

Our Code of Conduct

Our promise
to each other,
creating better
outcomes for all



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Welcome to Woolworths Group

To be part of Woolworths Group is to be part of an amazing team, guided by a shared purpose of **creating better experiences together for a better tomorrow**. 180,000 hearts and minds, turning everyday actions into moments of meaningful impact—always ready to care for our customers, the communities we serve and, most importantly, each other.

To make Woolworths Group the best place to work and shop, we've set out our expectations for us all to follow. Whether you've been with Woolworths Group for years, or you're just beginning your journey, it's important that you understand and follow these expectations. We all have a role to play if we want to be better together, and it's our collective engagement and participation that will make Woolworths Group the best it can be. Thank you for joining us on our journey.

With respect,

– Amanda Bardwell



Our Code of Conduct

Being a Part of Our Team



Being a Part of Our Team

This Code of Conduct outlines what is expected from each of us as team members. This includes all employees, contractors, board members, and everyone working within Woolworths Group across Australia, New Zealand, Asia or anywhere in the world, as part of Woolworths, Countdown, BIG W, Primary Connect, our Support Team, or any of our other businesses.

We ask that you read this document carefully, and reach out if you have any trouble understanding it. This Code of Conduct sets out our expectations for working at Woolworths Group. Every team member has a responsibility to follow this Code of Conduct, to do the right thing, and to encourage others to do the same.

We all have a responsibility to not just protect Woolworths Group, but grow its reputation in the eyes of our many stakeholders. By following this Code, our aim is that we can work together to encourage an inclusive, productive and enjoyable workplace for the whole team.

We take our Code of Conduct very seriously, as it firmly reflects our purpose and our values. Not following this Code may result in disciplinary action, including counselling, warnings or termination of employment/engagement.

From time to time, we will ask you to complete training to remain up-to-date. This training is a requirement of your role, and must be undertaken when it is due.

As you read through this document, please don't hesitate to talk to your team leader,

People Partner or People Advisory if there is anything that feels unclear, or if you have any further questions.

Working as a contractor

If you are doing work for Woolworths Group as a contractor, or you are employed by another company but are working alongside Woolworths Group team members, we expect you to follow these guiding principles while you are working with us. Failure to do so could lead to termination of your engagement.

When does this Code of Conduct apply?

- In the workplace (including Store, Support

Office, Distribution Centre) and any other work site, as well as working remotely;

- even if not during working time, especially if there is a sufficient connection to the workplace (including conduct on social media outside working hours);
- if attending any temporary alternative workplace;
- during overnight stays away from the workplace on work business or work-related events;
- during attendance at work-related functions (including training, educational and social activities); or
- in any situation which may involve a sufficient connection to the workplace.



Our Purpose

No matter who we are, what our role is, or what business we work for, we're all connected by our Group purpose:

We create better experiences together for a better tomorrow.

What we mean by **We**

It all starts with 'We' - all of us working together

What we mean by **Better**

Consistently innovating to lead and exceed expectations

What we mean by **Experiences**

Meaningful moments, both big and small to make positive impacts on the lives of teams, customers, communities and partners

What we mean by **Together**

Valuing that we are better together, with each other and in partnership

What we mean by **Tomorrow**

Understanding the plans we make and the actions we take today, are an opportunity to leave a positive impact for generations to come



Our Core Values

We care deeply. We listen and learn. We do the right thing.

Our values are what we stand for as individuals and as a Group. They guide the way we interact with each other, our partners our customers and our communities.



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Our Ways
of Working

We are Customer 1st,
Team 1st.
We are always improving.
We deliver end to end.
We encourage freedom
in a framework.
We keep things simple.

Our ways of working guide everything we do. It's how we work together as a team every day, to make a positive difference to our customers.



Our Code of Conduct

Respectful Workplace



Upholding Diversity & Inclusion



At Woolworths Group, our goal is to be a truly inclusive workplace, where every team member feels valued. We acknowledge our differences, and believe in the possibilities these differences create for our workplace culture and business outcomes.

Whatever our gender, age, ethnicity, religion, race, colour, marital status, family or carer's responsibility, disability or sexual orientation, we value and celebrate the diversity of our teams at all levels to help every team member feel safe and welcome. Diversity amongst our leadership is critical in setting the tone for the kind of inclusion we want to see throughout our business.

We know that people are happier and more fulfilled if they can be themselves, and bring their whole selves to work. That's why we strive to create an inclusive environment that celebrates the diversity of our team, giving all team members the opportunity to feel valued, respected and empowered.

There's never been a better time to be, and stay, true to ourselves—as individuals and as a collective. As well as having a positive impact within our teams, customers are also reassured when our team members are a reflection of themselves and their communities.



We expect our team to always behave in a manner that is in accordance with our policies, these principles, and the law. Please refer to:

[Diversity and Inclusion Policy](#)

[Respectful Workplace Policy](#)

[Gender Diverse and Gender Affirmation Policy](#)

Creating a Respectful Workplace

We strive to provide a positive workplace where everyone is treated with care and respect.

That means we must all:

treat customers, team members and others with dignity, courtesy and respect

do the right thing, be fair and be honest

work hard to connect with others and understand their everyday challenges

care genuinely and passionately about creating an environment where everyone belongs

listen, learn and respond appropriately to the views and concerns of others

consider how everything we say and do might impact others.

Identifying inappropriate behaviour

Creating an inclusive workplace, and looking after the health and wellbeing of our team members and customers is of utmost importance. This means it is not acceptable for any of us to engage in the following types of behaviours at work:

1. Bullying

Bullying is repeated, unreasonable behaviour towards another person (or group of people) that creates a risk to their physical and mental (psychological) health and safety.:

- Abusive, insulting or offensive language, or comments (including on social media) of a racist, sexist, homophobic or transphobic nature, or towards people with a disability
- Deliberately and unreasonably excluding someone
- Spreading misinformation or rumours
- Aggressive and intimidating conduct
- Practical jokes or initiations

2. Harassment and sex-based harassment

Harassment of team members, customers, suppliers or others is not acceptable. Harassment is any unwanted behaviour that might humiliate, offend, embarrass or intimidate another person. This could be a single incident, or happen repeatedly over time, and may be intentional or unintentional. Harassment includes (but is not limited to):

- Offensive or demeaning comments, jokes or banter (including based on someone's actual or perceived race, age, religion, disability, gender identity, sexual orientation or other personal characteristic), even if the other person doesn't seem to mind and even if it is not intended to offend
- Conduct or harassment of a demeaning and unwelcome nature based on someone's sex, or characteristics associated with their sex
- Conduct or harassment of a demeaning and unwelcome nature based on someone's gender or gender identity
- Mimicking someone's accent or habits
- Sharing inappropriate images, videos or memes
- Spreading misinformation or rumours, isolating a team member or being persistently unpleasant or rude

What would you do in this scenario?

