, we recognise opportunities to better integrate human rights performance into business decision making to promote responsible procurement principles. This year, we continued to lay the groundwork for a comprehensive RPP strategy, committing to embed a human rights supplier scorecard in our 2030 Sustainability Plan. Through this goal we aim to reward suppliers exceeding minimum compliance and incentivise positive behaviours – shifting from a purely risk-based lens to one that makes strong performance visible and commercially meaningful.

While the garment sector utilises structured frameworks like Action Collaboration Transformation on Living Wages (ACT) and Ethical Trading Initiative (ETI) to align RPP frameworks, the agricultural sector lacks a unified industry-wide equivalent to address its unique seasonality. Consequently, RPP has emerged as a key workstream within the Marketplace, providing the forum to address mutual recognition and reduce supplier audit burden. Aligned with the Marketplace's core principles of using market levers to incentivise responsible recruitment, we aim to reduce complexity and duplication across brands, supporting suppliers to seamlessly embed responsible recruitment within their businesses.

Beyond audit strategy

While audits are a key due diligence mechanism in our RS Program and continue to surface issues, we recognise that the most severe cases of forced labour do not occur in plain sight; they are systematically concealed to deliberately evade traditional auditing and oversight. We are therefore taking our learnings from the past three years of progress with worker voice and RPP initiatives to develop a holistic beyond audit strategy. This strategy will be a key enabler to the Group achieving the human rights goals outlined in the 2030 Sustainability Plan, and will reflect how beyond audit tools fit as part of our broader HR Program. We will progress this work in F27.

Investigating worker grievances

The fourth pillar of our HR Program reflects our commitment to enabling workers in our supply chain to directly raise complaints with us about adverse human rights impacts in our supply chain. Providing access to trusted and effective grievance channels, such as our Supplier Speak Up channel, is critical to achieving this.

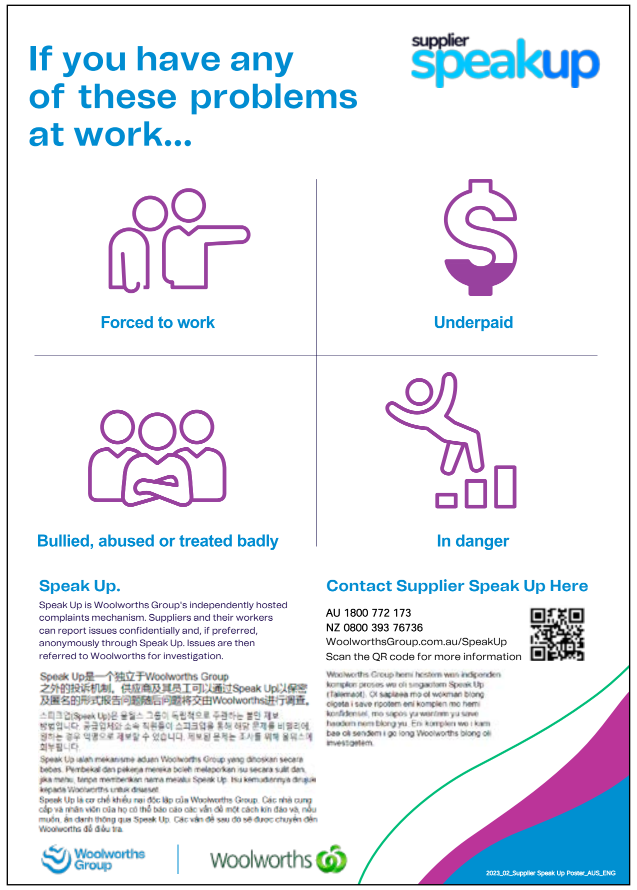
This year, we investigated a total of 33 human rights related grievances raised by workers across our supply chain. Grievances were raised through numerous channels, including our grievance mechanism, Supplier Speak Up (76%), and referrals from other business units or direct contact from workers (24%). In F26, there was a 23% decrease in investigations when compared to F25. This is due in part 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, 840 Woolworths Supermarkets across Australia have moved towards insourcing cleaning and trolley collection. As disclosed in our F25 Statement, 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. Direct employees of the Group can utilise Team Member Speak Up to raise grievances, and those grievances are outside the scope of this Statement.

