

Company Name Woolworths
Industry Agricultural Products (Supply Chain only)
Overall Score (*) 39.0 out of 100

Theme Score	Out of	For Theme
6.6	10	A. Governance and Policies
10.1	25	B. Embedding Respect and Human Rights Due Diligence
2.9	15	C. Remedies and Grievance Mechanisms
6.5	20	D. Performance: Company Human Rights Practices
7.5	20	E. Performance: Responses to Serious Allegations
5.5	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: General HRs commitment: Woolworths states it is 'committed to upholding human rights, not only with respect to our own team members but also for workers in our global upstream supply chain.' [Responsible Sourcing Policy, 01/07/2018: woolworthsgroup.com.au] Met: UNGC principles 1 & 2: "Woolworths Group is a signatory to the United Nations Global Compact (UNGC) [...] embraces and reflects the UNGC's core values of human rights, labour standards, the environment and business integrity." [Responsible Sourcing Policy, 01/07/2018: woolworthsgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> Not met: UNGPs: The Company makes reference to the eight characteristics of an effective grievance mechanism as outlined by the UNGPs, and states that its Responsible Sourcing Standards have been benchmarked to them, however, no formal commitment to the UN Guiding Principles could be found. [Responsible sourcing standards updated june 2019, 6/2019: woolworthsgroup.com.au] Not met: OECD
A.1.2	Commitment to respect the human rights of workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: UNGC principles 3-6: Woolworths is a signatory of the UNGC. In its Responsible Sourcing Policy, it states: 'Woolworths Group is committed to respecting human rights for our own team members and the workers in our upstream supply chain in alignment with the principles and guidance contained in the United Nations Guiding Principles on Business and Human Rights. [...] This

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			<p>policy is consistent with the principles of the International Labour Organisation Declaration on Fundamental Principles and Rights at Work and the United Nations Universal Declaration of Human Rights. Furthermore, Woolworths Group is a signatory to the United Nations Global Compact (UNGC) and this policy embraces and reflects the UNGC's core values of human rights, labour standards, the environment and business integrity. ' [Responsible Sourcing Policy, 01/07/2018: woolworthsgroup.com.au]</p> <ul style="list-style-type: none"> • Met: Explicitly list All four ILO for AG suppliers: The company Responsible Sourcing Standards specifies that suppliers are required to comply with all ILO core. With respect the rights to freedom of association and collective bargaining the Company also sets out alternative measures in case these rights are restricted by law: 'Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.' [Responsible sourcing standards updated june 2019, 6/2019: woolworthsgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: The company's Responsible Sourcing Standards explicitly list all ILO standards for suppliers. However, we found no evidence of these commitments for the company's own operation. [Responsible sourcing standards updated june 2019, 6/2019: woolworthsgroup.com.au] • Not met: Respect H&S of workers: The Company has a section on health and safety in its code of conduct: 'we care deeply about the safety, health and wellbeing of our teams, customers and contractors. We are all responsible for working together to make sure that anyone who works or shops with us goes home safely'. It includes a number of guidelines and links to health and safety policy and guidelines documents. [Responsible sourcing standards updated june 2019, 6/2019: woolworthsgroup.com.au & Code of Conduct, Feb 2019: woolworthsgroup.com.au] • Met: H&S applies to AG suppliers: A whole section of the Responsible Sourcing standards is dedicated to health and safety. [Responsible sourcing standards updated june 2019, 6/2019: woolworthsgroup.com.au]
A.1.3.AG.a	Commitment to respect human rights particularly relevant to the industry - land and natural resources (AG)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Respect land ownership and natural resources: No evidence of policies discussing land ownership and resources specifically, aside from Responsible Sourcing Policy discussing environmental compliance. The Company provides evidence of commitments to achieve zero deforestations. However, no evidence found in relation to respect land ownership, including supply chains. [Responsible Sourcing Policy, 01/07/2018: woolworthsgroup.com.au & 2018 Sustainability Report, Jun 2018: woolworthsgroup.com.au] • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights: The Company states 'Suppliers maintain an effective environmental management system that identifies environmental impacts including and not limited to water, wastewater, energy, air emissions, waste, hazardous materials, and other significant environmental risks' and 'Suppliers comply with all local resources management laws (e.g. tree clearing regulations, water usage regulations, etc.' in their Supplier Standard. However, this is not considered a commitment to respecting ownership/use of land and natural resources OR a commitment to respecting the right to water. [Responsible Sourcing Policy, 01/07/2018: woolworthsgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Voluntary Guidelines on Tenure Rights • Not met: IFC Performance Standards • Not met: FPIC for all • Not met: Zero tolerance for land grabs • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights
A.1.3.AG.b	Commitment to respect human rights particularly relevant to the industry – people's rights (AG)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Women's rights: No mention of women's rights in either the Responsible Sourcing Standards or Ethical Audit Checklist. The Corporate Responsibility Report makes reference to efforts by the company to improve gender equality in the workplace and discloses initiatives and targets to improve the gender pay gap. This does not reference women's rights specifically. [Ethical Audit Checklist V2, 06/2016: woolworthsgroup.com.au & Responsible Sourcing Standards, 23/08/2018: woolworthsgroup.com.au]

