

Company Name Woolworths Group
Industry Agricultural Products (Supply Chain only)
Overall Score 42.1 out of 100

Theme Score	Out of	For Theme
4.7	10	A. Governance and Policies
13.3	25	B. Embedding Respect and Human Rights Due Diligence
8.0	20	C. Remedies and Grievance Mechanisms
7.7	25	D. Performance: Company Human Rights Practices
8.4	20	E. Performance: Responses to Serious Allegations

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 2022 Methodology document for the sector concerned. 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	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: General HRs commitment: The Company indicates: 'Woolworths Group is committed to respecting the human rights of our own team members, workers in our supply chain and other stakeholders in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs)'. [Responsible Sourcing Policy, 06/06/2022: woolworthsgroup.com.au] Score 2 <ul style="list-style-type: none"> Met: Commitment to the UNGPs: The Company indicates: 'Woolworths Group is committed to respecting the human rights of our own team members, workers in our supply chain and other stakeholders in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs)'. [Responsible Sourcing Policy, 06/06/2022: woolworthsgroup.com.au]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Company has a commitment to the ILO Core: The Company indicates, in its Responsible Sourcing Policy that: 'Woolworths Group upholds [Company itself] and expects our suppliers to commit to respecting each of the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work and related core conventions'. [Responsible Sourcing Policy, 06/06/2022: woolworthsgroup.com.au] Met: Company has an explicit commitment to All four ILO Core: The Company indicates, in its Responsible Sourcing Policy that: 'Woolworths Group upholds [Company itself] and expects our suppliers to commit to respecting each of the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work and related core conventions. These include: the right not to be

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			<p>subject to forced labour, child labour or discrimination in respect of employment and occupations; and freedom of association and the right to collective bargaining'. [Responsible Sourcing Policy, 06/06/2022: woolworthsgroup.com.au]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company expect suppliers to commit to ILO Core: The Company indicates, in its Responsible Sourcing Policy that: 'Woolworths Group upholds and expects our suppliers to commit to respecting each of the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work and related core conventions'. [Responsible Sourcing Policy, 06/06/2022: woolworthsgroup.com.au] • Met: Company explicitly list All four ILO for suppliers: The Company indicates, in its Responsible Sourcing Policy that: 'Woolworths Group upholds and expects our suppliers to commit to respecting each of the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work and related core conventions. These include: the right not to be subject to forced labour, child labour or discrimination in respect of employment and occupations; and freedom of association and the right to collective bargaining'. [Responsible Sourcing Policy, 06/06/2022: woolworthsgroup.com.au]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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: Commitment to 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 inks to health and safety policy and guidelines documents. [Code of Conduct, Feb 2019: woolworthsgroup.com.au] & [Code of Conduct, Feb 2019: woolworthsgroup.com.au] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: The webpage section A safe place to work and shop indicates: 'The safety, health and wellbeing of our team members when it comes to hours of work are governed by the applicable industrial instrument and/or Awards in which provide the parameters around rostering principles which set out maximum hours, meal breaks and breaks between shifts. We also comply with health and safety laws in relation to hours of work. Further, our line managers monitor the workplace to ensure that our team is doing the right thing in ensuring our team has required breaks'. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. Moreover, commitments are expected to be placed in Company policy documents by CHRB approach. [A safe place to work and shop (web), N/A: woolworthsgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: The 2020 MSA indicates: 'Similarly, our purchase order Terms and Conditions and Vendor Trading Terms require suppliers to comply with the requirements under our Responsible Sourcing Policy and Responsible Sourcing Standards. Since the launch of our Responsible Sourcing Program in 2018, all new trade suppliers, both vendor and non-vendor brands, have signed an acknowledgement that they have read, understood and will comply with our Responsible Sourcing requirements when doing business with the Group'. The Responsible Sourcing Policy notes: 'The Responsible Sourcing Standards outline our expectations of suppliers in meeting this Policy. They include comprehensive criteria on business integrity, labour rights, fair and safe working conditions and environmental compliance'. The Responsible Sourcing Standards expands on the topic with health and safety related provisions, including: '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. [...]'. [Responsible Sourcing Policy, 06/06/2022: woolworthsgroup.com.au] & [Responsible Sourcing Standards, N/A: woolworthsgroup.com.au] • Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Responsible Sourcing Standards outline our expectations of suppliers in meeting this Policy. They include comprehensive criteria on business integrity, labour rights, fair and safe working conditions and environmental compliance'. Regarding its working hours provisions, the Responsible Sourcing Standards notes: '[...] Suppliers maintain and communicate a working hours policy to all workers. Workers may refuse overtime work without any fear of retaliation, disciplinary actions, or punishments. [...] Regular working hours shall not exceed 48

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			hours per week or allowable limits under applicable laws or CBA, whichever is stricter. [...] Overtime hours shall not exceed the legal limits or 12 hours per week (total of 60 hours), whichever is lesser. The following exceptions are allowed if: Allowed by national law or CBA; Appropriate safety measures are implemented to protect workers; Suppliers can demonstrate and prove exceptional circumstances (e.g. production peaks, accidents, or emergencies) [...]. [Responsible Sourcing Policy, 06/06/2022: woolworthsgroup.com.au] & [Responsible Sourcing Standards, N/A: woolworthsgroup.com.au]
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry – land, natural resources and indigenous peoples' rights (AG)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Respect land ownership and natural resources as set out in VGGT • Not Met: Respect land ownership and natural resources as set out in The IFC Performance Standards • Not Met: Respecting indigenous peoples' rights or ILO Convention No.169 or UN Declaration • Not Met: Expecting suppliers to make these commitments Score 2 <ul style="list-style-type: none"> • Not Met: Respecting the right to water • Not Met: Company's policy commits to obtain FPIC • Not Met: Expecting suppliers to make these commitments
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AG)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Women's rights: The Company indicates, in its Responsible Sourcing Policy that 'We commit to respect women's and children's rights as well as those of internal and foreign migrant workers in our operations and supply chain'. [Responsible Sourcing Policy, 06/06/2022: woolworthsgroup.com.au] • Met: Children's rights: The Company indicates, in its Responsible Sourcing Policy that 'We commit to respect women's and children's rights as well as those of internal and foreign migrant workers in our operations and supply chain'. [Responsible Sourcing Policy, 06/06/2022: woolworthsgroup.com.au] • Met: Migrant worker's rights: The Company indicates, in its Responsible Sourcing Policy that 'We commit to respect women's and children's rights as well as those of internal and foreign migrant workers in our operations and supply chain'. [Responsible Sourcing Policy, 06/06/2022: woolworthsgroup.com.au] • Met: Expects suppliers to respect at least one of these rights: The Company indicates, in its Responsible Sourcing Policy that 'We commit to respect women's and children's rights as well as those of internal and foreign migrant workers in our operations and supply chain. For all of these principles, we expect the same of our suppliers'. [Responsible Sourcing Policy, 06/06/2022: woolworthsgroup.com.au] Score 2 <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 remedy	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: The Company commits to remedy: The Company indicates that 'We are committed to engaging with potentially or actually affected stakeholders, including local communities, either directly, or in collaboration with our suppliers or other third parties to provide remedy'. Moreover, 'Workers' grievances are to be heard, appropriately investigated, and any required remedial action taken, in addition to building capacity and awareness around social and labour practices'. [Responsible Sourcing Policy, 06/06/2022: woolworthsgroup.com.au] • Met: Company expect suppliers to make this commitment: The Company indicates that 'We are committed to engaging with potentially or actually affected stakeholders, including local communities, either directly, or in collaboration with our suppliers or other third parties to provide remedy. [...] For all of these principles, we expect the same of our suppliers'. [Responsible Sourcing Policy, 06/06/2022: woolworthsgroup.com.au] Score 2 <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives: The Company has provided an additional source to this indicator, however, no material evidence was found. Commitments are expected to be placed in Company policy documents. • Met: Work with suppliers to remedy impact: It indicates: 'We are committed to engaging with potentially or actually affected stakeholders, including local communities, either directly, or in collaboration with our suppliers or other third parties to provide remedy'. [Responsible Sourcing Policy, 06/06/2022: woolworthsgroup.com.au]

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A.1.5	Commitment to respect the rights of human rights defenders	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: Zero tolerance attacks on HRs Defenders (HRDs): The Company indicates, in its Responsible Sourcing Policy that: 'Woolworths does not tolerate nor contribute to threats, intimidation or attacks (physical or legal) against human rights defenders'. [Responsible Sourcing Policy, 06/06/2022: woolworthsgroup.com.au] • Met: Company expect suppliers to make this commitment: The Company indicates, in its Responsible Sourcing Policy that: 'Woolworths does not tolerate nor contribute to threats, intimidation or attacks (physical or legal) against human rights defenders. We commit to working with human rights defenders to create safe and enabling environments for civic engagement and human rights at local, national or international levels. We expect our suppliers to make the same commitment'. [Responsible Sourcing Policy, 06/06/2022: woolworthsgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Work with HRD to create safe and enabling environment: The Company indicates, in its Responsible Sourcing Policy that: 'We commit to working with human rights defenders to create safe and enabling environments for civic engagement and human rights at local, national or international levels'. [Responsible Sourcing Policy, 06/06/2022: 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	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: Board level responsibility for HRs: The Responsible Sourcing Policy states 'Governance oversight of our approach to human rights management is provided by the Board Sustainability Committee'. [Responsible Sourcing Policy, 06/06/2022: woolworthsgroup.com.au] • Not Met: Describe HR expertise of Board member: Regarding Holly Kramer, Chair of the board Sustainability Committee, the webpage section Board of Directors indicates: 'Holly is an experienced Non-executive Director and chief executive, with extensive experience in retail and consumer markets across a range of industries. She has long been an advocate for gender equality, business ethics/culture and sustainability. She is the former CEO of Australian retailer, Best & Less. She has more than 25 years' experience in general management, marketing and sales, including roles at the Ford Motor Company (in the US and Australia), Telstra Corporation and Pacific Brands. In her role as Chair of the Board Sustainability Committee (SusCo), Holly is engaged with numerous external organisations, primarily focused on the issues of natural capital, food security/waste, human rights and consumer education'. However, although the Company indicates the Board Director, Holly Kramer, has expertise in sustainability issues and gender equality, it is not clear if she has human rights expertise in a broader sense. [Board of Directors_Holly Kramer, N/A: woolworthsgroup.com.au]