Continuously improving our Supplier Speak Up Program

In line with United Nations Guiding Principle 31, we recognise the importance of making sure our grievance mechanisms meet the eight effectiveness criteria, including accessibility and transparency. This year, we continued to strengthen our Supplier Speak Up Program to meet these criteria by:

- translating our Supplier Speak Up poster into six languages commonly spoken by workers in the PALM Program to increase the accessibility of Supplier Speak Up amongst horticulture and meat processing workers. We worked with the Australian Workers Union to make sure that the languages we selected were commonly spoken by workers in these industries, and have commenced the distribution of these updated posters
- updating our Human Rights Grievance Standard Operating Procedure to specify the potential outcomes that may occur as a result of an investigation (e.g. repayment of monies owed) and outline specific escalation pathways for contesting the outcome of grievances
- updating the Group's Human Rights webpage to improve the accessibility of our Program's resources, including Supplier Speak Up, for workers, suppliers and external communities.

During F27, we will continue to monitor our Supplier Speak Up Program's effectiveness, including tracking trends in grievance numbers and topics.



Supplier Speak Up poster.

Cleaning and trolley collection suppliers

In F26, 13 requests for assistance were received from workers in the trolley collection and cleaning supply chains in Australia and New Zealand, including 11 grievances raised through Supplier Speak Up and two through direct contact.

The most common allegations included underpayments (70%). 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 F26, a total of ~$33,098 was paid to three workers at five sites (noting some workers work across multiple sites). Once all issues, including underpayments, were rectified, consent to engage three subcontractors was withdrawn, resulting in them being prohibited from being re-engaged at any site in the future.

In New Zealand, we investigated one Supplier Speak Up grievance from a trolley collector in a Woolworths New Zealand Supermarket. The worker alleged that they were not being provided appropriate PPE, including insufficient sun protection. We worked with the supplier to make sure that PPE was provided to all workers, and also partnered with the supplier to strengthen their health and safety management systems so that health and safety risks were appropriately identified and managed within their business.

Supply chain

In F26, our Human Rights team received and investigated 20 complaints regarding alleged breaches of our RS Policy and/or Standards, 15 of which were raised through Supplier Speak Up. Allegations ranged from safety concerns, underpayments and excessive overtime, through to illegal phoenixing activity and unauthorised subcontracting. Sixteen of these investigations are now closed, with four ongoing.

In regards to all grievances for F26, where allegations were substantiated, remediation varied based on the nature of the cases but included: repayment of money withheld or underpaid; clearly communicating to our suppliers, and their subcontractors our expectations under our RS Standards; and with complainants' consent, referral of some matters for further investigation by Woolworths' direct supplier.

In F26, our two most prevalent categories for grievances were from workers in our horticulture and logistics supply chain. This year 45% of grievances we received were from workers in our logistics supply chain. This includes grievances from workers who deliver products from DCs to retail stores, as well as drivers who deliver direct to customers' homes. This builds on a trend from F25, where 27% of grievances were from drivers in this same category, and is consistent with logistics being identified as a high risk category in our F26 FLRA. 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 were underpayments and safety concerns. Six of these grievances related to the same supplier, and as a part of our investigations we have uplifted our contractual controls to require the supplier to remediate issues identified in their supply chain. The percentage of grievances for horticulture remains relatively consistent with F25 (25% F26 v. 30% F25).

Through our investigation of grievances we may substantiate allegations of worker exploitation. We recognise that worker exploitation occurs on a spectrum and unless otherwise stated in this Statement, these grievances do not amount to modern slavery indicators or modern slavery. When allegations are substantiated, we seek to make sure the worker is remediated, as well as support the supplier to put in place controls to prevent recurrence. For example, this year we put in place a MAP with one supplier in our apparel supply chain. These action plans are monitored by our team to make sure suppliers close out issues identified during the investigation and, where required, remediate workers.

