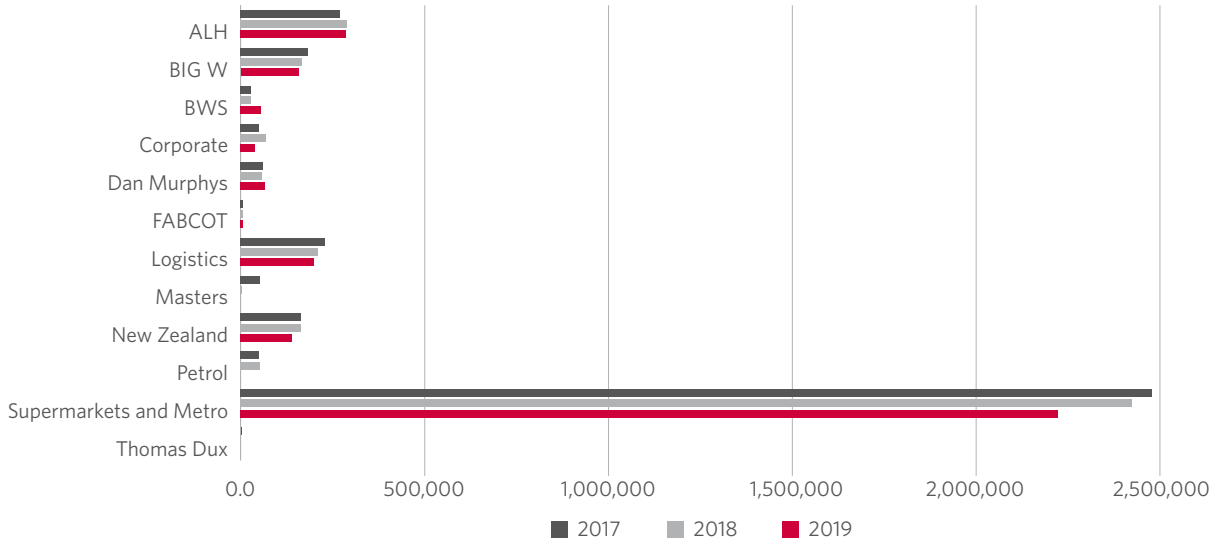
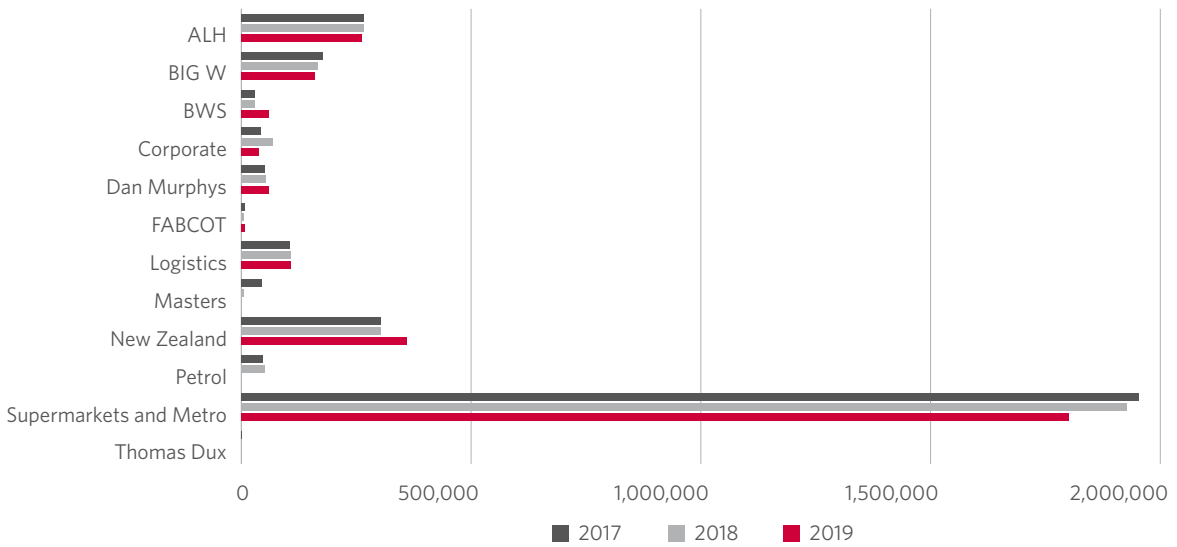


Sustainability metrics

TOTAL CO₂ EMISSIONS (t CO₂-e)



ELECTRICITY USE (MWh)



EMISSIONS FROM FACILITIES (t CO₂-e)