Ahmed has concerns with Steve's performance and has been meeting with him regularly to coach and develop him in the areas of concern. Steve is still not performing at the level required, so Ahmed continues to manage his performance, including formal performance management, is this okay?

Yes, Ahmed's actions are reasonable for the purpose of addressing unsatisfactory performance.

Identifying Inappropriate Behaviour

3. Sexual Harassment

Sexual harassment of team members, customers, suppliers or others is not acceptable. Sexual harassment is any uninvited, unwelcome sexual advance, unwelcome request for sexual favours or other unwelcome conduct, or unreciprocated behaviour of a sexual nature that a reasonable person would anticipate may humiliate, offend, embarrass or intimidate another person.

This includes (but is not limited to) the following conduct, which may occur during or outside of work hours:

Requesting, sending or showing sexual or offensive pictures or messages (including by phone or on social media)

Unwelcome comments or questions about a person's appearance, sexual activities or private life (whether in person or via social media or technology)

Unwelcome physical contact, such as shoulder massages or invading someone's personal space

Persistently asking someone on a date or to socialise outside of work, after previous refusals

Offensive or demeaning comments or jokes of a sexual nature (even if the intention is not to offend or humiliate)

Staring or leering at another person

Some types of sexual harassment may also be offences under criminal law, for example sexual assault or indecent exposure. Such behaviour, if suspected, may be reported to the police.

What would you do in this scenario?

Adam knows Samara through work, and they have recently become connected on Facebook. Adam has approached Samara at work and has sent Samara private messages via Facebook on a number of occasions asking Samara out. Despite Samara politely declining on more than one occasion, Adam has continued to send Samara private messages outside of work hours asking her out on a date. Is this okay?

No - although Adam is messaging Samara outside of work hours, they are connected through work, and this is sexual harassment as Adam is persistently asking Samara on a date despite her declining.

What would you do in this scenario?

Mitchell and Mary have worked together for some time. They get along really well and always joke around. They are friends on Snapchat and share funny pictures and videos with each other. Recently, Mitchell has been sending Mary a lot of sexually explicit memes and jokes. These make Mary uncomfortable, and she does not respond to them. Mitchell thinks it is funny and continues sending these, even when he receives no response. Is this okay?

No, it is not okay. Even if Mitchell does not intend to offend Mary, and thinks that what he is doing is funny, his conduct is inappropriate and may be considered sexual harassment. Even though Mary has not told Mitchell directly to stop, his behaviour is not acceptable.

What would you do in this scenario?

Peter has recently affirmed his gender at work, and has changed his name and pronouns to reflect his affirmed gender identity (he/him). Susan works with Peter and repeatedly refuses to address him using the correct name and pronouns. Instead, she refers to Peter by his dead name (previous name) and the pronouns she/her. This causes Peter distress. Is this okay?

No, Susan's actions display harassment on the grounds of gender identity. Peter has the right to be addressed by the name and pronouns that correspond with his gender identity. Additionally, Peter is also entitled to access the toilet, locker and change room facilities corresponding to his gender identity.

Identifying Inappropriate Behaviour

4. Racism

Woolworths Group is committed to a workplace that is free from racism. Any form of racism towards team members, customers, suppliers or others will not be tolerated or accepted. Racism takes many forms and can happen anywhere. It includes prejudice, discrimination, hatred, or antagonism directed towards someone due to the colour of their skin, their ethnicity or national origin, as well as the belief that one's own race is superior.

While racism can be associated with acts of abuse and aggression, racism doesn't always involve violent or intimidating behaviour. Often it can be making jokes, racially profiling, stereotyping others, negative comments about different ethnic groups, calling others racist names or verbally abusing them. It can also include bullying, harassing or excluding people from groups or activities because of where they come from.

A key part of this commitment is eliminating racism in all of its forms and challenging the attitudes that lead to it. This is also an important step in creating an inclusive workplace that embraces and promotes diversity, as we are a diverse team that reflects the communities we serve across Australia, New Zealand and Asia.

Not all racism is obvious. When held as part of someone's internal belief system, racism may not be revealed until it becomes apparent through an individual's actions or attitude.

Racism is more than just words, beliefs and actions. It can also be reflected in systems and institutions, and include all the barriers that prevent people from enjoying dignity and equality because of their race.

No team member or customer should ever experience racism at Woolworths, whether it's in one of our stores, one of our distribution centres or one of our support offices. We reject all forms of racism and are committed to eliminating racism for our team and customers.

What would you do in this scenario?

Glenn is a store manager, and while working he notices a family enter the store. The family is dark skinned and are carrying backpacks. He says to Mark, a team member with darker skin, "can you follow that family around and make sure they don't steal?". Is this okay?

No. Glenn is showing prejudice towards, and discrimination against, people based on his perception regarding their race. He is racially profiling and stereotyping, which is not acceptable behaviour, and a breach of the Code of Conduct.

What would you do in this scenario?

Ben hears Kate say "I always check the bags of people of different cultures, you can't trust them". Is this okay?

No, this is racism. Kate should not treat anyone less favourably because of their racial or ethnic group.

What would you do in this scenario?

Sarah is working in service when a customer wearing a hijab (scarf) comes to her checkout. After the customer leaves Sarah says to another team member, "it is so hot today why would you wear a scarf on your head." Is this okay?

No, this is a culturally insensitive comment even if Sarah thinks it is a joke it is not acceptable.

Identifying Inappropriate Behaviour

5. Victimisation

Victimisation means treating someone negatively because they have made, or have been involved in, a complaint. At Woolworths Group, we encourage our team members to speak up when a situation isn't right, and victimisation is never acceptable.

It is also unacceptable to disadvantage someone because they have raised concerns or asked questions in relation to their employment, such as their duties or pay, or because they plan to take, or are taking, leave or using other entitlements.

6. Violence

Violence towards team members, customers, suppliers or others is not acceptable. Violence and aggression is any incident where a person is threatened, attacked or physically assaulted in circumstances within or outside the workplace. Work-related violence and aggression covers many actions and behaviours that create a risk to physical and mental (psychological) health and safety.