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			<ul style="list-style-type: none"> • Not met: Children's rights: Woolworths includes ILO Convention 138 regarding child worker ages, and ILO Convention 090 regarding youth workers working at night. However, no reference to child rights beyond child labour is identified anywhere in the Responsible Sourcing Standards, Ethical Audit, Country Risk Matrix nor the Corporate Responsibility Report. [Responsible Sourcing Standards, 23/08/2018: woolworthsgroup.com.au] • Not met: Migrant worker's rights: Woolworths has a policy for engaging overseas workers disclosed on its vendor site. This policy states: "This Policy will help ensure that the rights of overseas workers in Woolworths' supply chain in Australia and New Zealand are protected, whether they are employed by our suppliers directly or through labour hire agencies or subcontractors. This Policy applies to the use of Overseas workers: at Woolworths' own sites (e.g. distribution centres and stores); or by service providers to Woolworths (e.g. trolley collection, cleaning, security, etc.); and or by suppliers of fresh produce, meat & poultry, seafood, bakery and deli products, and any product produced under Woolworths Own Brand labels." No international human rights conventions or guidelines are referenced in this policy. [Policy for employing overseas workers, 11/2015: wowlink.com.au] • Met: Expects suppliers to respect these rights: The Company clarifies that their responsible sourcing standards applies to all suppliers, including foreign migrant workers. In addition, to information on migrant workers mentioned above, the Company has extra standards relating to overseas or foreign migrant workers. These Additional Standards on Overseas or Foreign Migrant Workers apply if suppliers recruit, either directly or via a third party, overseas or foreign migrant workers into their business or supply chain. [Responsible Sourcing Standards, 23/08/2018: woolworthsgroup.com.au & Policy for employing overseas workers, 11/2015: wowlink.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business Principles • Not met: Convention on migrant workers • Not met: Expecting suppliers to respect these rights
A.1.4	Commitment to engage with stakeholders	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: Woolworths states that targets assigned under People, Planet, Prosperity (Corporate Responsibility Strategy) covers stakeholder engagement. Two of the targets in the PPP strategy discuss working with business partners. The company has also set an additional goal: 'We will collaborate with peak organisations to improve workers' lives'. [Corporate Responsibility Strategy 2020, 10/05/2018: woolworthsgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Regular stakeholder design engagement: The Company discloses 'Where possible, the Group seeks to work in multi-stakeholder partnerships that both scale impact and promote a coordinated approach to tackling complex issues.' In November 2017 at the AGM, Woolworths committed to working with the National Union of Workers (NUW) to identify and address human rights risks in fresh food supply chains in Australia. Woolworths also note that a Supplier Excellence Program has been launched which facilitates communication regarding standards and industry compliance, as well as codes of practice regarding overseas workers. The Company also states in reference to the dialogue with the National Union of Workers 'we work collaboratively towards the implementation of an agreed pre-qualification programme for labour-hire providers who operate in Woolworths' direct fresh food supply chains'. Similarly, Corporate Responsibility report mentions that internal stakeholder meetings have fed into the Corporate Responsibility Strategy. [Woolworths Group's Response on Ethical Sourcing and Supply Chain Human Rights, 42986: woolworthsgroup.com.au & Promoting better labour practices in our global supply chains, 10/05/2018: woolworthsgroup.com.au]
A.1.5	Commitment to remedy	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to remedy: The Company discloses in their Responsible Sourcing Policy 'It is important to Woolworths that effective remedies are available for affected people and communities where it is identified that our operations have caused or contributed to adverse impacts. These remedies may be provided through direct engagement with affected people and

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			<p>communities, or collaboration with our suppliers or other third parties. Woolworths is committed to ensuring channels are provided through which adversely affected people or communities can raise complaints or concerns without fear of retaliation, intimidation, harassment, discrimination or victimisation. Woolworths provides a Speak Up service for our team members and direct suppliers (and their team members) as a mechanism by which responsible sourcing concerns can be raised anonymously, and we are committed to working with our suppliers to ensure appropriate mechanisms are made available within their own supply chains.' [Responsible Sourcing Policy, 01/07/2018: woolworthsgroup.com.au]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Not obstructing access to other remedies: The Company discloses 'In addition to supporting operational-level grievance mechanisms, Woolworths is committed to cooperating with state-based judicial or non-judicial grievance mechanisms and will not impede access to such mechanisms for adversely affected persons to make a claim. We expect the same of suppliers.' [Responsible Sourcing Policy, 01/07/2018: woolworthsgroup.com.au] • Met: Work with AG suppliers to remedy impacts: As above, the Company indicates that it is committed to cooperate with suppliers to provide remedy, and it expects them to cooperate with state-based judicial or non-judicial grievance mechanisms. [Responsible Sourcing Policy, 01/07/2018: woolworthsgroup.com.au]
A.1.6	Commitment to respect the rights of human rights defenders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Zero tolerance attacks on HRs Defenders (HRDs): The Company states on their website: 'The Group is committed to ensuring channels are provided through which adversely affected people or communities can raise complaints or concerns without fear of retaliation, intimidation, harassment, discrimination or victimisation. This commitment extends to the work of human rights defenders, and the expectation they can operate in a safe and respectful environment across our operations.' [Promoting better labour practices in our global supply chains, 10/05/2018: woolworthsgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects AG suppliers to reflect company HRD commitments: 'All Woolworths Group suppliers must adhere to our Responsible Sourcing Standards, which prohibit any form of retaliation (e.g. intimidation, harassment, discrimination, termination, suspension) against any worker who uses a grievance mechanism to report an issue. If you experience any form of retaliation, this should be reported to Speak Up for review.' However, it is unclear if this also applies to human rights defenders. [Supplier Speak Up FAQs, 6/2019: woolworthsgroup.com.au]

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: CEO or Board approves policy: Responsible Sourcing Policy and human rights commitments signed by CEO and Board Member Brad Banducci. [Responsible Sourcing Policy, 01/07/2018: woolworthsgroup.com.au] • Met: Board level responsibility for HRs: Sustainability Committee is a Board Committee which overlooks policies regarding safety and health, community and social responsibility, environment, reputation and compliance. The Responsible Sourcing Policy states 'Governance oversight of our approach to human rights management is provided by the Board Sustainability Committee.' [Sustainability Committee Charter, 27/02/2015: woolworthsgroup.com.au & Responsible Sourcing Policy, 01/07/2018: woolworthsgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Speeches/letters by Board members or CEO: On the 22nd of November, Woolworths Group CEO, Brad Banducci said; "Our belief is that finding the right solution to address human rights risks in horticultural supply chains in Australia will be best achieved by working collaboratively with farmers, governments and unions." This media release went on to discuss efforts with the ACCR to improve labour supply-chain HR policies and processes. [Woolworths reaffirms commitment to improving labour rights in fresh food supply chains, 10/05/2018: woolworthsgroup.com.au]

