

2024

Modern Slavery Statement



Better together for 100 years

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Acknowledgement of Country

 Woolworths Group acknowledges the many Traditional Owners of the lands on which we operate, and 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.

Woolworths Group supports the invitation set out in the Uluru Statement from the Heart to walk together with Aboriginal and Torres Strait Islander peoples. 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.

Statement on reporting entities

Woolworths Group Limited (ACN: 000 014 675) is an Australian public company listed on the Australian Securities Exchange (ASX: WOW). The Company is registered at 1 Woolworths Way, Bella Vista NSW 2153, Australia. This Statement has been published in accordance with the *Modern Slavery Act 2018* (Cth) (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 1 on page 33) took to identify, assess, mitigate and remediate modern slavery risks in their operations and supply chains during the year ending 30 June 2024 (F24). Woolworths Group Limited makes this joint Modern Slavery Statement (Statement) on behalf of itself and the reporting entities listed on page 33 (other than The Quantum Group Holdings Pty Limited, The Quantum Group Pty Limited and Petstock Pty Ltd who will prepare separate reports for F24). All amounts are expressed in Australian dollars unless another currency is indicated. This report contains forward looking statements. Please read our disclaimer on page 2 of the [2024 Sustainability Report](#) 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. Appendix 2: PFD Food Services and Appendix 3: Statewide Independent Wholesalers, were approved by their respective Boards on 21 August 2024.

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.

MSA CRITERIA	REFERENCE IN THIS STATEMENT
Identify the reporting entity	Inside front cover and page 33
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 6-7
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 8-29
Describe how the reporting entity assesses the effectiveness of these actions	Page 30-31
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 32, 34-38

Section 1

CEO message

This year Woolworths Group is entering its 100th year. We could not have achieved this milestone without people – our Customers, our Team, our Suppliers and the Workers in our supply chain – who are key to delivering on our purpose of *creating better experiences together for a better tomorrow*.

F24 has been a very challenging year; cost-of-living pressures continue to impact customers, an increase in regulatory oversight for Australian supermarkets resulted in Woolworths Group's participation in a number of government inquiries, and we have received a year-on-year increase in issues raised by workers in our supply chain to Supplier Speak Up, our independent grievance mechanism.

Globally, conflict continues to exacerbate human rights risks in supply chains, and the International Labour Organization found that the total amount of illegal profits from forced labour is estimated to have risen 37% since 2014.¹

Modern slavery risks are dynamic. In F24 we were focused on the delivery of new controls to help address evolving risk areas. We:

- tested and rolled out Sayari Graph to help identify supply chain connections and flag potential links to forced labour at multiple supply chain tiers
- implemented a fibre testing program with Oritain to verify Australian Cotton claims on BIG W products
- supported eight labour hire providers in Nepal and Australia to undergo verification of their human rights and recruitment practices
- improved visibility of potential risks in our own operations through conducting a third party audit at three of our distribution centres.

Ongoing commitment is needed for lasting change and partnerships for scale. This is our ambition and we will continue to strengthen existing partnerships and identify new opportunities to address the systemic challenges of modern slavery risks in our supply chain.

As I sign off on my last Modern Slavery Statement as Woolworths Group's CEO, I am immensely proud of the impact our team has achieved as they continue to work in partnership to integrate a rights-respecting approach in our supply chain.

I would like to thank our outgoing Chief Sustainability Officer (CSO), Alex Holt, for her steadfast commitment to championing and embedding our Human Rights Program over the years. I know that Amanda Bardwell and Simon Lowden, the Group's incoming CEO and CSO respectively, are deeply passionate about our Group's purpose including the important work to identify, mitigate and remediate modern slavery risks. There is always more to do and I look forward to watching from afar our team's progress as they embark on the next horizon.

This Statement was approved by the Woolworths Group Board on 27 August 2024 on behalf of all reporting entities covered by this Statement.



Brad Banducci
Chief Executive Officer



Key progress in F24

- + ~\$306,000 returned to more than 310 workers in our supply chain following investigations or proactive monitoring of suppliers' social audit non-conformances
- + Conducted a supplier risk segmentation for non-trade suppliers to help prioritise human rights due diligence in our non-trade supply chain
- + 18 worker voice surveys deployed in Australia, Malaysia and Vietnam to strengthen real time insights into supply chain risks and triangulate audit findings
- + Designed two new frameworks to help improve our ability to identify and mitigate modern slavery risks: an extreme risk due diligence framework and guidance for engaging potentially affected stakeholders
- + 321 representatives from 260 suppliers have completed one or more Group e-learning courses on key aspects of our Human Rights Program
- + 73 human rights related grievances raised by workers across our supply chain, a 59% increase from F23.

¹ International Labour Organization, Profits and poverty: The economics of forced labour (2024).



Our structure, operations and supply chain

Our structure

Founded in 1924, Woolworths Group is one of Australia and New Zealand’s largest retailers. Today, we are a Group of food and everyday needs retail businesses comprising an extensive store network, online shopping platforms and complementary services and businesses that support our cornerstone retail brands.

Woolworths Group is the parent entity, with other subsidiary reporting entities. Details of each reporting entity covered by this Statement, together with a description of their respective activities, are set out in Appendix 1 on [page 33](#).



Woolworths Retail

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

Retail Platforms

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

Woolworths Food Company

Woolworths Group’s business to business (B2B) food businesses include PFD Food Services, Australian Grocery Wholesalers and Greenstock, our end-to-end Australian meat business.

W Living

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

Our operations

Woolworths Group is one of Australia and New Zealand’s largest retailers, with over 200,000 team members serving 25.1 million customers per week across our store network of 1,477 stores. At the heart of everything we do is our purpose – creating better experiences together for a better tomorrow.

Woolworths Supermarkets and Metro are our cornerstone food retail businesses in Australia and New Zealand with customers engaging with us through both our extensive store network and our online digital shopping platforms. Our store network includes 1,111 Australian Supermarkets and Metro stores and 188 New Zealand Supermarkets. As part of Primary Connect, our supply chain and logistics business, our team also supports our Australian and New Zealand retail network by performing work in our 27 Group owned distribution centres (DCs) across Australia and New Zealand.

WooliesX, our digital, data and loyalty business, consists of three platforms: eComX, idX and EverydayX. eComX includes our retail business to consumer and B2B eCommerce business, which includes our seven customer fulfilment centres (CFC) across Australia where team members stock, replenish and pick items for online orders.

BIG W, Petstock and Healthylife are our specialty retail businesses providing customers with their everyday needs both in-store and online with an extended 3P seller range through our online marketplaces. Sellers use our platform to host their products and maintain a direct relationship with customers from purchase through to delivery. Our store network includes 178 BIG W stores.

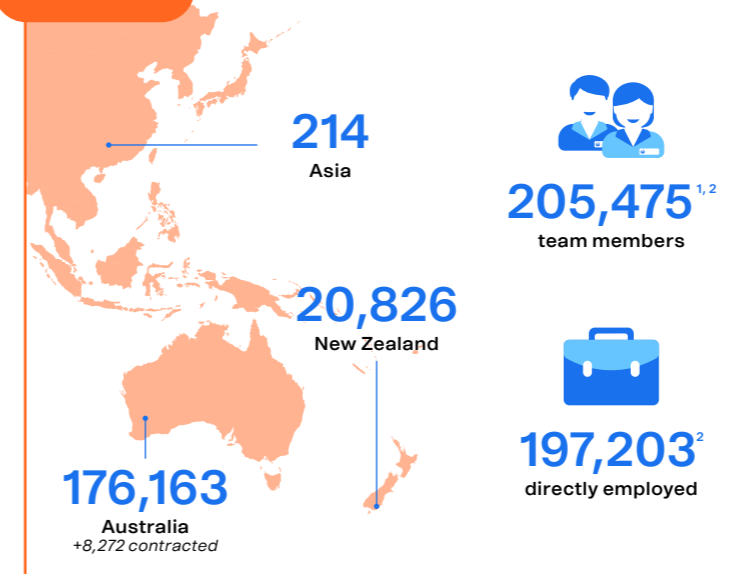
Our cornerstone food and everyday needs businesses are supported by businesses and platforms that deliver value for the Group, our partners and our customers.

Retail platforms include PC+, our third-party supply chain business; and Fabcot, the Group’s property and construction business. Digital platforms also support in delivering our retail offering to customers including wiq, the Group’s data and analytics platform and Cartology, our retail media business.

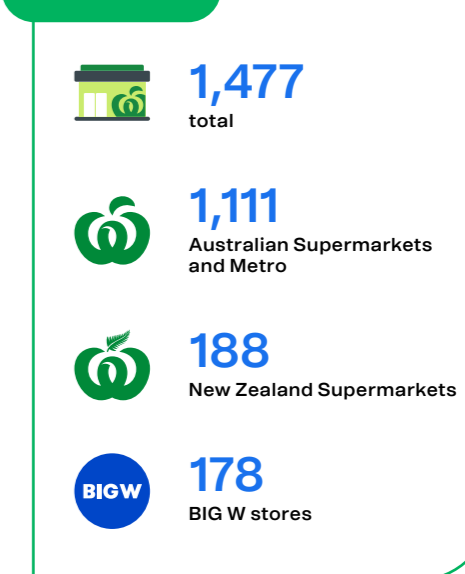
We are supported in working towards our sustainability objectives through business accelerators: W360, which aims to deliver market-leading innovations focused on energy, waste, water and packaging; W23, the Group’s venture capital and innovation fund that invests in innovative start-ups in retail and climate technology; and Healthylife, a platform that provides health products, telehealth services and digital tools.

Group businesses are supported by directly employed professional team members working in support functions in our support offices across Australia, New Zealand, Hong Kong SAR, Thailand and Bangladesh. The Group also engages a proportion of indirect workers who support our business with ongoing labour to meet the variable needs of the business, or the provision of services in Group facilities. This includes labour hire workers, who support activities such as the picking and packing of products in Australian and New Zealand DCs, or picking and packing online orders at CFCs; and operations services workers, who perform regular work that the Group outsources to third parties, such as cleaning, trolley collection and security services.

Our team



Our stores



1 Team members include 8,272 contractors.
2 Team members and directly employed exclude Statewide Independent Wholesalers Limited, The Quantum Group Holdings Pty Limited, The Quantum Group Pty Limited, PFD Food Services Pty Ltd and Petstock Pty Ltd.



Our supply chain

Woolworths Group works with more than 13,500 direct suppliers globally across both trade and non-trade supply chains. Given the size and diversity of Woolworths Group businesses, our supply chain is complex, geographically dispersed and includes small family businesses through to global multinational companies.

Our supply chain involves tens of thousands of additional suppliers who contribute by providing goods or services to our direct suppliers. This could be ingredients or component parts that go into a final product, or a company that is subcontracted in the logistics supply chain. These indirect suppliers may be tier two (supplying to our direct suppliers), tier three (supplying to tier two suppliers), or suppliers at lower tiers of the supply chain. Like many global retailers, having full transparency of indirect suppliers at the lower tiers of the supply chain is a challenge. We prioritise projects to improve supply chain visibility where there are inherently higher risks of modern slavery, so we are in a better position to identify and, where needed, remediate risks to people. This is discussed further on pages 20 and 21.

Throughout this Statement, we refer to 'suppliers' and 'sites'. Suppliers are businesses that Woolworths Group has made a payment to. Sites are the facilities (such as a factory or packing shed) used by suppliers to produce or manufacture the goods supplied to the Group. One supplier may have multiple sites across different countries or locations.

Supply partners

Total direct suppliers:

7,621 trade suppliers

6,174 non-trade procurement

Own brand suppliers:

1,610 Woolworths Food Company

435 BIG W

46 Non-trade procurement

47 Number of sourcing countries for own brand suppliers

Image: Peninsula Fresh Organics, Victoria.



Supply chain – trade

The Group partners with 7,621 direct trade suppliers of vendor brands, own brand and fresh produce. Trade products span an array of categories, including apparel, long-life food, fresh, general merchandise, toys and homewares.

Vendor brand suppliers provide branded products that are of ten common household names. Suppliers that make products for Woolworths Group brands are referred to as 'own brand' suppliers. Some suppliers supply both vendor brand and own brand products.

Own brand and fresh products are in-scope for our Responsible Sourcing (RS) Program which is referred to throughout this Statement. For own brand products, ~83% of food manufacturing sites are in Australia and New Zealand, with non-food trade categories in supermarkets such as general merchandise, and health and beauty, sourced mainly from China (~73%) and Australia (~9%). In F24, ~96% of all fresh fruit and vegetables, and 100% of fresh meat sourced by Greenstock for Australian Supermarkets was sourced from Australian farmers and growers. Similarly, 100% of own brand fresh meat for Woolworths New Zealand is sourced from New Zealand. There are 435 sites supplying BIG W branded products— of these, ~93% are sourced from China, Bangladesh and India.

Supply chain – non-trade

We source products, equipment and services from 6,174 direct non-trade suppliers. These products, equipment and services are not sold to customers, but are required for the day-to-day operations of the Group. The sourcing of non-trade goods, equipment and services where spend is over \$1 million is managed by our Non-trade Procurement team.

The top three non-trade categories by spend are supply chain (36%), information technology (17%) and Group services (14%). Examples of non-trade products include products that may feature a Woolworths Group brand such as shopping baskets, trolleys or uniforms. It also includes products that are not branded such as packaging materials, information technology equipment and construction materials.

The majority of non-trade services operate in facilities that are owned and operated by the Group, such as our retail stores, DCs and CFCs in Australia and New Zealand. Examples of non-trade services include cleaning, trolley collection, security services, refrigeration, warehousing and last mile delivery.

Suppliers in scope of Woolworths Group's Responsible Sourcing Program or due diligence.



¹ 'Majority owned businesses' refers to businesses that are controlled by the Group, but not wholly owned, as per the definition of 'control' in the Australian Accounting Standards.

Identifying risks of modern slavery

No global retailer is immune to modern slavery risk. As the largest retailer in Australia and New Zealand, it's important for us to have the right people, processes and systems to continuously monitor our operations and supply chain.

We use a number of mechanisms to monitor our internal and external environment to identify and manage risks. This includes tools to identify key inherent or potential risks of our suppliers and reviewing information sources that provide country/sector risk overviews. We continue to invest to build our suite of risk identification capabilities including third-party intelligence, whilst leveraging the insights from our RS Program and our Human Rights team.