This can include (but is not limited to):

Punching, pushing, fighting, spitting, hitting, shoving, tripping or other physical violence

Threats of violence to team members, customers and partners as well as any of their family or friends

Abusive behaviour, including insults and name-calling

Intimidating behaviour that creates a fear of violence, such as stalking or threatening to cause physical harm

7. Unlawful Discrimination

Discrimination of team members, customers, suppliers or others is not acceptable. Discrimination means treating someone less favourably because of a protected attribute. This includes (but is not limited to) limiting access to training or other benefits, not promoting someone, or ending someone's employment.

Examples of protected attributes, which cannot be a reason for treating someone less favourably, include (but are not limited to):

- Marital or relationship status, pregnancy, breastfeeding, parental status or carer or family responsibilities
- Sexual orientation, gender, gender identity, intersex status or gender expression
- Race, colour, descent, nationality, national origin, ethnicity or religious belief
- Disability
- Age

Not all unwelcome behaviour or interpersonal issues will constitute one of the forms of unacceptable behaviour discussed above. Sometimes, two or more team members just do not get on, or are having difficulty working together. For more information on difficult working relationships, as well as the unwelcome behaviour discussed above, please also refer to the Respectful Workplace Policy.

What would you do in this scenario?

Sumit supervises Nada and Tom. Sumit offers additional shifts to Tom instead of Nada because Nada has a child, and Sumit thinks she might not be able to work outside school hours. Is this okay?

No, this is discrimination. Sumit cannot treat Nada less favourably because she has a child. Sumit should not assume that Nada cannot work the additional shifts. He should provide her with the same opportunities, and let her decide whether or not she can do a particular shift.

What would you do in this scenario?

Sudesh raised a complaint regarding the way food is handled in the Deli. Shortly after raising the complaint, Sudesh finds that he is no longer contacted to pick up extra hours, and his manager gives him short answers rather than engaging in conversation with him. Is this okay?

No, Sudesh should not be treated negatively because he has raised concerns, and the conduct he is experiencing may be victimisation.

What would you do in this scenario?

John is a team member who has just finished his shift for the day. While John is walking to his car, he bumps into a customer he knows outside of work who frequently shops at the store. John and the customer get into a verbal altercation, which starts to get very heated and John proceeds to threaten the customer. Is this okay?

No. Although John knows the customer outside of work and has just finished his shift for the day, John is in a public location while still wearing his work clothing. This behaviour towards team members, customers, suppliers, or others is not acceptable.

Our Code of Conduct

How we Act



Our Safety, Health and Wellbeing

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.

To achieve this, you must:

- Immediately stop any job or task that you believe is unsafe
- Always address hazards as you become aware of them
- Only use equipment that you are trained and authorised to use
- Wear Personal Protective Equipment (PPE) required for the task
- Follow any safety and health processes including rules, policies or procedures
- Report incidents and injuries immediately
- Not undertake duties when you have consumed or are under the influence of illicit drugs or alcohol in the workplace (as defined in the Drug and Alcohol Policy).

Mental (psychological) health and safety is as important to us as physical health and safety. We care deeply about this, and want people to know that it's okay not to feel okay, and it's absolutely okay to ask for help. If you're not okay, please see the Questions & Help section at the end of this document to find out more about the support available to you.

Remember that no task is so urgent, and no service is so important, that you cannot take the time to do it safely.



If you are in doubt about any health and safety issues, please speak to your team leader for assistance. Please refer to:

[Safety and Health Policy](#)

[Drug and Alcohol Policy](#)



Our Safety, Health and Wellbeing

What would you do in this scenario?

Sophie is a new team member in a store, and is asked by another team member to move some products using a pallet jack. Sophie has not been trained on this, but she wants to help out and make a good impression. What should she do?

Sophie should let the other team member know that she has not been trained on, or authorised to use the pallet jack, but she can ask if there is anything else she can do to help instead.

What would you do in this scenario?

Ayesha notices her team member, Mark, isn't acting like his usual self lately. He has been getting angry and upset, and has been turning up late to his shifts. As Mark's Line Manager, Ayesha is concerned for his wellbeing. What should Ayesha do?

Ayesha should ask Mark if he is okay, and have a conversation about how he is feeling. Ayesha should try to understand whether Mark's work might be impacting his mental wellbeing, and if so, Ayesha might tell Mark about some of the support options available if needed.

What would you do in this scenario?

Barry is a team member who works in one of our Distribution Centres. Whilst operating a forklift, Barry has an accident and collides into his colleague, Brenda, who is operating another forklift. Neither Barry nor Brenda are hurt from the accident, and only have 5 minutes of their shift remaining. Barry and Brenda want to finish their shift on time so they agree not to report the accident. Have Barry and Brenda done the right thing?

No, Barry and Brenda have not done the right thing. Although no one was hurt, they must follow the required safety process at the Distribution Centre (which includes immediately stopping the work, isolating the area and immediately reporting the incident to the relevant team leader).

What would you do in this scenario?

John has a big load to get through. He moves a pallet of stock to the front of the store. To make sure he gets through his work faster, he rides the pallet jack back through the store. Has John done the right thing?

No, John should never ride on a pallet jack, no matter how important the work is. John should remember that no task is so urgent and no service is so important that you cannot take the time to do it safely.

What would you do in this scenario?

Tom works in Customer Service, he loves his job and always does the right thing. Tom sees a customer who he is familiar with and suspects that this customer has been stealing stock. Tom follows the customer around the store. When the customer attempts to leave Tom asks to perform a bag check and when the customer refuses he prevents him from leaving by holding on to him. Has Tom done the right thing?

No, Tom should stay calm and clear of the customer. He should never touch the customer. Safety is the most important thing and if a customer refuses to cooperate or becomes abusive, then allow the customer to leave. This includes where the products are taken without payment. Under no circumstances are team members to leave the store to pursue someone.

What would you do in this scenario?

Kam goes to the pub next door for her lunch break. While having lunch, Kam has two beers and then returns to finish her day. Has Kam done the right thing?

No, while Kam may not be over the legal limit it is not appropriate for her to undertake duties when she has consumed alcohol as this could pose a safety risk to her, her team mates or customers.

Understanding your Team Benefits

Woolworths Group puts our customers and our teams first. That's why we provide exclusive offers under our Team Benefits program.

As part of this program, we offer eligible team members a discount card, referred to as the Everyday Rewards Plus Card in Australia, and the WOW People Discount Card in New Zealand. It can be used across a number of Woolworths Group businesses in Australia and New Zealand and selected partners.

This program is exclusive to our team members and should not be misused or shared more broadly. To find out more about the discount card, including correct and acceptable ways to use it, see the:



[Everyday Rewards Plus Card Policy](#)

[Do's and Don't](#)

[T&Cs Asia](#)



To make sure that our team members receive the greatest benefit from the program, we regularly monitor usage to check it is in line with our policies. Misuse of this benefit, including by sharing it with friends, extended family or customers, could result in disciplinary action or a loss of the benefit.