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			<p>Score 2</p> <ul style="list-style-type: none"> Met: Speeches/letters by Board members or CEO: On an opening letter to its 2021 MSA, the Company's CEO indicates: ' This year the Woolworths Group Board approved a Risk Appetite Statement that identified human rights at level one: we work "towards zero" and take all reasonably practicable measures to achieve risk elimination'. The CEO also states the following in Company's 2020 MSA opening letter: 'People are the core of our business – our customers, team members, suppliers and the workers in our global supply chains. We believe in a better tomorrow for everyone and are deeply committed to upholding human rights across our operations and supply chains. We recognise that as Australia's largest retailer our responsibility is to lead by example. Leading is not about doing better than others; it is about doing the right thing, taking responsibility for our actions and collaborating across industries and sectors to achieve common standards to help eradicate modern slavery. Situations that exacerbate worker vulnerability such as natural disasters, political discontent and economic crisis are becoming the norm. This past year, Australian businesses faced two unparalleled events: the summer bushfires in Australia; and the COVID-19 pandemic. In response to these unprecedented events we adjusted some of our planned activities in favour of addressing the immediate health, safety and well-being of our operational team members and the communities we serve. We also took significant steps to support our suppliers in their response to the emerging labour risks within our global supply chain. We know that modern slavery disproportionately affects women, migrant workers, people of colour and other vulnerable workers. [...] which is why we have increased our industry engagement to reduce the vulnerability of workers in our supply chains and to reinforce our commitment to respecting human rights'. [2020 MSA, 08/2020] & [2021 MSA, 24/08/2021]
A.2.2	Board responsibility	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: Board/Committee review HRs strategy: It indicates, in its Sustainability Committee Charter: 'Sustainability encompasses how Woolworths conducts its businesses, now and in the future, including commitments to the community, supply chain human rights and social responsibility [...]. The Committee's role is to oversee the systems, policies and processes to achieve the Group's sustainability objectives and monitor sustainability risks'. One of its duties is: 'Oversee development, monitor execution and review effectiveness of strategies, policies, frameworks and initiatives relating to human rights, including modern slavery and the responsible sourcing program'. It details the frequency of the Committee meetings and it conducts 'an annual review of its performance and effectiveness'. [Sustainability Committee Charter, 25/08/2021] Met: Examples/trends re HR discussion in the last reporting period: The 2021 Modern Slavery Report indicates: 'This year the Woolworths Group Board approved a Risk Appetite Statement that identified human rights at level one: we work "towards zero" and take all reasonably practicable measures to achieve risk elimination'. [2021 MSA, 24/08/2021] <p>Score 2</p> <ul style="list-style-type: none"> Met: Meets both requirements under score 1: See above. Not Met: How affected stakeholders/HR experts informed discussions: The Company indicates in both 2020 and 2021 MSA that external Human Rights Advisory partners, such as ELEVATE and Verité, are part of the Human Rights Governance. However, it is not clear how the experiences of these external human rights experts informed Board level discussions, no further description was found. [2020 MSA, 08/2020] & [2021 MSA, 24/08/2021]
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 2021, the Company describes its Remuneration and incentive scheme for Executive Key Management Personnel (KMP), which includes the CEO. The CEO is also part of the Board of Directors. One aspect taken into account in the Short Term Incentive is 'Safety': ' We are a people business and the safety of our team and customers is of great importance. Safety performance is measured using three equally weighted measures, which includes improvement in: (i) customer claims; (ii) total recordable (team member) injuries; and (iii) hours lost. We measure the number of injuries as opposed to frequency rates so that our measures are easier to understand and communicate. Hours lost are included in the overall safety performance to help us understand both the frequency and severity of injuries'. [2021 Annual Report, 30/07/2021] Not Met: At least one key HR risk, beyond employee H&S: See above. Regarding the Executive Remuneration Framework Review, it notes: 'During F21 the Board

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			<p>reviewed the appropriateness of the executive remuneration framework, and identified two opportunities to strengthen alignment of the underlying performance measures with the Group's strategic objectives. From F22, the Safety metric in the STI scorecard will evolve to a new broader measure – Severity Rate – which includes all team and customer injuries or illnesses (first aid through to lost time injuries, both physical and psychological) and events with potential for high severity. We will also introduce a Reputation measure in our Long-Term Incentive (LTI), replacing the Sales/sqm measure, which will operate alongside our financial performance measures'. As for the Long-Term Incentive, it explains the changes effective in 01/07/2021 (F22): 'Reputation, using the RepTrak measure, and calculated as the average of the previous 12 months rolling 12-month scores in the final year of the plan vs. the baseline. This measures brand reputation across four key metrics; trust, admiration, positive feeling, and esteem'. The Rationale being: 'Reputation plays a key role in the extent to which customers choose to engage with Woolworths Group, and has a high correlation to sales. It represents delivery against our purpose (internally), commitments (externally) and evolving expectations of our customers. It also takes into account our relationship with our team, suppliers, and other key stakeholders. Including this measure in the LTI will keep these matters in sharp focus as we seek to deliver our strategy'. However, the health and safety of local communities or workers in the supply chain is not considered. Moreover, it is not clear the link between reputation and company's human rights policy commitment(s) or strategy. CHR B expects specific referent to human rights topics (if only health and safety, it is expected to include health and safety of local communities or workers in the supply chain). [2021 Annual Report, 30/07/2021]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public: See above. The Annual Report also details how individual performance is assessed: 'Two equally weighted categories of goals are used to review performance: Business strategy and performance goals that capture how individuals contribute to the performance of the business during the year, and their contribution to initiatives that will transform our business for the future. Ways-of-Working and people goals that capture how business strategy and performance goals have been delivered, and how leaders set their teams up for success'. Moreover, it describes how the outcomes short-term incentives (STI) are delivered. 'Depending on business and individual performance: Zero for below entry performance. 50% of STI target for entry performance. 100% of STI target for target performance. 150% of STI target for stretch performance. This gives the Board sufficient opportunity to vary STI outcomes so they reflect differing levels of performance. The Board also has discretion to vary STI awards due to factors that are beyond these performance measures so that rewards appropriately reflect complete performance'. However, it is not clear the percentage of remuneration linked to safety. Previous assessment was based on a source released in 2018 which is considered outdated according to the CHR B three-reporting-year timeframe for sources. [2021 Annual Report, 30/07/2021] • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	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: Board process to review business model and strategy: The Company indicates, in its Risk Committee Charter, the committee's responsibilities: 'Oversee development, monitor execution and review effectiveness of risk strategy, framework, policies and initiatives to identify and address the Group's material risks. Monitor management's performance against the risk management framework, the effectiveness of the control environment and implementation of risk reduction measures. Review the Woolworths Risk Management Framework at least annually to satisfy itself that it continues to be sound, and make recommendations to the Board in relation to changes to the framework. Regularly review whether Woolworths Group is operating within the risk appetite set by the Board, including providing recommendations in relation to changes to risk capacity, appetite and risk limits. Monitor internal audit reviews of the adequacy of the Group's processes and controls for managing risk'. The 2021 Annual Report notes: 'The Board has demonstrated its commitment to Risk Management, with the formation of a new Risk Committee and the appointment of a Chief Risk Officer to the Woolworths Group Executive Committee, reporting to the CEO and Committee chair'. Human rights aspects are integrated into the Company's risk management. The 2021 MSA indicates 'Over F21, Woolworths Group commenced a risk management maturity uplift across the organisation with the appointment of a Chief Risk Officer and development of a risk management strategy to support the Risk Appetite Statements. A key focus of this strategy is in-depth

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			<p>understanding of key material risk events, of which modern slavery is one'. In its 2020 MSA, the Company discloses its Responsible Sourcing Structure charter and measures to ensure COVID-19 to support workers and suppliers. However, although there's a risk management overview and includes human rights, it is not clear whether it can go beyond risk management, opening venues to adapt and review business model and strategy for inherent risks to human rights. [Risk Committee Charter, 28/07/2021] & [2021 Annual Report, 30/07/2021]</p> <ul style="list-style-type: none"> • Not Met: Describe frequency and triggers for reviewing <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided: The Company indicates, in its 2021 MSA: 'This year BIG W [a Company's subsidiary] made progress against ACT's Responsible Purchasing Practice (RPP) commitments. 111 BIG W team members and suppliers completed the RPP survey identifying areas for improvement including planning and forecasting, product development, and sampling. Work will continue on implementing a labour costing protocol and an exit strategy policy in F22'. However, it is not clear this action was decided as a result of discussions on its business model and strategy for inherent risks to human rights at board level or a board committee. [2021 MSA, 24/08/2021]

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)

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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: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Senior responsibility for HR implementation and decision making: The Company's 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 Human Rights 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 (web), N/A: woolworthsgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How it assigns Day-to-day responsibility: See above. The webpage Promoting better labour practices in our global supply chains indicates: 'Day-to-day, the Chief Sustainability Officer has responsibility for the human rights program and this is discharged to the Head of Sustainability - Human Rights'. Also, the 2021 MSA also notes: 'Our Human Rights Program includes our Groupwide modern slavery framework that is operationalised by each business unit (BU). [...] The Managing Director of each BU is ultimately responsible for managing human rights risks. They are directly accountable to the CEO and Board, and endorse the final Modern Slavery Statement to the Board Sustainability Committee (SusCo)'. [Promoting better labour practices in our global supply chains (web), N/A: woolworthsgroup.com.au] & [2021 MSA, 24/08/2021]

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			<ul style="list-style-type: none"> • Met: Day-to-day resources and expertise allocation in own ops: The 2021 MSA notes: 'Our Human Rights Program includes our Groupwide modern slavery framework that is operationalised by each business unit (BU). Our Group governance approach promotes ongoing consultation with BUs on human rights due diligence and the outcomes are reported annually in this Statement: A centralised Human Rights Steering Committee (SteerCo) meets monthly and is attended by senior leaders of each BU. Three cross-functional Agile 'Squads' meet fortnightly in the areas of: responsible sourcing (our brands), procurement (non-trade), and operations (Group). These Squads were our F21 focus areas designed to accelerate due diligence in these businesses and will be reviewed in F22 aligned with our strategy'. The webpage section Promoting better labour practices in our global supply chains explains: 'The Head of Sustainability - Human Rights manages a team of 8 human rights subject matter experts, who partner with businesses across the Group to develop frameworks to mitigate human rights risks across our operations and supply chain. In recognition of the breadth of our operations and supply chain, the Human Rights team is also supported by human rights experts in New Zealand and Asia to ensure consistent and targeted delivery of our human rights program'. [2021 MSA, 24/08/2021] & [Promoting better labour practices in our global supply chains (web), N/A: woolworthsgroup.com.au] • Met: Resources and expertise allocation in the supply chain: The 2021 MSA notes: 'Our Human Rights Program includes our Groupwide modern slavery framework that is operationalised by each business unit (BU). Our Group governance approach promotes ongoing consultation with BUs on human rights due diligence and the outcomes are reported annually in this Statement: A centralised Human Rights Steering Committee (SteerCo) meets monthly and is attended by senior leaders of each BU. Three cross-functional Agile 'Squads' meet fortnightly in the areas of: responsible sourcing (our brands), procurement (non-trade), and operations (Group). These Squads were our F21 focus areas designed to accelerate due diligence in these businesses and will be reviewed in F22 aligned with our strategy'. The webpage section Promoting better labour practices in our global supply chains explains: 'The Head of Sustainability - Human Rights manages a team of 8 human rights subject matter experts, who partner with businesses across the Group to develop frameworks to mitigate human rights risks across our operations and supply chain. In recognition of the breadth of our operations and supply chain, the Human Rights team is also supported by human rights experts in New Zealand and Asia to ensure consistent and targeted delivery of our human rights program'. [2021 MSA, 24/08/2021] & [Promoting better labour practices in our global supply chains (web), N/A: 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: Score 1</p> <ul style="list-style-type: none"> • Met: Senior manager incentives for human rights: In its Annual Report 2021, 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': 'We are a people business and the safety of our team and customers is of great importance. Safety performance is measured using three equally weighted measures, which includes improvement in: (i) customer claims; (ii) total recordable (team member) injuries; and (iii) hours lost. We measure the number of injuries as opposed to frequency rates so that our measures are easier to understand and communicate. Hours lost are included in the overall safety performance to help us understand both the frequency and severity of injuries'. [2021 Annual Report, 30/07/2021] & [2019 Annual Report, 29/08/2019: wow2019.qreports.com.au] • Not Met: At least one key HR risk, beyond employee H&S: See above. Regarding the Executive Remuneration Framework Review, it notes: 'From F22, the Safety metric in the STI scorecard will evolve to a new broader measure – Severity Rate – which includes all team and customer injuries or illnesses (first aid through to lost time injuries, both physical and psychological) and events with potential for high severity. We will also introduce a Reputation measure in our Long-Term Incentive (LTI), replacing the Sales/sqm measure, which will operate alongside our financial performance measures of Relative TSR and ROFE'. As for the Long-Term Incentive, it explains the changes effective in 01/07/2021 (F22): 'Reputation, using the RepTrak measure, and calculated as the average of the previous 12 months rolling 12-month scores in the final year of the plan vs. the baseline. This measures brand reputation across four key metrics; trust, admiration, positive feeling, and esteem'. The Rationale being: 'Reputation plays a key role in the extent to which customers choose to engage with Woolworths Group, and has a high correlation to sales. It represents delivery against our purpose (internally), commitments (externally) and evolving expectations of our customers. It also takes into account our relationship