Third-party intelligence screening

- **EiQ forced labour risk assessment and insights:** an integrated risk platform that enables our team to monitor global forced labour indicators to identify key risks related to key sourcing countries, product categories or commodities. Our Human Rights team uses EiQ on demand to provide input into the Group's sourcing strategies. EiQ also informs our forced labour risk assessment.
- **Sentinel supplier scanning:** analyses internet data drawn from material in the languages of sourcing countries, and 45 international sanctions lists for incidents, insights and negative news related to human rights violations, including forced labour risks. Reports are issued monthly and in F24 121 incidents were identified, including potential forced labour risks that were reviewed and action taken where required.
- **Control Risks' geopolitical risk monitor:** provides insights into geopolitical dynamics, potential supply chain disruptions and regulatory developments. Reports are issued monthly and we monitor these for both general trends and specific incidents related to our supply chain. This year general global risks raised included protests regarding minimum wage increase in the ready-made garment sector in Bangladesh, increased risk of exploitation for migrant workers crossing from Myanmar to Thailand, and potential impacts of political tensions and trade tariffs on workers in China.
- **Sayari Graph:** a deep risk investigation and analysis platform that uses trade and beneficial ownership data from official sources to surface supply chain connections and flag potential links to forced labour at multiple supply chain tiers. In F24, we tested and subsequently rolled out Sayari Graph to further enhance our forced labour risk detection capability (see page 13).

Responsible Sourcing Program tools

- **Sedex Radar:** used by the RS team in Australia and New Zealand to segment new supplier sites into risk categories based on inherent risk scores generated for product type and site location.
- **Identifying trends in audit reports:** our team monitors trends from RS audit reports via a centralised dashboard of audit findings. This facilitates identification of trends in non-conformances and monitoring of changes over time.
- **Further supplier risk segmentation:** in higher risk categories we may seek additional information to help us further prioritise our approach. For example, in F23 we conducted a specific seafood risk assessment that identified tuna, shrimp and prawns as the higher risk products in this category. This informed further due diligence in F24 (see page 21).

Insights from our team, workers, industry, and civil society

- **Team:** our Human Rights team regularly engage with suppliers and other stakeholders in sourcing locations. These interactions help us gather insights into potential or actual risks.
- **Worker engagement:** through mechanisms such as worker forums, union engagement, worker voice tools, and informal interactions during site visits we gain a worker-centric lens on our human rights risks.
- **Industry and civil society:** our team reviews reports and insights from non-government organisations, industry publications, and human rights defenders. We also participate in industry initiatives outlined in the Partnerships section on page 12.

Inherent risk in our operations and supply chains

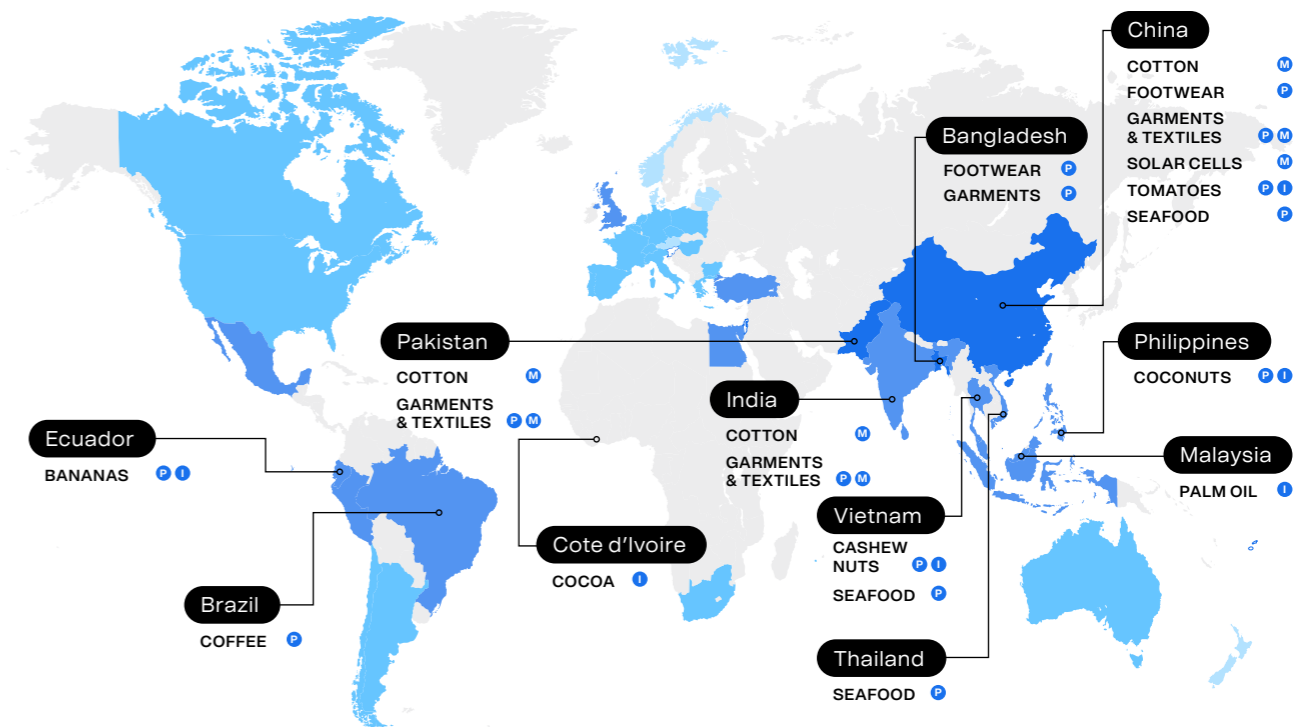
Modern slavery includes eight types of serious exploitation.¹ Based on our understanding of these types of exploitation and our operations and supply chain, we have identified five salient modern slavery risks in our value chain:

- **Debt bondage:** the payment of excessive recruitment fees or associated costs, and retention of identity documents
- **Deceptive recruiting for labour:** workers promised certain jobs, benefits or conditions that do not eventuate
- **Forced labour:** restrictions of movement, intimidation, threats, including State-sanctioned forced labour
- **Trafficking in persons:** recruitment, harbouring and movement of a person for exploitation, namely forced labour
- **Worst forms of child labour:** where children are exploited through slavery or similar practices or engaged in hazardous work.

We have assessed the risk of slavery, servitude and forced marriage as less likely in our value chain based on the nature of the work in our operations and supply chain.

Through a combination of risk tools and insights, we have an informed view of where inherent modern slavery key risks may reside in our operations and supply chain. We consider that the risk of modern slavery in our direct team is low as the Group has visibility over team members' employment terms and conditions. However, where indirect labour is used at our sites, such as labour hire workers in DCs or CFCs and operations services workers, this carries an inherently higher risk of modern slavery as we do not have direct oversight. Similarly, in areas of our supply chain characterised by a higher proportion of migrant workers in typically lower skilled industries where people may be less aware of their rights and, therefore, more susceptible to exploitation, we observe an inherent higher risk. Some of those considered most relevant to our supply chain – including as a final product, ingredient or raw material – are outlined on the map below.

Global supply chain risk landscape



Source: LRQA, EiQ Country Risk Supply Chain Risk: Labour Index, 2024.

Key: ● Extreme ● High ● Medium ● Low ● No direct sourcing ○ No data available ● Product ● Ingredient ● Material

¹ Modern Slavery Act 2018 (Cth), s4.; Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities (2023), 77-80.



Taking action to address risks

Our Human Rights Program is how we seek to address key inherent modern slavery risks in our operations and supply chain. We implement our Human Rights Program through specially designed frameworks, policies, purposeful partnerships and our Responsible Sourcing (RS) Program due diligence.

Our Human Rights Program

Our Human Rights Program is integral to how we manage key risks to people, including modern slavery and broader worker rights risks, in our operations and supply chain. It is informed by the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work. The Human Rights Program does not directly govern risks to people in our operations. Risks to our direct team members, including pay, physical and psychological safety and conduct, are primarily managed by the Group’s People Team and the Businesses and Platforms in which they work (e.g. Supermarkets team or Finance team).

Risks to indirect workers on Woolworths Group sites (e.g. labour hire in distribution centres) are primarily managed by the relevant business units (e.g. Primary Connect). The Human Rights team provides advice to business units on frameworks and controls to help manage these risks. The People Team is considering how the management of key risks to indirect workers may be enhanced through a consolidated governance process.

Our Human Rights Program pillars

Our approach to human rights has been in place for seven years, and has evolved to include four operational pillars, summarised below. The first phase (2018-2020) focused on the development and roll-out of the RS Program for own brand and fresh suppliers. The current phase (2021-2025) provides for bespoke human rights due diligence to address modern slavery risks, the uplift of our human rights grievance channel and enhancing our framework to reflect the growth of the Group and our changing business needs. Multiple partners help us to deliver this work and provide scale so we are better positioned to address root causes of modern slavery risks.

1

Responsible Sourcing Program

Our foundational social compliance program with due diligence for suppliers in scope of the RS Standards

2

Bespoke interventions to address modern slavery risks

Recognises that systemic geographic or commodity based risks require unique interventions

3

Effective grievance mechanisms

That are trusted and effective so we can support access to remedy for impacted workers

4

Partnerships

With key external organisations and with majority owned businesses

Governance

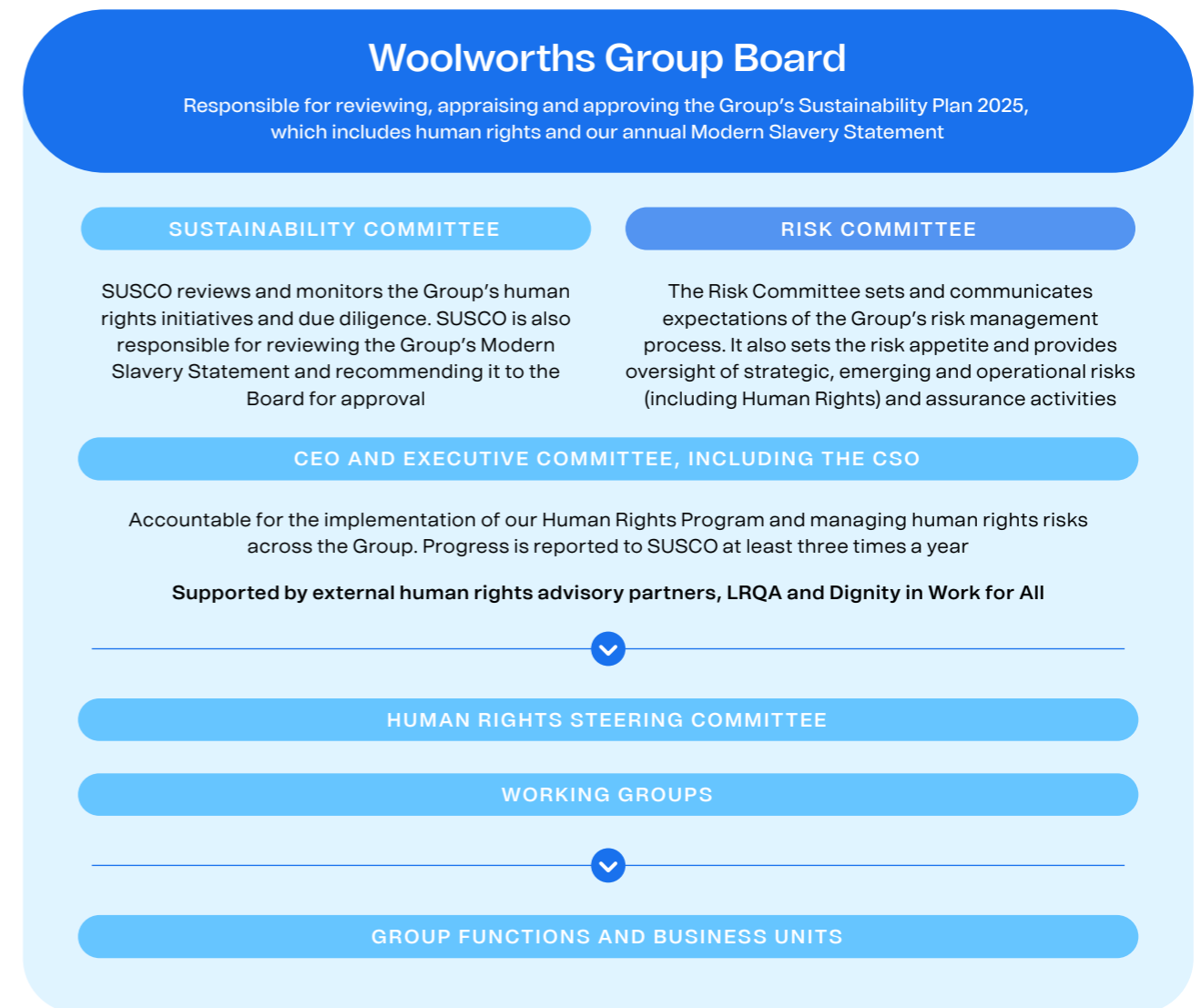
Board

The Board Sustainability Committee (SUSCO) meets at least three times a year and has carriage of the overall governance and monitoring of the Group’s Human Rights Program. Key metrics, including the status of human rights investigations, are reported to SUSCO. This is complemented by an annual human rights risk report and updates as required through the monthly CEO Report to the Board. Improvements to our control environment are also 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

The Chief Sustainability Officer (CSO) is the executive sponsor of the Human Rights Program. Our Group Human Rights team, which sits within Group Sustainability and reports through to the CSO, is responsible for delivering our overarching human rights strategy and annual work plan, which includes our work to address modern slavery risks. Human Rights team members in Australia, New Zealand, Hong Kong SAR and Bangladesh are supported by cross-functional working groups for specific prioritised work programs.

The Human Rights Steering Committee (SteerCo) is comprised of senior leaders from key businesses and Group functions. SteerCo provides input into the Human Rights Program’s implementation including management and remediation of modern slavery risks. In F24 SteerCo met nine times and members are reviewed annually based on strategic priorities.



How our governance informs program implementation

Key elements of our Human Rights Program are also aligned to a number of our internal human rights and risk governance approaches. By considering our activities in this way we have a view on how we seek to implement our program principles at each stage of the human rights due diligence process that, in turn, is aligned to the Group’s risk management framework.