How To Use and Behave Across Social Media

We all need to make sure we use social media safely and effectively, and always do the right thing online.

It's important to remember that content shared on websites can exist online indefinitely, as well as being shared and seen by a much larger audience than might be intended. Below are our expectations for using social media.

We always treat others with respect

Whenever interacting with, or talking about, team members, customers or others connected with work, or when discussing Woolworths Group on social media – whether at work or not – you must:

- Always treat everyone with dignity, courtesy and respect, even if they have made negative, inflammatory or untrue comments about you or Woolworths Group
- Never make insulting, demeaning, threatening, sexual or discriminatory comments to or about someone (even if the other person is not mentioned by name)
- Never send sexual or offensive pictures or videos
- Never disclose personal information about other team members or customers
- Never post or share anything about team members, customers or other people connected with the Group that is inconsistent with our Respectful Workplace Policy

We protect our confidential information

Information you come across at work can sometimes be sensitive or confidential, so it's important that you never share this on social media. (The exception is the appropriate sharing for work purposes on internal-only forums such as private work Google Currents pages or Workplace for NZ). Similarly you must never 'like' or re-share other people's posts containing Woolworths Group's confidential information.

Confidential information is internal information that is not readily available to the public. This might include information about team members, customers, strategy, business plans, internal events, profit information, sales results or upcoming promotions. For more information about confidential information, see [page 27](#).

What would you do in this scenario?

Sarah hears from another team member that Woolworths will be stocking an innovative new product in the lead up to Christmas, but the product has not been officially announced externally. She posts on LinkedIn that she is excited to work for a company that supports product innovation, but does not mention the specifics of the product. Is this okay?

Yes, Sarah has not revealed any confidential information, so this is okay.

What would you do in this scenario?

Tom hears that the Company will be dropping prices on a range of products on Saturday. He posts on Facebook that people should hold off on buying until then. Is this okay?

No. Tom has revealed confidential information. Even if he was trying to help customers, this was not the right way to do that. In addition to being seen by Tom's Facebook friends, this information could also potentially be picked up by the media and/or competitors and this may have a negative impact on sales and the Company's competitive advantage.

How To Use and Behave Across Social Media

We are advocates for Woolworths Group and our businesses

Using social media to promote our Group and businesses is encouraged. However, you shouldn't talk negatively about Woolworths Group, or share, comment on or 'like' anything that might damage the Group's reputation, brand or commercial interests, including posts that are incorrect or misleading.

It's important to remember that if you list your workplace on social media, people will see you as a face of our business—even when you are not working or talking about work. Accordingly, any views you share, or comments you make associated with Woolworths Group should be consistent with the views of the Group.

If you want to raise a concern about Woolworths Group, or anything related to the Group, you should speak to your team leader or contact People Advisory, BIG W Employee Services, Team Services for NZ team members, or Speak Up. Social media is not an appropriate forum for this.

We are honest and transparent

If you are talking about Woolworths Group or related topics, or even retail in general, you should make it clear that you work for the Group, but the views you are expressing are your own and not those of the Group. Team members can only comment on behalf of Woolworths Group, or use logos and branding, with approval from one of our Social Media teams.

We check before posting

Before posting anything related to work—including sharing photos and videos taken at work, in one of our workplace locations, or of people wearing our uniform, logos or a name badge—reread your post and ask yourself:

- How might your post impact Woolworths Group if it becomes widely viewed?
- Would you want your team leader or team members to see it?
- Are you revealing any confidential information?
- How would a customer feel if they read the post?

If you are unsure whether the content is appropriate and consistent with the principles outlined above, you should ask someone else to review it before you post. You can talk to your team leader, the business' Social Media team or the Group External Communications (Media) team for guidance.

We limit our use during work hours

Generally, social media should only be used during breaks—unless it is being used for work purposes (for example, finding a recipe or social media promotion for a customer). Use of social media during work hours should not impact your ability to do your job.

Please also refer to the

[Social Media Policy and Guidelines](#)

What would you do in this scenario?

Pietro serves a difficult customer who is challenging Pietro about the price of an item. When Pietro goes on his lunch break, he posts about the incident on his Facebook profile. Is this okay?

No. Before posting anything on social media that relates to work, Pietro should reflect on how the post might impact Woolworths Group, how the customer would feel if they saw the post, and whether Pietro would want his team leader to see the post. If Pietro has any concerns about the incident, he should raise them with his team leader.

What would you do in this scenario?

Kate is on TikTok while working in the fresh produce department and decides to post a funny video of her juggling some apples. The video gets a lot of likes so Kate starts regularly posting videos of her juggling different fruits and vegetables. The videos are really popular and Kate says she is promoting the fresh produce at Woolworths. Is this okay?

No, Kate has made the videos in the store and while in her uniform. Even if Kate believes she is promoting Woolworths, she has not obtained the appropriate permissions and could be breaching food safety and handling processes in the way she is handling the food. Kate should ask someone else to review the videos before she posts them. She should talk to her team leader, the business' Social Media team or the Group External Communications (Media) team for guidance.

Opportunities with Media and External Stakeholders

Woolworths Group is a well-known business in Australia and New Zealand; the media, industry associations, community groups, regulators and politicians understandably pay close attention to what we do.

As a representative of Woolworths Group, everything you do at work, and the decisions you make can have a direct impact on the Group's reputation. We always want that impact to be positive.

That's why we encourage all our team members to behave in a way that continues to build our good reputation. A good reputation is hard to earn, but can be easily damaged.

To ensure that you do not inadvertently risk Woolworths Group's reputation, it is important that you:

- Do not provide information to the media or talk to the media if they approach you, unless your role authorises you to do so. If the media does approach you, refer them to the contact details of the Woolworths Group External Communications (Media) team listed on this page
- Do not provide information to politicians or government officials, unless approved by the Government Relations team
- Do not reference Woolworths Group negatively in any online social medium or public forum

We strive to have a positive relationship with everyone we interact and work with, so it's important that all enquiries from customers, partners, the media and all other external groups and organisations are dealt with quickly and appropriately.

If the media approach you, please refer them to the Woolworths Group External Communications (Media) team at media@woolworths.com.au (in Australia or Asia), or call (02) 8885 1033 (in Australia) or media@countdown.co.nz (in New Zealand).

Participation in political activities

Woolworths Group respects the rights of team members to participate in the political process, but we also need to avoid any potential conflicts of interest, or situations that could damage our reputation.