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			<p>with our team, suppliers, and other key stakeholders. Including this measure in the LTI will keep these matters in sharp focus as we seek to deliver our strategy'. However, the health and safety of either local communities (affected by agricultural activities) or workers in the supply chain don't seem to be considered, which is a CHRB requirement in case health & safety is the only issue included in incentives (it is not clear the link between reputation and company's human rights policy commitment(s) or strategy). [2021 Annual Report, 30/07/2021]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public: See above. The Annual Report also details how individual performance is assessed: 'Two equally weighted categories of goals are used to review performance: Business strategy and performance goals that capture how individuals contribute to the performance of the business during the year, and their contribution to initiatives that will transform our business for the future. Ways-of-Working and people goals that capture how business strategy and performance goals have been delivered, and how leaders set their teams up for success'. Moreover, it describes how the outcomes short-term incentives (STI) are delivered. 'Depending on business and individual performance: Zero for below entry performance. 50% of STI target for entry performance. 100% of STI target for target performance. 150% of STI target for stretch performance. This gives the Board sufficient opportunity to vary STI outcomes so they reflect differing levels of performance. The Board also has discretion to vary STI awards due to factors that are beyond these performance measures so that rewards appropriately reflect complete performance'. However, it is not clear the percentage of remuneration linked to safety. Previous assessment was based on a source released in 2018 which is considered outdated according to the CHRB three-reporting-year timeframe policy. [2021 Annual Report, 30/07/2021] & [2019 Annual Report, 29/08/2019: wow2019.qreports.com.au] • Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	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: HR risks is integrated as part of enterprise risk system: Human Rights aspects are included in the Company's risk management under the following risks: Safety, Health & Wellbeing, Sustainability, Legal, Regulatory and Governance, Suppliers. [2021 Sustainability Report, N/A] & [2019 Annual Report, 29/08/2019: wow2019.qreports.com.au] • Met: Provides an example: It indicates different mitigation activities for the different risks identified. For Safety, Health and Wellbeing: 'Our Board, People Committee and Group Executive Committee monitor safety, health and wellbeing performance and have oversight for the overall management approach. Through the application of a comprehensive set of controls, we aspire to proactively manage our material safety, health and wellbeing risks, periodically testing the application of these controls to meet, as a minimum, our legislative requirements. In addition, we also deploy a series of agile response mechanisms with the aim of minimising the impacts of a failure. We are also committed to understanding and mitigating psychosocial work-related mental health risk factors, which could unduly impact a team member's mental health'. As for Sustainability: 'Our Group Sustainability Plan also outlines our Responsible Sourcing Program in detail. Our approach to addressing human rights related risks across our supply chain with due diligence requirements for specific suppliers, plus self-assessments, audits and contractual specifications'. Regarding Legal, Regulatory and Governance risks: 'Woolworths Group has an ethics reporting service (Speak Up) as well as a whistleblowing process, and actively encourages current and former team members, suppliers and their families to report wrongdoing and breaches of the law'. Finally, concerning risks related to Suppliers: 'Our Responsible Sourcing, Modern Slavery and Quality Standards give clear guidance to our suppliers of the standards we require to support our commitment to source safe, quality and compliant products. We conduct periodic assessment of our suppliers, plus independent audits to give assurance and to drive ongoing improvement initiatives across our supplier base. Our Voice of Supplier surveys and Supplier Speak Up Program provide mechanisms for our suppliers to respond openly (and anonymously) and their responses are reviewed and escalated as required. The Board, Risk Committee and Group Executive Committee has oversight of this risk'. [2021 Annual Report, 30/07/2021] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Audit Ctte or independent risk assessment: The 2021 MSA notes: 'Over F21, Woolworths Group commenced a risk management maturity uplift across the organisation with the appointment of a Chief Risk Officer and development of a risk management strategy to support the Risk Appetite Statements. A key focus of this strategy is in-depth understanding of key material risk events, of which modern

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>slavery is one. Our Human Rights team, working with a number of risk partners across the Group, has begun embedding human rights into BU risk frameworks. We further leveraged the Group's risk expertise to review and improve the Human Rights Program. Notably we: Provided input into the development of the Group's new Risk Assessment Standard; Completed a risk profile of our Human Rights Program (i.e. risks to strategy) to confirm key control improvements are captured into the program and validated with the Human Rights Steering Committee; Completed a supply chain process map to understand the multiple stakeholders, handover points and related controls across our international logistics; Completed a bowtie risk assessment, a risk evaluation method used to analyse and demonstrate causal relationships, in the scenario of a modern slavery event occurring in our operations or supply chain. This allowed us to determine the control environment supporting the management of this risk'. The Company indicates in its 2021 Annual Report: 'The Board has demonstrated its commitment to Risk Management, with the formation of a new Risk Committee and the appointment of a Chief Risk Officer to the Woolworths Group Executive Committee, reporting to the CEO and Committee chair. Finally, the Risk Committee Charter, indicates that responsibilities include 'Oversee development, monitor execution and review effectiveness of risk strategy, framework, policies and initiatives to identify and address the Group's material risks. Monitor management's performance against the risk management framework, the effectiveness of the control environment and implementation of risk reduction measures. Review the Woolworths Risk Management Framework at least annually to satisfy itself that it continues to be sound, and make recommendations to the Board in relation to changes to the framework. [...] Monitor internal audit reviews of the adequacy of the Group's processes and controls for managing risk'. [2021 Annual Report, 30/07/2021] & [2021 MSA, 24/08/2021]</p>
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Not Met: Communicates its policy to all workers in own operations: The Company's website indicates that 'Woolworths communicates its commitment to respecting human rights through our Responsible Sourcing Policy and Standards. To reflect these commitments to our team members, team members are required to complete the Code of Conduct training upon commencing in the workplace'. The Code of Conduct explains: 'We all need to make sure we buy goods and services fairly and responsibly. This means: [...] never cutting corners on the implementation of our Responsible Sourcing Policy and Responsible Sourcing Standards. [...] ensuring that our buying and procurement processes are transparent and in line with our Fair Trading Principles '. However, although the Company indicates that workers receive onboarding training on its Code of Conduct and the Code acknowledges the importance to respect the Responsible Sourcing Policy and the Responsible Sourcing Standards [both document contain the Company's human rights provisions], it is not clear it communicates its human rights provisions to its workers and how (i.e how is communicated last update to existing employees). The Company is expected to indicate communication also happens in local languages where necessary. The Company provided additional comments in its feedback to CHRB, however, they were related to supplier communication. [A safe place to work and shop (web), N/A: woolworthsgroup.com.au] & [Code of Conduct, Feb 2019: woolworthsgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • 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: Score 1</p> <ul style="list-style-type: none"> • Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a • Met: Requires suppliers to communicate policy requirements: The 2020 MSA indicates: 'One of the key ways in which we articulate our human rights expectations and control the potential risk of modern slavery arising in our global supply chain is through our contracting process with our direct suppliers. Building on existing Responsible Sourcing provisions, modern slavery specific provisions have been incorporated in our non-trade procurement contracts and Vendor Trading Terms. For moderate to high risk areas, another control mechanism we use is a Compliance Statement, which is a supplier modern slavery compliance confirmation. We request the supplier to sign and provide this statement to Woolworths on the commencement date of an agreement and on each anniversary of the commencement date during the agreement term. [...] Similarly, our purchase order Terms and Conditions and Vendor Trading Terms require suppliers to comply

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>with the requirements under our Responsible Sourcing Policy and Responsible Sourcing Standards'. The Responsible Sourcing Policy notes: 'This Policy and Standards are shared with suppliers during onboarding and forms part of their contract of doing business with us, including the requirement that suppliers communicate this Policy to their own suppliers and/or contractors and extend the principles of this Policy throughout their supply chain and/or operations'. The Responsible Sourcing Policy contains the Company's human rights commitments. [2020 MSA, 08/2020] & [Responsible Sourcing Policy, 06/06/2022: woolworthsgroup.com.au]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: The Responsible Sourcing Policy notes: 'This Policy and Standards are shared with suppliers during onboarding and forms part of their contract of doing business with us, including the requirement that suppliers communicate this Policy to their own suppliers and/or contractors and extend the principles of this Policy throughout their supply chain and/or operations'. The Responsible Sourcing Policy contains the Company's human rights commitments. [Responsible Sourcing Policy, 06/06/2022: woolworthsgroup.com.au] & [Partner Hub, N/A: partnerhub.woolworthsgroup.com.au] • Not Met: Company requires suppliers to cascade down to their suppliers: The Responsible Sourcing Policy notes: 'This Policy and Standards are shared with suppliers during onboarding and forms part of their contract of doing business with us, including the requirement that suppliers communicate this Policy to their own suppliers and/or contractors and extend the principles of this Policy throughout their supply chain and/or operations'. The Responsible Sourcing Policy contains the Company's human rights commitments. However, although the Company indicates it expects suppliers to communicate its policy commitments to their suppliers, it is not clear it requires its suppliers to cascade the contractual or other binding requirements down their supply chain. The Company has provided additional sources, however, no further evidence was found. [Responsible Sourcing Policy, 06/06/2022: woolworthsgroup.com.au]
B.1.5	Training on 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: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Not Met: How workers are trained on HR policy commitments: The Company's website indicates: 'Woolworths communicates its commitment to respecting human rights through our Responsible Sourcing Policy and Standards. To reflect these commitments to our team members, team members are required to complete the Code of Conduct training upon commencing in the workplace'. The Code of Conduct explains: 'We all need to make sure we buy goods and services fairly and responsibly. This means: [...] never cutting corners on the implementation of our Responsible Sourcing Policy and Responsible Sourcing Standards. [...] ensuring that our buying and procurement processes are transparent and in line with our Fair Trading Principles'. In the 2021 Modern Slavery Report, the Company indicates that it has a 'comprehensive policy framework which is communicated to our team members through training, regular monitoring and extensive grievance mechanisms'. However, although the Company indicates that workers receive onboarding training on its Code of Conduct and the Code acknowledges the importance to respect the Responsible Sourcing Policy and the Responsible Sourcing Standards [both documents contain the Company's human rights provisions], it is not clear it trains workers specifically on its human rights commitments. No description found of how they are trained or the content of the training found. The webpage section Promoting better labour practices in our global supply chains notes '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 the Company is currently its workers are trained on its human rights policy commitments. The Company has provided additional sources, however, links to these sources could not be accessed. [2021 MSA, 24/08/2021] & [Code of Conduct, Feb 2019: woolworthsgroup.com.au] • Met: Trains relevant managers including procurement: The Company indicates that 'our entire Produce team has attended two formal briefing sessions, the first at the launch of the Responsible Sourcing Program and the second at the launch of the Requirements for Labour Providers. At the first session, we were joined by worker advocate Moe Tragi to share his past experience of working in a situation of bondage on an Australian farm. For the second session, global ethical recruitment expert Marie Apostle from the Fair Hiring Initiative, trained our team on the complexity of labour hire for migrant workers and indicators of forced labour in labour hire arrangements'. The Company has provided additional comments to this