HUMAN RIGHTS PROGRAM PRINCIPLES	ALIGNED TO OUR HUMAN RIGHTS DUE DILIGENCE APPROACH	ALIGNED TO THE GROUP’S RISK MANAGEMENT FRAMEWORK	KEY ELEMENTS OF THE APPROACH
<i>No global retailer is immune to modern slavery risk in their operations and supply chain.</i>	Identify new and escalating risks to people and segment suppliers accordingly	Risk assessment	<ul style="list-style-type: none"> Annual human rights and forced labour risk outlook Supplier risk segmentation for own brand and fresh suppliers under RS Program Category-level risk segmentation for direct non-trade suppliers Identify risk trends from the RS audit program and third-party intelligence screening Ongoing horizon risk scanning Bespoke risk analysis and strategic support in extreme-risk areas.
<i>We adopt a human rights-based approach in our modern slavery strategy. That means that we consider risks to people alongside risks to the business.</i>	Mitigate risks with appropriately designed controls that operate consistently and effectively	Risk response	<ul style="list-style-type: none"> Comprehensive policy framework including RS Policy, Standards and Addendums Adoption of contractual framework including a standard modern slavery clause in key contract templates and additional clauses in extreme risk contracts as required Monitoring controls such as supplier questionnaires, third-party audits, corrective action plans and site visits Industry specific due diligence strategies for extreme risk areas.
<i>Identifying actual or potential situations of modern slavery demonstrates our program is effective. We will always do the right thing, which means acting in the best interests of potentially affected workers.</i>	Remediate issues when they arise and promote effective grievance mechanisms	Risk response	<ul style="list-style-type: none"> Remediate issues, prioritising the most critical issues when they arise and understood and used in our operations and by suppliers Defined and operationalised grievance and investigation procedures When issues arise, our priority is to work with suppliers to remediate. We move to termination if a supplier is non-cooperative.
<i>Modern slavery can only be ended by working with others. We will work collaboratively to drive change that addresses the root causes of modern slavery.</i>	Collaborate to build capability, address root causes and scale impact	E2E management	<ul style="list-style-type: none"> Supplier management action plans as a tool to address root causes Industry engagement and participation in joint initiatives to scale impact Demonstrate leadership and positive impact through strategic collaboration, i.e. external advisory roles and advocacy.
<i>We will be transparent about our risks, not shy away from challenges, and aim to report on outcomes not just outputs.</i>	Communicate with stakeholders regularly and transparently	Record and report	<ul style="list-style-type: none"> SUSCO updates and annual human rights risk report SteerCo receives updates on the progress against the strategy at least bi-monthly Annual disclosure: Modern Slavery Statement and Sustainability Report Participate in external benchmarks including the Corporate Human Rights Benchmark and Know the Chain forced labour benchmark Seek to engage with potentially affected stakeholders in a way that is inclusive and meaningful.

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 work across the Group and throughout our supply chain.

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

Team member policies

POLICY	PURPOSE AND IMPLEMENTATION
Code of Conduct	Outlines how we expect team members (including contractors) to behave towards each other, our customers and the community, including compliance with the Responsible Sourcing Policy. Team members are required to complete training during induction and then on a regular cycle.
Respectful Workplace Policy	Articulates the expectation that all team members treat everyone with respect when at work, when representing our businesses or when interacting with team members outside of work. A new training module was released in F24. Team members are required to complete training annually.
Right to Work Policies	Promotes compliance with Australian and New Zealand immigration laws so that team members’ working rights are respected. Updated in F24 and available to all team members on the Group’s intranet.
Fraud, Anti-Bribery and Corruption Policy	Articulates 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. The Team Member Speak Up Policy was updated in F24 to enable the service to receive whistleblower complaints.

Supply chain policies

POLICY	PURPOSE AND IMPLEMENTATION
Responsible Sourcing (RS) Policy	Underpinned by the United Nations Guiding Principles on Business and Human Rights (UNGPs), the RS Policy sets expectations for our operations and all direct suppliers in relation to human rights and responsible sourcing, including modern slavery.
Responsible Sourcing Standards	Detailed requirements for all direct suppliers of own brand and fresh products. The Standards address the International Labour Organization’s core conventions including forced or compulsory labour and are underpinned by the UNGPs. See pages 17- 18 .
Requirements for Labour Hire Providers in our Australian Horticulture Supply Chain	Outlines specific requirements for the engagement of labour hire providers used by direct and indirect suppliers in our Australian horticulture supply chain. Implementation is supported by guidance and a checklist. F24 actions outlined on page 19 .
Responsible Recruitment Addendum	Sets out supplier requirements, guidance and remediation protocols for two modern slavery indicators as they relate to the recruitment of migrant workers in our supply chain. In F24, we continued implementation with our Malaysian sites and commenced implementation with our sites in Thailand. See page 20 for more information.
Child Labour Addendum	Sets out supplier expectations and remediation protocols relating to the respect for children’s rights in our supply chain. In F24, 325 suppliers received targeted communications on their responsibilities under the Child Labour Addendum. See page 23 for more information.
Sustainable Cotton Policy	Sets out the minimum social and environmental requirements that apply to Group own brand products containing cotton. Progress in F24 outlined on page 22 .
Supplier Speak-Up Policy and service	Independently-hosted reporting channel for all suppliers and workers, their family and community members to raise concerns confidentially and (if desired) anonymously. Progress in F24 outlined on pages 27-28 .



Our partnerships

No one entity can solve the complex challenge of modern slavery. Aligned with one of the guiding principles of our Sustainability Plan 2025, ‘we embrace the power of partnerships to create change’, this year we actively engaged with key membership groups to contribute to industry-wide change through scaled solutions and advocacy.

Human Rights and Responsible Sourcing Program partners

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



Agreements

Multi-party agreements are a strategic form of partnership that enable us to work towards delivering agreed objectives with different stakeholders. In F24 BIG W continued its work to implement the International Accord and its Bangladesh and Pakistan Country Specific Safety programs, and Action Collaboration Transformation on Living Wages (ACT). In Australia, horticultural workers were engaged in two worker forums held under a joint Retail Supply Chain Alliance (RCSA) MOU.



Industry collaborations

Learning from and being part of conversations with local and global peers helps us to keep abreast of leading practices and shared industry challenges. Where we get the opportunity, we continue to raise the need for collective action to address root causes of modern slavery risk such as bribery and corruption, and advocate for migrant workers’ rights. Members of the Human Rights team hold leadership positions at the Consumer Goods Forum Human Rights Coalition, the United Nations Global Compact Network Australia, the NSW Anti-slavery Commissioner’s Advisory Panel and the Australian Government’s Modern Slavery Expert Advisory Group.



Our frameworks

As human rights risks are dynamic, so too is our program to develop and implement new guidance frameworks in response to emerging key risks, or to enhance the governance of our Human Rights Program. This year we developed an extreme-risk due diligence framework and an approach for meaningful engagement with impacted stakeholders.

Extreme-risk due diligence guidance framework

The extreme-risk due diligence (ERDD) framework is a due diligence process seeking to minimise the Group’s exposure to ‘extreme’ human rights risk typically found at lower supply chain tiers. The ERDD framework is intended to help better identify and mitigate links we or our suppliers may have to extreme-risk regions or commodities – which require dedicated bespoke interventions to seek to ameliorate these risks.

Extreme risk is defined as:

- **Extreme-risk regions:** where the nature and context of the human rights risks, for example, State-sanctioned forced labour, are too challenging to allow for any practical change to be made through working with suppliers in line with our program principles; and
- **Extreme-risk product categories:** a raw material or component part that is at high risk of originating from an extreme-risk region even when the final product is sourced from a non-extreme risk region.

The assessment of potential extreme-risk regions and product categories is largely driven by quantitative risk data from EiQ, as well as qualitative data, such as government sanctions, UN agency reports and civil society reports.

To gain better transparency of supply chain actors and screen for links to extreme-risk regions, we have invested in Sayari Graph to map supply chain connections and flag potential links to forced labour and other risks. Sites that are flagged as potentially operating in or having material

links to an extreme-risk region or product category may be defined as ‘in scope’ of the ERDD framework, and will be subject to bespoke interventions to mitigate identified risk.

In F24, we have tested this approach by applying it to a selection of tomato paste based products. Through using Sayari Graph, we screened 10 ingredients suppliers and were able to identify a range of risk exposure. We worked with a number of suppliers to better understand these risks and, where relevant, made recommendations to the suppliers for ongoing sourcing.

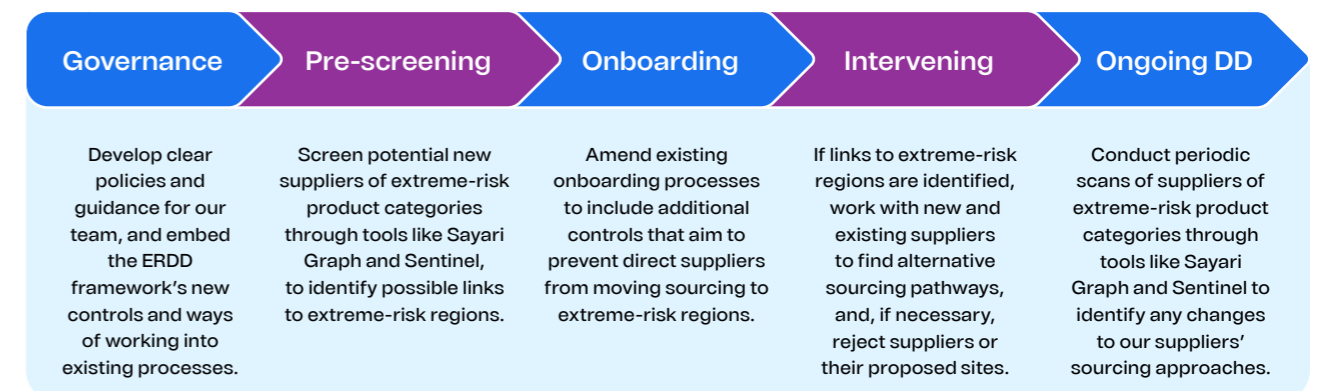
In F25, we will seek to pilot the ERDD framework by inserting new controls into various stages of internal sourcing processes for own brand products and select non-trade procurement, including:

- Flagging whether a new product or procurement project features an extreme-risk product category, which risks introducing links to an extreme-risk region into our supply chain
- Screening new potential suppliers and their sites for links to extreme-risk regions using Sayari Graph.

If actual or potential links to an extreme-risk region are identified at lower supply chain tiers, we may take a number of steps including providing preferred raw-material supplier lists to up-chain suppliers.

We may also use the ERDD framework to screen existing suppliers’ raw material sources and, if necessary, work with our direct suppliers to mitigate risk in their supply chains.

Our plan to implement the ERDD framework



Guidance framework for meaningful engagement with impacted stakeholders

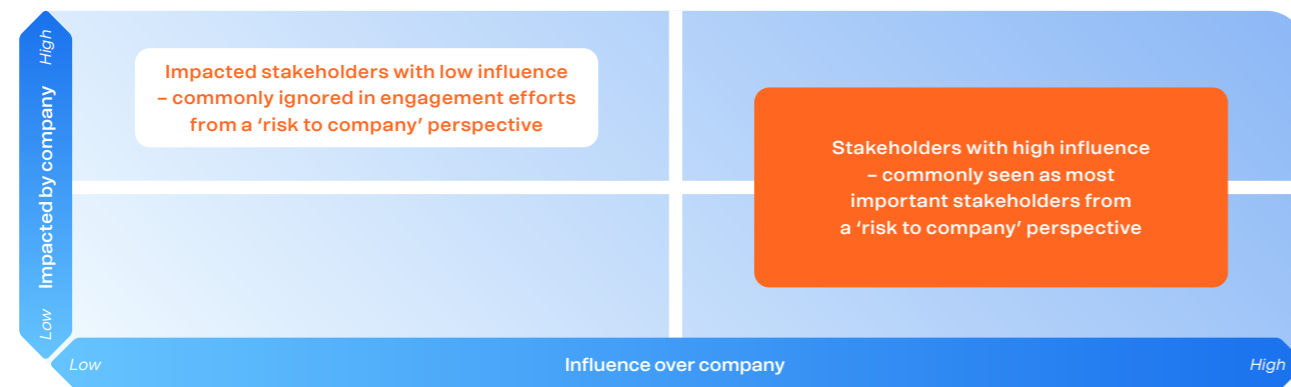
Like many multinational companies, the United Nations Guiding Principles on Business and Human Rights (UNGPs) have shaped our approach to human rights due diligence and remediation. This year, we sought greater alignment to the UNGPs, in particular guiding principle 18, which asks businesses to engage in 'meaningful consultation with potentially affected groups and other relevant stakeholders' to more effectively gauge human rights risks and impacts. We also understand that meaningful consultation can help establish higher-quality, long-lasting relationships with stakeholders that go beyond one-off engagements that, in turn, further helps to mitigate potential human rights impacts.

In F24 we partnered with Shift, a business and human rights non-profit organisation, to design a *Guidance Framework for Meaningful Engagement with Stakeholders Impacted by Woolworths Group's Operations or Value Chain*.

In designing the framework we consulted with team members across the Group, including from the Inclusion, Indigenous Affairs, Property and Customer teams, on current approaches, and opportunities to improve meaningful engagement with their relevant stakeholders. Inputs from current practice and lessons learned from across the Group are reflected in the final guidance framework.

The framework aims to help our Human Rights team continue to embed a 'risk to people' lens rather than leading with 'risk to business' when designing and evaluating key activities. Whereas traditional stakeholders tend to have more influence in a 'risk to business' approach, 'risk to people' considers individuals and groups who may be most severely impacted by our actions. This concept is captured in the image below.

Stakeholder impact vs. influence



The framework is centred on nine guiding principles to inform meaningful engagement as we seek to incorporate new perspectives into our Human Rights Program design and evaluation. Importantly, we will look to prioritise engagement with at-risk groups in our supply chain, with a view to develop an approach that helps better identify and mitigate modern slavery risks. We will identify key opportunities to test the framework in F25.

Our nine guiding principles to inform meaningful engagement

1. Be clear about who we need to engage with to meet our human rights commitments.
2. Design how we engage with impacted stakeholders to support everyone feeling respected and safe.
3. Be transparent with stakeholders about the purpose and scope of engagement and about how we have responded to their perspectives.
4. Use feedback from stakeholders as a reality check on assessments of effectiveness.
5. Elevate the perspectives of stakeholders in our programmatic and strategic decision making.
6. Seek to build longer-term relationships with stakeholders based on mutual trust.
7. Seek to address issues raised by stakeholders outside of our own business needs.
8. Design grievance mechanisms that are more likely to be trusted by impacted stakeholders.
9. Recognise that respectful stakeholder engagement is a skill.



Managing risk in our own operations

Direct

The majority of the Group's approximately 205,000 team members are employed directly. This means we have visibility of employment terms and conditions, which are set out in contracts of employment and relevant industrial instruments that are regulated by Australian and New Zealand employment laws. Approximately 88% of Australian team members are covered by 29 enterprise agreements and 83% of New Zealand team members are in roles that are covered by 12 collective agreements.