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A.2.2	Board discussions	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Board/Committee review of salient HRs: The Sustainability Committee is responsible for human rights issues. The Company discloses 'We have developed an organisational structure and accountability to embed human rights management into our business. Governance oversight of human rights management is provided by the Board's Sustainability Committee..' [Sustainability Committee Charter, 27/02/2015: woolworthsgroup.com.au & Promoting better labour practices in our global supply chains, 10/05/2018: woolworthsgroup.com.au] Met: Examples or trends re HR discussion: In its Annual Report 2018, the Company indicates: 'During the year we took a number of decisive steps towards achieving our 2020 targets in the prosperity pillar, including our response to the management of supply chain human rights. As part of a Group-wide review project, we updated our Responsible Sourcing Policy and launched our new Responsible Sourcing Program in early July. The new program responds to global best practice programs, regulation and legislation such as Australia's forthcoming Modern Slavery Act, and sets out our business expectation for social compliance. Our approach to doing this is anchored by two main documents, the Responsible Sourcing Policy that applies to all direct suppliers; and the Responsible Sourcing Standards that apply to all direct suppliers, other than suppliers of branded goods and services.' Responsible Sourcing Policy is signed by CEO and approved by the Board of Directors [Annual Report 2018, 2019: woolworthsgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> Met: Both examples and process
A.2.3	Incentives and performance management	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Incentives for at least one board member: In its Annual Report 2018, the Company describes its Remuneration and incentive scheme use for Executive Key Management Personnel (KMP), which include its CEO. One aspect taken into account in the Short Term Incentive is 'Safety': 'In FY18 we moved to a more holistic safety measure which includes customer and team member safety. Following several years of strong improvement, our progress on overall safety in FY18 has slowed. [Annual Report 2018, 2019: woolworthsgroup.com.au] Not met: At least one key AG HR risk, beyond employee H&S: See above. However, the health and safety of local communities or workers in the supply chain is not considered. [Annual Report 2018, 2019: woolworthsgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> Met: Performance criteria made public: See above [Annual Report 2018, 2019: woolworthsgroup.com.au]

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Commits to ILO core conventions: See indicator A.1.2 Met: Senior responsibility for HR: The Company website discloses: "'Responsible sourcing and related human rights issues are raised at the Board through papers compiled by our Group Sustainability team, who have oversight of the Group approach to human rights.'" The Company also discloses "Our Responsible Sourcing Steering Committee comprises of Executive and Senior leaders from across each of the Group's business units. This Committee oversees our Group-wide framework for identifying human rights risks and impacts in the supply chain, as well as setting and now monitoring our policy and minimum standards. ' [Promoting better labour practices in our global supply chains, 10/05/2018: woolworthsgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> Met: Day-to-day responsibility: The Company discloses 'The Steering Committee is supported by a Working Group that has the day-to-day responsibility for embedding human rights in the supply chain. The Working Group meets regularly and is coordinated by Woolworths Groups' Responsible Sourcing Manager. ' On the Sustainability Report the Company lists the name of the General Manager for Quality, Health & Sustainability and the Senior Manager, Group Sustainability. The Company states that the 'Group Sustainability team, who have oversight of the Group approach to human rights.' [Promoting better labour practices in our global supply chains, 10/05/2018: woolworthsgroup.com.au]

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			<ul style="list-style-type: none"> Met: Day-to-day responsibility for AG in supply chain: The Company discloses 'Senior management in each business are then responsible for managing human rights issues with their suppliers.' There is also a Woolworths Groups Responsible Sourcing Manager. [Promoting better labour practices in our global supply chains, 10/05/2018: woolworthsgroup.com.au]
B.1.2	Incentives and performance management	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Senior manager incentives for human rights: In its Annual Report 2018, the Company describes its Remuneration and incentive scheme use for Executive Key Management Personnel (KMP), which include its CEO. One aspect taken into account in the Short Term Incentive is 'Safety': 'In FY18 we moved to a more holistic safety measure which includes customer and team member safety. Following several years of strong improvement, our progress on overall safety in FY18 has slowed. We achieved Entry performance for customer safety but not team member safety for FY18'. (Team member safety: TRIFR). [Annual Report 2018, 2019: woolworthsgroup.com.au] Not met: At least one key AG HR risk, beyond employee H&S: See above. However, the health and safety of local communities or workers in the supply chain is not considered. [Annual Report 2018, 2019: woolworthsgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> Met: Performance criteria made public: See above [Annual Report 2018, 2019: woolworthsgroup.com.au]
B.1.3	Integration with enterprise risk management	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: HR risks is integrated as part of enterprise risk system: In its Annual Report 2018, the Company summarizes its risks in 4 groups: Strategic, Compliance, Financial and Operational. Human Rights risks are included as part of Strategic (Sustainability and environment), Compliance (Legal, regulatory and governance) and Operational risks (supplier relationships) [Annual Report 2018, 2019: woolworthsgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Audit Ctte or independent risk assessment: Ethical Audit document exists, however it appears to be undertaken in-house and it is not clear how it relates to the performance of any roles. [Ethical Audit Checklist V2, 06/2016: woolworthsgroup.com.au]
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Commits to ILO core conventions: See indicator A.1.2 Not met: Communicates its policy to all workers in own operations: While the Company requires all employees to read, acknowledge, and complete online training on the Code of Conduct, this does not include its human rights policy. The Company has disclosed to the CHRB that they launched the Responsible Sourcing Policy internally through briefing sessions across the different business units the week commencing 25th June 2018. The Company has also disclosed that all employees are English speakers in Australia. However, it is not clear how it communicates its policy commitment(s) to all workers. [CHRB Engagement Response, 01/07/2018 & Code of Conduct, Feb 2019: woolworthsgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Commits to all 4 ILO core conventions: See indicator A.1.2 Not met: Communication of policy commitments to stakeholder Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2 Not met: Communicating policy down the whole AG supply chain Met: Requiring AG suppliers to communicate policy down the chain: The Company website states that suppliers are required to complete the Supplier Capability Self-assessment for each of their production facilities. The Supplier Self-assessment questionnaire includes requirements for assessment of quality, ethical, financial and commercial capability. In the Responsible Sourcing Policy, the Company states: 'We require our direct suppliers to communicate this Policy to their own suppliers and extend the principles of this Policy through their supply chain.' However, there is no requirement to cascade the contractual agreement down the supply chain. [Responsible Sourcing Policy, 01/07/2018: woolworthsgroup.com.au & Promoting better labour practices in our global supply chains, 10/05/2018: woolworthsgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> Met: How HR commitments made binding/contractual: The