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>indicator, however, key evidence was already in use. [2019 Sustainability Report, 29/08/2019]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Not Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet company's HR commitment: The 2020 Sustainability Report indicates: 'All direct suppliers, other than suppliers of branded goods and services, are subject to further requirements that, at a minimum, include self assessments and training accompanying self assessment, training and education programs. Additional layers, such as third party audit requirements, or unannounced factory visits, are then added as the level of risk increases with the moderate, priority and specialised groups'. However, it is not clear the training focuses on helping suppliers meet its human rights policy commitment. No description of the training or of the content of the training found. The 2021 MSA indicates: 'Last year we committed to disseminate supplier guidance and conduct training at sites in Malaysia to address forced labour risks. These were paused due to the prioritisation of remediation and the ongoing impacts of COVID-19. Incorporating the lessons learned from this case will inform our due diligence for other sites in Malaysia and recommending these activities is a priority in F22'. However, although the Company describes some specific trainings for suppliers, no evidence found of general human rights training (policy commitments) conducted for suppliers. [2021 MSA, 24/08/2021] & [2020 Sustainability Report, 2020] • Not Met: Disclose % trained
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.a: See indicator A.1.2.a • Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company indicates that 'This past year, we focused on on-boarding our direct suppliers to our Responsible Sourcing Program'. The Program is framed by the company's Responsible Sourcing Policy and its Responsible Sourcing Standards and they contain the core ILO principles. Suppliers have to submit a valid mutual recognition audit 'Once our team receives an audit from one of the mutually recognised schemes, we then grade this against the Responsible Sourcing Standards. There are four possible grading outcomes: zero-tolerance (red), critical (purple), moderate (amber) and minor (green). A zero-tolerance results in immediate cease of trade pending an investigation, while those with a critical outcome are conditionally approved to trade with agreed corrective actions'. The Company has provided an additional source to this indicator, however, key information was already in use. The monitoring of this program takes place in own operations and supply chains. In its own operations monitoring is particularly focused in forced labour in relation to the provision of services such as security, cleaning, trolley collecting, as well as workers in distribution centres and productions sites. [Supplier Guidelines, 12/2019] & [2020 MSA, 08/2020] • Not Met: Proportion of supply chain monitored: The Company discloses some details of audits including numbers of sites visited. However, it is not clear the actual percentage of the supply chain that is being monitored. [2021 MSA, 24/08/2021] • Not Met: Describe how workers are involved in monitoring: Regarding its own operations, the 2020 MSA indicates: 'Contracted workers participate in our regular Voice of Team engagement surveys where they can anonymously raise any concerns. In F19, 83% of DC workers surveyed reported feeling enabled, engaged, and energised when at work'. As for its supplier monitoring, it explains: 'We engage with workers both formally and informally including onsite visits by our teams, surveys and structured meetings with unions and worker representatives. This year we completed 55 site visits, 5 worker briefing sessions with union representatives in the horticulture sector and surveyed more than 1,200 supply chain workers in Australia and Bangladesh. These engagements are a valuable insight into the experience of workers and help validate other sources of information. We take action from these engagements and they continue to inform our program development'. However, although the Company indicates that workers are engaged during the monitoring process, the indicator looks for evidence of how the Company's own workers are involved in doing/overseeing monitoring process. [2020 MSA, 08/2020] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Not Met: Describes corrective action process: The 2020 Sustainability Report discloses the 'Framework for supplier engagement in our Responsible Sourcing Program' which includes corrective action plan. The Responsible Sourcing

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Standards indicates that 'Woolworths will verify compliance to the Standards. This may be in the form of a supplier self-assessment, requesting policies, procedures or records under our mutual recognition audit program, implementing a corrective action plan, conducting an onsite visit or via an onsite audit'. However, no description found of its corrective action process. [2020 Sustainability Report, 2020] & [Responsible Sourcing Standards, N/A: woolworthsgroup.com.au]</p> <ul style="list-style-type: none"> • Met: Disclose findings and number of corrective action: The 2020 MSA discloses the findings in relation to 'forced labour identified in supply chain audits'. There were '6 suppliers from Malaysia' with non-compliances related to recruitment fees. As for its remedy: 2 cases open/4 cases closed: 6 workers from Myanmar reimbursed approx. \$1251 each in recruitment fees; One site implemented a 'Home Leave Procedure Policy' ensuring workers do not pay a leave deposit; One site partnered with Impactt to review historic recruitment fees. There were also '5 suppliers from Malaysia and Thailand' linked to document deposits. The Remedy: '5 cases closed: At 4 sites, passports were returned to all migrant workers; At 1 site, workers have a key to access the security box where passports are stored'. Finally '2 suppliers from South Africa and India 'were found in non-compliance working hours (forced overtime). Their remedy status: '1 case open/1 case closed'. The 2021 MSA also discloses the results of its risk assessment, indicating country, Inherently higher risk product categories, number of direct suppliers, Top non-conformances from supplier audits and Examples of actions taken. It also indicates its 'zero tolerance cases', disclosing the country, the number and type of non-compliances. [2021 MSA, 24/08/2021] & [2020 MSA, 08/2020]
B.1.7	Engaging and terminating business relationships	2	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: HR affects selection of suppliers: The Company indicates in its website section Promoting better labour practices in our global supply chains that '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. [...] 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: 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'. Moreover, in the document Responsible Sourcing Program, it is stated that 'Suppliers in the minimum risk segmentation must complete a self-assessment questionnaire (SAQ). The SAQ will be sent to suppliers at the time of onboarding or registering a new site and must be completed prior to trade commencing'. [Promoting better labour practices in our global supply chains (web), N/A: woolworthsgroup.com.au] & [Responsible Sourcing Program, 12/2019: woolworthsgroup.com.au] • Met: HR affects on-going supplier relationships: The Company indicates that 'a red audit outcome is considered a zero-tolerance breach of WOW's Standards [...] This will typically result in a cease of trade while WOW conducts an investigation. This length of the ease of trade is dependent upon the severity of the issues and whether both parties can agree to terms to remediate the findings within a defined timeline. If suppliers do not remediate a zero tolerance finding or demonstrate a willingness to improve, this will result in termination of supply'. It also indicates that 'consecutive purple audits may result in a downgrade to red while a root cause investigation is conducted'. [Supplier Guidelines, 12/2019] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights • Met: Working with suppliers to meet HR requirements: The 2021 MSA explains it has a system called Management Actions Plans (MAPs): 'A MAP is a methodology introduced last year to directly engage suppliers involved in a grievance case or where zero tolerance issues were identified in an audit. MAPs are co-created and co-signed with suppliers with the goal of identifying root causes of a particular issue/s. The duration of the MAP generally ranges between three to six months during which time we work closely with our suppliers to support remediation and the building of robust management systems to prevent recurrence. This year examples of MAP actions included a review of supplier's management systems for labour providers, training on our RS Policy and Standards and supporting suppliers to develop their own RS manuals'. [2021 MSA, 24/08/2021]

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.8	Approach to engagement with affected 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: Stakeholder process or systems to identify and engage with workers/communities in the last two years: According to its website section Promoting better Labour practices in our global supply chains: 'We regularly engage with key external stakeholders to understand their expectations in relation to human rights and responsible sourcing. This includes: Civil Society: Over the years, the Group has established a dialogue with key non-government organisations (NGOs) in Australia and overseas, largely as they relate to external benchmarking programs. This year, we plan to build and strengthen these engagements and develop new partners with broader civil society actors. (...) Workers: Our teams regularly engage with workers in our supply chain through factory and farm visits, both announced and unannounced. As we roll out our new Responsible Sourcing Program, we will identify opportunities for enhanced worker engagement and consultation. Unions: Woolworths supermarkets is in dialogue with the United Workers Union (UWU) as 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. For more information read the press release here'. The 2021 Sustainability Report indicates: ' We listen and engage with stakeholders regularly and transparently through: RS Policy and Standards, Supplier and worker surveys, Annual reporting and Modern Slavery Statement, Supplier roadshows, workshops and surveys, (...) Woolworths Group website'. The Company has also provided evidence, in its feedback to CHRB where it indicates efforts and commitments with Aboriginal and Torres Strait Islander peoples. It also states that 'Almost 5,000 of our team members are Aboriginal and Torres Strait Islander peoples. We are deeply committed to listening, learning and growing as part of our reconciliation journey. Across Woolworths Group, we define reconciliation as actions that create healing from past and current injustices endured by our First Nations peoples'. [Promoting better labour practices in our global supply chains (web), N/A: woolworthsgroup.com.au] & [2021 Sustainability Report, N/A] Met: Provides two examples of engagement with stakeholders: It indicates it engaged with workers in Bangladesh: 'To triangulate the findings from the virtual factory visits and management interviews at supplier sites in Bangladesh, this year we rolled out a survey to 2,694 workers across 10 apparel factories. The responses from workers regarding grievance mechanisms, wages and benefits, medical facilities and COVID-19 initiatives of the factory were positive'. Moreover, 'in November 2020 Woolworths Group launched our Sustainability Plan 2025. As part of the company-wide consultation on the plan, we held two interactive sessions with team members from across the Group on our Human Rights strategy. We were joined by survivor advocate, Moe Turaga, who shared his past experience of working in a situation of bondage on an Australian farm'. Regarding its own operations, the 2020 MSA indicates: 'Contracted workers participate in our regular Voice of Team engagement surveys where they can anonymously raise any concerns. In F19, 83% of DC workers surveyed reported feeling enabled, engaged, and energised when at work' (although figures refer to FY19, it was ongoing and reported in 2nd half of 2020). [2021 MSA, 24/08/2021] <p>Score 2</p> <ul style="list-style-type: none"> Met: Analysis of stakeholder views on company's HR issues: Regarding the survey in carried out with workers in Bangladesh, the results show: 'The responses from workers regarding grievance mechanisms, wages and benefits, medical facilities and COVID-19 initiatives of the factory were positive. The survey did, however, identify that workers required more hygiene products and that they experienced stress when at work. In response, our team coordinated with suppliers so that more hygiene products are available onsite. We are further preparing a train-the-trainer on wellbeing at work and stress release exercises. The survey also identified that 85% of workers felt they would benefit from training on nutrition'. In the case of the interactive session with team members, the Company listened to survivor advocate, Moe Turaga, 'who shared his past experience of working in a situation of bondage on an Australian farm. Through this discussion our team contributed ideas on how we could better identify and support at-risk customers, something we will explore further in F22. [2021 MSA, 24/08/2021] Met: Describe how views influenced company's HR approach: Regarding the requests carried out by workers in Bangladesh: 'In response, our team coordinated with suppliers so that more hygiene products are available onsite. We are further preparing a train-the-trainer on wellbeing at work and stress release exercises'. In relation to forced labour, 'our team contributed ideas on how we could better identify and support at-risk customers, something we will explore further in F22'. [2021 MSA, 24/08/2021]