We consider that the risk of modern slavery in our direct team is low. Strong policies, ongoing monitoring, team member training and accessible grievance mechanisms are key controls we use to mitigate the risk of modern slavery in our operations. We recognise the importance of freedom of association and acknowledge the right of team members to negotiate collectively. Woolworths Group has regular engagements with registered trade unions, and an estimated 36% of Australian team members and 49% of New Zealand team members are members of a registered trade union. We acknowledge that risks to our team may be greater in inherently higher-risk geographies, including the geographies our Asia team operates in. However, our 214 directly employed team members across the Asia region are performing specialised

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

We have implemented controls, monitoring and governance arrangements to make sure that we are meeting our legal and policy 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 legislative entitlements. As part of this end-to-end review of all elements of our pay processes, we reported issues related to our long service leave arrangements in 2022, which were resolved in Victoria in F24. We continue to remediate any shortfall where we identify it, and proactively engage with regulators as relevant.

Indirect

We seek to implement proportionate controls to mitigate the inherently higher risk of modern slavery to indirect workers performing work on our sites. We have approached this by:

- conducting a review of our contracts with indirect workers. 100% of labour hire suppliers who provide labour hire workers in our Australian distribution centres have agreed to contracts that include modern slavery mitigation requirements. This is true too for the majority of suppliers providing cleaning, trolley collection or security services on Australian sites.
- completed baseline social compliance audits of security service providers in our Australian retail sites and of labour hire providers who provide labour hire workers in our Australian DCs, see pages 25 and 26 respectively
- ongoing internal and external monitoring of cleaning and trolley collection suppliers at Group trading sites in Australia and New Zealand, see below.

Our commitment to effective governance and monitoring of the trolley collection and cleaning contracting supply chain continues. In F24, 76 Australian trading sites were externally audited, and 12 sites were internally audited by the Group's Facilities Management Compliance team. This is aligned to our target of having 5% of supplier sites audited in each audit cycle.

Where non-compliance is identified, our approach is to partner with primary contractors to remedy breaches and, where required, provide an appropriate outcome for affected workers. However, if the non-compliance is sufficiently serious or the contractor does not cooperate in remediation, we will no longer engage the contractor. As a result of audits in F24, \$4,535 was repaid to four workers at two sites. Corrective actions will continue to be implemented as the audits progress towards conclusion.

In New Zealand, work continued to have cleaning and trolley collection contractors become full members of Building Service Contractors of New Zealand (BSCNZ). Six contractors achieved full BSCNZ membership in F24, bringing the total number of contractors with full membership to 11 (55%). Where a supplier has non-conformances identified in a BSCNZ social compliance audit, they are put on a management action plan (MAP). In F24, four MAPs were closed out and one supplier had an audit follow-up, resulting in repayments of ~\$100,00 to 96 past and present workers in New Zealand's trolley collection and cleaning supply chain. One MAP is underway, with completion expected in F25.

Integrating new businesses into our Group

Our approach

This year, we continued to implement our approach to assessing risk across the Group's majority owned businesses and partnered with these businesses based on our level of control and influence. In F23, we delivered two key frameworks to support this pillar: the Mergers and Acquisitions (M+A) Human Rights Framework and the Human Rights Marketplace Framework. This year, we have progressed implementing these frameworks with the following key results:

- three majority owned businesses have a policy that aligns with the Group Responsible Sourcing (RS) Policy and has been adopted by their respective boards
- over 30 1:1 engagements with senior leaders of majority owned businesses in relation to human rights
- the Human Rights team conducted two pre-acquisition due diligence activities on potential business acquisitions
- drafting guidelines for third-party sellers on their obligations under the RS Policy in line with the Marketplace Framework.

In F25, we will continue to implement the M+A Human Rights Framework and review it to make sure 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 company's 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 entity to adopt, or align with, the Group's Responsible Sourcing Policy. Plan for own brand suppliers to be onboarded to the Group's Responsible Sourcing Program, including risk based segmentation and relevant due diligence¹.

CASE STUDY

Partnering with Petstock

In F24, Woolworths Group acquired a 55% interest in Petstock, a leading Australian and New Zealand specialty pet business. In line with the M+A Human Rights Framework, prior to the acquisition the Human Rights team was engaged in the due diligence process to determine the company's level and materiality of human rights (including modern slavery) risks. The results of the due diligence processes were conveyed to the relevant decision makers, including the Woolworths Group Board, as part of the acquisition decision. Following announcement of the intended acquisition, the Human Rights team conducted a human rights control assessment, with improvement opportunities informing an integration plan.

Post acquisition, Woolworths Group has partnered with Petstock to support it in continuing to uplift its approach to managing human rights risks. Petstock has adopted a Responsible Sourcing and Human Rights Policy that is aligned to the Woolworths Group approach, and is currently conducting due diligence on own brand pet food and accessory suppliers in alignment with the Woolworths Group RS Program. Petstock Group will submit its own modern slavery statement for F24.

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.

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 businesses capability and maturity.

Managing risk in our supply chain

Supply chain – trade

Our Responsible Sourcing (RS) Program governs how we manage key human rights risks in our trade supply chain.

Taking a risk-based approach:

- suppliers of vendor branded goods are expected to have established arrangements and processes which are consistent with our commitment to responsible sourcing and upholding human rights outlined in the RS Policy
- sites producing own brand and fresh products are in-scope of our RS Standards, and are segmented into four risk categories – **minimum, moderate, priority and specialised** – which inform their due diligence requirements.

Minimum risk sites are currently transitioning from requiring a Woolworths Group self assessment questionnaire (SAQ) to an SAQ of one of our recognised third-party schemes. Sites in the moderate, priority and specialised risk segments require third-party social audits.

Audits are graded against four possible non-conformance (NC) outcomes – zero-tolerance (ZT), critical, moderate, and minor. Moderate or minor NCs are addressed during the audit cycle as part of scheme follow-up, while our team prioritises ZT and critical NCs for additional focus. For moderate and priority suppliers that are part of an audit cycle, audit frequency is based on the audit outcome; sites with minor and moderate NCs are typically re-audited every two years, while those with a critical or ZT outcome are generally audited on an annual cycle. Sites with a ZT may be subject to an issue-specific interim audit as required.

In F24, 898 moderate, priority and specialised sites were audited as part of our RS Program in trade. Two sites were graded ZT and 217 sites had critical NCs.

Outcomes for moderate and priority risk segmented sites

We take a risk-based approach and prioritise audit follow-up with moderate and priority risk sites with critical NCs. Based on the supplier's circumstances, this could include proactive monitoring of NCs, co-developing corrective action plans and site visits for capability building and issues monitoring. Of the 133 moderate and priority risk sites with critical NCs in F24, 50 were closed and validated via scheme follow-up, and we continue to progress closure of the remainder.

The following trends were observed for critical NCs in F24:

- **Building and environmental permits:** Critical NCs in China often relate to factories not having required building or construction certificates or permits due to broader administrative challenges in their local context. Through a proactive due diligence approach, NCs related to building fire safety certification were reduced from 42% of the total critical NCs raised in Asia in F23 to 18% in F24. NCs related to environmental permits reduced from 27% in F23 to 10% in F24.
- **Environment:** 72% of environment related critical NCs in F24 were raised in China. The most common of these is related to chemical management, particularly hazardous substances. We are developing guidance on chemical handling for suppliers to help them better understand our requirements.

Managing zero-tolerance cases

Two sites were graded ZT in F24. One site had five ZT issues related to inconsistent record keeping across working hours, wage payment, and production timesheets. A management action plan (MAP) was put in place including training for both factory management and workers on ethical business practices. The issues were addressed and closed via follow-up audit. The second site was graded ZT due to an alleged bribery attempt by the supplier to the auditor during a quality audit. A MAP was completed, including training on the Group's bribery and corruption policy requirements.

Supplier pre-screening

In F24, 68 moderate and priority risk sites were pre-screened as part of the supplier selection process in Asia. This may include reviewing recent and past audit reports, site visits, and meeting with suppliers to better understand their approach to human rights and modern slavery risk management. Fourteen sites were not approved to trade with Woolworths Group for reasons including wage payment issues, excessive overtime, double-bookkeeping, and health and safety concerns.



Specialised risk segmentation

Despite typically being rated 'low risk' in global indices, modern slavery risks such as deceptive recruitment, debt bondage and forced labour are still present in industries in Australia and New Zealand that rely on third-party labour hire providers (LHPs) and migrant workers often working on a casual or seasonal basis.¹ The specialised risk segment of our Responsible Sourcing (RS) Program was designed to capture suppliers in these categories.

Australian horticulture

This year we continued our baseline social compliance audit roll-out by requiring all direct fruit and vegetable (F&V) suppliers to have one social audit² completed at a growing/packing site.³ At the end of F24, 93% of our direct F&V suppliers have now completed a social compliance audit or our proportionate due diligence approach for smaller F&V suppliers. We are working with the remaining 26 suppliers to implement appropriate due diligence.

We have approximately 479 direct F&V sites, and in F24 165 audits were conducted. Seventy-six sites had a combined 149 critical non-conformances (NCs) identified. Although this represents a year-on-year increase in critical NCs, it is reflective of an increase in the volume of annual audits. Of the critical NCs:

- 24% relate to incorrect payments, such as workers not paid in accordance with minimum legal entitlements, resulting in ~\$48,000 repaid to more than 50 workers in our Australian horticulture supply chain in F24
- 23% were for health and safety, including obstructed and unmarked exit routes, which have or continue to be followed up by suppliers, auditors and our team
- 19% for inadequate systems to manage LHPs, resulting in improved contracts between suppliers and the LHP, and improved or established processes to regularly review identification, payslips and contracts of LHP workers. Our LHP Checklist, Guidance and online training are available to suppliers.

In F24 we piloted a new risk-based due diligence approach for smaller F&V suppliers. This new approach was informed by supplier consultation and our teams' observations, including that social compliance audits might not be the best tool to identify risks for smaller F&V suppliers, and that the cost of implementing an audit is not always feasible. Alternate due diligence approaches for smaller F&V suppliers include scheme self-assessment and training, and worker voice (see [page 23](#)). Currently, 22 sites have piloted the alternative due diligence approach and feedback has been positive.

In addition, through social compliance schemes, we now have visibility of 1,083 supplier sites used in our fresh produce supply chain. This includes tier two and tier three sites. Six hundred and fifty three of these sites have completed a social audit, which is a 25% increase in visibility of supplier sites in our F&V supply chain with an audit from F23.

¹ Walk Free, *Modern Slavery in Australia: Global Slavery Index 2023 Country Study* (2023).

² Or an agreed alternate RS due diligence approach in place, discussed further below.

³ Where a direct supplier does not have a growing or packing site, the audit requirement extends to one of their strategic grower/packer sites.

⁴ 'Target group' refers to New Zealand fresh produce suppliers in scope of the current phase of the RS Program audit roll-out in NZ. It currently excludes international suppliers, and agents/importer sites with administrative facilities only. These sites are currently required to complete a self-assessment questionnaire.

New Zealand horticulture and meat

Following the extreme weather events in 2023 that deeply impacted the horticulture industry in Aotearoa New Zealand, we resumed social compliance audits in F24, with 84 audits completed and reviewed. To date 127 fruit and vegetable supplier sites in New Zealand have completed RS audit requirements, which represents 84% of the phase one target group.⁴ Thirty-seven NCs were identified, including two critical NCs relating to LHP due diligence requirements and grievance processes. We have engaged the remaining 15 in-scope sites to plan for their audit completion in F25.

In F24, we also conducted a baseline review to understand the current compliance approaches of our direct red meat processors in New Zealand. This included which processors were already Sedex members, and therefore already meet our audit requirements.

Greenstock – Our Australian meat business

All 54 fresh meat sites supplying Greenstock are in scope of the RS Standards. These sites, consisting of abattoirs and boning rooms, are on a RS audit cycle. In F24, 35 audits were renewed, with the remainder of audits still in date or scheduled. Four audits completed by Greenstock suppliers in F24 had critical NCs. Findings included health and safety issues, namely missing fire extinguishers or first aid kits (35%), LHP due diligence gaps associated with hiring, disciplinary and termination practices (16%) and wage deductions (14%). Critical NCs identified in F24 have been closed with over \$50,000 returned to 39 workers, remediating fees levied by LHPs and some direct suppliers for vaccinations and other inaccurate deductions.

In F24, the Human Rights team continued to progress its risk mitigation activities with meat suppliers by:

- partnering with Greenstock to provide updates on human rights risks in the industry during business reviews of strategic meat suppliers
- including key human rights questions in a sustainability survey sent to feedlot suppliers to help enhance our understanding of risk in this area.

Managing labour hire risks in our Australian horticulture and meat supply chains

Where labour hire providers (LHPs) are used in the horticulture supply chain, there may be increased risk to workers. This is due to decreased visibility by the horticulture business of how their LHP workers are paid and treated; and with the majority of these workers being migrant workers, they are inherently more vulnerable to exploitation.¹ With an estimated 50% of fruit and vegetable (F&V) businesses in Australia engaging LHPs to source labour,² safeguarding recruitment practices in Australian horticulture continues to be a priority. We operationalise this through our Requirements for Labour Providers in our Australian Horticulture Supply Chain (Requirements).

Australian horticulture

In F24 we expanded the scope of our LHP verification process to direct F&V suppliers and their growers who are members of Sedex or Fair Farms and are visible to Woolworths Group via the scheme platforms. This was achieved by utilising the Sedex and Fair Farms platforms which, as a result of our collaborative efforts in F23, now collect data related to LHPs. We now have the capability to check that LHPs meet one of the four compliance criteria of our Requirements.³ This year we identified 240 LHPs in operation across 498 grower sites, with 71 LHPs across 80 sites found as not meeting our verification requirements. The most common instance of non-compliance was LHPs operating in a State that did not have licensing requirements and the LHP meeting no other verification criteria. We are working with these suppliers to support their sites to engage compliant LHPs, and will continue to monitor during the next harvest season.