That means:

- You must comply with all relevant laws regarding lobbying, gifts or benefits to government officials or government employees
- Any donation to a political party made by or on behalf of Woolworths Group must be consistent with the Group's Political Donations Policy, which includes obtaining approval from our Government Relations team.

It's important that any person who considers running for elected office does not inadvertently create a conflict of interest or impact Woolworths Group's reputation, and that the process occurs purely in an individual capacity. If you are thinking of running for elected office, you should notify your team leader and the Woolworths Government Relations team.

Public submissions

As a large business which interacts with all levels of government, Woolworths Group is often invited to contribute to government inquiries, consultations, planning processes and reviews. Our Government Submissions Guidelines, which apply to all Woolworths Group business units and controlled subsidiaries, are in place to ensure all submissions on behalf of Woolworths Group are managed in a consistent and coherent way, with the appropriate executive governance.

If you have any questions or concerns, contact the Head of Government Relations and Industry Affairs, via governmentrelations@woolworths.com.au or media@countdown.co.nz.

Please also refer to the Political Donations Policy, and the

Fraud, Anti-Bribery and Corruption Policy

and where relevant, the

Woolworths Group Government Submission Guidelines

Our Code of Conduct

How we do Business



How we do Business

One of our important core values is that we always do the right thing.

That means you should:

Carry out your duties in good faith, always following relevant laws, policies and procedures

Respect the human rights of your team, customers, and all those you interact with in the course of performing your role

Complete the training applicable to your role, and raise anything that you don't understand with your team leader

Avoid engaging in behaviour—or ignoring behaviour by others—which breaches this Code of Conduct, any of our policies, or the law

Promptly raise issues (or suspected breaches) with your team leader

You should treat customers fairly and with respect, as relevant to your role. For example:

- Listen to and value customer feedback
- Address customer concerns regarding products that are faulty, unfit or mislabelled
- Make sure our marketing, promotional information, product packaging and labelling is legal, clear, truthful and always carefully checked

Taking care of Woolworths Group property

We are all responsible for the property that belongs to Woolworths Group. We need to make sure we use items properly and take care of any property we come into contact with.

In your role, you may be given access to things that belong to the Group, such as:

- Cash
- Equipment
- Products and merchandise
- Computers, mobile phones, tablets and passwords
- Motor vehicles
- Buildings and sites
- Confidential information
- Intellectual property

You should always handle stock, equipment and other Woolworths Group property with care, and remember to:

Ensure every sale is processed through the point of sale in the correct way

Assume that damaged or expired stock is wanted and valuable to Woolworths Group and should be accounted for and disposed of in the appropriate way

Never take any stock, money or property, no matter how small or inexpensive

Where appropriate, seek permission from a team leader to take property from

the workplace and ensure its removal is documented

Use property and business tools for their intended business use and not for personal use unless authorised

Use property and business tools appropriately and responsibly including with appropriate care and ensuring they are returned in good working condition

Return property, including hard and soft copies of documents, when you stop working with Woolworths Group

If you believe that theft or damage to Woolworths Group property is happening in your workplace, you should report it immediately to your team leader or a loss prevention representative. Theft or damage to property is a criminal offence.

To protect our customers, team members and sites, Closed Circuit Television (CCTV) video surveillance equipment operates at our sites. CCTV cameras are clearly visible, and are not installed in bathroom areas, change rooms or locker rooms.

What would you do in this scenario?

When Tracy finishes her shift, she marks down a roast chicken that has just been cooked so that she can buy it at a cheaper price. The store will be closing in an hour, so the chicken possibly won't be sold anyway. Is this okay?

No. It's not right for Tracy to mark down a product so that she or another team member can buy it more cheaply. If Tracy is not sure whether the chicken is needed or will be sold, she should speak to her team leader.

What would you do in this scenario?

Phil has been given samples of new nappies from a supply partner. When he doesn't think the nappies will be needed any more, he gives them to his brother who has a baby. Is this okay?

No. Samples are provided for a business purpose. Phil should check with his team leader before taking them home, or using them for any other purpose.

How we do Business

Navigating gifts and entertainment

We're committed to being honest, unbiased, and always behave with integrity every day. To maintain a level playing field for all of our partners, our policy is to not accept gifts, and to only accept entertainment in accordance with the Gifts and Entertainment Policy.

Examples of gifts include: physical products, cash, gratuities, supplier-paid trips, and any other personal favours. Examples of entertainment include: meals, and tickets to sport or entertainment events.

If you are offered a gift—unless it is part of a Woolworths Group approved promotion, and you have received prior direction that it is approved for you to accept it—you are expected to:

- decline the gift; or
- if declining the gift is not possible, or is inappropriate, the gift can be accepted, but should be logged in the Gift and Entertainment Register and used for charity or raffle prizes.

This is how you are expected to respond if you are offered entertainment:

If it relates to a professional development or professional awards event, it can be accepted but needs to be logged in the Gift and Entertainment Register, and signed off by the relevant General Manager

If it relates to a sporting or entertainment event (e.g. a concert), it can be accepted if the value does not exceed AU\$150 per person in Australia or NZ\$150 per person in New Zealand. You will need to log it in the Gift and Entertainment Register.

If the value exceeds AU/NZ\$150 per person, and you would like to accept the entertainment, you should pay the value greater than \$150, notify your manager and log the entertainment in the Gift and Entertainment Register (exceptions apply for partner award dinners – see the Gifts and Entertainment Policy)

Please also refer to the

Gifts and Entertainment Policy

Fraud, Anti-Bribery and Corruption Policy

What would you do in this scenario?

Prakash is moving a tray of perishables from a freezer. Another team member asks him to help out in Deli for fifteen minutes as it's busy. To save time, the team member asks Prakash to leave the perishables in the corridor while he helps out. Prakash tells the team member that he needs to put the perishables back in the freezer before helping in Deli. Is this right?

Yes. If Prakash had not put the perishables back into the freezer (or in the case they were going into) before helping in Deli, the perishables would have spoiled and been a stock loss. This may have created a food safety risk, which Prakash was able to avoid.

What would you do in this scenario?

A sales rep gives Sam a \$25 gift card to celebrate a successful promotion. What should Sam do?

Because a voucher or gift card is classed as a gift, Sam should thank the sales rep but politely decline the gift, explaining that Woolworths Group policy is to not accept gifts.

Navigating Conflicts of Interest

We are all expected to act in the best interests of Woolworths Group. This means that we must avoid conflicts between our own interests and the Group's interests wherever possible. Conflicts of interest can include any personal interests, relationships or activities that may influence you (or be seen to influence you) to act in a way that is not in the Group's best interests.