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			<p>Compliance with Woolworths' Responsible Sourcing Policy is a requirement for supplying goods to Woolworths in accordance with Woolworths' Vendor Trading Terms. According to Woolworths' Vendor Trading Terms, suppliers are required to comply with Woolworths' policies set out on our supplier portal, Wowlink. [WOWLINK portal, 17/08/2018: wowlink.com.au]</p> <ul style="list-style-type: none"> • Not met: Including on AG suppliers: In the Responsible Sourcing Policy, the Company states: 'We require our direct suppliers to communicate this Policy to their own suppliers and extend the principles of this Policy through their supply chain.' However, there is no requirement to cascade the contractual agreement down the supply chain. [Responsible Sourcing Policy, 01/07/2018: woolworthsgroup.com.au]
B.1.5	Training on Human Rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2: See indicator A.1.2 • Not met: Trains all workers on HR policy commitments: The Company discloses 'We will be rolling out training over the coming year to increase the awareness of all team members on the topic of human rights and our commitment in this area.' However, it is not clear if the company already trains their workers on its Human rights commitments and policy. [Promoting better labour practices in our global supply chains, 16/08/2018: woolworthsgroup.com.au] • Not met: Trains relevant AG managers including procurement: The Company adds 'For our buying and sourcing teams, we will implement more targeted training on how to better incorporate respect for human rights into business decisions.' Furthermore the Company discloses The Group will support suppliers to understand and embed our Responsible Sourcing Standards. We will do this through information sessions, guidance documents, training materials and, in higher-risk categories, establishing communities of practice.' However, it is not clear if the company already trains their workers on its Human rights commitments and policy. [Promoting better labour practices in our global supply chains, 16/08/2018: woolworthsgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2: See indicator A.1.2 • Not met: Both requirements under score 1 met: As above [Promoting better labour practices in our global supply chains, 16/08/2018: woolworthsgroup.com.au]
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2: See indicator A.1.2 • Not met: Monitoring implementation of HR policy commitments: Woolworths reports that as per ethical audits 79.5% of its suppliers are conditionally approved, 18.5% approved, and 2% are at risk with regards to its ethical policy. Numbers of major, minor and critical corrective action has also been disclosed. This is disclosed in its Corporate Responsibility 2017 report. However, there is no further information to indicate that the Company any human rights monitoring systems for its own operations. <p>The Company has disclosed ' we will conduct an annual supplier risk assessment. This assessment is based on a number of factors including country risk, third-party social compliance data and the nature of the supplier arrangement.</p> <p>Based on this assessment, suppliers will be categorised into four risk segments and this segmentation will determine the activities suppliers are required to complete in order to verify compliance with the Standards. These include, but are not limited to:</p> <p>Attending training and education sessions Completing a supplier self -assessment questionnaire (SAQ) Submitting an audit under our third-party social compliance 'Mutual Recognition' scheme Agreeing to and implementing a corrective action plan Demonstrating continuous improvement Announced and unannounced factory or site visits. ' [Corporate Responsibility Report, 2017: woolworthsgroup.com.au]</p> <ul style="list-style-type: none"> • Met: Monitoring AG suppliers: Woolworths has introduced a Supplier Excellence Training program delivered by SAI Global that trains all suppliers on the Engaging Overseas Employers Policy and other Codes of Practice. Verification checks on existing suppliers was also disclosed in the Corporate Responsibility Report,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>however no specific figures were reported. [Corporate Responsibility Report, 2017: woolworthsgroup.com.au]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2: See indicator A.1.2 • Met: Describes corrective action process: Woolworths Corporate Responsibility report discloses that ethical audits yielded 816 major corrective actions, 230 minor corrective actions, and 41 critical corrective actions. The Company discloses 'Factories at risk or that need critical corrective actions cannot start production for Woolworths until these issues are resolved.' [Corporate Responsibility Report, 2017: woolworthsgroup.com.au & Promoting better labour practices in our global supply chains, 16/08/2018: woolworthsgroup.com.au] • Not met: Example of corrective action • Met: Discloses % of AG supply chain monitored: Woolworths reports that as per ethical audits 79.5% of its suppliers are conditionally approved, 18.5% approved, and 2% are at risk with regards to its ethical policy. [Corporate Responsibility Report, 2017: woolworthsgroup.com.au]