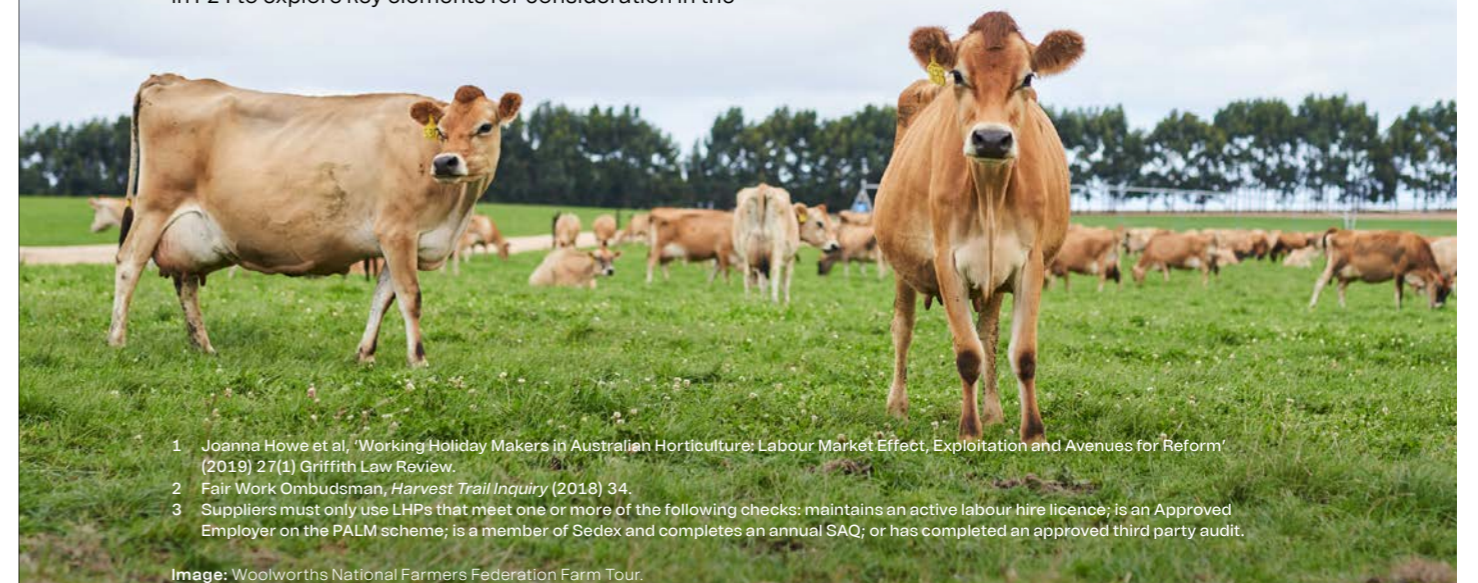
In response to engaging with industry on a national labour hire licensing scheme in F23, we funded research in F24 to explore key elements for consideration in the

development of a national licensing regime that both protects workers and assists horticulture businesses to manage risk. The research findings, along with the outcomes of our ongoing LHP verification, will be utilised in F25 to advocate for the creation of a robust national labour hire licensing regime.

In F23, we also began our partnership with The Fair Hiring Initiative to pilot *On the Level*, a program which trains, audits and has the potential to certify LHPs as ethical recruiters. The four LHPs selected for the Australian pilot service a number of horticulture suppliers across multiple produce categories and States, including jurisdictions with and without licensing requirements. The pilot revealed numerous risks including inadequate grievance mechanisms, unclear or missing contracts, a lack of policies and procedures regarding repatriation and reimbursement, and risks of harassment towards workers engaged by LHPs. In F25, we will consult with our suppliers that nominated LHPs to discuss these risks and next steps.

Meat

This year we intended to extend our Requirements to Greenstock suppliers. However the Australian Meat Industry Council has since piloted a Voluntary Code of Conduct for Migrant Workers. This independently audited certification program is for livestock processors and employers in the industry to demonstrate compliance with regulation and industry best practice. The launch of this Code of Conduct, and developments towards a national labour hire licensing scheme, led us to pause the extension of our Requirements to avoid duplicating industry efforts. A gap analysis and plan for the targeted roll-out of further LHP due diligence in meat will take place in F25.



¹ Joanna Howe et al, 'Working Holiday Makers in Australian Horticulture: Labour Market Effect, Exploitation and Avenues for Reform' (2019) 27(1) Griffith Law Review.

² Fair Work Ombudsman, *Harvest Trail Inquiry* (2018) 34.

³ Suppliers must only use LHPs that meet one or more of the following checks: maintains an active labour hire licence; is an Approved Employer on the PALM scheme; is a member of Sedex and completes an annual SAQ; or has completed an approved third party audit.

Image: Woolworths National Farmers Federation Farm Tour.



Taking action to promote responsible recruitment

Since remediating a case of forced labour including excessive recruitment fees in F23, we continue to focus on responsible recruitment as a key area to meaningfully address forced labour risks. Our Responsible Recruitment Addendum (the Addendum) outlines steps for supplier sites in Malaysia and Thailand to embed the Priority Industry Principles, which are considered core standards to address key drivers of forced labour: every worker should have freedom of movement, no worker should pay for a job and no worker should be indebted or coerced to work. Alongside efforts to pilot labour hire providers (LHPs) certification, our goal is to contribute to a supply chain ecosystem where ethical recruitment practices are the norm for labour agents, employers and retailers across the supply chain.

Malaysia

Having continued implementing the Addendum with our suppliers in Malaysia in F23, in F24 we focused on following up outstanding actions and verifying implementation and effectiveness. We source directly from 13 supplier sites in Malaysia, that employ some 4,000 workers, of which ~28% are migrant workers mostly from Nepal and Bangladesh. This year, five of these sites improved their RS audit grading year-on-year, with two of these sites closing recruitment fee related non-conformances. Another six sites maintained the same audit grade and two sites were new in F24.

We partnered with Ulula to conduct worker voice surveys designed to support the Addendum's implementation at three sites in Malaysia. Importantly, surveys were conducted as part of our remediation deed with the site that had previously identified modern slavery.

Thailand

We know that lengthy and costly cross-border recruitment¹ coupled with informal in-country recruitment and weak due diligence by employers² continues to exacerbate risks for migrant workers in Thailand.³ We have 26 supplier sites in Thailand, employing ~37,000 people, mainly in food manufacturing including canned and frozen seafood, canned vegetables and rice. Migrant workers account for ~56% of the total workforce, the majority from Myanmar and Cambodia.

We held a two-day supplier workshop facilitated in Thai by Dignity in Work for All, focused on implementing the Employer Pays Principles (EPP). Feedback from participants showed improvements in understanding across all of the workshop's topics. Thirty-three participants from 24 sites attended and discussions highlighted key themes including:

- Changing government policy and a lack of guidance on due diligence for migrant workers recruited domestically
- The legalities and practicalities of remediating fees related to bribery and corruption
- Audit schemes' interpretations on the adequacy of fees repayment programs, including differing expectations on the repayment of historic fees.

¹ Walk Free, Global Slavery Index Country Study: Modern Slavery in Thailand (Web Page) <<https://www.walkfree.org/global-slavery-index/country-studies/thailand/>>.
² Dignity in Work for All, In-Country Recruitment of Foreign Migrant Workers and Risks of Forced Labour and Human Trafficking in Thailand (2024).
³ Walk Free, Global Slavery Index Regional Findings: Modern Slavery in Asia and the Pacific (Web Page) <<https://www.walkfree.org/global-slavery-index/findings/regional-findings/asia-and-the-pacific/>>.

Collectively, these surveys pointed to a number of issues, such as potential isolated instances of discrimination, and we are monitoring the sites' remediation of these issues. One allegation of recruitment fees is still under investigation.

We also continued our work with The Fair Hiring Initiative (TFHI) to test the potential for certification of LHPs in the Nepal-Malaysia migration corridor. Of the four Nepalese LHPs nominated by our suppliers in Malaysia, one is on the path to verification, two have made significant improvements to their recruitment practices, and one did not complete the process. We will seek to promote the pilot with global peers to help increase the pool of certified agents in Nepal. We will also give feedback to our Malaysian suppliers to encourage ethical recruitment at a site level.

Two recruitment agencies from Myanmar also joined to share their experience of the TFHI's On The Level certification program.

Since commencing the implementation of the Responsible Recruitment Addendum in Thailand:

- All 21 sites that recruit migrant workers have provided migrant worker recruitment policies and procedures for review. Of these, 14 sites have additionally worked with our team to co-create a time-bound implementation plan to improve their policies and procedures in line with the Addendum.
- We are currently following up with two sites with historic recruitment fees/repayment discrepancies identified in recent social audits by co-creating time-bound implementation plans to close gaps in policy and practice. These sites are prioritised for site visits in F25.

A process has been refined to pre-screen prospective new Thai and Malaysian sites for compliance with the Addendum.

Bespoke interventions to address modern slavery risks

Whilst our Responsible Sourcing audit program has coverage of our direct own brand and fresh suppliers, we understand that modern slavery risks are also present in lower supply chain tiers. Our work to address the most extreme risks in seafood, cotton and key commodities, such as rice and coconuts, continues.

Seafood

As confirmed by our F23 forced labour risk assessment, seafood continues to be the top modern slavery risk in our food supply chain. The severity of forced labour, human trafficking and debt bondage risks in seafood varies across location, species and gear type (catching method), and risks are increasingly exacerbated by changes in fishing patterns due to climate change.¹ Last year we conducted a specific seafood risk assessment and further identified tuna as the top species risk in the seafood category.

From F24, new and existing canned tuna suppliers to Woolworths Food Company have been required to collect supply chain traceability details, including information regarding the illegal, unreported and unregulated (known as IUU) vessel list, in a standardised format for every batch of tuna shipped to Woolworths Group. Suppliers are required to maintain this information in-house and provide the data within 24 hours of any request made by Woolworths Group. This is subject to spot-checks.

In F24, we also continued scoping for a pilot to conduct vessel level modern slavery risk assessments of select tuna suppliers. However, during implementation we identified practical challenges in engaging tuna vessels including access limitations imposed by traders. Large-scale traders source the vast majority of tuna raw material processed by our suppliers. Traders have significant leverage across the industry and it became apparent that meaningfully engaging traders is required in order to implement effective vessel level due diligence. Developing a strategic approach to engage traders in higher risk commodities supply chains is the next step.

Additionally, we continued a cross-functional pilot to test an end-to-end traceability software solution for a range of seafood products, including tuna. With a focus on data integrity, the pilot is still in the minimum viable product phase.



Commodities – rice and coconuts

In F24, the Human Rights team conducted site visits to six Thai suppliers' rice processing facilities to discuss human rights risk in supply chains. This included five existing and one prospective new rice supplier, with processing sites for own brand bagged rice as well as microwavable rice products. The prevalence of brokers and/or traders was again highlighted as an industry-wide feature. The use of brokers and traders to source raw material can vary depending on price, availability and demand for rice, which is driven often by geopolitical and environmental factors. This can lead to limitations in full traceability to raw material and limited oversight of working conditions for smallholder farmers.

Supplier engagement activities with two coconut processing facilities and five smallholder farming 'clusters' in the Philippines yielded similar discussions. Such raw material traders can act as money lenders and middlemen for farming communities, and exercise substantial power across the industry. Research suggests that this is further exacerbated by bribery and corruption challenges.² Like that of seafood, developing an approach to engage traders in commodities supply chains is the next step.

¹ UK Office of the Independent Anti Slavery Commissioner, *Modern Slavery, Environmental Destruction and Climate Change: Fisheries, Field, Forests and Factories* (2018).
² Transparency International, *The Philippines: Corruption and anti-corruption efforts* (2023).



Cotton

Cotton is one of the most common fibres used in Woolworths Group own brand products, including apparel, home and beauty products. It is also the top non-food risk in our trade supply chain and we remain vigilant in monitoring global cotton-growing regions that are the subject of allegations, or known cases of child or forced labour.

Across the Group, our approach to address risks related to cotton used in our supply chain is governed by our Sustainable Cotton Policy, and we continue to make progress. This year, following the announcement that Better Cotton had launched a pathway to achieve traceable cotton, we updated our Sustainable Cotton Policy to include Better Cotton as another option for our team and suppliers to source from.

BIG W utilises 96% of the Group's cotton consumption for own brand product and leads on the development and implementation of our due diligence tools. This year BIG W focused on growing its volume of cotton sourced sustainably and responsibly in accordance with the sourcing requirements of the Sustainable Cotton Policy. Of the accepted standards and programs, BIG W is strategically focused on organic, recycled and Australian cotton.

Validating raw materials and any associated claims requires robust internal procedures, and BIG W has established procedures for organic, recycled and Australian cotton. In the case of Australian cotton, to give customers extra confidence in our product claims, BIG W has established a traceability and verification process. This includes a desktop traceability system supported by Cotton Australia, and a fibre testing program delivered in partnership with Oritain, a global leader in applying forensic and data science to verify the origin of products

and raw materials. The testing program is based on a statistical sampling plan where samples are taken at random throughout the production process and the sample DNA is analysed to confirm the country of origin of the cotton fibre.

During F24 BIG W continued to increase transparency of cotton in its supply chain with the ongoing roll-out of a supplier self assessment questionnaire (SAQ) to 26 suppliers. The SAQ is designed to facilitate transparency of supply chain actors including raw material and processing suppliers. It also provides visibility of the supplier's capability to provide certified cotton, such as organic, and the supplier's ability to identify the country of origin of cotton. Our ambition to establish a more efficient and effective data and reporting platform is ongoing as we explore enhancements to current processes and systems.

In F24, Woolworths New Zealand undertook a uniform refresh as part of the rebrand from Countdown to Woolworths New Zealand. For this procurement activity we are taking a phased approach to due diligence requirements for cotton with an initial focus on core store garments. We are partnering with our supplier of these products to conduct ongoing document reviews regarding the source of cotton used.

Worker voice and responsible purchasing practices

Social compliance audits are an integral control in our Responsible Sourcing Program. However, we recognise the need for a variety of due diligence tools to identify human rights risks. We also recognise the potential of our own practices to positively impact outcomes for workers in our supply chain.

Listening to workers through worker voice

Worker voice surveys help identify issues that may be more challenging to surface in a routine audit. In F24 we continued to deploy worker voice through partnering with 18 suppliers alongside Ulula and AskYourTeam, two providers of technology-driven worker engagement platforms. Together we've engaged over 1,000 workers in three countries, across both our trade and non-trade supply chains, capturing their sentiment through anonymous feedback on topics including the recruitment process, wages, wellbeing, health and safety, and accommodation.