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	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: Identifying risks in own operations: Regarding its own operations, the 2020 MSA indicates: 'This year, as part of our specific forced labour risk assessment, we identified service suppliers that deliver services at a Woolworths-owned and operated site. We examined the inherent risks involved with delivering the services based on: Workforce characteristics: Nature of the work and required skillset. Product characteristics: Seasonality, production costs, product value, market competition. Business processes: Labour recruitment, supply chain transparency, complexity of the value chain. The following were identified, as the highest risk services in our operations: Security arrangements; Cleaning arrangements; Trolley collection services; Third-party labour at direct production sites; Temporary labour in our distribution and logistics operations'. [2020 MSA, 08/2020] • Met: Identifying risks through relevant business relationships: The Company describes how Responsible Sourcing Program is integrated in our Human Rights Due Diligence Framework, 'which also aligns to the key elements of the Group Risk Management Framework'. It explains how it identify its human rights risks: 'We use product and country-level risk insights, including aggregated third party audit findings, to conduct our risk assessment'. [2021 Sustainability Report, N/A] & [Responsible Sourcing Program, 12/2019: woolworthsgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: The 2020 MSA indicates: 'Since 2017, we have conducted supplier risk assessments designed together with our program partner ELEVATE, a global business risk and sustainability solutions provider. These assessments inform our Responsible Sourcing Program and areas of focus. This year, we expanded our supplier segmentation methodology to focus on forced labour risks across Group operations and supply chains. These assessments focused on the inherent risks of exploitation involved in producing the products and delivering the services in our operations and supply chains'. However, although the Company indicates it works together with ELEVATE, it is not clear it has a global system it has in place to identify its human rights risks and impacts on a regular basis across its activities involving consultation with affected stakeholders. The Company has provide an additional source to this indicator, however, the link could not be open. [2020 MSA, 08/2020] • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
B.2.2	Assessing human rights risks and impacts	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: Describe process for assessment of HR risks and discloses salient HR issues: The 2020 MSA indicates: 'Since 2017, we have conducted supplier risk assessments designed together with our program partner ELEVATE, a global business risk and sustainability solutions provider. These assessments inform our Responsible Sourcing Program and areas of focus. This year, we expanded our supplier segmentation methodology to focus on forced labour risks across Group operations and supply chains. These assessments focused on the inherent risks of exploitation involved in producing the products and delivering the services in our operations and supply chains'. The 2021 MSA indicates that labour hire and operation services '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 applicable rights and available protections'. [2020 MSA, 08/2020] & [2021 MSA, 24/08/2021] • Met: How process applies to supply chain: The Company describes how Responsible Sourcing Program is integrated in our Human Rights Due Diligence Framework, 'which also aligns to the key elements of the Group Risk Management Framework'. It explains how it identifies its human rights risks: 'We use product and country-level risk insights, including aggregated third party audit findings, to conduct our risk assessment. This informs our supplier segmentation into four risk categories: Priority, Moderate, Specialised, Minimum, Priority and moderate risk sites are required to undergo a third party audit, with the former being prioritised for corrective action follow-up and site visits. Specialised is a unique category for suppliers of fresh food and also requires an audit. Minimum risk suppliers are required to complete a self-assessment'. [2021 Sustainability Report, N/A] • Met: Public disclosure of the results of HR assessment: It indicated: 'Working with our program partner, ELEVATE, a global business risk and sustainability solutions

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>provider, and their integrated risk platform, EiQ, our insights into modern slavery risks continues to improve. In F21, two timely new indicators were added to the risk assessment process – data on domestic migrant worker labour; and hygiene and sanitation (including COVID-19 risks). Generally, this risk assessment indicated that the ongoing impact of COVID-19 and changing geopolitical dynamics saw a continuation, and in some cases escalation, of macro risk trends such as: Deterioration in health and safety practices across global supply chains; Increase in employment-related violations including non-compliance with minimum-wage requirements; (...) Increase in forced labour risks, notably among countries with large numbers of economic labour migrants'. [2021 MSA, 24/08/2021]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets all requirements under score 1: See above. • Not Met: How it involved affected stakeholders in the assessment
B.2.3	Integrating and acting on human rights risks and impact assessments	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"> • Not Met: Action Plans to mitigate risks: In the section Mitigating and remediating risks of modern slavery, in its 2020 MSA, the Company indicates: ' Strong policies, contracts, monitoring and worker engagement are our key program controls to manage potential or actual risks of modern slavery in our operations and supply chain'. It them explains each of these items in depth. The 2021 MSA indicates its progress to date on managing extreme risk commodities and how it monitors international trade enforcement tools. However, it is not clear the scale of actuation once the risk is detected. CHRB looks for a proactive global system to prevent, mitigate or remediate its salient human rights issues rather than a remediation for a non-compliance. [2020 MSA, 08/2020] & [2021 MSA, 24/08/2021] • Not Met: Description of how global system applies to supply chain: The Company describe its mitigation process, in its 2021 Sustainability Report, which is part of its due diligence framework: 'We accept eight different third-party schemes selected based on their coverage, relevance and alignment to our RS Policy and Standards: BSCI, SMETA, SA8000, ICTI, WRAP, GLOBAL GAP GRASP, Fair Farms, NZ GAP social practice-add on. All audits are graded against four possible outcomes: Zero-tolerance, Critical, Moderate, Minor. Follow-up audits, desktop reviews, site visits, and supplier guidance support continuous improvement'. As a result: ' We prioritise follow-up on corrective actions based on supplier segmentation and audit outcome. We work closely with suppliers and relevant stakeholders to provide: Support and capacity building for continuous improvement; Relevant guidance documents; Targeted root cause remediation through management action plans'. In the section Mitigating and remediating risks of modern slavery, in its 2020 MSA, the Company indicates: ' Strong policies, contracts, monitoring and worker engagement are our key program controls to manage potential or actual risks of modern slavery in our operations and supply chain'. It them explains each of these items in depth. The 2021 MSA indicates its progress to date on managing extreme risk commodities and how it monitors international trade enforcement tools. However, it is not clear the scale of actuation once the risk is detected. CHRB looks for a proactive global system to prevent, mitigate or remediate its salient human rights issues rather than a remediation for a non-compliance. [2021 Sustainability Report, N/A] & [2020 MSA, 08/2020] • Met: Example of actions decided on at least 1 salient HR issues: In the context of a potential for modern slavery in Malaysia: 'routine audits serve the purpose of identifying red flags for further investigation. As a potential indicator of debt bondage, Woolworths Group triggered our ZT procedure and engaged ELEVATE, to conduct a full investigation [...] As a result: Our team and the supplier are finalising a fees reimbursement plan; We have agreed further corrective actions that seek to address the root cause of the payment of recruitment fees including governance of labour agents and a requirement for pre-departure briefing for migrant workers before they leave their home country; Additional measures include: Providing policies and information in languages workers can understand; Improvements to bring current dormitory conditions into line with Malaysian legal requirements. [...] Incorporating the lessons learned from this case will inform our due diligence for other sites in Malaysia and recommencing these activities is a priority in F22'. [2021 MSA, 24/08/2021] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	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: System for tracking or monitor if actions taken are effective: The 2021 MSA indicates: 'An improved understanding of our control environment has informed our approach to measuring the effectiveness of previously reported actions and measurements. Utilising Group Risk's scale of Control Effectiveness Ratings we assessed three elements of our measurements: control effectiveness, design effectiveness and operating effectiveness. We found that while some controls are substantially effective, there is more work to do to improve the operating discipline of controls. Further, the controls applied to the broad set of measures across the RS Program. As a result, it was determined that we would maintain separate monitoring for the whole RS Program and report on specific measures to address modern slavery in this Statement'. A draft of these measures was disclosed in the MSA. It contains ten measures to address modern slavery risks. For example: Number of sites where indicators of forced labour were identified, Number of modern slavery cases confirmed. [2021 MSA, 24/08/2021] • Not Met: Lessons learnt from checking system effectiveness: The Company indicates, that as a result, of its assessment of effectiveness of their actions: 'it was determined that we would maintain separate monitoring for the whole RS Program and report on specific measures to address modern slavery in this Statement'. However, it is not clear it is a result of a lessons learned while tracking the effectiveness of its actions on at least one of its salient human rights issues. [2021 MSA, 24/08/2021] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights 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: Provides two examples of comms with stakeholders: In its 2021 Modern Slavery Report, it indicates: 'Acknowledging the risks to migrant worker cohorts in the provision of services to our stores, this year we updated and redistributed the Supplier Speak Up poster in our Australian Supermarkets'. It involved updating the poster, translating it into 5 languages, distributing it and including into 5 languages the Supplier Speak Up Poster in the Stores Compliance Self-Assessment'. In the context of forced labour risk in Malaysia, the Company is providing 'policies and information in languages workers can understand'. The latter case was found out through audits. The Company provides different examples of engagement with stakeholders, such as engagement with 'supply chain workers in Australia and Bangladesh', a roundtable session with United Workers Union, an agreement with the Retail Supply Chain Alliance. It also indicates that it has a set of procedures, found in its Human Rights Grievance Process, including: 'we maintain regular communication with all parties involved in an investigation and communicate with broader stakeholders through our annual reports'. However, the Company is expected provide least two examples demonstrating how it communicates with affected stakeholders regarding specific human rights impacts raised by them or on their behalf. No evidence found. [2021 MSA, 24/08/2021] & [Human Rights Grievance Process, N/A] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% 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	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: Channel accessible to all workers: The Company states that 'Our Team Member Speak Up service is available to current and former team members (both employees and contractors) who work for, or are contracted to, an Endeavour Group Limited or one of its subsidiaries, as well as their associates and families, both in Australia and overseas'. [Team Member Speak Up Policy, 02/20/2020]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Channel is available in all appropriate languages and workers aware: The Company indicates that 'the Speak Up portal is available in 8 already translated languages most commonly spoken by our team and suppliers. (...) The Speak Up hotline is able to receive reports in 130 commonly spoken languages. Mention your language when you speak to the operator, and a translator will be sourced. Interpreters for some languages are easier to source than others and are based on availability at the time of your call'. The Speak Up tool is available online. The Company indicates, in its webpage section A safe place to work and shop indicates: 'team members are required to complete the Code of Conduct training upon commencing in the workplace'. The Code contains information on its grievance mechanism. [Speak Up FAQ, 11/2021: secure.ethicspoint.com] & [A safe place to work and shop (web), N/A: woolworthsgroup.com.au] • Met: Describe how workers in the supply chain have access to grievance mechanism: 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, N/A: woolworthsgroup.com.au] • Met: Expect Suppliers to convey expectation to their own suppliers: The Responsible Sourcing Policy indicates: 'Woolworths provides a Speak Up service in key languages for our team members and suppliers (and their team members and workers) as a mechanism by which responsible sourcing concerns can be raised confidentially and, if desired, anonymously. Woolworths suppliers are expected to have their own effective grievance mechanism which embeds the UNGP's eight effectiveness criteria for company grievance mechanisms. In alignment with these criteria and to promote a robust grievance process, suppliers shall also make available Woolworths Supplier Speak Up as a complimentary channel available for all workers in our supply chains to raise concerns'. [Responsible Sourcing Policy, 06/06/2022: woolworthsgroup.com.au]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: Grievance mechanism for community: The Responsible Sourcing Policy indicates: 'Woolworths provides a Speak Up service in key languages for our team members and suppliers (and their team members and workers) as a mechanism by which responsible sourcing concerns can be raised confidentially and, if desired, anonymously. Woolworths suppliers are expected to have their own effective grievance mechanism which embeds the UNGP's eight effectiveness criteria for company grievance mechanisms'. In addition, it indicates that indicates that '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'. [Responsible Sourcing Policy, 06/06/2022: woolworthsgroup.com.au] & [Promoting better labour practices in our global supply chains (web), N/A: woolworthsgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages and stakeholder awareness: The Speak Up FAQs indicates: 'the Speak Up portal is available in 8 already translated languages most commonly spoken by our team and suppliers. (...) The Speak Up hotline is able to receive reports in 130 commonly spoken languages. Mention your language when you speak to the operator, and a translator will be sourced. Interpreters for some languages are easier to source than others and are based on availability at the time of your call'. The Modern Slavery Report indicates: 'Acknowledging the risks to migrant worker cohorts in the provision of services to our stores, this year we updated and redistributed the Supplier Speak Up poster in our Australian Supermarkets'. It involved updating the poster, translating it into 5 languages, distributing it and 'Including the display of the Supplier Speak Up Poster in the Stores Compliance Self-Assessment'. Also, the Responsible Sourcing Standard notes: 'We expect suppliers to embed the Woolworths Speak Up service as part of their grievance management policy and procedures. This includes ensuring workers are aware of the service and that Speak Up posters in all relevant languages are posted in visible locations at all sites'. [Speak Up FAQ, 11/2021: secure.ethicspoint.com] & [2021 MSA, 24/08/2021] • Not Met: Communities access mechanism direct or through suppliers: It indicates: 'Our Supplier Speak Up service is available to any supplier, contractor, or