B.1.7	Engaging business relationships	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR affects AG selection of suppliers: Ethical sourcing verification of all suppliers follows a three step process: capability assessment, site inspection and factory ethical audit. Once these are undertaken, a further ethical sourcing audit is completed on the supplier. [Promoting better labour practices in our global supply chains, 10/05/2018: woolworthsgroup.com.au] • Met: HR affects on-going AG supplier relationships: Human rights risks subject to the Company's ethical sourcing audit are assessed based on the Woolworths country risk matrix. Facilities [suppliers] in countries rated very high, high and moderate are subject to the full scope of the ethical sourcing audit while other ratings are exempt. Outcomes from audits are reported in the Company's annual Corporate Responsibility Report. [Woolworths Group's Response on Ethical Sourcing and Supply Chain Human Rights, 42986: woolworthsgroup.com.au & Promoting better labour practices in our global supply chains, 10/05/2018: woolworthsgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met: Ethical sourcing verification of all suppliers follows a three step process: capability assessment, site inspection and factory ethical audit. Once these are undertaken, a further ethical sourcing audit is completed on the supplier. [Promoting better labour practices in our global supply chains, 10/05/2018: woolworthsgroup.com.au] • Not met: Working with AG suppliers to improve performance: Woolworths runs a Supplier Excellence Training program via SAI global for all of its suppliers with regards to its full host of policies. However, the Company provides no specific example where it has worked with a supplier to improve their human rights performance. [SAI Global: Woolworths Supplier Excellence Program, 10/05/2018: saiglobal.com & Woolworths Group's Response on Ethical Sourcing and Supply Chain Human Rights, 42986: woolworthsgroup.com.au]
B.1.8	Approach to engagement with potentially affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Stakeholder process or systems: Aside from Uzbek cotton (issue from previous years), the company has not disclosed any analysis of HR actions that have been taken or supplier views on particular HR issues. • Not met: Frequency and triggers for engagement • Not met: Workers in AG SC engaged • Not met: Communities in the AG SC engaged <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifying risks in own operations • Met: Identifying risks in AG suppliers: Woolworths provides a country risk matrix which is used in its implementation of ethical audits across the supply chain. It also works with SEDEX - an initiative to share global HR data on suppliers. [Corporate Responsibility Report, 2017: woolworthsgroup.com.au]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: Woolworths provides a country risk matrix which is used in its implementation of ethical audits across the supply chain. It also works with SEDEX - an initiative to share global HR data on suppliers. [Corporate Responsibility Report, 2017: woolworthsgroup.com.au] • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Met: Explains use of HRIAs or ESIA (inc HR): Discloses on website that when a country is rated at risk by its country risk matrix, an ethical audit will be carried out. (Low risk countries are not subject to this.) The circumstances under which this happens and the methodology are disclosed in a document entitled: Country risk ratings and countries subject to Woolworths ethical sourcing audits. [Country risk ratings and countries subject to Woolworthsethical sourcing audits, 25/04/2014: woolworthsgroup.com.au]
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Salient risk assessment (and context): Supplier country risk is assessed on a country risk matrix, after which ethical audit process takes place. [Corporate Responsibility Report, 2017: woolworthsgroup.com.au] • Not met: Public disclosure of salient risks: Ethical Audit status and Corrective Action Plan severity is disclosed in the Corporate Responsibility Report. However, no evidence found of the Company specifying which are the salient risks in their operations and locations. [Corporate Responsibility Report, 2017: woolworthsgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Action Plans to mitigate risks: The Company has commitment to "work collaboratively towards the implementation of an agreed pre-qualification programme for labour-hire providers to ensure that all labour providers who wish to operate in Woolworths' direct fresh food supply chains comply with labour and human rights standards" and to "support workers in Woolworths' supply chains to be educated about their workplace rights". The Company website states that these commitments manage human rights risks and ensure compliance with the Company's Responsible Sourcing Policy and Policy for Employing or Engaging Oversees Workers. [Woolworths reaffirms commitment to improving labour rights in fresh food supply chains, 10/05/2018: woolworthsgroup.com.au] • Met: Including in AG supply chain: As above. • Met: Example of Actions decided: The Company outlines how it responds to "critical non compliances" in its supply chain and gives an example of Uzbek cotton that it instructs suppliers not to purchase. [Uzbek Cotton Policy, 25/08/2014: woolworthsgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met: The Uzbek Cotton Policy is one area in which Woolworths has disclosed the risk, process and example of HR issues in the supply chain. [Uzbek Cotton Policy, 25/08/2014: woolworthsgroup.com.au]
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks: Discloses on website that when a country is rated at risk by its country risk matrix, an ethical audit will be carried out. (Low risk countries are not subject to this.) The circumstances under which this happens and the methodology are disclosed in a document entitled: Country risk ratings and countries subject to Woolworths ethical sourcing audits. However the risks identified, steps taken to mitigate them, and how successful these steps have been, are not communicated clearly. • Not met: Comms plan re assessing risks