Breakdown of business units in our supply chain that received grievances in F26

Case study

Investigating risk in our store delivery supply chain

This year we received an anonymous complaint by email 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 subcontracted drivers were working in excess of their visa working hour restrictions and that contractors were employing drivers with no or limited work rights. These allegations also raised concerns that our direct supplier was not monitoring its subcontracted workforce in accordance with our expectations. This triggered an investigation, whereby the direct supplier conducted a deep dive of their own processes which substantiated that a small number of subcontractors were engaging drivers who were working in excess of the working hour restrictions set by their student visa conditions.

This issue was promptly remedied by the supplier, but the investigation prompted us to partner 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:

- improving monitoring of drivers on student visas, making sure that drivers can only be engaged by the supplier when they have the right to work in Australia
- implementing checks to verify that subcontractors were not further subcontracting
- uplifting their existing audit program to include verification that contractors were paying subcontractors the correct rates of pay and entitlements, and keeping accurate payslips.

Case study

Grievances in our garment supply chain

In F26, three independent reports were managed after being raised by workers across different sites for the same garment supplier over an 18-month period, describing consistent patterns of inappropriate management behaviour, including allegations of verbal abuse, bullying and workers feeling unable to safely raise concerns. While each report was investigated individually, the recurring nature of the allegations indicated a broader workforce culture issue requiring deeper engagement.

Rather than treating the grievances as isolated incidents, we worked directly with the supplier's senior management to review the underlying causes. In response, the supplier undertook an internal investigation, supported by a survey of 163 workers across the site. While the survey results identified many positive responses, they also highlighted opportunities to strengthen supervisor behaviour, increase worker confidence in grievance mechanisms and reduce workers' fear of retaliation. The supplier subsequently implemented a management action plan comprising short, medium and long-term actions which included a review of internal procedures, strengthening communication with workers, providing leadership and wellbeing training for managers, and improving awareness of available grievance channels.

Recognising that supplier-led assessments alone cannot validate whether workplace culture has genuinely improved, we are partnering with an independent third party to conduct worker voice surveys across the supplier's three sites. The surveys will help to validate whether corrective actions have been embedded in practice and identify any remaining gaps requiring further remediation.

Our partnerships

In aspiring to take a leadership role in advancing human rights, partnerships are a key strategic priority for us to scale our interventions, address root causes and shine a light on potentially systemic practices. We implement this pillar of our HR Program through key industry appointments and collaboration, engaging with governments and regulators, and increasing advocacy in key risk areas.

Human Rights and Responsible Sourcing Program partners

We partner with human rights specialists as our external partners including Humantics, 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 concluded a three-year term on the amfori Board in F26, 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. We have a Memorandum of Understanding with the Retail Supply Chain Alliance (RSCA), and in F26 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 ACT.

Industry collaborations and advocacy

Modern slavery is a global challenge that can only be ended by working with others. 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 human rights risks for workers in our horticulture and meat supply chains (see page 41) as well as our support for mandated supply chain due diligence.

Our advocacy

We have an ambition to play a leading role in advancing human rights, including addressing the most salient human rights issues in our supply chain. A key part of realising this ambition is advocating for industry or regulatory change where we identify an opportunity to address a root cause of human rights issues in our supply chain.

Our advocacy is data-led and risk-based – we utilise data from our HR Program alongside our risk assessments to identify opportunities to advocate for change where relevant. We recognise that with our scale there is an opportunity for us to have a positive impact on workers in our supply chain, but equally acknowledge that no global retailer can solve modern slavery alone and that in order to shift the dial, some issues require regulatory or structural change.