If you think you might have a potential conflict of interest (or that someone else might perceive one), you must disclose that interest to your team leader. You will also need to make a conflict of interest declaration. See the [Conflict of Interest Policy](#) for more information on how to complete the conflict of interest declaration.

Here are some examples of conflicts of interest:

- Your sibling holds a sales role with a supply partner with whom you may end up negotiating a contract
- You have a material financial interest in a business which is seeking to do business with Woolworths Group
- Your spouse holds a senior position with a major competitor
- You work for Woolworths Group in a role where you have access to confidential or market sensitive information and have a second job with a competitor
- You are in a close personal relationship with another team member whose job or career you have influence over (for example, someone who reports to you)

You must not use your position with Woolworths Group to obtain any personal benefit (other than

remuneration and other Woolworths Group benefits to which you are entitled), or to benefit any other business or person.

If you have an actual, potential or perceived conflict of interest:

- Avoid putting yourself in a position where you are choosing between what is in the Group's best interests and what is in your interest (or the interest of someone you are connected with)
- Woolworth's Group may also make changes, or take additional steps that we consider necessary to protect team members, those they are connected with, and the Group from the potential conflict.

You should seek help from your team leader with this, and ensure any conflict of interest is captured in SuccessFactors, or using the form linked within the Conflict of Interest Policy. Please also refer to the:

[Conflict of Interest Policy](#)

What would you do in this scenario?

Arjun works in the Procurement team, and Arjun's sibling, Sonali, just secured a role with a major supply partner. Currently, Arjun does not have to liaise with the partner, but Arjun may need to in future as part of his role. Arjun is pretty sure this won't present a conflict. Should Arjun disclose this?

Although Arjun doesn't think that their sibling's new job is a current conflict, it is a potential conflict, and Arjun should therefore disclose the potential conflict to their team leader. Arjun must then complete a conflict of interest declaration. Even if Arjun never ends up liaising with the major supply partner, Arjun should disclose the conflict just in case.

What would you do in this scenario?

Sally wants to hire her boyfriend, Nick, to work on a project. Nick is an expert in this particular work, and Sally has received advice from the Performance and Reward team on the market rate for the role. Is it okay for Sally to hire Nick?

Although the choice is legitimate, and Sally is trying to do the right thing for Woolworths Group, Sally hiring Nick might look like a conflict of interest. It's fine for Sally to put Nick's name forward for the role, but Sally should let the Talent Acquisition team do a proper search to make sure Nick is the best person for the job. Sally should also seek approval from her team leader and seek the advice of her People Partner. If Nick is found to be the best person for the job and is hired, he shouldn't report to Sally and Sally shouldn't be involved in future decisions for him regarding promotions, pay and ongoing performance management.

What would you do in this scenario?

Jenny is the Customer Service Manager at the Store and her daughter, Kelly, wants a job at Woolworths. Jenny hires her daughter as a part time team member in the customer service department. Jenny does not tell her manager but everyone in the store knows that Kelly is Jenny's daughter. Is this okay?

While it may be known that Kelly is Jenny's daughter, Jenny should still notify her manager, and complete the Conflict of Interest declaration in SuccessFactors or the Form. It may be more appropriate for Kelly to work in another department where Jenny is not her direct manager.

Using Information Technology

All team members have a role to play in protecting Woolworths Group's information, including customer information. We must also act to protect all technology and information systems within the Group.

To keep our systems safe:

- Team members are provided with unique accounts with passwords, which should not be shared with others.
- Information sent, received or stored on Woolworths Group systems (including email, chat, internet and intranet) may be monitored.
- If you receive a suspicious email, do not respond or click on any links, instead forward the email to hoax@woolworths.com.au, or hoax@woolworths.co.nz or hoax@countdown.co.nz for NZ team members.
- Always use systems (including, email, chat and Workjam) in a manner consistent with this Code of Conduct. Communications on these systems are monitored and recorded and any breaches may be investigated.
- Report suspected security incidents to the Incident Management Centre immediately on **1800 008 584** (Australia) or **0800 501 801** (New Zealand). A security incident is any event that may indicate that Woolworths' systems or data have been compromised.
- Familiarise yourself with, and always act in accordance with the Acceptable Use of Information Systems Policy.

What would you do in this scenario?

Jing receives an email from a well-known organisation saying that she has won a free holiday, which she must claim within 24 hours by clicking on a link. What should Jing do?

Emails such as the one Jing received are often used by scammers to trick the recipient into submitting their personal or financial information, and are commonly referred to as Phishing emails. Jing should not click on the link and should forward the email to hoax@woolworths.com.au or hoax@woolworths.co.nz for investigation.

What would you do in this scenario?

Sabina is really frustrated with a change to business operations, which means her roster has to change. She posts about how frustrated she is, and makes bad comments about her Store Manager and Group Manager in a Workjam chat (Workplace chat NZ) which is visible to the whole store. Others start to comment raising similar complaints. Is this okay?

No. Workjam should always be used in a way that treats everyone with dignity, courtesy and respect. Sabina's conduct is a misuse of the IT service, and a breach of the Code of Conduct. There are more appropriate ways for Sabina to raise her concerns, such as speaking directly to her Store Manager and Group Manager.



Our Code of Conduct

How to treat personal and confidential information

To help us remain competitive, and to keep the information people trust us with safe, team members should not share Woolworths Group information with any person who is not authorised to see that information. This applies both during and after Woolworths Group employment.

As part of your role you may be trusted with documents and information that belong to Woolworths Group, our customers, team members and partners. For more information please refer to our:

Woolworths Group Privacy Policy

Countdown Privacy Policy

Internal Team Member Privacy Policy

Personal information

Under privacy laws, there are strict rules about how we can collect personal information from our customers, team members and others, how we can use that information (including restrictions on sharing it with others), and what we need to do to protect the information. Remember, someone's personal information generally can't be shared without that person's consent. We all play a vital part in complying with these rules.

Customers

Woolworths Group places great importance on protecting our customers' information. You should only collect, use, retain, store or disclose customer information in accordance with the Group's policies, and only where this is required

for your role. For example, if you find a lost credit card, you must take appropriate steps to keep the card secure, as well as the personal information on it, as strict rules apply for dealing with credit card data.