	SCOPE 1	SCOPE 2	SCOPE 3	TOTAL
ALH	33,829	222,689	30,931	287,449
BIG W	4,169	128,180	22,568	154,917
BWS	3,082	44,577	6,850	54,509
Corporate	1,443	29,025	4,661	35,129
Dan Murphys	6,976	52,177	6,767	65,920
FABCOT	81	5,628	729	6,438
Logistics	338	87,451	16,708	104,497
New Zealand	51,300	35,115	17,957	104,372
Supermarkets and Metro	452,583	1,486,839	262,560	2,201,982
Grand Total	553,801	2,091,681	369,731	3,015,213

TRANSPORT EMISSIONS BY USE (t CO₂e)

END USE	AUSTRALIA	NEW ZEALAND
Business Travel	4,863	2,232
Home delivery	10,475	10,555
Logistics 3rd Party Road	95,816	23,296
Trolley Collection	15,914	-

WASTE (tonnes)**Australia - material diverted from landfill**

	2015	2016	2017	2018	2019
Food waste to composting or energy ¹	17,359	15,791	16,877	16,187	50,626
Food waste to farmers	-	-	-	-	32,318
Food to charity	2,956	3,231	4,015	4,062	7,791
Cardboard	192,170	218,535	222,145	229,821	233,167
Plastic film	7,028	8,226	9,232	9,088	8,998
Polystyrene	3	-	-	-	-
Other	131	47	296	46	40
Total Australia	219,647	245,830	252,565	259,204	332,940

New Zealand - materials diverted from landfill

	2015 ²	2016	2017	2018	2019
Cardboard	25,324	26,057	26,709	28,219	28,499
Plastic film	1,253	1,307	1,296	1,412	1,596
Food waste to farmers	807	787	768	1,265	887
Food to charity ³	509	509	509	1,895	2,603
Other	435	440	1,193	836	2,410
Total NZ	28,328	29,100	30,475	33,627	35,994
Total diverted	247,975	274,930	283,040	292,831	368,935

Total Waste to landfill

97,389

1 F19 food waste to composting or energy scope has been updated from prior years.

2 F15 total excluded Farmers and charity.

3 2018 Food waste to farmers and charity methodology has been updated from prior years.



Workplace metrics

BOARD OF DIRECTORS

	FEMALE	MALE	TOTAL
<25	0	0	0
25-<35	0	0	0
35-<45	0	0	0
45-<55	3	1	4
55-<65	1	1	2
>65	1	2	3
Total	5	4	9

FEMALE REPRESENTATION BY EMPLOYMENT CATEGORY¹

Executives	29%
Senior Managers	34%
Managers	43%
Office support	55%
Technicians and trades	11%
Sales	59%
Other	18%

RATIO OF BASIC SALARY AND REMUNERATION OF FEMALE TO MALE EMPLOYEES BY EMPLOYMENT CATEGORY¹

This table averages all the salaries within the non-managerial or managerial category. Within each category, there are different roles and levels of positions. The ratio to average reported here does not compare like-with-like roles and does not represent the Pay Parity Project.

	2019		2018	
	AVERAGE ANNUALISED SALARY	RATIO TO AVERAGE	AVERAGE ANNUALISED SALARY	RATIO TO AVERAGE
Non-managerial Female	\$47,298.38	96.44%	\$47,412.27	97.05%
Non-managerial Male	\$51,237.68	104.47%	\$50,638.30	103.65%
Average Salary	\$49,044.65		\$48,854.17	
Managerial Female	\$79,747.45	92.98%	\$77,282.05	92.40%
Managerial Male	\$90,209.77	105.17%	\$87,952.71	105.16%
Average Salary	\$85,771.27		\$83,635.69	

RESPECT AND DIGNITY

We expect our employees to treat each other, our customers and our suppliers with respect and dignity. We train our employees on these expectations, but sometimes we do have issues which escalate to external jurisdictions. We are working towards a resolution on the outstanding claims.

Discrimination

No of claims lodged in Australia during the year	18
Number resolved in financial year	20

¹ This is provided from the WGEA report which has an extraction date of 1/1/2019 and is for Australian based Team Members only.

Freedom of Association

We have longstanding relationships with the unions that represent our employees, and 80% of our workplace is covered by Enterprise Bargaining Agreements (EBAs).

GROUP	EBA EMPLOYEES	TOTAL HEADCOUNT	%
ALH (Venue & Support)	0	11,377	0.0%
Big W	15,762	17,438	90.4%
Endeavour Drinks	7,418	14,600	50.8%
Food Group	126,088	142,536	88.5%
Statewide Independent Wholesalers ¹	329	360	91.4%
Group Support	6,976	9,706	71.9%
Total Employees	156,573	196,017	79.9%

¹ Wholesale customer stores.