This year we have continued to advocate for changes that will address root causes of systemic issues in our supply chain and improve transparency. Our key areas of focus in F26 were:

National labour hire licensing

Labour hire plays an important role in our supply chain, particularly in our domestic horticulture supply chain, enabling suppliers to manage seasonal demands and access workforce flexibility. The majority of LHPs adhere to legal obligations; however, as evidenced by numerous investigations and reports[1] as well as our own RS Program data, some operators exploit regulatory loopholes.

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 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.

In F26, we helped establish a coalition of industry bodies, unions, government agencies, investors and retailers who support the need for a national labour hire licensing scheme. We wrote a joint letter to each State and Territory Workplace Minister, along with the Federal Minister, outlining the need for a harmonised scheme and encouraging them to prioritise this reform. We were pleased to see agreement from the Victoria, New South Wales, Western Australia, South Australia and the Australian Capital Territory governments to consider ways to achieve a consistent approach to labour hire regulation across state and territory schemes, including through model laws. We will continue to advocate for a national scheme to reduce risk in supply chains with a high reliance on LHPs, support suppliers in managing their workforce and ultimately improve outcomes for vulnerable workers.

Reforms to the MSA

Like many other businesses across Australia, we have been monitoring the progress of the proposed changes to the MSA since the *Report of the Statutory Review of the Modern Slavery Act* was released in May 2023. We have actively made submissions on these changes and engaged collaboratively with the Attorney General's Department, with a view to supporting the evolution of regulation where it is proportionate and will ultimately improve the livelihoods of workers across our supply chain. With an estimated 50 million people globally in a situation of modern slavery, we know no retailer is immune to the risk of modern slavery in their supply chains. In line with our HR Program principles, we see finding these issues as a sign of effectiveness, and support changes that enable businesses to focus on transparently identifying and remediating these issues. We support an uplift via mandated due diligence, provided that it gives businesses the flexibility to continue to take a risk-based prioritisation approach to the administration of due diligence.

Progress on the Modern Slavery Bill in New Zealand

With direct suppliers in New Zealand and 181 Woolworths New Zealand stores, we have been reporting on our progress on embedding respect for human rights in our New Zealand supply chain under the Australian MSA since 2020. We are therefore monitoring the progress of the Modern Slavery Bill in the New Zealand parliament closely. We have seen the benefits of the MSA in Australia in uplifting maturity in understanding modern slavery risks, and support New Zealand introducing similar legislation, provided that this legislation is not unnecessarily duplicative for businesses who must report under both the Australian and New Zealand regimes.

1 For example, see the Fair Work Ombudsman's *Harvest Trail Inquiry Report 2018* and *Horticulture Compliance report of 2025*, and the Commonwealth's *Report of the Migrant Workers' Taskforce March 2019*.

Assessing the effectiveness of our actions

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.

We are committed to maintaining effective systems to identify, assess, respond to and proactively manage human rights 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. In F26, the Group risk appetite statement was reviewed and updated to reflect two different risk appetites for this material risk. The intention of this change is to recognise that we have more control and leverage with own brand products compared to vendor brand products. As a Group, we have:

- minimal appetite for modern slavery risks and aspire to take all reasonable measures to achieve risk elimination, when the risk relates to our own brand or own brand analogous suppliers in our supply chain
- a balanced position on modern slavery risk that is neither risk seeking nor risk avoidant, but accepts that some risk is part of doing business when the risk relates to supplier branded products.

Our risk approach provides the guiding framework and risk appetite for 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 F26, the Human Rights team worked closely with the Group Risk team to refine our risk appetite statements to provide greater clarity on the distinct risk profiles of own brand versus vendor brand supply chains. We refreshed our existing metrics and tolerances, while identifying new leading indicators to be implemented in F27.

Our assurance work focused on control design effectiveness, specifically targeting the non-trade supplier RS Program and reviewing our New Zealand human rights operations against Group standards and alignment with New Zealand human rights legislation. We also mapped stakeholder polarisation regarding supply chain visibility to better understand the Group's positioning.