Please also refer to the:

Acceptable Use of Information Systems Policy

Partners

Usually, when Woolworths Group receives information from another party, such as a partner, we have agreed to keep that information confidential. This means you must:

- Only use the information for the reason it was given to Woolworths Group and as agreed with our partner
- Not share it with people outside of Woolworths Group without the owner's permission
- Keep the information in a secure and safe location if the information is in hard copy format, or restrict access to the information on a need-to-know basis with other team members if the information is in soft copy format
- Securely destroy, permanently delete, or de-identify personal information if the business purpose for which the information was collected has been exhausted and there is no legal requirement to retain the information
- Treat all personal information in accordance with privacy laws

Woolworths Group information

Information about Woolworths Group and our operations, strategies, finances, customers and team—or anything else that is not publicly known—must be kept confidential and not disclosed to anyone outside Woolworths Group, including friends and family, on social media, or if speaking at events. If you are due to speak at an event, be sure to let your team leader know what information you'll be sharing.

What would you do in this scenario?

Rachna's sister works in marketing for a competitor. Rachna and her sister sometimes talk about Woolworths Group ideas for upcoming promotions. Is this okay?

No. Rachna is giving away confidential information. This is not okay, even if Rachna's sister promises not to tell anyone or use the information at work. Rachna and her sister may also be breaching competition laws by discussing price and promotions.

What would you do in this scenario?

Andrew, a Store Manager, has received a medical report from a team member. Andrew then shares some of the medical information in this report with the team member's team leader (who doesn't need to know this information for business reasons). Is it okay that Andrew shared this information?

No. Generally, medical information must be kept confidential (unless the team member consents to the information being shared) and can only be used for the purpose it is provided.

What would you do in this scenario?

Rohan has made a list of customer names and addresses for a competition. When he goes to send this to his team leader, Sarah, he accidentally sends it to another Sarah who works at his former company. What should he do?

Rohan should tell his team leader and report any unintentional disclosure, loss or theft of customers' or team members' personal information (including but not limited to email address, phone number, physical address and date of birth) to the Incident Management Centre (IMC) immediately on 1800 008 584 (Australia) or 0800 501 801 (New Zealand). It may be possible to recover the email or steps can be taken to ask the recipient to delete the email. It may also be necessary to undertake a review to determine whether the customers need to be notified.

Our Code of Conduct

Record keeping

We're committed to operating responsibly and in accordance with legislation and accounting principles.

This means that:

- We need to make sure our financial records, people records and systems are accurate and complete
- All of our financial transactions and funds need to be recorded correctly and supported by proper documentation (electronic or paper) so they can be audited reliably and reported honestly
- Falsifying Woolworths Group documents, or any information given to external

parties including the government or regulators, is unacceptable

- No team member should deliberately keep, or help another team member to keep, records that intentionally mislead or hide the true nature of a transaction
- All Woolworths Group funds, transactions and bank accounts must be reflected in Woolworths Group's books/accounts. No 'off book' transactions can be made

What would you do in this scenario?

Wendy, a Store Manager, is approached by someone external who offers to clean the store very cheaply if Wendy pays in cash and does not document the work. Is this okay?

No. Wendy should not agree to any arrangement where she is asked not to keep records or to pay 'cash in hand'. Wendy should call People Advisory, her team leader, and/or raise a Speak Up report.

Trading in Woolworths Group and other companies' shares

As a team member, you may become aware of confidential information that could affect the Woolworths Group share price, or the share price of another company.

This confidential price-sensitive information is known as Inside Information. Team members should never trade in Woolworths Group shares or the shares of another company while in possession of Inside Information about that company. This prohibition applies to any form of trade including buying, selling or transferring shares.

Team members must also not share the Inside Information directly or indirectly with another person who may use the Inside Information to

trade (or encourage someone else to trade) in Woolworths Group shares or the shares of another company. In addition to being a breach of our policies, this is against the law.

From time to time, team members may be advised not to trade in shares in other companies due to confidential, price-sensitive information being known through business dealings. As a general rule, buyers should not buy or sell shares in a partner they are dealing with on Woolworths' behalf.

Woolworths operates blackout periods where Specified Persons (and if applicable, their Closely Related Parties) must not buy or sell Woolworths Group shares. Team members who

are Specified Persons must also seek pre-trade clearance before trading in Woolworths Group shares.

These processes protect team members who are Specified Persons from inadvertently trading Woolworths Group shares when confidential, price-sensitive information is known within the Group. You will be notified by email if you are a Specified Person. A list of Specified Person roles and a definition of Closely Related Parties is available on the "Securities Trading" page on the People Portal.

Please also refer to the [Securities Trading Policy](#) page on Me@Woolies.

What would you do in this scenario?

Tim owns shares in Big Biscuits, which has a major contract with Woolworths Group. Tim hears from a team member that Big Biscuits is about to lose its contract. Tim sells his shares because he is worried that Big Biscuits' share price will fall and that he will lose money. Is this okay?

No. Tim's decision to sell his Big Biscuits shares is based on information that is not publicly known and might affect Big Biscuits' share price. He should not sell his shares, and can seek further advice from the Chief Legal Officer or Company Secretary.

Adhering to Food Safety and Responsible Sourcing

Food and product safety is paramount, and we are all accountable for it. Where relevant to your role, you should make sure that the products we supply are safe and meet regulatory requirements, including safety warnings and labelling. If you become aware of an issue with a product—either through a customer complaint or a recall issue—you should make sure that immediate action is taken to investigate and prevent sale of recalled products.

It is important that, where relevant to your role, you make sure that you are aware of the policies and legislation that apply, and that you comply with the [Responsible Sourcing Policy](#) and [Standards](#).

This means, never asking or accepting bribes, selecting suppliers that meet our minimum expectations, and always acting ethically and responsibly. Please also refer to the:

Food and Grocery Code of Conduct

Fraud, Anti-Bribery and Corruption Policy

Responsible Sourcing Policy & Standards

Staying aware of sanctions

Governments impose restrictions on activities relating to certain countries, organisations, or individuals called ‘sanctions’. Sanctions are designed to bring a situation of international concern to an end by influencing those responsible to limit the adverse impacts of a situation, or to penalise those responsible.

Business activities that may be affected by sanctions are supplier relationships, financial transactions, talent acquisition, investor relations, and other areas dealing with external parties.

We must always be aware of sanctions when doing business. This is not only to comply with the law, but also to meet our customers’ and community expectations. To find out more about sanctions and the tools available to you, [click here](#), read the Fraud, Anti-Bribery and Corruption Policy, and if required raise a Speak Up report if you believe anyone is breaching sanctions.

What would you do in this scenario?

Phan, a Category Manager, receives a response to a tender from a potential supplier. The potential supplier is quoting a price for the work that is significantly lower than other suppliers, and lower than what Phan understands to be the market rate for the work the supplier will complete. Should Phan automatically award the work to the supplier, given they have the lowest price?