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Comms plan re action plans for risks: The Company has communicated in its publicly available sources that it has a system to take action to prevent, mitigate or remediate its salient human rights issues and has provided an example. [Woolworths reaffirms commitment to improving labour rights in fresh food supply chains, 10/05/2018: woolworthsgroup.com.au & Uzbek Cotton Policy, 25/08/2014: woolworthsgroup.com.au] • Not met: Comms plan re reviewing action plans • Not met: Including AG suppliers Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company has a Team Member Speak Up Policy that applies 'to current and former team members who work for, or are contracted to a Woolworths Group company, as well as their associates and families, both in Australia and overseas.' Matters that can be raised with this service include violation of human rights. A report can be made via telephone with numbers for various countries, or online. The report is handled by a third party. [Team Member Speak Up Policy, Feb 2019: woolworthsgroup.com.au] Score 2 <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Not met: Channel is available in all appropriate languages • Met: Expect AG supplier to have equivalent grievance systems: 'Suppliers maintain and provide multiple grievance mechanisms (e.g. confidential suggestion boxes, hotlines, email, worker committees, designated space for worker meetings, meetings between management and worker representatives, etc.) as a way to provide confidential means for workers to raise grievances.' 'The United Nations Guiding Principles on Business and Human Rights (known as the UNGPs) outlines eight characteristics of an effective grievance process (extracted below). Suppliers are encouraged to assess the effectiveness of their grievance process and commit to continuous improvement.' [Responsible sourcing standards updated June 2019, 6/2019: woolworthsgroup.com.au] • Met: Opens own system to AG supplier workers: In its Supplier Speak Up Policy, the Company indicates: 'Any supplier, contractor (including farm workers, trolley collectors, and cleaners), or consultant, as well as their relatives and dependants, which provides goods or services to the Woolworths Group in Australia or overseas can use the service.' [Supplier Speak Up Service] [Supplier Speak Up Policy, Feb 2019: woolworthsgroup.com.au]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Grievance mechanism for community: In its website section 'Promoting better Labour practices', the Company indicates that 'The Group provides a Speak Up service for our team members and direct suppliers (and their team members) as a mechanism by which responsible sourcing concerns can be raised anonymously, and we are committed to working with our suppliers to ensure appropriate mechanisms are made available within their own supply chains.' This applies to employees and their dependants. However, the company's Speak Up program is not specified for community stakeholders. Customers are able to complain via the Woolworths product site feedback form, but this is not specific to human rights. [Help and Support, 10/05/2018: woolworths.com.au & Promoting better Labour practices in our global supply chains, Ap 2019: woolworthsgroup.com.au] Score 2 <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages: See above. The WOWLINK website lists local phone options for Hong Kong and China, and clarifies they are accessible in local languages. • Not met: Expects AG supplier to have community grievance systems: The company's Ethical Audit Checklist for suppliers includes a requirement for suppliers to provide "confidential communications channels for employees to report incidents of bribery and corruption". However, CHRB could not find evidence of a grievance mechanism for external individuals and communities to report Human Rights relate impacts. [Ethical Audit Checklist V2, 06/2016: woolworthsgroup.com.au] • Not met: AG supplier communities use global system: There is no evidence that the company's Supplier Speak Up policy extends to supply chain external