Looking ahead to F27, we aim to execute deep dives into specific business units for more granular insights and expand our reporting to include a balance of leading and lagging metrics for more timely risk oversight.

Key effectiveness indicators for F26

Aligned to our HR Program Pillars, the below table outlines how we assessed our effectiveness and the key outcomes for F26. 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.

HOW WE ASSESS OUR EFFECTIVENESS	EXAMPLES OF F26 OUTCOMES
Pillar 1 Own Operations (manufacturing)	
Identifying and remediating instances of human rights risks in our own operated manufacturing facilities	• Identified 27 major NCs in owned and operated manufacturing facilities, with remediation ongoing
Pillar 2 Responsible Sourcing Program	
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 took appropriate action regarding a potential case of modern slavery in our supply chain • Remediated 195 critical NCs in our supply chain
Monitoring trends in audit results to identify where there have been changes and whether our interventions led to those changes	• Piloted the expansion of our RS Program in our non-trade supply chain
Periodic reviews of the RS Program, including reviews by third parties, to assess whether the RS Program remains fit for purpose	• Continued to strengthen governance, including releasing the updated HR Policy and RS Standards • Ranked #1 by KnowTheChain Benchmark
Examining findings to determine what root causes are contributing to repeated issues	• Identified trends in our audit data, leading to the planned expansion of the Responsible Recruitment Addendum in F26 • Conducted our third forced labour risk assessment (FLRA)
Pillar 3 Bespoke interventions	
Periodical review of risk identification tools to make sure we are considering the dynamic nature of human rights risks	• Given its effectiveness at identifying salient risks in our supply chain, scaled Sayari to better understand other categories in our supply chain
Ongoing review of whether our frameworks to manage bespoke areas of risk are fit for purpose	• Conducted our third FLRA to review which categories are inherently higher risk, validating our approach to strengthening beyond audit controls
Incorporating worker perspectives into our HR Program	• Reviewing worker voice findings for Asia and Australia to include in our beyond audit approach for F27
Pillar 4 Grievances	
Monitoring the number of human rights complaints received to understand if grievance mechanisms are trusted and accessible	• 33 grievances investigated, with a continued increase in grievances from workers in our logistics supply chain
Reviewing the operation of Supplier Speak Up, including through testing the hotline and provided feedback to the third-party host	• Improved accessibility of Supplier Speak Up by translating posters into six languages spoken by workers in the PALM program
Pillar 5 Partnerships	
Considering feedback from suppliers, investors and other stakeholders to identify opportunities for improvement	• 37 site visits, with feedback used to inform HR Program • Seven meetings with civil society and 16 meetings with worker representatives

Progress against objectives

As our HR Program continues to mature, and aligned to the conclusion of the Group's 2025 Sustainability Plan, we set new key objectives to support us in achieving our 2030 goals. The following table monitors our progress against these key objectives, outlining what progress has been made this year and how we will continue to progress in F27.

Operations

OBJECTIVES	PROGRESS AGAINST OBJECTIVES
Monitor evolution of the Group, making sure frameworks remain fit for purpose	**F26:** Incorporated a new pillar to our HR Program – Own Operations (Manufacturing) – to outline how we conduct human rights due diligence in Group-owned manufacturing facilities **F27:** Roll out Own Operations (Manufacturing) pillar to owned manufacturing and food processing facilities
Team member training on modern slavery and human rights, prioritising those managing higher risk categories	**F26:** Human rights team trained in accordance with team training requirements **F27:** Develop a comprehensive Group-wide training approach in partnership with human rights consultants

