



Responsible Sourcing Policy

1. Introduction

We believe in earning our customers' trust by acting responsibly and doing the right thing for our people, our customers, our communities, and our environment. We expect the same standards from our suppliers. This policy covers our approach to our upstream supply chain in all of our businesses. The businesses that form the Woolworths Group are described [on our website](#).

Woolworths Group is committed to respecting human rights for our own team members and the workers in our upstream supply chain in alignment with the principles and guidance contained in the United Nations *Guiding Principles on Business and Human Rights*. This means we undertake due diligence activities to identify, prevent and mitigate any adverse human rights impacts of our operations. Governance oversight of our approach to human rights management is provided by the [Board Sustainability Committee](#).

This policy is consistent with the principles of the International Labour Organisation *Declaration on Fundamental Principles and Rights at Work* and the United Nations *Universal Declaration of Human Rights*. Furthermore, Woolworths Group is a signatory to the United Nations Global Compact (UNGC) and this policy embraces and reflects the UNGC's core values of human rights, labour standards, the environment and business integrity. This policy also complements our comprehensive Diversity & Inclusion strategy that ensures our team members are treated with fairness and respect.

In line with our purpose and values, Woolworths Group is committed to the regular review of our responsible sourcing approach.

2. Commitment to Responsible Sourcing

Woolworths Group is an Australian and New Zealand business. We have a complex global upstream supply chain, with a long standing commitment to a large number of domestic and international suppliers.

We recognise that there are a number of different legal frameworks and cultural environments that our suppliers operate in globally. We also recognise that we need to continuously monitor our responsible sourcing framework. We will review this policy annually, or when circumstances dictate; for example, to align with changes in regulations or address emerging issues.

We require all suppliers with whom we have a direct relationship for goods and/or services we sell or use in our businesses to comply with this Policy. We regularly review our supplier arrangements and we encourage our suppliers to be open and honest about the challenges they face so we can help them find practical solutions.

We require our direct suppliers to communicate this Policy to their own suppliers and extend the principles of this Policy through their supply chain. We are committed to working with our suppliers to implement improvement plans and help them achieve compliance.

To support this Policy, Woolworths Group has developed a set of Responsible Sourcing Standards, which apply to all of our suppliers with whom we have a direct relationship for goods and/or services we sell or use in our businesses (other than suppliers of branded goods and services).

The Responsible Sourcing Standards are a key way that we implement the commitments in this Policy. They include comprehensive criteria on business integrity, labour rights, fair and safe working conditions and environmental compliance.

We have an audit framework to review compliance with our Responsible Sourcing Standards. It is built on the principle of mutual recognition and we accept findings from the following social compliance industry programs:

- Supplier Ethical Data Exchange (Sedex) and Sedex Members Ethical Trade Audit (SMETA)
- International Council of Toy Industries (ICTI) Ethical Toy Programme
- Amfori (Business Social Compliance Initiative)
- Social Accountability (SA) 8000
- Worldwide Responsible Accredited Production (WRAP)
- Global Good Agricultural Practice Risk Assessment.

We require suppliers of branded goods to have established arrangements which are consistent with our commitment to responsible sourcing and upholding human rights.

3. Summary of Responsible Sourcing Standards

Our Responsible Sourcing Standards are designed to address specific responsible sourcing risks in our upstream supply chain. The Standards cover 18 separate criteria, in the following key areas:

- **Compliance with Local Laws:** Suppliers must comply with all relevant local laws, rules and regulations in the countries in which they operate, including those relating to business integrity, transparency, bribery and corruption.
- **Management Systems:** We believe that robust management systems, including hiring, disciplinary and termination practices, are important for suppliers to build and develop in order to support compliance requirements and sustainability goals. Suppliers are responsible for establishing these management systems to support their operations.
- **Social and Labour Standards:** All workers must be treated with respect and dignity. Suppliers are to provide workers with a safe place to work, and respect workers' rights to freedom of association. 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.



- **Environmental Standards:** Suppliers must comply with all applicable environmental laws and regulations, and maintain an environmental management system that identifies and manages environmental impacts.
- **Additional Standards:** Where applicable, suppliers must comply with standards relating to overseas foreign migrant workers, authorised subcontracting and homeworkers.

4. Remedy and Grievance Mechanisms

It is important to Woolworths that effective remedies are available for affected people and communities where it is identified that our operations have caused or contributed to adverse impacts. These remedies may be provided through direct engagement with affected people and communities, or collaboration with our suppliers or other third parties.

Woolworths is committed to ensuring channels are provided through which adversely affected people or communities can raise complaints or concerns without fear of retaliation, intimidation, harassment, discrimination or victimisation. Woolworths provides a Speak Up service for our team members and direct suppliers (and their team members) as a mechanism by which responsible sourcing concerns can be raised anonymously, and we are committed to working with our suppliers to ensure appropriate mechanisms are made available within their own supply chains.

Brad Banducci
CEO, Woolworths Group

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Date effective:	1 July 2018
Accountable:	Chief Executive Officer
Contact:	Responsible Sourcing team via: Email: responsiblesourcing@countdown.co.nz
Grievance mechanism:	Vendor Speak Up: https://bit.ly/2qFUqGq Telephone: 1800 772 173 Email: vendorspeakup@deloittedigital.com
Related policies:	Uzbek cotton policy