WORKFORCE AND TURNOVER

Headcount by Business Unit

GROUP/BRAND	FEMALE	MALE	TOTAL
ALH (Venue & Support)	6,348	5,029	11,377
Big W	11,990	5,448	17,438
Endeavour Drinks	5,556	9,044	14,600
Food Group	80,970	61,566	142,536
Statewide Independent Wholesalers ²	27	333	360
Group Support	2,270	7,436	9,706
TOTAL	107,161	88,856	196,017

² Wholesale customer stores.

Head-count by employee type

	FEMALE	MALE	TOTAL
Full-time	24,528	30,447	54,975
Part-time	50,660	30,303	80,963
Casual	31,973	28,106	60,079
Total	107,161	88,856	196,017

Head-count by region

	FEMALE	MALE	TOTAL
ACT	1,338	1,396	2,734
NSW	31,591	26,889	58,480
NT	1,017	788	1,805
QLD	22,524	17,048	39,572
SA	6,085	5,671	11,756
TAS	2,667	2,068	4,735
VIC	22,401	20,383	42,784
WA	9,082	6,402	15,484
NZ	10,192	8,075	18,267
China	251	110	361
Bangladesh	6	25	31
Thailand	7	1	8
Total	107,161	88,856	196,017



Workplace metrics (continued)

Workforce by age

AGE BAND	FEMALE	MALE	TOTAL
<25	36,007	36,312	72,319
25-<35	21,672	24,026	45,698
35-<45	17,698	13,763	31,461
45-<55	17,081	8,509	25,590
55-<65	12,392	5,125	17,517
>65	2,311	1,121	3,432
Total	107,161	88,856	196,017

Turn over by region

	TOTAL TERMINATIONS			% LABOUR TURNOVER		
	FEMALE	MALE	TOTAL	FEMALE	MALE	TOTAL
ACT	340	458	798	23.9%	34.5%	29.0%
NSW	6,512	6,693	13,205	20.3%	25.0%	22.4%
NT	347	343	690	36.1%	40.6%	38.2%
QLD	5,357	4,754	10,111	24.2%	26.8%	25.4%
SA	1,192	1,297	2,489	19.5%	22.8%	21.1%
TAS	403	435	838	14.9%	20.8%	17.5%
VIC	4,594	4,933	9,527	19.9%	24.5%	22.0%
WA	1,984	1,855	3,839	23.0%	27.0%	24.8%
NZ	2,328	2,492	4,820	22.9%	31.0%	26.5%
China	92	46	138	33.6%	28.8%	31.8%
Bangladesh	1	2	3	24.5%	40.0%	33.0%
Thailand	1	1	2	19.4%	57.1%	28.9%
Total	23,151	23,309	46,460	21.5%	26.0%	23.6%

Turnover by age

	TOTAL TURNOVER			% LABOUR TURNOVER		
	FEMALE	MALE	TOTAL	FEMALE	MALE	TOTAL
<25	11,850	12,502	24,352	32.3%	33.5%	32.9%
25-<35	5,127	6,159	11,286	23.8%	25.9%	24.9%
35-<45	2,615	2,399	5,014	14.8%	17.5%	15.9%
45-<55	1,905	1,257	3,162	11.1%	14.7%	12.3%
55-<65	1,189	707	1,896	9.7%	13.9%	10.9%
>65	465	285	750	20.8%	25.2%	22.3%
Total	23,151	23,309	46,460	21.5%	26.0%	23.6%

New Hires by Region

REGION	TOTAL NEW HIRES		
	FEMALE	MALE	TOTAL
Australian Capital Territory	389	471	860
New South Wales	7,500	7,320	14,820
Northern Territory	393	337	730
Queensland	5,844	5,022	10,866
South Australia	1,302	1,240	2,542
Tasmania	386	399	785
Victoria	4,883	5,166	10,049
Western Australia	2,120	2,012	4,132
New Zealand	3,176	3,351	6,527
China	103	32	135
Bangladesh	4	10	14
Thailand	4	0	4
Total	26,104	25,360	51,464

New Hires by Age

AGE	TOTAL NEW HIRES		
	FEMALE	MALE	TOTAL
<25	14,976	15,495	30,471
25-<35	5,454	5,901	11,355
35-<45	2,843	2,243	5,086
45-<55	2,006	1,055	3,061
55-<65	763	586	1,349
>65	62	80	142
Total	26,104	25,360	51,464

Parental Leave¹

We offer paid parental leave to eligible Australian-based team members, which includes 12 weeks paid parental leave, total parental leave period of up to 24 months and superannuation paid on both paid and unpaid leave for the first 12 months. Permanent team members are eligible if they have completed six months of continuous service prior to taking the leave or if they qualify as an eligible casual employee.