Supply chain

OBJECTIVES	PROGRESS AGAINST OBJECTIVES AND F25 PLANS
Regularly update the identification and validation our highest supply chain risks via an independent expert forced labour risk assessment	**F26:** Conducted our third forced labour risk assessment in partnership with Humantics **F27:** Implement recommendations from forced labour risk assessment to improve our bespoke due diligence
Continue to review and uplift RS Program to make sure due diligence is effective	**F26:** Updated HR Policy and RS Standards; piloted the expansion of the RS Program in non-trade **F27:** Roll out expansion of RS Program in non-trade to more suppliers
Identify opportunities to advocate for industry or regulatory change	**F26:** Advocated for a national labour hire licensing scheme and contributed to consultation on changes to the MSA **F27:** Continue to monitor HR Program trends to identify opportunities for advocacy
Advance our 'beyond audit' tools, including worker voice	**F26:** Increasingly deployed worker voice as a targeted verification tool **F27:** Incorporate learnings from worker voice pilots into a beyond audit strategy
Embed a human rights scorecard to assess and track progress	**F26:** Partnered with Woolworths Retail to integrate responsible sourcing performance into supplier scorecards **F27:** Complete an external review of industry approaches and develop an F30 horizon plan for delivery
Improve visibility beyond direct (tier one) suppliers of our high-risk supply chains	**F26:** Commenced expansion of the RS Program into tier two of our Australian horticulture supply chain **F27:** Continue to expand RS program into tier two and support the progress of other Group projects such as SpecRight
Improve transparency and contribute towards closing the living wage gap in key high-risk supply chains	We are currently in the planning stages, with dedicated and detailed work plans to commence F28

Delivering on impact

– next steps and future priorities

For the past eight years, we have focused on building robust safeguards to identify, mitigate and remediate modern slavery and severe worker exploitation, particularly with our tier one supply chain.

As we enter the 2030 phase of our Sustainability Plan, our ambition is evolving. We are moving beyond simply 'doing no harm' to actively contributing to the improved livelihoods of the workers in our supply chain. We want to incentivise good practices, address systemic root causes, and make sure that our business resilience is built on a foundation of respect.

F27 priorities

Rewarding care

We want to measure and incentivise doing the right thing. We will focus on expanding our supplier scorecard to assess, track and incentivise supplier partners who go beyond minimum compliance. By giving our sourcing teams clear data on human rights performance, we aim to build accountability directly into sourcing decisions.

Shining a light deeper

We know that the most severe risks of worker exploitation lay deeper in global supply chains. A major priority for the year ahead is extending our line of sight past our direct suppliers and into tier two in key high-risk categories. We want to identify root causes and embed respect for workers' rights where they are most vulnerable.

Integrating forced labour risk assessment findings into our HR Program

We will consider the findings of the forced labour risk assessment to improve our bespoke due diligence in identified high-risk categories and geographies.

Embedding governance improvements

We will embed the strategic governance uplift as well as identify and roll out program improvements based on learnings from both our governance review and forced labour risk assessment.

Horizon priorities

Expanding worker voice and beyond audit interventions

Over the next year, we will expand our worker voice initiatives to allow our program to be guided by the lived experiences of the workers themselves. By providing safe, trusted channels for grievance and feedback, we can empower the people who make our products to help us design better, more effective interventions.

Strengthening our approach to responsible recruitment

While global supply chains carry significant complexity, we are equally committed to protecting vulnerable workers in Australia. We will strengthen our Responsible Recruitment Addendum and actively roll it out across our Australian supply base. We believe true change requires partnership, and we will work to equip our local suppliers with practical, step-by-step guidance on navigating exploitative recruitment fees.

The next phase of our HR Program will increasingly depend on strengthening visibility and oversight across labour systems, workforce models, and operational pressure points that sit beyond traditional supplier compliance monitoring. Future effectiveness will increasingly rely not only on supplier oversight, but on improving the quality, depth and precision of labour-risk detection across complex workforce and supply chain systems.

Appendix 1

Our associated businesses

PFD Food Services

PFD Food Services Pty Ltd (PFD) is Australia's largest foodservice distributor, distributing chilled, frozen and ambient food products, along with non-food items such as cleaning products, to foodservice operators Australia-wide. As of October 2024, PFD became a wholly owned entity of Woolworths Group. PFD's operations are described in the body of this Statement. As integration is ongoing, details of PFD's supply chain and an update on how the human rights risks in the supply chain are being managed are outlined in this appendix.