No, Phan should not automatically accept the lower price. While it is important that Phan obtains the best value for money, he cannot act unethically and needs to be aware of the important role Woolworths plays in its supply chain. If Phan suspects that the price is too low, he should work with the potential supplier to understand how they arrived at the quote while still enabling workers to be paid appropriately. If in doubt, Phan should escalate the matter to his team leader, who may also contact the Group Human Rights team at responsiblesourcing@woolworths.com.au.

What would you do in this scenario?

Tara, a Store Manager, is approached by a sales rep, who offers to give her a bottle of wine if she puts his products in an over-and-above display in a prominent location. What should Tara do?

No payments should ever be made to make someone act in Woolworths Group’s favour, a team member’s favour or for the benefit of someone else (including family or friends). Tara may give the sales rep the over-and-above display if it will be justified by sales or in accordance with other relevant policy/process, but Tara should not accept or be influenced by the inducement of a bottle of wine.

What would you do in this scenario?

One of Rob’s partners calls to tell him that some products have been seized by a foreign government, and that the government is demanding \$10,000 to release the shipment. What should Rob do? Should he make the payment.

No. Bribes or facilitation payments should never be paid by a team member or by a third party. Rob should immediately raise this with his team leader, his People Partner, or through Speak Up.

Choosing your Preferred Dress

Dress and personal presentation are important expectations of team members.

While what may be considered as the Workplace has changed for some, we are all expected to dress appropriately while at work locations and when representing Woolworths Group. This means wearing a professional and appropriate style of clothing, consistent with your role and location. Attire must never present a safety issue and must be in line with this Code of Conduct.

This includes:

- Wearing preferred clothing (in line with applicable policies/guidelines for your location and role) or professional business attire. It's always okay to wear cultural and religious garments, and you may wear clothing that best aligns to your gender identity.
- Wearing clothing that is safe in the relevant environment, and wearing appropriate protective or safety clothing when required
- Being clean, tidy and maintaining personal hygiene and grooming
- Wearing a name badge or identity card when on work premises
- Wearing only Woolworths Group authorised business logos, promotional garments or accessories, (e.g. caps, if you are in a customer-facing role)
- Keeping jewellery to an acceptable business-level standard. Additional department-specific requirements may also apply, (e.g. when working in a fresh food department)

- Wearing respectful attire that demonstrates respect to others and is not offensive.

What would you do in this scenario?

Amar wears a turban to represent his faith. Can he wear it to work in a store?

Yes. It's absolutely fine for Amar to wear a turban at work, irrespective of where he works.

What would you do in this scenario?

Ben wears thongs, shorts and a singlet to work in one of our support offices. Is this okay?

No. Team members are expected to wear professional business attire at our support offices, even on Fridays when professional and business-appropriate smart casual clothing can be worn.



Our Code of Conduct

Expectations of Our Leaders



Expectations of Our Leaders



Team Leaders, Managers and Supervisors (Leaders) have a responsibility to role model and promote this Code of Conduct.

Leaders are also responsible for:

- making sure team members have a clear understanding of the expectations and values outlined in this Code of Conduct, and any other relevant legislation and policy;
- discussing issues and clarifying expectations with team members;

- monitoring the workplace and intervening quickly and appropriately when behaviour that is contrary to this Code of Conduct is observed or reported. A formal complaint does not need to be made before the appropriate action is taken;

- treating all complaints seriously and with care, including taking action to deal with any matters arising out of contraventions of this Code of Conduct in a timely and reasonable manner; and

- making fair, transparent and consistent decisions regarding any allegations of behaviour that is inconsistent with the Code of Conduct.

Our Code of Conduct

Questions,
Speak Up and
Further Help



Our Code of Conduct

Questions, Speak Up and Further Help

At Woolworths Group, we encourage our team members to speak up when something isn't right.

Unwelcome behaviours and breaches of our Policies and this Code of Conduct are not only unacceptable in our workplace. They may also be against the law. If you believe this is happening to you, or another team member—whether by another team member, a team leader, a customer, or anybody at work—there are informal and formal ways to address this.

Options include speaking to the person in question, if you feel comfortable and safe doing so, or raising in any of the following ways:

Your team leader

Your first point of call for any queries, advice or support.

People Partner

For more sensitive or complex people queries or support, or in Asia for payroll and benefits issues.

Me@Woolies

For people policies, processes and guidance material. Go to [Me@Woolies](#).

Your enterprise agreement

For more information about your entitlements and responsibilities go to the People Portal.

People Advisory (Aus) / Team Services (NZ)

For people matters, including understanding your pay and benefits and resolving workplace issues:

- Australia - Call **1800 008 584**, or use webchat or a service request through Me@Woolies
- New Zealand - Call **0800 735 477** or by email to team.services@countdown.co.nz
- Asia - Please email asiapeopleservices@woolworths.com.au

Speak Up

Woolworths Group Team Member Speak Up is an independent complaints handling service hosted by an external company. To understand what type of concerns should be raised with Speak Up, consult our [Team Member Speak Up policy](#).

Where you identify a serious matter that doesn't seem right, for example a potential breach of the law or our policies, including suspected fraud or corruption, or need to raise an issue anonymously. Call:

- Australia - **1800 334 319**
- New Zealand - **0800 393 76736**
- Hong Kong & Macao - **(852) 800 96 0016**
- Mainland China - **(86) 400 6 612 693**
- Thailand - **(66) 1800 013 018**
- Bangladesh - **(91) 0800 0000 333**

For more details on how to report please go to WoolworthsGroup.com.au/SpeakUp or email GroupCompliance@woolworths.com.au



Sonder (All Team Members)

For 24/7 confidential guidance and support, our partner Sonder provides our team members with on-demand personal safety, health and wellbeing support through access to counsellors, psychologists, emergency management and nurses to address medical concerns. From Australia, you can call the Sonder Support Centre on 1800 234 561. To provide access to your family, you can share the code "IAMHEREFAMILY" with any member of your immediate family. For more information, visit the ["I am here"](#) page on Me@Woolies. In New Zealand call 0800 447 444 for the Sonder Support Centre. To provide access to your wider whānau, you can share the code WWNZFAMILY. For more information, visit the Team Benefits page on the People portal. To download the Sonder app, scan the QR code.



Financial Wellbeing Program

For information and support with finances for team members in Australia and New Zealand, including interest-free loans.

In Australia
Call **1300 975 418** or email support@goodmoney.com.au.

In New Zealand
Call **0800 969 379** or email fwp@goodshepherd.org.nz.

This Code of Conduct may be changed from time to time and does not form part of any contract of employment or enterprise agreement. September 2022.