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>consultant, as well as their relatives and dependants, which provides goods or services to the Woolworths Group in Australia or overseas. This group is referred to as 'you' in this policy'. However, it is not clear how it ensures external individuals and communities have access to the mechanism to raise complaints or concerns about human rights issues at the company's suppliers or the company expects its suppliers to establish a mechanism for them to raise such complaints or concerns. [Supplier Speak Up Policy, 01/2021: woolworthsgroup.com.au]</p> <ul style="list-style-type: none"> • Not Met: Expect supplier to convey expectation to their own suppliers: The Company indicates that 'our Responsible Sourcing Standards require our suppliers to provide workers with a channel to share their feedback, concerns and ideas, at their place of work (site). This channel is commonly referred to as a grievance mechanism'. No details found, however, on whether this channel should be open to suppliers' external stakeholders, including communities. [Supplier Guidance on Developing Grievance Mechanisms, 05/2019]
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 • Not Met: Examples (at least two) of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	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: Response timescales and how complainants will be informed: The Company discloses investigation stages: 'Receiving a grievance: an initial assessment is conducted to determine whether the worker or company is in the Group's supply chain and covered by the human rights investigations procedure. Intake process: we conduct a triage process to prioritise and assess the grievance. It is then allocated to an investigator, recorded in our systems, and notified to relevant stakeholders. Investigation: The investigator conducts a desktop review to scope the investigation and present it to the Investigation Working Group. [...] The investigator then drafts and implements an investigation plan, including meetings with the complainant, respondent and any witnesses, and any further follow-up meetings with the Working Group. Finally, the investigator prepares the Investigation Report. The Report sets out the evidence analysed, factual findings, and recommendations to the decision maker. Outcome: the Investigation Report is considered at the final Working Group meeting. Feedback is received and any required amendments are made. [...] Closing an investigation: after the outcome has been determined, relevant parties have been notified, and (if appropriate) remedies delivered (or a plan has been implemented to do so), an investigation is closed'. Also: 'we deal with grievances in a timely and efficient manner, prioritising them based on severity. The duration of investigations will depend on the circumstances in each case. However, we always strive to keep all parties regularly informed of the steps that are being taken and the results of the process'. In the context to the Team Member Speak Up Tool, the Company indicates: 'The duration of a formal investigation will depend on the circumstances including the number of allegations, witnesses and other factors. (...) Endeavour Group's Speak Up Manager, or the external Speak Up provider, will acknowledge receipt of your report and provide regular progress updates. The nature of the updates will depend on the circumstances. For example, we will not provide information that may compromise the investigation or the disclosure of confidential information. You will be informed when the investigation has been completed, but will not routinely receive details on findings into each of your allegations'. The same applies to the Supplier Speak Up tool. However, timescales (or estimates) for addressing the complaints or concerns and for informing the complainant are not clear. [Team Member Speak Up Policy, 02/20/2020] & [Supplier Speak Up Policy, 01/2021: woolworthsgroup.com.au] • Not Met: Describe support (technical, financial, etc) available for equal access by complainants <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism: Regarding the outcomes of grievances raises, the Company indicates: 'the Investigation Report is considered at the final Working Group meeting. Feedback is received and any required amendments are made. This includes a determination of whether the allegations are substantiated; not substantiated (disproven); or not substantiated (insufficient evidence). If the allegations are substantiated, the Human Rights Team and internal partners will engage with the supplier to develop

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>a remediation plan. Consideration will be given to the most appropriate remedy/-ies in each case, taking into account the complainant's wishes'. However, although the Company indicates that 'Consideration will be given' taking into account the complainant's wishes, no further explanation of the types of outcomes to the complainant and how are communicated. [Human Rights Grievance Process, N/A]</p> <ul style="list-style-type: none"> • Not Met: Escalation to senior/independent level: It indicates, in its Team Member Speak Up Policy: 'The Woolworths Group Chief Legal Officer (CLO) and Chief People Officer (CPO) oversee the Team Member Speak Up program. Woolworths Group Compliance supports the CLO and CPO including managing the external Speak Up provider and by providing advice and reports on the status and nature of issues being raised. The CLO, CPO, the Endeavour Group Managing Director, and other senior leaders including representatives from Woolworths Group Compliance comprise the Endeavour Group Speak Up Committee. It meets at least every six months to review the effectiveness of the service, to help ensure consistency in process and outcomes, and make relevant recommendations'. The Human Rights Grievance Process notes: 'Our independently administered Speak Up service is provided for escalation of those matters that cannot be raised through existing procedures. An external provider is responsible for the operation of the service and reports can be made confidentially and/or anonymously if preferred. Concerns can be raised with the service by email, website and telephone (in which case they are answered by experienced call centre operators). Reported concerns are documented in the confidential portal and a report is sent to a nominated Woolworths Speak Up manager to escalate. Typically, people who raise concerns will be provided with updates as appropriate as the matter progresses, and the findings or outcomes arising from the complaint'. However, it is not clear if escalation to more senior levels or independent third party adjudicators or mediators also entails challenging the process or outcome and that it can be done at complainant discretion. [Team Member Speak Up Policy, 02/20/2020] & [Human Rights Grievance Process, N/A]
C.5	Prohibition of retaliation for raising complaints or concerns	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: It indicates: 'Woolworths is committed to ensuring trusted and accessible channels are provided through which adversely affected people or communities can raise complaints or concerns about our business or our suppliers without fear of retaliation, intimidation, harassment, discrimination or victimisation'. Moreover, it notes that, for both, supplier and team Speak Up mechanisms: 'It is unlawful for a person or a company to: engage in any conduct that causes, or will cause, any detriment; or make a threat to cause any detriment (whether express, implied, conditional or unconditional), to an eligible whistleblower or another person because the person engaging in the conduct believes or suspects that the other person or a third person made, may have made, proposes to make, or could make, a protected disclosure. This includes where such belief/suspicion was only part of the reason why the action is taken'. [Responsible Sourcing Policy, 06/06/2022: woolworthsgroup.com.au] & [Team Member Speak Up Policy, 02/20/2020] • Met: Practical measures to prevent retaliation: 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. Both Team and Supplier Speak Up Policy state: 'If you use the Speak Up service, we're committed to protecting you, including against adverse consequences or victimisation as a result of raising a matter, and by protecting your identity and maintaining confidentiality. Any team member who discloses your identity inappropriately, or causes detriment to you, may face disciplinary action, up to and including termination. If you feel that you have been victimised as a result of raising a Speak Up report, you may: raise a new Speak Up report for this purpose, contact Woolworths Group's Whistleblower Protection Officer (WPO)'. Moreover, The Speak Up page is open to anyone to access. Any person can fill in the form as it has the option 'other' when inquiring about the complainant relationship to the Company. It offers the option to remain anonymous. [Supplier Speak Up Policy, 01/2021: woolworthsgroup.com.au] & [Team Member Speak Up Policy, 02/20/2020] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders: It indicates: 'Woolworths is committed to ensuring trusted and accessible channels are provided through which adversely affected people or communities can raise complaints or concerns about our business or our suppliers without fear of retaliation, intimidation, harassment, discrimination or victimisation'. However, CHRB methodology is looking for a commitment not to retaliate against workers