PFD's supply chain

Supply chain

PFD has a vast supply chain, with over 1,000 direct suppliers providing vendor brands, own brand and fresh products to PFD, which are sold and distributed to approximately 45,000 customer sites every week. PFD products encompass a wide range of categories including frozen, chilled and dry foods, protein, packaging and cleaning products. The largest categories are restaurant ingredients, meat, seafood and pantry items.

The majority of the products that PFD sources are vendor branded, with PFD storing the products in its warehouses before they are distributed to customers. A smaller proportion of fresh products are received by PFD, where PFD will cut and package that product to be delivered to customers with a PFD logo. From a non-trade perspective, although the majority of deliveries to customers are made by drivers directly employed by PFD, PFD also engages 303 contractor drivers and 85 carriers to support in the delivery of goods to customers. PFD also has other contracted service providers such as cleaners.

Identifying modern slavery risks in PFD's supply chain

In F24, PFD completed a desktop risk assessment of its supply chain to confirm high-risk areas. This year, we reviewed the results of this risk assessment and validated them against the results of our FLRA. This process confirmed that seafood and protein products are the categories that have the inherently highest risk of modern slavery in PFD's trade supply chain and will be priority focus areas.

Integration Progress

As PFD is a wholly owned entity of the Group, PFD's suppliers are now direct suppliers to the Group and are therefore in scope of the Group HR Program. Given the complexity and scale of integrating new businesses into the Group, the onboarding of a new business' suppliers is phased over time based on inherent risk and the new business' capability and maturity.

In F26, the Human Rights team worked closely with the PFD team to determine which PFD suppliers are in scope of the RS Program. This involved:

- a category level assessment to identify suppliers in inherently higher risk categories, using our F26 FLRA to guide the selection of high-risk categories
- reviewing which suppliers had a close connection to PFD as a brand, including through the use of PFD's logo or address on pack
- reviewing PFD suppliers to determine if any were already supplying products to the Group and if so, whether they were already conducting RS Program due diligence.

As we worked through this process, we identified that PFD's business model as a food distribution business (rather than a retailer) poses unique challenges to strictly applying the RS Program principles. We continue to work through this process with PFD, and will update our own governance as required to capture any differences in how the RS Program is applied to PFD suppliers.

In F27, we will prioritise suppliers in the highest-risk categories for onboarding to the RS Program, including requiring these suppliers to complete relevant social compliance audits where appropriate. We will also partner closely with PFD to make sure they have internal resources who are trained and capable of administering this due diligence on an ongoing basis.

Appendix 2

Our associated businesses

The Kitchenary

The Kitchenary Pty Ltd (The Kitchenary) is one of the largest ready-meal and convenience food manufacturers in Australia. As of June 2025, The Kitchenary became a wholly owned entity of Woolworths Group. The Kitchenary's operations are described in the body of this Statement. As integration is ongoing, details on The Kitchenary's supply chain and an update on how the human rights risks in that supply chain are being managed are outlined in this appendix.

The Kitchenary's supply chain

Supply chain

The Kitchenary (TK) has a supply chain of over 140 direct suppliers who provide vendor brand, own brand and fresh products. TK partners with these suppliers to manufacture ready-meal and convenience foods for a range of clients including supermarkets and everyday customers. Key categories of TK products include meat, dairy and fresh produce.

One hundred percent of TK's fresh produce is locally sourced and manufactured at either their Australia or New Zealand sites. Raw agricultural products including proteins, produce, dry goods and dairy are transformed into ready-made chilled and frozen meals. To operationalise its business, TK also engages over 400 non-trade suppliers. These suppliers provide services including IT, cleaning, and distribution and transport.