This year we progressed our pilot in the following areas:

- Identified over 30 actions for improvement across 14 farms in Australia, relating to grievance management, management of labour hire providers (LHPs), employees understanding their entitlements and health and safety
- Workers hired by a LHP at a large farm raised issues relating to wage deductions, limited confidence in grievance channels and bullying. This provided the supplier with visibility of issues not previously identified, enabling them to take immediate action, including direct engagement with workers to enhance awareness of grievance channels and developing an action plan with their LHP
- Finalised the second round of worker voice surveys at a site in Vietnam to enhance an investigation (see [page 29](#))
- Deployed surveys at three sites in Malaysia to verify supplier compliance with our Responsible Recruitment Addendum (see [page 20](#))
- Deployed surveys at three of our DCs to enhance our understanding of risks for labour hire workers.

Ongoing engagement to identify opportunities for an industry approach to worker voice, as well as targeted use for enhanced due diligence, will support our F25 approach.

An enhanced focus on child rights

Building on our Child Labour Addendum launched in F22, this year we enhanced our site visit approach in Asia to guide team members to ask key questions relating to child rights and gender. This resulted in our team identifying a potential case of young workers carrying out overtime at a production site in China. Engagement with the supplier and a relevant audit scheme is underway to understand the nature of work conducted by young workers and the protections for young workers that are in place. This included briefing the auditor to focus on young workers during the next supplier audit.

Responsible Purchasing Practices

We believe that purchasing practices play an important role in promoting responsible supply chains. Responsible Purchasing Practices (RPP) are commitments to enact policies that do not have a negative impact on wages and working conditions in the supply chain.

In F24 we conducted workshops with Primary Connect, non-trade procurement, Woolworths Food Company (WFC) and our fruit and vegetable team to establish a common language and build leaders' awareness on the topic of RPP. We also collected information about our existing practices to help identify opportunities for ongoing alignment with best practice. Examples of existing practices identified include established avenues for suppliers to raise concerns or grievances through Woolworths Voice of Supplier surveys and our Supplier Speak Up channel, WFC's processes for production forecasting and on-time payments, including a policy for payment terms for small suppliers, and the Woolworths Trade Partner Charter which includes a commitment to act like business partners.

As members of ACT on Living Wages, our BIG W team continued to work towards meeting their responsible purchasing commitments. In F24:

- 107 out of 112 in-scope BIG W team members completed ACT's e-learning on fair terms of payment and responsible exit of supplier relationships
- A Responsible Exit Procedure was developed to support BIG W team members implement their Responsible Exit Policy published in 2023
- Internal training on the Responsible Exit Policy was developed and roll-out has commenced for relevant team members
- 93 BIG W suppliers were invited to participate in the ACT Purchasing Practice Assessment. Of those, 84 responded, providing insights including opportunities to improve practices relating to costing, forecasting and order processes.



Supply chain – non-trade

Our non-trade supply chain comprises 6,174 direct suppliers of goods not for resale, and service providers required for the operation of the Group’s core businesses. We take a risk-based approach to partnering with our non-trade suppliers to manage modern slavery risk.

Policies, contracts and targeted approaches for areas of higher risk are the key mechanisms we have implemented to mitigate modern slavery risk in our non-trade supply chain. The sourcing of non-trade goods, equipment and services where spend is over \$1 million per annum is managed by our Non-trade Procurement team and governed by our Woolworths Group Procurement Policy. All non-trade suppliers are in scope of our Responsible Sourcing (RS) Policy, and we aim for all non-trade template contracts and purchase orders to include modern slavery clauses and mandate compliance with our RS Policy. We continue to prioritise due diligence in inherently higher risk categories, including uniforms, renewable energy equipment and third-party services.

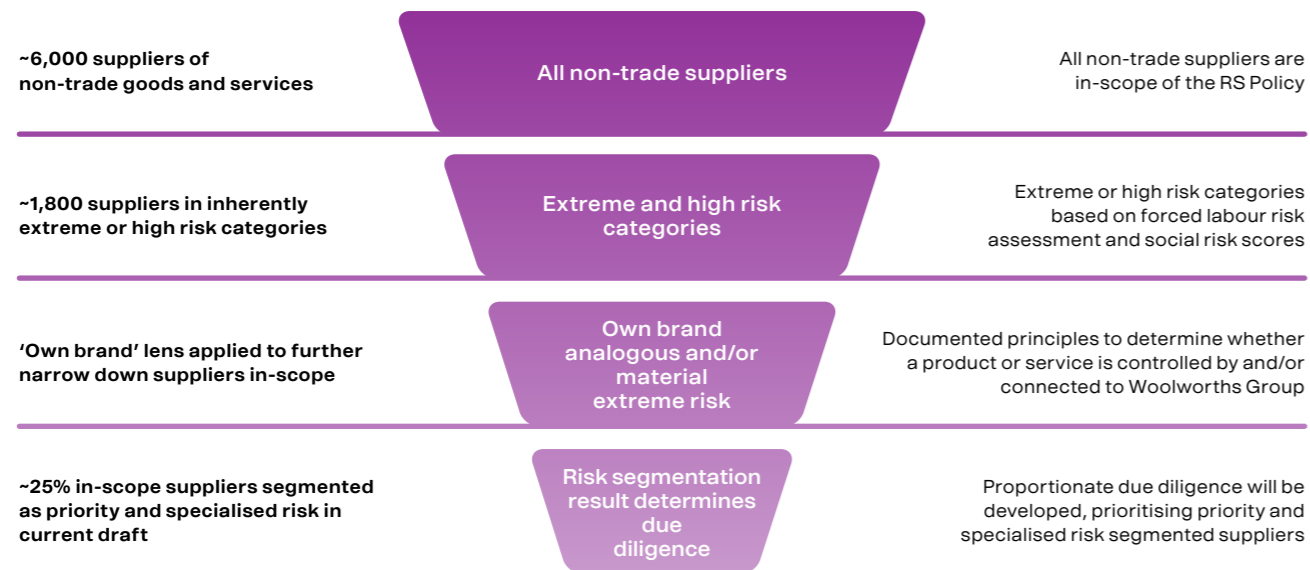
Expanding our RS Program in non-trade

Human rights risks are dynamic, and we continue to review our program to make sure our interventions remain fit for purpose. In line with this, in F23 the Group identified an opportunity for a programmatic uplift to our RS Program to provide a consistent approach to managing labour rights risk across our trade and non-trade supply chain.

In F24, we developed a risk segmentation approach for non-trade suppliers to determine which suppliers will be in scope of the RS Program, and how to further risk-segment in-scope suppliers. The Human Rights team partnered with LRQA to identify inherently extreme and high risk non-trade categories based on our F23 forced labour risk assessment and LRQA’s social risk scores. Non-trade suppliers in these categories have then been assessed to determine their connection to the Group. Consistent with our approach to in-scope trade suppliers, in-scope non-trade suppliers will be subject to further risk segmentation, with proportionate human rights due diligence depending on their risk segment.

In F25, we will continue to work with key non-trade business units to develop proportionate human rights due diligence for suppliers based on their risk segmentation.

Non-trade supplier risk segmentation process



Security service providers

Our end-to-end labour governance framework aims to improve oversight of compliance with workplace laws by third-party labour providers in our operations. We have taken a phased approach to implementing this framework, commencing implementation with security service suppliers. In F24, all security suppliers who provide static security guarding services in Australian Supermarkets were required to complete a baseline third-party social compliance audit. We developed a bespoke external audit tool for auditors to verify our suppliers’ compliance with relevant legislation and Group requirements for both directly employed and subcontracted workers. Key non-conformances (NCs) identified in multiple suppliers’ audits included underpayments, non-provision of documents that hindered the verification of tax and superannuation payments and guards not being aware of the Group’s Supplier Speak Up Program. Management action plans were entered into with five suppliers to rectify NCs, and suppliers will be re-audited to monitor for continuous improvement.

Renewable energy equipment

We recognise raw materials used to manufacture renewable energy equipment, such as polysilicon from China and cobalt for lithium-ion batteries from the Democratic Republic of Congo, present an inherently higher risk of modern slavery.¹ Our sustainability goal to be powered by 100% green electricity by 2025, and over the longer term achieve net positive emissions, has involved the ongoing procurement of solar panels. In F24, we continued our partnership approach with our solar panel provider through 1:1 meetings to gain an improved understanding of how they manage human rights risks in their supply chains.

zero-emissions by 2030, we have conducted human rights due diligence on our home delivery truck EV suppliers. Our main supplier will undergo a third-party social compliance audit and site visit from the Human Rights team at the manufacturing site that produces vehicles for the Group, and then partner with the Group to strengthen its human rights due diligence of its supply chain if needed.

Similarly, in New Zealand, potential EV suppliers completed a self assessment questionnaire tailored to the specific risks of EV manufacturing. Responses were reviewed by the Human Rights team, who supported the project team to identify preferred suppliers, with the level of supply chain transparency a key consideration.

We also continue to monitor our electric vehicles (EV) suppliers. In Australia, as we work towards our aim of making 100% of home delivery trucks



Image: Woolworths Cumberland Park, South Australia.

¹ James Cockayne, Edgar Rodriguez and Oana Burcu "The Energy of Freedom? Solar energy, modern slavery and the Just Transition" (2022) University of Nottingham Rights Lab.



Primary Connect

Primary Connect is Australia and New Zealand’s largest food and retail supply chain and logistics company, delivering products to over 1,200 Woolworths Supermarkets, Metro, BIG W stores and customer fulfilment centres (CFCs). Primary Connect also delivers direct to business customers, and this service is called PC+. Primary Connect stores products for store distribution in 27 distribution centres (DCs) across Australia and New Zealand, where our team and labour hire casuals pick and pack pallets, which are then transported by road, rail and sea, using a fleet of ~1,500 road trailers and 71 carrier partners.

International

International shipping is a complex industry with unique modern slavery risks, exacerbated by the physical remoteness of shipping and the restriction of movement for workers. The Group has direct engagement with three freight forwarding companies who we partnered with to import ~\$2.5 billion worth of goods in F24. In F24, we joined the Institute of Human Rights and Business Responsible Shipping Dialogue to gain insights over how other companies are mitigating risks in their international shipping supply chain and share learnings.

Distribution centres

In F23, we consolidated the number of suppliers who provide labour hire casuals in our DCs to two suppliers. This allows us to focus on collaboration and partnership with suppliers to drive positive outcomes for workers and the business. In F24 both labour hire suppliers who provide workers in our Australian DCs underwent a third-party social compliance audit at three sites across the country. Suppliers were audited against the expectations set out in our RS Standards, with key findings including opportunities to improve grievance mechanisms and training. In F25, we will partner with these labour hire suppliers to close out non-conformances and identify opportunities to strengthen our ongoing monitoring of labour hire suppliers.

Store delivery

Our domestic transport network moves goods from Primary Connect warehouses to stores and CFCs, as well as delivering direct to businesses for external customers. The Group does not directly employ team members to conduct this work; rather we use carrier partners to facilitate the transport of goods across our network. In F23, we identified opportunities to strengthen ongoing monitoring of human rights risks with our domestic carrier partners. In F24, we conducted a gap analysis on the inclusion of modern slavery clauses in supplier contracts. We issued side letters to five suppliers to update their contracts, as well as including carrier partners as in-scope for our non-trade segmentation approach (see page 24).

WooliesX

Once goods have reached a store or CFC, WooliesX then partners with multiple carrier partners to perform ‘last mile’ delivery services; that is, delivering online purchases from our stores or CFCs directly to customers’ homes. More than half of our carrier partners deliver products in Woolworths Supermarkets branded trucks, with the remaining proportion engaged through an ‘on demand’ point-to-point model.

Last mile

We are conscious of balancing customer benefits of last mile delivery with our responsibility to make sure all our suppliers are acting in compliance with workplace laws and treating drivers with respect. In F22, we developed a Fair Pay and Entitlements Framework 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. This framework continues to be used in business reviews with each platform to discuss safety performance, rates of driver pay and working conditions to improve transparency over on-demand partners’ drivers earnings. We also receive regular safety incident reporting utilising an incident reporting framework that outlines the severity of the incident and the corresponding reporting protocols.

In F24, we also partnered closely with a last mile delivery supplier to strengthen their management of labour rights risks in our home delivery supply chain. As a result of this partnership, our supplier has now introduced a Social Responsibility and Compliance Code specifically for subcontractors who perform home delivery services for the Group. They have also developed auditable standards that will be used to monitor their subcontractor’s compliance with the Code. These auditable standards are planned to be rolled out by our supplier in F25, and the Group will monitor results from these audits through quarterly business reviews with the supplier.



Section 5

Grievance and remediation

Woolworths Group is committed to providing an effective and accessible grievance mechanism to receive and manage complaints about adverse human rights impacts in our operations and supply chain. Providing access to trusted, effective grievance channels, including our Supplier Speak Up channel, is critical to doing this.

Our focus is on continuously improving the effectiveness of our grievance channels – and our investigations procedure – so that our suppliers and their workers feel confident in speaking up to raise their concerns or complaints when they need to. This year, we investigated a total of 73 human rights related grievances raised by workers across our supply chain, including grievances raised by workers in our cleaning and trolley collection supply chain. This is an increase from F23, when 46 grievances were investigated.

Cleaning and trolley collection suppliers

In F24, our Australian Facilities Management Compliance team investigated 39 matters in the trolley collection and cleaning supply chains, including 30 grievances raised by workers through Supplier Speak Up and nine through direct contact or internal sources. Allegations included underpayments (64%), subcontractor issues (22%), non-compliance with Pegasus, a contractor safety management system (5%), unfair dismissal (5%), bullying (2%) and roster change (2%).

Where non-compliances were identified, we partnered with our supplier 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 these investigations, in F24

a total of ~\$40,300 was paid to 28 workers at eight sites. Once underpayments were rectified, three direct suppliers were terminated from five sites, six subcontractors were terminated across 68 sites, and five subcontractors were barred from providing trolley collection and cleaning services to any Woolworths Group site.

In F24, New Zealand received four complaints related to three cleaning contractors. The complaints included allegations of a lack of employment agreements and payslips, cash payments and payments less than minimum wage. One investigation was unable to be substantiated, one led to the supplier entering into a management action plan (MAP) which is ongoing, and the third was referred to the New Zealand Labour Inspectorate who investigated and issued the supplier with an improvement notice.



Image: Woolworths Greenway Village, Colebee NSW.

Supplier Speak Up

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

Forced to work	Underpaid
Bullied, abused or treated badly	In danger

Speak Up. Report any concerns through our confidential Supplier Speak Up channel. Suppliers and their workers can report issues confidentially and anonymously through Speak Up. Issues are then referred to Woolworths for investigation.

Contact Supplier Speak Up Here

1800 778 178
61 0800 888 9876

Woolworths Group and Supplier Speak Up are not responsible for any issues of information.