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>and stakeholders through: legal action against persons or organisations who have brought or tried to bring a case against it involving credible allegation of adverse human rights impacts, or against the lawyers representing them; firing or engaging in economic forms of retaliation against any workers or their representatives who have brought or tried to bring a case against it involving an allegation of human rights abuse; engaging in violent acts or threats to the livelihoods, careers or reputation of claimants or their lawyers. No further evidence found.</p> <p>[Responsible Sourcing Policy, 06/06/2022: woolworthsgroup.com.au]</p> <ul style="list-style-type: none"> • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: In its Supplier Speak Up Policy, the Company states that 'it is unlawful for a person or a company to: engage in any conduct that causes, or will cause, any detriment; or make a threat to cause any detriment (whether express, implied, conditional or unconditional), to an eligible whistleblower or another person because the person engaging in the conduct believes or suspects that the other person or a third person made, may have made, proposes to make, or could make, a protected disclosure. This includes where such belief/suspicion was only part of the reason why the action is taken. "Detriment" includes dismissal, disciplinary action, harassment, discrimination, property damage, reputational damage and other types of damage to a person'. Also, the Human Rights Grievance Process notes: 'The Group will not retaliate against any worker or stakeholder raising credible allegations through legal actions or by imposing punitive economic measures'. However, it is not clear if this commitment is extensive to suppliers' external stakeholders. No further evidence found. [Supplier Speak Up Policy, 01/2021: woolworthsgroup.com.au] & [Human Rights Grievance Process, N/A]
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	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: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms: The Company had this subindicator awarded based on an earlier version of the document. No evidence found in latest version or in alternative sources of an indication of the process by which it cooperates with state-based non-judicial grievance mechanism(s) on complaints brought against it. [Responsible Sourcing Standards, N/A: woolworthsgroup.com.au] • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	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: Describes how remedy has been provided: The Company indicates, in its 2019 Sustainability Report, that 'in Australia, we facilitated AUD\$198,720 in repayments by labour contractors to 35 workers that had been underpaid. One sub-contractor was referred to the FWO. This brings the total repayments in Australia by labour contractors over the past 18 months to AUD\$225,000. In China, we secured the repayment of US\$24,695 in wages for 55 workers by their employers'. Also, the 2021 MSA notes: 'As a result of the investigations, this year service providers repaid \$361,851 to 24 workers in the trolley and cleaning sector across 25 sites in five states. Thirteen subcontractors and their key management personnel were terminated based on critical and deliberate non-compliance, such as intentional underpayments, falsification of records or manipulating Woolworths Group procedures. A further four primary contractors were temporarily suspended while critical issues were investigated, resulting in one termination at the conclusion of the investigation'. [2019 Sustainability Report, 29/08/2019] & [2021 MSA, 24/08/2021] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Changes to systems, processes and practices to stop similar impact: As an outcome of a whistleblower investigation, the Company indicates that 'Beyond continuous improvement for suppliers, we also looked internally at how our purchasing practices and processes may have contributed to this situation. The analysis found: Our sourcing team had limited visibility over factory capacity; and We did not have a clearly defined process for managing subcontracting risks. Based on these findings we have worked hard to improve our systems and mitigate future exposure. In June 2019, our general merchandise team launched a new product development process that includes factory capacity assessments as part of their supplier desktop review and subcontracting information on product specification briefs. Our new process for subcontracting has also been adopted across the Group. In H1F20, we will focus on training our team and suppliers on our requirements. We will continue learn from our experiences, using data and program insights to drive improvements'. [2019 Sustainability Report, 29/08/2019]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	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: Number grievances filed, addressed or resolved and outcome achieved: The 2021 Sustainability Report notes: 'This year we investigated 72 supply chain breaches or worker grievances, a decrease of 15% from last year. (...) In F21, our Facilities Management Compliance team investigated 65 matters involving allegations in the trolley collection and cleaning supply chains at our Australian trading sites. These allegations included underpayments (74%), subcontractor non-conformance (15%), visa irregularities (5%) and other issues (6%)'. Moreover, 'As a result of the investigations, this year service providers repaid \$361,851 to 24 workers in the trolley and cleaning sector across 25 sites in five states. Thirteen subcontractors and their key management personnel were terminated based on critical and deliberate non-compliance, such as intentional underpayments, falsification of records or manipulating Woolworths Group procedures. A further four primary contractors were temporarily suspended while critical issues were investigated, resulting in one termination at the conclusion of the investigation. In F21, our RS team managed a total of 19 grievance investigations - seven of these investigations involved allegations of breaches of our RS policy that were raised in F21, and the remaining 12 were investigations that commenced in F20 and continued in F21. The allegations investigated included alleged underpayments, failure to provide minimum employment entitlements and business integrity. As a result of these investigations, we entered into nine Management Actions Plans (MAPs)'. [2021 Sustainability Report, N/A] • Not Met: How lessons from mechanism improve management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (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: Discloses timebound target for suppliers to pay living wage or include in code or contracts: The Responsible Sourcing Standards indicates: 'Woolworths believes that wages should always be enough to meet the basic needs of workers and their families and be able to provide some discretionary income for them. While we recognise that there is no universal guidance on how to calculate such a wage, we strive to work closely with our suppliers to promote freedom of association and collective bargaining, as well as better wage management systems – particularly in jurisdictions lacking a robust minimum wage setting mechanism. To this end, we will also collaborate with global organisations to move towards achieving living wages, not just minimum wages, for all workers and their families who do not have the benefit of robust minimum wage frameworks in their jurisdiction'. The 2020 MSA notes 'our purchase order Terms and Conditions and Vendor Trading Terms require suppliers to comply with the requirements under our Responsible Sourcing Policy and Responsible Sourcing Standards'. [Responsible Sourcing Standards, N/A: woolworthsgroup.com.au] & [2020 MSA, 08/2020]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Improving living wage practices of suppliers: In its 2021 Modern Slavery Report the company notes cases of underpayment of wages in India and the investigation of two other cases in Australia as well as other three sites in their fresh meat supply chain. However, no details found in relation to proactive work carried out by the Company to improve performance of suppliers in relation to living wage practices. BIGW, one of the Company’s subsidiaries indicates: ‘In February 2020, BIG W joined Action, Collaboration, Transformation (ACT) to address living wages in Bangladesh. ACT is an agreement between global brands, retailers and trade unions to achieve living wages for workers. [...] Our commitments and progress to date in our responsible sourcing and responsible purchasing programs include: We have formed a working group among our cross functional team to deliver the ACT commitments; We have made a commitment to fair labour costing model and have recently completed a trial of a cost base calculation (CBC) model; We remain committed to fair terms of payment, on time payment and updates to payment terms and we are currently trialling a Supply Chain Finance scheme; We have rolled out ACT Purchasing Practice online survey with our suppliers and cross functional BIGW team. By the end of F22 we aim to: Launch our Responsible Exit Policy; Train our relevant team and suppliers on our ACT living wage commitments’. However, although the Company indicates that BIGW is part of ACT and that it makes efforts towards achieving a living wage, it is not clear the work it does together with supplier, as evidence seems to focus in improving own Company's purchasing practices. It indicates that it will train suppliers on its living wages commitment, however, it is not clear that there is work being done currently. [Sustainability BIGW, N/A: bigw.com.au] & [2021 MSA, 24/08/2021] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.1.2	Aligning purchasing decisions with human rights	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: Avoids business model pressure on HRs (purchasing practices): The 2020 MSA notes ‘COVID-19’s impact on our human rights work plan In response to COVID-19 the following activities were paused to ensure our team could respond to the heightened human rights risks presented by the pandemic: Modern slavery specific compliance training has been delayed however our Responsible Purchasing Practices training has been running throughout the pandemic’. The 2021 MSA indicates the ‘number of team members completed e-learning on responsible purchasing’: 375. Although the Company indicates the trains team member on Responsible Purchasing Practices, it is not clear the practices it adopts to avoid price or short notice requirements or other business considerations undermining human rights. [2020 MSA, 08/2020] & [2021 MSA, 24/08/2021]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Practices adopted to pay suppliers in line with agreed timeframes: The 2020 MSA notes some general support offered by the Company for suppliers during COVID-19: ‘During the peak of the pandemic we have also instituted a number of other key initiatives to reduce or minimise the potential for human rights harm including: Reducing payment terms from 60 days to 14 days for eligible small suppliers to ensure cash flow across the entire Group, creating a positive impact on more than 1,100 small suppliers. [...] In special circumstances, released early payments to nine suppliers to assist with cash flow’. However, these measures seemed to have taken place during the pandemic exclusively. The webpage section Woolworths commits to fast payment terms for smaller suppliers indicates that the Company has signed the Business Council of Australia’s supplier payment code: ‘The code is a voluntary, industry initiative that commits participants to paying small business suppliers within 30 days of receiving the correct invoice and correct goods or services. Woolworths has also published its own small supplier payments policy, which incorporates its existing practice of paying small suppliers of merchandise to Woolworths supermarkets within 14 days of receiving goods. The move comes three months after the Morrison Government warned that large entities that failed to pay small businesses on time would be “named and shamed” after a review into the impact of late payments on the small business community’. The Company indicates it has signed a commitment to shorten payment terms to small suppliers only and it articulates why that is the case. Also, 'In February 2020, BIG W joined Action, Collaboration, Transformation (ACT) to address living wages in Bangladesh. [...] Our commitments and progress to date in our responsible sourcing and responsible purchasing programs include: We have formed a working group among our cross functional team to deliver the ACT commitments; We have made a commitment to fair labour costing model and have recently completed a trial of a cost base calculation (CBC) model; We remain committed to fair terms of payment, on time payment and updates to payment terms and we are currently trialling a Supply Chain Finance scheme; We have rolled out ACT Purchasing Practice online survey with our suppliers and cross functional BIGW team’. [2020 MSA, 08/2020] & [Woolworths commits to fast payment terms (web), 12/02/2019: insideretail.com.au] • Not Met: Review own operations to mitigate negative impact: See above. The Company (subsidiary BIG W) has made a commitment to fair labour costing model and has completed a trail of a cost base calculation model. No further details found, including review of merchandising and planning (considering Company's practices in general and not one subsidiary). <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices: The 2020 MSA notes some general support offered by the Company for suppliers during COVID-19: ‘During the peak of the pandemic we have also instituted a number of other key initiatives to reduce or minimise the potential for human rights harm including: Reducing payment terms from 60 days to 14 days for eligible small suppliers to ensure cash flow across the entire Group, creating a positive impact on more than 1,100 small suppliers. [...] In special circumstances, released early payments to nine suppliers to assist with cash flow’. However, although the Company indicates the changes it made during the Pandemic, it is not clear how it assessed its purchasing practices to avoid undermining its human rights commitments. It seems that practice applied temporarily due to the pandemic. [2020 MSA, 08/2020]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.3	Mapping and disclosing the supply chain	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: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The Company indicates that 'Woolworths sources 96% of our fresh fruit and vegetables in Australia from some 423 direct suppliers. More than half of our direct suppliers are from two states – Queensland and Victoria – followed by New South Wales, Western Australia, South Australia, Tasmania and the Northern Territory. This is what we call tier one, or direct, suppliers. Our tier two supply chain are those growers that supply into our direct suppliers. Of our 14 largest direct suppliers, collectively the Australian Fresh Produce Alliance, there are an estimated 1,500 tier two growers. This is just a small section of our second tier supply chain. We will continue to map our second tier to have greater transparency of the indirect growers that contribute to our fresh produce supply chain'. On its website, it indicates that '100 percent of the fresh meat sold at Woolworths supermarkets is produced in Australia and 96% of fresh fruit and vegetables sold at our supermarkets are grown on farms in Australia. We also have a complex global supply chain and source products from many countries including China, India and Bangladesh'. The Company discloses 100% of its direct suppliers of Big W (apparel). 'Woolworths Food Group publishes the list of factories that directly produce our apparel and textile products. We are working to map our suppliers beyond tier 1 (supplier producing the final product) to include, where possible, tier two and three suppliers (suppliers producing components of a final product). [2019 Sustainability Report, 29/08/2019] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why: The 2020 MSA discloses a 'key commodities risk map'. It indicates: 'We conducted two forced labour risk assessments for non-vendor branded trade suppliers in food and non-food. We identified top inherent risks by country and commodity, relevant to our supply chain, which has informed our priority areas for further due diligence at multiple supply chain tiers. Overall, we identified higher risks across more categories and countries in our food supply chain'. The map discloses the product, the country of production, a color-coded 'global supply chain risk landscape' [from low to extreme]. It includes food commodities and non-food products. Regarding its seafood suppliers, the 2021 MSA notes: 'There are three main avenues of seafood entering the Group's supply chain: fresh or 'behind the counter', own brand 'long-life' (e.g. tinned salmon), and as an ingredient in other products. Fresh and own brand seafood is sourced from 43 direct suppliers spanning operations and fisheries in 22 countries. Sixty-eight percent of fresh seafood is fished in Australia followed by transboundary waters to the north east and west of Australia, Vietnam and New Zealand'. The subsidiaries Woolworths Food Group and BIG W disclose a list of their apparel suppliers. However, although the Company discloses some of its suppliers, it is not clear it discloses the names and specific locations of the direct and indirect suppliers who make up the most significant parts of its supply chain. It is also expected to explain how it has defined what are the most significant parts of its supply chain. [Promoting better labour practices in our global supply chains (web), N/A: woolworthsgroup.com.au] & [2020 MSA, 08/2020] • Met: Discloses which direct or indirect suppliers is involved in higher-risk activities: The 2020 MSA discloses a 'key commodities risk map'. It indicates: ' We conducted two forced labour risk assessments for non-vendor branded trade suppliers in food and non-food. We identified top inherent risks by country and commodity, relevant to our supply chain, which has informed our priority areas for further due diligence at multiple supply chain tiers. Overall, we identified higher risks across more categories and countries in our food supply chain'. The map discloses the product, the country of production, a color-coded 'global supply chain risk landscape' [from low to high]. It includes food commodities and non-food products. Regarding its seafood suppliers, the 2021 MSA notes: 'There are three main avenues of seafood entering the Group's supply chain: fresh or 'behind the counter', own brand 'long-life' (e.g. tinned salmon), and as an ingredient in other products. Fresh and own brand seafood is sourced from 43 direct suppliers spanning operations and fisheries in 22 countries. Sixty-eight percent of fresh seafood is fished in Australia followed by transboundary waters to the north east and west of Australia, Vietnam and New Zealand'. The subsidiaries Woolworths Food Group and BIG W disclose a list of their apparel suppliers. [2020 MSA, 08/2020]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.4.b	Prohibition of child labour: Age verification and corrective actions (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: Child Labour rules in codes or contracts: The Responsible Sourcing Standards indicates: '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. [...] 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'. It also indicates: 'Additionally there are three stand alone documents in addendum to the Standards that are referenced in, and must be read in conjunction with, the relevant section: [...] Woolworths Child Labour Prevention and Remediation Protocol'. The 2020 MSA notes 'our purchase order Terms and Conditions and Vendor Trading Terms require suppliers to comply with the requirements under our Responsible Sourcing Policy and Responsible Sourcing Standards'. [Responsible Sourcing Standards, N/A: woolworthsgroup.com.au] & [2020 MSA, 08/2020] • Not Met: How working with suppliers on child labour: The Company indicates on its website that 'The apparel industry carries a higher risk of child labour (...). Our BIG W business is committed to the ongoing transparency of its supply chain by publishing the details of factories that directly produce their own brand apparel and general merchandise quarterly on our website'. Moreover, its 2021 Modern Slavery Report describes a program to combat child labour in its cotton supply chain. However, this datapoint is specific about the agricultural sector. No details found in relation to proactive work carried out by the Company to improve performance of suppliers in relation to child labour and to improve working conditions for young workers in its agricultural supply chain. The Company has provided additional feedback to this indicator, however, its source could not be found in the public domain. [Promoting better labour practices in our global supply chains (web), N/A: woolworthsgroup.com.au] & [2021 MSA, 24/08/2021] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made
D.1.5.b	Prohibition of forced labour: Recruitment fees and 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'. The 2020 MSA notes 'our purchase order Terms and Conditions and Vendor Trading Terms require suppliers to comply with the requirements under our Responsible Sourcing Policy and Responsible Sourcing Standards'. [Responsible Sourcing Standards, N/A: woolworthsgroup.com.au] & [2020 MSA, 08/2020] • Met: How working with suppliers on debt & fees: In the context of a potential for modern slavery in Malaysia: 'routine audits serve the purpose of identifying red flags for further investigation. As a potential indicator of debt bondage, Woolworths Group triggered our ZT procedure and engaged ELEVATE, to conduct a full investigation [...] As a result: Our team and the supplier are finalising a fees reimbursement plan; We have agreed further corrective actions that seek to address the root cause of the payment of recruitment fees including governance of labour agents and a requirement for pre-departure briefing for migrant workers before they leave their home country; Additional measures include: Providing policies and information in languages workers can understand; Improvements to bring current dormitory conditions into line with Malaysian legal requirements. [...] Incorporating the lessons learned from this case will inform our due diligence for other sites in Malaysia and recommencing these activities is a priority in F22'. [2021 MSA, 24/08/2021] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees: Regarding its efforts to manage forced labour in Malaysia, the 2021 MSA discloses some figures if a ELEVATE run investigation: 'Estimated the fees paid by 226 workers to be approximately \$3,300 per worker'. However, although the Company indicates the number of reimbursement, it is not clear the number affected by (scope of the issue, potential people, regions affected) the payment of recruitment fees or related costs in its supply chain. [2021 MSA, 24/08/2021] • Not Met: Analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.d	Prohibition of forced labour: Wage practices (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: Suppliers to pay workers in full and on time in codes or contracts: In its Responsible Sourcing Standards, the Company indicates: 'Suppliers pay workers in a timely manner within defined time frames. Where no time frame limits are specified by law, payment must be paid at least within thirty (30) days [...] Suppliers pay workers correctly on overtime hours at premium rates as legally required or agreed within a CBA, whichever is higher. [...] Suppliers provide all legally required benefits, including all forms of paid leave (including but not limited public holidays, annual leave and sick leave), to all workers. [...] Suppliers shall not take deductions from workers' wages as a disciplinary measure or any deductions from wages not provided for by law, without written consent from the worker. [...] Workers are paid correctly for all paid time off (e.g. breaks and leaves) and work stoppages, if any, as required by law'. The 2020 MSA notes 'our purchase order Terms and Conditions and Vendor Trading Terms require suppliers to comply with the requirements under our Responsible Sourcing Policy and Responsible Sourcing Standards'. [Responsible Sourcing Standards, N/A: woolworthsgroup.com.au] & [2020 MSA, 08/2020] • Not Met: How working with supply chain to pay workers regularly and on time: Although the Company has been investigating cases of underpayments, it is not clear how it works with supply chain to pay workers regularly, in full and on time. [2021 MSA, 24/08/2021] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.1.5.f	Prohibition of forced labour: Restrictions on workers (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: 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.' The 2020 MSA notes 'our purchase order Terms and Conditions and Vendor Trading Terms require suppliers to comply with the requirements under our Responsible Sourcing Policy and Responsible Sourcing Standards'. [Responsible Sourcing Standards, N/A: woolworthsgroup.com.au] & [2020 MSA, 08/2020] • Not Met: How working with suppliers on free movement: According to its 2021 MSA, during an audit, the Company found a non-compliance in Malaysia, it 'was related to withholding of passports, which was remediated by giving workers unrestricted access to their safety deposit box'. The 2020 MSA indicates: 'There were 474 audits undertaken by our suppliers this year across our international supply chain, which identified modern slavery risks at 13 supplier sites related to the recruitment of migrant workers, passport retention and forced overtime. In line with our policy, we communicated our remediation expectations and worked with suppliers to resolve these issues'. In the case of passport retention it corrective action consisted in: 'At 4 sites, passports were returned to all migrant workers; At 1 site, workers have a key to access the security box where passports are stored'. Although the Company provides an example of a corrective action, it is not clear how it proactively works with suppliers to eliminate retention of worker's documents or other actions to physically restrict movement in a broader sense. The indicator is looking for work done in order to prevent restrictions on workers. [2021 MSA, 24/08/2021] & [2020 MSA, 08/2020] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
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.' The 2020 MSA notes 'our purchase order Terms and Conditions and Vendor Trading Terms require suppliers to comply with the requirements under our Responsible Sourcing Policy and Responsible Sourcing Standards'. [Responsible Sourcing Standards, N/A: woolworthsgroup.com.au] & [2020 MSA, 08/2020] • Met: How working with suppliers on FoA and CB: It indicates, in its 2021 MSA: 'In F21 we planned to continue worker education programs in partnership with the unions. Due to COVID-19 border restrictions and timing of harvest seasons, we were unable to deliver these. Instead Woolworths Group coordinated and facilitated multi-stakeholder, pre-harvest information sessions for suppliers and labour providers on workplace compliance. The sessions were targeted at higher risk regions, Sunraysia and Goulburn Valley, and included presentations from the Fair Work Ombudsman, WorkSafe Vic, Department of Health and Human Services, Labour Hire Licensing Authority (Vic) and unions. Presenters communicated key messages on legislative requirements, labour hire licensing regimes and facilitating a COVID safe harvest. Ninety-two participants attended the two sessions. In F22 we aim to return to in-person events as soon as practicable'. The 2020 MSA notes: 'This year we completed 55 site visits, 5 worker briefing sessions with union representatives in the horticulture sector and surveyed more than 1,200 supply chain workers in Australia and Bangladesh'. The Company also indicated that it has signs an agreement with union partnership, Retail Supply Chain Alliance. [2021 MSA, 24/08/2021] & [2020 MSA, 08/2020] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress
D.1.7.b	Health and safety: Fatalities, lost days, injury, occupational disease 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.' The 2020 MSA notes 'our purchase order Terms and Conditions and Vendor Trading Terms require suppliers to comply with the requirements under our Responsible Sourcing Policy and Responsible Sourcing Standards'. [Responsible Sourcing Standards, N/A: woolworthsgroup.com.au] & [2020 MSA, 08/2020] • Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period • Not Met: Fatalities rate for lasting reporting period • Not Met: Occupation disease rate for last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S: It indicates some work done with suppliers on the apparel sector (footwear, garments). However, this indicator is specific about the agricultural sector. [2021 MSA, 24/08/2021] • Not Met: Assessment of the number affected by H&S issues in the SP