Indicator Code	Indicator name	Score (out of 2)	Explanation
			communities - only vendors and employees are specified. [Supplier Speak Up Policy, Feb 2019: woolworthsgroup.com.au]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages users to create or assess system: Woolworths Corporate Responsibility Strategy 2020 identifies collaborating with stakeholders through dialogue, as well as noting plans to "establish common platforms for the discussion and development of solutions such as developing resilience to climate impacts and sharing knowledge with our suppliers on emissions reduction strategies and energy productivity improvements." Aside from this, no description has been provided of how users are engaged in the design of Human Rights systems. [Corporate Responsibility Strategy 2020, 10/05/2018: woolworthsgroup.com.au] • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: AG suppliers consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Response timescales • Met: How complainants will be informed: The Company discloses 'Typically, Deloitte will provide you with progress reports in respect of Woolworths' investigations based on feedback received from Woolworths, and a report of the outcome and of any internal or external remedial actions by Woolworths arising from the complaint.' [WOWLINK portal, 17/08/2018: wowlink.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Escalation to senior/independent level: The Woolworths Speak Up Policy notes that 'The Chief Legal Officer (CLO) oversees the Supplier Speak Up program to ensure objectivity and independent review. Group Compliance reports and advises on the status and nature of issues being raised'. No timescales are provided. Separately, Woolworths noted in its response to CHRB in 2017 that breaches of the ethical audit will be escalated as follows The Company discloses "Woolworths has a process in place for breaches of our ethical sourcing policy, which involves the formation of an internal cross-functional team (including representatives from the Commercial / Quality / Sustainability and Legal departments) to conduct an internal investigation and determine the appropriate course of action with the supplier. This may include: A temporary or permanent stop trade, Issuance of a breach notice; Notifying Fair Work or relevant authorities of any illegal activity; Additional Ethical Audits being undertaken with the supplier." [Supplier Speak Up Policy, Feb 2019: woolworthsgroup.com.au & Woolworths Group's Response on Ethical Sourcing and Supply Chain Human Rights, 42986: woolworthsgroup.com.au]
C.5	Commitment to non-retaliation over complaints or concerns made	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: In its Responsible Sourcing Standards, the Company indicates to its suppliers: 'Workers are trained and aware of grievance mechanism options and understand that they can communicate without fear of retaliation, intimidation, harassment, or discrimination.' In addition, in its Speak Up Policy, it states: We are committed to protecting users of the Speak Up service against adverse consequences resulting from raising a matter. Any Woolworths team member who discloses an identity inappropriately, or causes detriment to any Speak Up user will face disciplinary action including possible termination.' [Supplier Speak Up Policy, Feb 2019: woolworthsgroup.com.au & Woolworths Group's Response on Ethical Sourcing and Supply Chain Human Rights, 42986: woolworthsgroup.com.au] • Met: Practical measures to prevent retaliation: The Company discloses 'The Group provides a Speak Up service for our team members and direct suppliers (and their team members) as a mechanism by which responsible sourcing concerns can be raised anonymously, and we are committed to working with our suppliers to ensure appropriate mechanisms are made available within their own supply chain.' The Company WOWLink resource states 'Telephonic submissions made to the Speak Up service will be dealt with by call centre operators who are specially trained to gather and record sensitive information. All concerns are then documented and a report is sent to a nominated independent Woolworths representative to escalate.' Furthermore, the Speakout mechanism is operated by a third party - Deloitte. [Speak Up Deloitte, 43230: vendorspeakup.deloittedigital.com & Promoting better labour practices in our global supply chains, 10/05/2018: woolworthsgroup.com.au]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects AG suppliers to prohibit retaliation
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Won't impede state based mechanisms: The Company discloses in their Standards " In addition to supporting operational-level grievance mechanisms, Woolworths is committed to cooperating with state-based judicial or non-judicial grievance mechanisms and will not impede access to such mechanisms for adversely affected persons to make a claim. We expect the same of suppliers. [Responsible sourcing standards updated june 2019, 6/2019: woolworthsgroup.com.au] • Not met: Complainants not asked to waive rights Score 2 <ul style="list-style-type: none"> • Met: Will work with state based or non judicial mechanisms: As above. [Responsible sourcing standards updated june 2019, 6/2019: woolworthsgroup.com.au] • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks: The Company outlines how it would respond to critical non compliances by suppliers. However it does not discuss remedies. [Ethical Audit Checklist V2, 06/2016: woolworthsgroup.com.au & Country risk ratings and countries subject to Woolworthsethical sourcing audits, 25/04/2014: woolworthsgroup.com.au] Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (in the supply chain)	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Living wage in supplier code or contracts: The Responsible Sourcing Standards, which is a code for suppliers and own operations, covers information regarding living wages. [Responsible sourcing standards updated june 2019, 6/2019: woolworthsgroup.com.au] • Met: Improving living wage practices of suppliers: In their Responsible Sourcing Standards the Company discloses 'we strive to work closely with our suppliers to promote freedom of association and collaborative bargaining, as well as better wage management systems. We will also collaborate with global organisations to move towards achieving living wages, not just minimum wages, for all workers and their families'. [Responsible sourcing standards updated june 2019, 6/2019: woolworthsgroup.com.au] Score 2 <ul style="list-style-type: none"> • Met: Both requirements under score 1 met: The Responsible Sourcing Standards, which is a code for suppliers and own operations, covers information regarding living wages. This stipulates improving the living wage practices of suppliers too. [Responsible sourcing standards updated june 2019, 6/2019: woolworthsgroup.com.au] • Not met: Provides analysis of trends demonstrating progress
D.1.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Avoids business model pressure on HRs (purchasing practices) • Not met: Positive incentives to respect human rights (purchasing practices) Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.3	Mapping and disclosing the supply chain	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifies suppliers back to manufacturing sites (factories or fields): The company provides a list of Sourcing Countries together with a number of producers in each country. However, we found no evidence of the company's direct and indirect suppliers in these countries. [Sites Approved to Trade, 42461: woolworthsgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Discloses significant parts of SP and why: The Company disclosed a list of apparel factories which are suppliers for BIG W and Woolworths Food Group. [Sites Approved to Trade, 42461: woolworthsgroup.com.au & Factory list - Big W, Feb 2019: woolworthsgroup.com.au]
D.1.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Child Labour rules in codes or contracts: Suppliers are obligated to comply with the Responsible Sourcing Standards: 'Child labour should not be present in Woolworths' supply chain and no child should partake in the production of goods and services in the supply chain. [...] 6.1. Suppliers maintain a written hiring policy and age verification procedure in place for the recruitment of all workers, both full-time and part-time or temporary. 6.2. Suppliers keep copies of official government records and/or identification papers that verify worker's date of birth and legal right to work. In countries where proof-of-age documents, birth certificates, or other government-issued forms of identification are not available, suppliers shall seek an independent and reliable way of determining a worker's age to verify the worker's age (e.g. education certificates, election cards, residential document, etc.) 6.3. Suppliers are prohibited from employing any children for work under the age of 15. However, in countries where the local minimum age is 14 in accordance to ILO Convention 138, the younger age shall apply. 6.4. There are no workers employed who are under the age for mandatory schooling, as required by local law. 6.5. Young workers (who are under the age of 18 and above the legal minimum working age) shall not engage with any night work in accordance to ILO Convention 090. [...]6.10. Suppliers encourage and allow eligible workers, especially young workers, to pursue educational opportunities.' [Responsible sourcing standards updated june 2019, 6/2019: woolworthsgroup.com.au] • Not met: How working with suppliers on child labour <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made
D.1.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Debt and fees rules in codes or contracts: In its Responsible Sourcing Standards, the Company indicates: 'Suppliers shall not subject, bind, or encourage workers to employment as a condition of fulfilling terms of debt to a third party or to the employers themselves. Personal loans to workers under circumstances where repayment terms suggest debt bondage or forced labour is strictly prohibited.' [Responsible sourcing standards updated june 2019, 6/2019: woolworthsgroup.com.au] • Not met: How working with suppliers on debt & fees <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made
D.1.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Free movement rules in codes or contracts: In its Responsible Sourcing Standards, the Company indicates: 'Workers retain possession of their own original identification papers or personal things (e.g. passports, visas, ID cards, bank cards etc.).[...] Workers have the freedom of leaving the workplace premise at the end of their working shifts. If entrances are guarded for safety reasons, workers shall have free access at all times. Workers have the freedom of movement during working shifts to take designated breaks (e.g. bathroom, drinking water, etc.) and/or under exceptional cases where they need to take personal leave for family emergencies or illnesses, without fear of retaliation or disciplinary action. Workers shall not be forcibly required to live in employer-owned or -controlled housing arrangements. For workers who live employer-owned or -controlled housing facilities, the freedom of movement shall not be unreasonably restricted.' [Responsible sourcing standards updated june 2019, 6/2019: woolworthsgroup.com.au] • Not met: How working with suppliers on free movement