Supplier Speak Up is a confidential channel for reporting issues. It is not a substitute for legal advice. For more information, please contact your legal counsel.

Woolworths Group and Supplier Speak Up are not responsible for any issues of information.

Supply chain

In F24, our Human Rights team investigated 30 complaints regarding alleged breaches of our Responsible Sourcing (RS) Policy and/or Standards, 15 of which were raised through Supplier Speak Up. Seventeen of these investigations are now closed and 13 are still under investigation. Allegations included a range of issues – including underpayments, bullying and harassment, poor working conditions, physical abuse, deceptive recruitment and child labour.

The two allegations of deceptive recruitment and one allegation of child labour were potential incidents of modern slavery. In the first deceptive recruitment case, Woolworths Supermarkets was the target of a fraudulent international scheme purporting to be hiring employees for work in our stores. The relevant authorities were identified to conduct an investigation. The second case relates to a fresh produce supplier in New Zealand, and the investigation is ongoing.

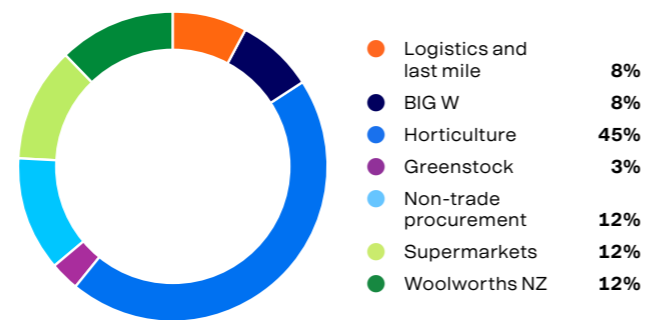
In response to allegations of child labour at a supplier site in China, we engaged The Centre for Child Rights and Business and LRQA to conduct a child labour assessment. Whilst the allegation was not substantiated, it was considered that there was potential for child labour due to weakness in controls to prevent both child labour and unauthorised subcontracting. The site remains suspended from trade while corrective actions are addressed.

In all other cases, 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 one matter relating to the alleged underpayment of workers by a non-trade supplier, we were unable to substantiate the complainant's claims due to insufficient information but worked with our supplier to test their process with a view to prevent further breaches.

Further, in cases where gaps were identified with our suppliers' own grievance mechanisms, we provided access to our Supplier Grievance and Remedy Questionnaire: a diagnostic tool to support suppliers to understand and address issues in their approach to grievance and remedy. 170 suppliers have used the diagnostic tool to date.

This year, we saw an increase in human rights related complaints in our horticulture supply chain compared to last year. There are various potential explanations for this, including but not limited to: operational pressures impacting our suppliers and their workers; the high-risk nature of the horticultural sector from a human rights perspective; and our increased engagement and outreach to workers in our horticultural supply chain through the distribution of Speak Up posters and participation in biannual worker forums jointly hosted with the RCSA.

Breakdown of business units in our supply chain that received grievances in F24



Continuous improvement

In F24 we continued to strengthen Supplier Speak Up by:

- + Distributed Speak Up posters in traditional and simplified Chinese to our suppliers in China to raise awareness of our grievance mechanism
- + Conducted a review of our Speak Up Policy and implemented improvements, including authorising Speak Up as a recipient of protected disclosures
- + Developed a process for quarterly testing of the Group's international hotlines to test the phone lines' functionality, quality and effectiveness. The first test was conducted in May 2024.



CASE STUDY

Working with a Vietnamese supplier to address excessive overtime hours

In F23, we received an anonymous message from a worker at a supplier site in Vietnam indicating they may be working under conditions of forced labour. This triggered an investigation, including a third-party unannounced audit, independent forced labour assessment, and a worker voice survey to triangulate the audit findings. While no forced labour was found, excessive overtime and consecutive work days beyond legal limits were identified.

After closing the investigation, we continued to work with our supplier to better understand the underlying causes of workers' excessive overtime hours. As a result, the supplier introduced an efficiency scheme under which workers receive incentive payments for achieving performance targets within set timeframes. This means workers' standard pay can be boosted by the incentive payment without the need for overtime. Further, to understand worker sentiment we partnered with Ulula to facilitate a worker voice survey and found that:

- Nearly all respondents stated they have seen improvements to their working conditions
- 100% of workers respond positively when asked: 'Is your base pay (without overtime) enough to meet your basic needs (rent, food, transport and utilities)?'
- 95% agree or strongly agree that 'When I work overtime, I am correctly paid for the additional time and work'.

Management has indicated they have also seen operational efficiencies from the scheme, including in electricity costs due to the reduced hours that machines are in operation.



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 key modern slavery risks in accordance with relevant legislation, international human rights standards, regulatory obligations, shareholder expectations and good corporate governance principles. Throughout the Statement we have attempted to report the outputs and, where possible, the outcomes of our actions. This is part of how we take stock of the effectiveness of our day-to-day activities.

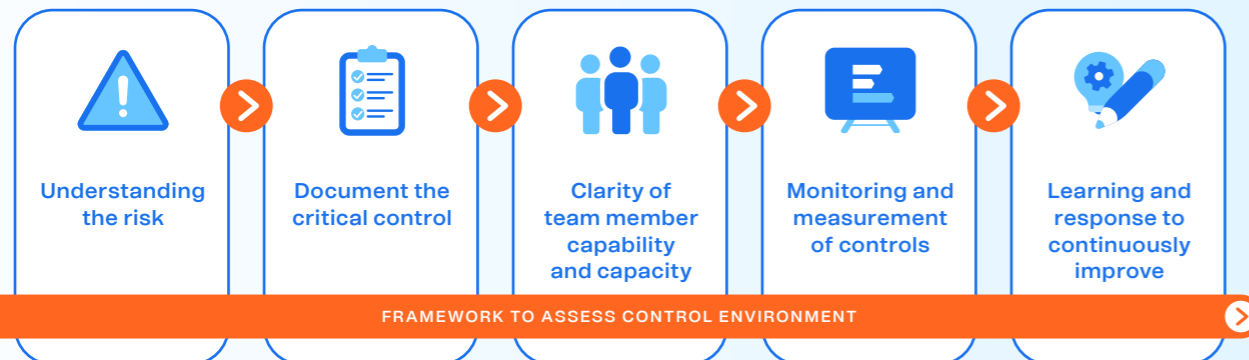
We integrate modern slavery risk management into our Group Risk Management Framework

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 event that we proactively manage in line with the Framework. We have minimal appetite for this material risk, and take all reasonably practicable steps to work 'towards zero' to achieve risk elimination.

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

In F23, we assessed our key modern slavery risks and controls at a Group level. In F24, the assessment was completed with the business units in scope of the Responsible Sourcing Program. From the work performed, we have comfort that our overall approach to managing key modern slavery risks are in line with the Group's risk appetite. The outcomes of this assessment, including opportunities for improvement, were reported to the ExCo and the Board's Risk Committee.

Group Risk – Control Environment Maturity Assessment



Independent Review

As part of our continuous improvement mindset, an independent review of our Responsible Sourcing (RS) Program was performed in F24. The review focused on the design and operating effectiveness of the RS Program across four key areas of our business – BIG W, Woolworths Food Company, Fruit and Vegetables and Greenstock.

The review achieved two key outcomes – validating areas of improvement that Management have self-identified and were already working on, and identifying additional improvement areas. These include better documentation of supplier monitoring activities, improving quality of data sources and opportunities to automate key activities to minimise risk of manual tasks error. Action plans and timelines have been developed to deliver these recommendations. Following the success of this review, Management will consider extending independent reviews on other pillars of the Human Rights Program.



Developing tools to test and improve Responsible Sourcing audit quality and effectiveness

Third-party social compliance schemes, including audits, are one of the ways suppliers in scope of our RS Standards are required to demonstrate compliance. In F24 we developed an audit quality improvement plan to increase the reliability of audit reports and drive continuous improvement across two areas:

- 1. Engagement:** regular cadence with scheme and certification bodies (CBs) to discuss challenges and opportunities
- 2. Tracking and escalation:** audit quality issues with schemes and CBs.

These work streams seek to create clear steps to improve, track and report audit quality issues, so that the Human Rights team can work with our partners to lift capability. While this work has occurred ad hoc to date, our coordinated plan to help improve audit quality will commence in F25.

Similarly, as human rights risks continue to evolve, we understand that announced and semi-announced audits commissioned by our suppliers may have limitations, especially in high-risk countries. In F24 we partnered with Dignity in Work for All (DIWA) to pilot an unannounced audit process. The purpose of this approach was to test the application of issue-specific as well as broader human rights based unannounced audits as an additional level of due diligence. DIWA conducted unannounced audits at three sites across Vietnam, Thailand and China, including a seafood supplier. The audits identified issues that weren't raised in the sites' previous announced/ semi-announced audits, suggesting there is utility to the unannounced audit approach. We are following up with suppliers to action the audit non-conformances, and will consider the role of unannounced audits in our overall RS Program in F25.



Progress against our objectives

The following table outlines our key initiatives to deliver our 2025 plan. As we progress, we will maintain a practical and risk-based approach, and adjust priorities to align with our Human Rights Program objectives.

Operations

OBJECTIVES	PROGRESS AGAINST OBJECTIVES AND F25 PLANS
Undertake a salient human rights issue assessment	F24: Completed assessment in consultation with key internal and external stakeholders F25: Aim to publish the assessment outcomes and integrate the findings into our human rights planning for the 2030 Sustainability Plan.
Partner with entities in the Group to strengthen their modern slavery due diligence	F24: Progressed embedding the M+A Human Rights Framework with new and existing majority owned businesses F25: Continue to embed M+A Human Rights Framework and review for currency.
Team member training on modern slavery and human rights, prioritising those managing higher risk categories	F24: Conducted training across different business units on topics such as responsible purchasing practises, and also updated content for an online team training module F25: Develop the online training module and launch the team training.
Design and pilot a mechanism to engage potentially affected groups	F24: Partnered with Shift to design a <i>Guidance Framework for Meaningful Engagement with Stakeholders Impacted by Woolworths Group's Operations or Value Chain</i> F25: Pilot the guidance framework across different use cases.

Supply chain

OBJECTIVES	PROGRESS AGAINST OBJECTIVES AND F25 PLANS
Introduce modern slavery e-learning to targeted suppliers	F24: 321 representatives from 260 suppliers have completed one or more Woolworths Group e-learning courses on aspects of our Human Rights Program F25: Continue rollout with suppliers.
Pilot opportunities to embed worker voice in our Responsible Sourcing Program	F24: Eighteen worker voice surveys deployed in Australia, Malaysia and Vietnam F25: Continue follow-up surveys at selected supplier sites and partner with Issara to commence a new worker voice pilot in Thailand.
Conduct a forced labour risk assessment	F24: Developed an extreme risk due diligence (ERDD) framework to address bespoke areas of intractable risk F25: Roll out ERDD framework in selected areas.
Continue to prioritise due diligence of labour hire providers (LHPs) in our Australian horticultural supply chain	F24: Utilised Sedex and Fair Farms to identify and verify LHPs, and contributed to the development of research on a national labour hire scheme F25: Continue to review LHPs and conduct advocacy on a national labour hire scheme.
Design and deliver due diligence for identified high-risk commodities	F24: Developed enhanced long-life tomato due diligence and conducted site visits with rice and coconut suppliers F25: Develop an approach to engage traders in commodity supply chains.
Design and deliver a due diligence approach for non-trade suppliers based on category risk segmentation	F24: Designed and delivered a supplier risk segmentation approach for non-trade suppliers F25: Socialise supplier risk segmentation approach with key business units and plan for implementation of a due diligence approach.

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 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	PRINCIPLE ACTIVITIES DURING REPORTING PERIOD
Woolworths Group Limited (ACN 000 014 675)	Woolworths Retail is the Group's cornerstone food retail businesses located in Australia and New Zealand comprising over 1,000 Supermarkets and Metro and complementary business to consumer (B2C) eCommerce channels.
Woolworths (South Australia) Pty Limited (ACN 007 873 118)	
Progressive Enterprises Holdings Limited (ACN 113 919 878)	
Leasehold Investments Pty Ltd (ACN 009 237 932)	
Drumstar Pty Ltd (ACN 085 415 032)	

Woolworths Food Company

REPORTING ENTITIES	PRINCIPLE ACTIVITIES DURING REPORTING PERIOD
Woolworths Group Limited (ACN 000 014 675)	Woolworths Food Company (WFC) comprises the development of the Group's own brand and exclusive products; Australian food wholesale and distribution businesses, including Australian Grocery Wholesalers and Statewide Independent Wholesalers. Also includes the red meat business, Greenstock, and the food service business, PFD.
PFD Food Services Pty Ltd ¹ (ACN 006 972 381)	
Statewide Independent Wholesalers Limited ¹³ (ACN 009 519 546)	
Woolworths (Victoria) Pty Limited (ACN 004 177 155)	

W Living

REPORTING ENTITIES	PRINCIPLE ACTIVITIES DURING REPORTING PERIOD
Woolworths Group Limited (ACN 000 014 675)	W Living comprises the Group's specialty retail businesses BIG W, Petstock and HealthyLife.
Petstock Pty Ltd ^{2,5} (ACN 098 394 588)	

Retail Platforms

REPORTING ENTITIES	PRINCIPLE ACTIVITIES DURING REPORTING PERIOD
Woolworths Group Limited (ACN 000 014 675)	Woolworths Group's platforms and services work to support our retail businesses and include our distribution and fulfilment network, Primary Connect; data and advanced analytics company, Quantum; and retail media business, Cartology.
Fabcot Pty Ltd (ACN 002 960 983)	
The Quantum Group Holdings Pty Limited ²⁴ (ACN 121 842 957)	
The Quantum Group Pty Limited ²⁴ (ACN 102 444 253)	
Cartology Pty Limited (ACN 009 671 149)	
Woolworths Group Payments Pty Limited (ACN 646 516 001)	
Wpay Pty Limited (ACN 646 547 908)	

¹ Controlled, but not wholly owned, entity of Woolworths Group Limited.

² Controlled, but not wholly owned, entity of Woolworths Group Limited, to lodge its own Modern Slavery Statement for F24.

³ Statewide Independent Wholesalers Limited registered office is 8 Translink Avenue, Western Junction TAS 7212.

⁴ The Quantum Group Holdings Pty Limited and The Quantum Group Pty Limited registered office is Bay 12, 2 Locomotive Street, Eveleigh NSW 2015.