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Provides analysis of trends demonstrating progress: The 2021 MSA indicates: 'Critical NCs [non-conformances] that become overdue, in spite of follow-ups and reminders, may indicate a more systemic issue. NCs related to safety (56%) [...] continue to be overdue, and this is consistent with our findings last year. We recognise that auditing alone will not be sufficient to resolve these issues in the long term, so in F22 we will partner with strategic suppliers to explore the root cause of these issues and pilot improvement KPIs in an attempt to make progress on these industry-wide issues'. [2021 MSA, 24/08/2021]
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: Includes resettlement requirements that the supplier provides financial compensation • Not Met: Assessment of the number affected by land rights issues in its SP • 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: Its Responsible Supplier Standard indicates: 'All workers have access to potable drinking water and clean water for washing. All workers have access to potable drinking water and clean water for washing'. However, no supplier requirement including refraining from negatively affecting access to safe water found. [Responsible Sourcing Standards, N/A: 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: Assessment on the number affected by lack of access to water and sanitation • Not Met: Provides analysis of trends demonstrating progress
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, N/A: woolworthsgroup.com.au] • Met: How working with suppliers on women's rights: The Company indicates that 'this year, BIG W was selected by amfori BSCI and the CSR Centre Bangladesh to participate in a women's empowerment program, Shohola.. (...) The Shohola Project seeks to address the structural barriers to women in leadership positions by: Sensitising top – and mid-level management to gender equality and gender-based harassment; and Empowering female workers through leadership and capacity building training.(...) The programs aims to: Train at least 80 supervisors and 800 female factory workers; Have an indirect impact to 2,500+ women workers through a buddy system; and Create gender-based awareness in 6,500 households'. [2019 Sustainability Report, 29/08/2019] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • 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		No allegations meeting the CHRB severity threshold were found, and so the score of 33.69 out of 80 points scored in themes A-D has been applied to produce a score of 8.42 out of 20 points for theme E.

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 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, 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.

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