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: FoA & CB rules in codes or contracts: In its Responsible Sourcing Standards, the Company indicates: 'Suppliers respect the right of all workers to freedom of association and collective bargaining. No workers shall be subjected to harassment, intimidation, or retaliation in their efforts to associate or bargain collectively. Suppliers adopt an open attitude towards the activities of worker representative groups and union organisations and do not interfere with or prevent these activities. Suppliers shall not discriminate against union members or worker representatives by refusing to hire them or by terminating workers based on union affiliation or organising efforts.' [Responsible sourcing standards updated june 2019, 6/2019: woolworthsgroup.com.au] • Not met: How working with suppliers on FoA and CB <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
D.1.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: In its Responsible Sourcing Standards, the Company sets out clear health and safety requirements, such as: 'Suppliers comply with all applicable laws regarding working conditions, good housekeeping, and provide workers with a safe and hygienic workplace. Health and safety procedures shall comply with all national and local laws. Suppliers have a health and safety policy and provide regular health and safety training to all workers. Training records are maintained. [...] All workers have access to potable drinking water and clean water for washing.[...] Suppliers maintain structural and building safety, and maintain all legally required building or construction certificates/reports/permits.' [Responsible sourcing standards updated june 2019, 6/2019: woolworthsgroup.com.au] • Not met: Injury Rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosure <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How working with suppliers on H&S • Not met: Provides analysis of trends demonstrating progress
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Rules on land & owners in codes or contracts • Not met: How working with suppliers on land issues <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
D.1.9.b	Water and sanitation (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Rules on water stewardship in codes or contracts: The Responsible Sourcing standards states "There shall be sufficient number of functional and sanitary toilets in accordance with local law per floor and gender. All workers have access to potable drinking water and clean water for washing.[...] Potable drinking water shall be provided to all workers in dormitories and canteens. [...] Suppliers maintain a wastewater treatment policy and procedure with trained staff to oversee the operation. Wastewater treatment facilities must be appropriately sized and functioning to handle effluent capacity at all times.' [Responsible Sourcing Standards, 23/08/2018: woolworthsgroup.com.au] • Not met: How working with suppliers on water stewardship issues <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.10.b	Women's rights (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Women's rights in codes or contracts: The non-discrimination section of the Responsible Sourcing Standards sets out the following standards 'All workers have the equal opportunity for employment, promotion, training, and retirement based on their ability and job performance. Suppliers shall not require pregnancy or medical testing of workers as a condition of employment. Suppliers shall not make decisions on a female worker based on her pregnancy status that may result in dismissal, threats, or disadvantages in employment benefits. Pregnant workers shall not be engaged in work that creates substantial risk to themselves and their babies.' [Responsible sourcing standards updated June 2019, 6/2019: woolworthsgroup.com.au] Not met: How working with suppliers on women's rights <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> Headline: Woolworths Supply chain alleged to be involved in slavery, human trafficking and forced labour in Thailand Area: Forced labour Story: In 2015 an investigative report by the Associated Press alleged slavery, human trafficking and forced labour at shrimp peeling facilities in Thailand that supply major supermarkets including Woolworths, Safeway, Kroger, Wal-Mart, Olive Garden a subsidiary of Darden Restaurants, and the retailer Dollar General. <p>The investigation focused on the Gig Peeling Factory in Samut Sakhon, which supplies the second largest Thai sea food supplier Thai Union as well as others, but makes clear there are other peeling sheds that also illicitly supply major exporters.</p> <p>The investigation focused on the Gig Peeling Factory in Samut Sakhon, which supplies the second largest Thai sea food supplier Thai Union as well as others, but makes clear there are other peeling sheds that also illicitly supply major exporters. Employees at the Gig Peeling Factory were alleged to be migrant workers and children and were reportedly subject to human rights abuses including being beaten, detained, trapped, forbidden to talk with colleagues and forced to work 16-hours a day sometimes without pay. Most workers were migrants from Burma without visas or work permits, it was reported. They were sold by a broker with promises of well-paid jobs, but expected to pay their debt to the employer (the purchaser) or the boat owner. When complaining, employees are alleged to be threatened because of their illegal status. Documented migrants were also vulnerable because their employer held on to identification papers so they could not leave.</p> <ul style="list-style-type: none"> Sources: [The Guardian: theguardian.com][Company website: woolworthsgroup.com.au]
E(1).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Public response available: The Company has indicated through the press that 'we will investigate this further with our supplier and seek advice from our NGO partners'. <p>Score 2</p> <ul style="list-style-type: none"> Not met: Response goes into detail
E(1).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Company policies address the general issues raised Met: Policies apply to the type of business relationships involved <p>Score 2</p> <ul style="list-style-type: none"> Met: Policies address the specific rights in question: The Company's Ethical sourcing policy prohibits forced labour at their suppliers (included indebted labour, bonded labour, no restriction of movement outside of working hours). In addition, Woolworths' new Responsible Sourcing Program covers the issues, such as indebted labour and the retention of documents, mentioned in the allegations.
E(1).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Engages with affected stakeholders Not met: Encourages linked business to engage affected stakeholders

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Provides remedies to affected stakeholders • Not met: Has reviewed management systems to prevent recurrence Score 2 <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	2.95 out of 4	Out of a total of 42 indicators assessed under sections A-D of the benchmark, Woolworths made data public that met one or more elements of the methodology in 31 cases, leading to a disclosure score of 2.95 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> • Met: Company reports on GRI: Woolworths Corporate Responsibility Report is developed in line with the GRI, it includes a GRI Index. [Corporate Responsibility Report, 2017: woolworthsgroup.com.au] • Not met: Company reports on SASB • Met: Company reports on UNGPRF: Woolworths states commitment to respecting human rights in line with UNGP on Business and Human rights, but does not report on UNGPRF. [Promoting better labour practices in our global supply chains, 10/05/2018: woolworthsgroup.com.au]
F.3	Key, High Quality Disclosures	0.5 out of 4	Woolworths met 1 of the 8 thresholds listed below and therefore gets 0.5 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> • Met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2019 Key Findings report and technical annex for more details of the research process.

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.