Identifying modern slavery risks in TK's supply chain

TK operates a supplier approval and onboarding process to identify human rights risks in its supply chain. This includes a modern slavery and trafficking questionnaire. In addition to communicating the requirement that all suppliers commit to ensuring their supply chains are not linked to modern slavery, this questionnaire aims to increase visibility over a supplier's risk management processes. Specific questions are structured around: organisation structure, training, supplier engagement and response processes. Responses are reviewed by the Procurement team. Should any potential risks be identified, the questionnaire is escalated to the Chief Supply Chain Officer and Technical Director, who are ultimately responsible for managing any risks. If deemed necessary, they will conduct another risk assessment of the supplier to determine ongoing suitability. This foundational due diligence is supported by established policies which set clear expectations for lawful and ethical behaviour.

Integration Progress

As a wholly owned entity of the Group, all of TK's direct suppliers are in scope of the Group HR Program. Recognising the complexity of integrating a new business to the Group, we plan to take a phased approach to onboarding new TK suppliers. This allows us to manage the scale of the integration by focusing first on high risk areas and matching our timeline to TK's operational maturity.

In F26, the Human Rights team worked closely with TK to determine which TK suppliers are in scope of the RS Program. This involved:

- a category level assessment to identify suppliers in inherently higher risk categories, using our F26 FLRA to guide the identification of high-risk categories
- reviewing TK suppliers to determine if any were already supplying products to the Group and, if so, whether they were already conducting RS Program due diligence.

As a retailer, the Group engages with suppliers in a different way to TK's food manufacturing facilities. As such, we recognised that it is not practical to strictly apply our RS Program principles to TK's supply chain. We will continue to work with TK to address how our HR Program expectations can be most appropriately and effectively applied to their supply chain. This will include reviewing which suppliers have a close connection to TK as a brand, including through the use of TK's logo or address on pack.

In F27, the highest risk categories of TK suppliers, according to our F26 FLRA, will be prioritised for initial onboarding to the RS Program. This will involve determining the most appropriate due diligence requirements for in-scope suppliers including social compliance audits. We will continue to partner closely with TK to make sure their internal resources are trained and capable of administering any ongoing due diligence.

Appendix 3

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 1,130 Supermarkets and Metro and a large eCommerce network.
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)	
Statewide Independent Wholesalers Limited[1,2] (ACN 009 519 546)	
Woolworths (Victoria) Pty Limited (ACN 004 177 155)	
The Kitchenary Holdings Pty Ltd (ACN 108 790 718)	
The Kitchenary Pty Ltd (ACN 619 485 353)	

W Living

REPORTING ENTITIES	ACTIVITIES
Woolworths Group Limited (ACN 000 014 675)	W Living comprises the Group's specialty retail businesses BIG W and Petstock.
Petstock Pty Ltd[1,3] (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, Quantium; and retail media business, Cartology.
Fabcot Pty Ltd (ACN 002 960 983)	
The Quantium Group Holdings Pty Limited[1,4] (ACN 121 842 957)	
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 F26.
2 Statewide Independent Wholesalers Limited registered office is 8 Translink Avenue, Western Junction TAS 7212.
3 Petstock Pty Ltd registered office is 1–3 Humffray Street N, Bakery Hill VIC 3350.
4 Quantium Group Holdings Pty Limited registered office is Bay 12, 2 Locomotive Street, Eveleigh NSW 2015.

Except as described in footnotes 2, 3 and 4, 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 2026 annual reporting documents include:

Annual Report

For a consolidated summary of Woolworths Group's financial, operational and climate performance in F26.

Corporate Governance Statement

Describes the Group's corporate governance framework, policies and practices as at 26 August 2026.

Nature Report

The Group's approach to identifying and addressing nature-related risks and opportunities.

Sustainability Data Pack

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

The 2026 reporting suite can be found at **www.woolworthsgroup.com.au/reports**

Company directory

Registered Office

1 Woolworths Way,
Bella Vista NSW 2153
Tel: (02) 8885 0000
Web: www.woolworthsgroup.com.au

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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