⁵ Petstock Pty Ltd registered office is 1-3 Humffray Street N, Bakery Hill VIC 3350. Except as described in footnotes 3, 4 and 5, the registered office of each of the reporting entities within Woolworths Group is 1 Woolworths Way, Bella Vista NSW 2153.



PFD Food Services

PFD Food Services (PFD) is Australia’s largest foodservice distributor, connecting Australians through food by partnering with foodservice operators nationwide. Customer-centricity and team focus are core to PFD’s success. Since June 2021, Woolworths Group has held a 65% equity stake in PFD, providing us with access to Group expertise managing human rights, including modern slavery, risks. PFD is not directly managed by Woolworths Group, and accordingly, PFD has its own policies and processes to manage modern slavery risks.

Governance

PFD’s Risk and Audit Committee meets quarterly to proactively review and assess potential and arising risks. The Executive Leadership Team annually review the PFD risk appetite statement, making recommendations based on evolving market and business conditions. Specifically, PFD’s risk appetite for modern slavery risks is that we aspire to eliminate modern slavery risks. We have minimal appetite for this material risk, and take all reasonable practicable steps to work ‘towards zero’ to achieve risk elimination. This risk appetite statement serves as a guiding principle for all risk and business decisions, guiding informed and responsible choices.

Identifying and mitigating modern slavery risks

Operations

PFD operates a national network platform across Australia, with our corporate office located in Knoxfield, Victoria. We oversee 52 foodservice distribution centres and six processing facilities.

Our workforce comprises approximately 2,750 FTE across our national office, State and regional branches. The majority of PFD’s team members are employed directly, with employment terms and conditions set out in either an enterprise agreement, modern award or employment contract. Approximately 5% of our team consists of contractors, including subcontractors and labour hire workers, who help us manage peak demand and fill operational gaps.

We recognise that due to the nature of the industry there are inherently higher risks of labour rights issues in our seafood processing facilities. To mitigate this, in 2019 PFD became a member of Supplier Ethical Data Exchange (Sedex). PFD seafood processing facilities undergo Sedex SMETA audits as a mechanism to continually monitor and review our practices at PFD seafood processing facilities.

Supply chain

PFD has a vast supply chain, with over 1,080 direct suppliers providing vendor brands, own brand and fresh products to PFD, which are sold and distributed to approximately 53,200 customer sites every week. Our products encompass a wide range of categories including frozen, chilled and dry foods, protein, packaging and cleaning products. Although the majority of deliveries to customers are made by drivers directly employed by PFD, we engage 60 FTE contractor drivers and 73 food carriers to support

in the delivery of goods to customers. We also have other contracted service providers such as cleaners.

In F24, PFD proactively reviewed suppliers who are required to comply with the *Modern Slavery Act 2018* (Cth) to make sure they had a current modern slavery statement. PFD also completed a desktop risk assessment of our supply chain to confirm our high-risk areas. The following are the categories that we have identified as having an inherently higher risk of modern slavery:

- **Seafood:** There are inherent modern slavery risks across the global seafood sector, including forced labour and debt bondage. PFD sources and supplies seafood across Australia, including own brand and branded product in fresh packaged, value-added and frozen forms.
- **Protein:** Sector-wide challenges in meat processing, particularly migrant labour and working conditions, contribute to an inherently higher risk of modern slavery. PFD has two meat processing facilities in Brisbane and Hobart. Nationally, PFD provides fresh, value-added and frozen lines through branded and own brand ranges.
- **Indirect Labour:** PFD engages a portion of indirect workers to support our operations. PFD recognises that labour rights risks may be higher for indirect workers as PFD has less control over how these workers are engaged, treated and remunerated.

In F25, we will review the findings of our desktop review and consider what proportionate controls to implement to mitigate the risk.

CASE STUDY

Updating our Responsible Sourcing Policy

In line with our commitment to continuous improvement, in F24 we reviewed our Responsible Sourcing Policy and Whistleblower Policy (Policies). We identified opportunities to update the Policies to align them with internationally recognised frameworks, including the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization’s eight core conventions, to more accurately reflect PFD values and enhance external transparency on our processes.

Our Whistleblower Policy now includes a dedicated independent grievance mechanism to provide greater objectivity and transparency. This service is supported by Woolworths Group and has been designed with appropriate escalations through the PFD business and up to PFD Board. The updated Policies were approved by the PFD Board and integrated into the Trade Circular (supplier contract) document, which we review and share annually with suppliers. The Policies are also publicly available on our website, and in July 2024 we trained team members accountable for sourcing and management decisions on the Policy’s requirements.

Assessing the effectiveness of our actions

PFD has made progress in its approach to modern slavery risk mitigation. However there remain further opportunities for improvement, including a review of appropriate activities to measure effectiveness that will commence in F25. In F24 the following activities have been completed:

WORKSTREAM	ACTIVITY	MEASUREMENT
Governance	Collaboration with Woolworths Human Rights team	<ul style="list-style-type: none"> • Monthly meetings held with Woolworths Group Human Rights team
	Team member training	<ul style="list-style-type: none"> • F23 Modern Slavery Statement shared with all Team members • Grievance training for PFD Executive Leadership Team
	Communications	<ul style="list-style-type: none"> • Incorporation of Responsible Sourcing and Grievance Mechanism in Trade Circular (supplier contract)
Risk management	Risk Management	<ul style="list-style-type: none"> • Standing Risk and Audit Committee agenda item • Human rights forms part of PFD risk appetite statement and is reviewed annually
	Modern slavery questionnaire	<ul style="list-style-type: none"> • Reviewed 68% of existing suppliers’ responses to our modern slavery questionnaire
	SMETA auditing of PFD facilities	<ul style="list-style-type: none"> • SMETA audits of all direct PFD fish processing sites
Grievance	Channels, including confidential, and mechanisms for grievances to be raised	<ul style="list-style-type: none"> • Established and communicated a confidential grievance program

Consultation with entities

PFD wholly owns Fishboyz Pty Ltd (ACN 164 015 749). In August 2022, the Fishboyz business (including employment of employees) was fully integrated within PFD and ceased to operate as a separate operating entity. The Fishboyz Pty Ltd shell entity has no residual operations to attest to. We do not own or control any other entities.

Looking ahead to F25

In F25, PFD will continue to partner with Woolworths Group to align on an approach for further due diligence of own brand products, as well as considering how to further embed our grievance mechanism for team members.

The content in relation to PFD (pages 34–35) was approved by the PFD CEO and Board of Directors on 21 August 2024.



Statewide Independent Wholesalers

Statewide Independent Wholesalers (SIW) is a distribution company which operates as a joint venture between Woolworths Group (60%) and Tasmanian Independent Retailers (TIR) (40%). It operates out of its distribution centre in Western Junction, Tasmania to pick and dispatch approximately 37 million cartons per annum of goods. These goods are then delivered to various businesses across Tasmania, including 32 Woolworths Supermarkets, approximately 160 IGA and independently bannered stores, three Dan Murphy's and 36 BWS liquor outlets. SIW is not directly managed by Woolworths Group, and accordingly, SIW has its own policies and processes to manage modern slavery risk.

Identifying and mitigating modern slavery risks

Operations

SIW directly employs a mix of full-time, part-time and casual team members who work across the distribution centre, transport services and support roles in Tasmania, Australia. SIW team members are employed directly with their employment terms and conditions set out in either an enterprise agreement, modern award, or employment contract.

SIW recognises the need to continually monitor its operations for modern slavery risk and has policies and processes in place to mitigate these risks, including a Code of Conduct, Respectful Workplace Policy and Whistleblower Policy. Procedures include pre-employment screening, including confirmation of working rights and training relevant team members on modern slavery mitigation practices. Due to these factors, the risk of modern slavery in SIW's direct team members is considered low.

SIW also outsources services to third-party providers to perform regular and ongoing work on SIW's site. These categories are inherently higher risk due to a workforce often characterised by a higher portion of migrant and unskilled workers who may be less aware of their workplace rights.

Supply chain

SIW procures food, general merchandise and liquor goods directly from suppliers to supply to customers. Woolworths Group, Endeavour Drinks and TIR are responsible for the initial sourcing of goods and checking that procurement complies with their relevant policies. In F24, SIW worked with TIR to better understand their processes for managing modern slavery risks and progress with their improvement plans in the areas of due diligence, governance, training and collaboration. SIW also has monthly engagements with the Woolworths Group Human Rights team to understand Woolworths Group's approach to managing human rights risks.

SIW sources various non-trade products and services to support its operations. This includes IT equipment, uniforms, transport services and requisites for the maintenance and repairs of its facilities and equipment. SIW recognises that there are categories of goods and services that carry an inherently higher risk of modern slavery despite direct suppliers being Australian based, such as the raw materials in uniforms (including freezer gear and boots) and the potential for multiple levels of subcontracting in logistics.

Supply partners

797 trade suppliers

207 non-trade suppliers

4 outbound logistics suppliers

7 operations service providers

Operations

1 distribution centre

13,455 wholesale grocery, liquor product lines received, picked and dispatched

Distributed to approximately **230** outlets

Team

453 directly employed team members

88% covered by single enterprise agreement

36% registered with trade union

Our Human Rights Framework

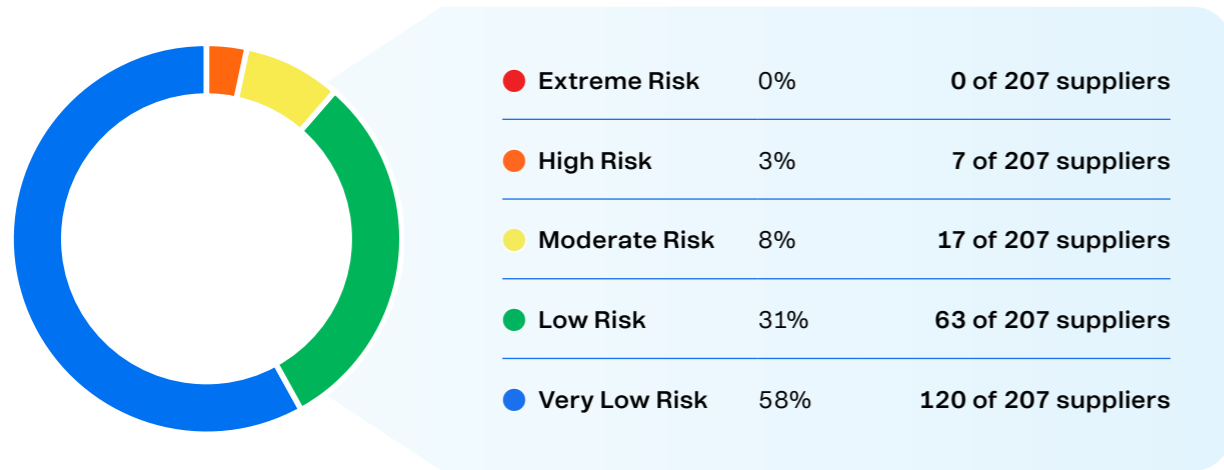
As a business that has a significant impact on people right across Tasmania, respecting human rights is central to SIW's organisational value of 'Think People'. In F23 the SIW Board approved the SIW Human Rights Policy (Policy) which sets out SIW's expectations for team members and suppliers in relation to human rights. The Policy is embedded through the organisation's operations through ongoing team member training, providing copies of the Policy to SIW suppliers, and making the Policy publicly available on the SIW website. SIW requires new suppliers to complete a human rights due diligence questionnaire that is assessed by SIW, as well as annually complete a Human Rights Compliance Agreement.

To reflect SIW's ongoing commitment to respecting human rights, the following work was prioritised during F24 to uplift our human rights program and check ongoing supplier compliance with the Policy and applicable modern slavery laws:

ACTIVITY	PURPOSE
Human Rights Risk Methodology	Methodology for assessing inherent human rights risk amongst non-trade suppliers. The methodology was utilised to complete the non-trade supplier inherent risk assessment.
Non-Trade Supplier Risk Assessment	Utilising the developed methodology, a risk assessment was conducted for all non-trade suppliers highlighting which suppliers carry the highest levels of inherent human rights risk within SIW's supply chain.
Supplier Engagement Process Map	Designed an end-to-end process for non-trade suppliers from onboarding, risk segmentation, control administering and ongoing monitoring.
Procurement Guidelines	Sets expectations in relation to human rights and responsible sourcing that SIW team members must follow when engaging new non-trade suppliers.
Due Diligence Questionnaire	Uplifted the existing supplier due diligence questionnaire for greater transparency and improved assessment of human rights risk. The enhanced questionnaire was implemented in F24.
Whistleblower Policy	Uplifted grievance reporting mechanism for team members and suppliers, with complaints handled by dedicated internal SIW Protected Disclosure Officers. The uplifted policy and supporting training materials commenced roll-out in F24.



Risk profile for non-trade suppliers



The supplier risk assessment, conducted using the Human Rights Risk Methodology, has highlighted the areas of the supply chain that hold the greatest levels of human rights and modern slavery risk. Guided by this risk assessment, SIW understands the areas of highest risk within its operations and seeks to develop targeted strategies to identify, mitigate and remediate this risk.

Assessing the effectiveness of SIW's actions

The key activities that enable SIW to monitor the implementation of its modern slavery approach include:

WORKSTREAM	ACTIVITY	MEASUREMENT
Governance	Board education	Annual session to educate Board on business and human rights
	Collaboration meetings with WOW and TIR	16 meetings
	Team member training	Human Rights Policy included in new team member induction for directly employed team
Risk management	Non-trade supplier risk assessment	Non-trade suppliers assessed and risk segmented
	Due diligence questionnaire	All in scope new suppliers provided validation information
	Compliance agreement	All compliance statements for moderate and high risk suppliers with spend over \$15,000 were completed

Looking ahead to F25

In F25, SIW will develop a plan for implementation of the frameworks developed in F24. SIW will also continue to strengthen its human rights program through ongoing collaboration and consultation with Woolworths Group, TIR and suppliers.

The content in relation to SIW (pages 36–38) was approved by the General Manager and Board of Statewide Independent Wholesalers on 21 August 2024.

2024 Reporting Suite

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



2024 Annual Report

For a consolidated summary of Woolworths Group's financial and operational performance in F24.



2024 Sustainability Report

For detailed information on our progress against our Sustainability Plan 2025.



2024 Sustainability Data Pack

For detailed data on our key sustainability metrics.



2024 Corporate Governance Statement

Describes our corporate governance framework, policies and practices as at 28 August 2024.

[The 2024 reporting suite can be found here.](#)

Company directory

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Woolworths Group Sustainability

Simon Lowden
Chief Sustainability Officer

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