	2019		2018	
	ON PARENTAL LEAVE IN PERIOD	TEAM MEMBERS STILL EMPLOYED ²	ON PARENTAL LEAVE IN PERIOD	TEAM MEMBERS STILL EMPLOYED ²
Female	4,387	4,180	4,373	4,225
Male	351	348	38	32
Total	4,738	4,528	4,411	4,257

1 This is provided from the WGEA report which has an extraction date of 1/1/2019 and is for Australian based Team Members only.

2 Team members in this category are considered to have either returned from parental leave during the period, or remain on parental leave at period end.



Workplace metrics (continued)

SAFETY AND HEALTH PERFORMANCE

Occupational health and safety management system

Number and % of employees covered by an occupational health and safety management system that are internally and externally audited

All our Australian and New Zealand team members, contractors and labour hire workers are covered by Business Safety Management Systems.

All of our safety management systems are internally audited by our Group Safety and Health Assurance function or by Group Risk Internal Audit.

All of our safety management systems are externally audited in at least one Jurisdiction where it is required as part of our self-insurer license terms or as part of other legal requirements such as the ACC in New Zealand.

BUSINESS	NO. OF TEAM MEMBERS	PERCENTAGE OF TEAM MEMBERS
Supermarkets	120,822	100.00%
Supply Chain	8,066	100.00%
BIG W	17,438	100.00%
Metro	3,448	100.00%
Endeavour Drinks	9,579	100.00%
Corporate	1,778	100.00%
Woolworths New Zealand	18,267	100.00%
ALH Hotels	15,917	100.00%
Woolworths Group	195,315	100.00%

1 The table above provides data for employees only and excludes contractors and labour hire.

2 Employees that are not on the core Woolworths payroll system are excluded.

WORK RELATED INJURIES

Business TRIFR and TRI results for 2019

BUSINESS	PER MILLION HRS	PER 200,000 HRS	TRI	FY19 HOURS WORKED
Supermarkets	13.46	2.69	1,687	125,310,506
Supply Chain	28.56	5.71	354	12,394,878
BIG W	8.24	1.65	145	17,599,041
Metro	10.05	2.01	34	3,383,192
Endeavour Drinks	13.08	2.62	171	13,069,384
Corporate	3.95	0.79	13	3,294,851
Woolworths New Zealand	18.17	3.63	530	29,162,892
ALH Hotels	25.21	5.04	315	12,494,719
Woolworths Group¹	14.99	3.00	3,249	216,709,463

1 Excludes Petrol.

Business TRIs by Gender for 2019

BUSINESS	FEMALE		MALE		TOTAL
	COUNT	%	COUNT	%	COUNT
Supermarkets	1,148	68%	539	32%	1,687
Supply Chain	67	19%	287	81%	354
BIG W	108	74%	37	26%	145
Metro	17	50%	17	50%	34
Endeavour Drinks	83	49%	88	51%	171
Corporate	10	77%	3	23%	13
Woolworths New Zealand	292	55%	238	45%	530
ALH Hotels	184	58%	131	42%	315
Woolworths Group¹	1,909	59%	1,340	41%	3,249

¹ Excludes Petrol.

Woolworths Group Limited TRIFR for F17-19

KPI	F17	F18	F19
TRIFR (million hours worked)	17.19	15.90	14.99
TRIFR (200,000 hours worked)	3.44	3.18	3.00

TRIs by Nature Group for 2019

NATURE GROUP	FEMALE		MALE		TOTAL
	COUNT	%	COUNT	%	COUNT
Traumatic Sprain/Strain	882	59%	619	41%	1501
Musculoskeletal	437	60%	291	40%	728
Wounds and Lacerations	230	56%	183	44%	413
Fractures	104	58%	74	42%	178
Other	256	60%	173	40%	429
Woolworths Group¹	1,909	59%	1,340	41%	3,249

¹ Excludes Petrol.

TRIs by Mechanism Group for 2019

MECHANISM GROUP	FEMALE		MALE		TOTAL
	COUNT	%	COUNT	%	COUNT
Manual Handling	1,116	56%	876	44%	1,992
Slips/Trips	325	74%	112	26%	437
Hitting Objects	183	58%	134	42%	317
Being hit by moving objects	158	53%	140	47%	298
Other	127	62%	78	38%	205
Woolworths Group¹	1,909	59%	1,340	41%	3,249

¹ Excludes Petrol.



Workplace metrics (continued)

Business Close Calls (Near Hits)

BUSINESS	WOOLWORTHS GROUP COUNT	CONTRACTOR COUNT	AGENCY COUNT
Supermarkets	235	27	5
Supply Chain	952	100	179
BIG W	155	8	5
Metro	18	9	0
Endeavour Drinks	134	18	3
Corporate	4	1	0
Woolworths New Zealand	421	66	20
ALH Hotels	Not Available	Not Available	Not Available
Woolworths Group¹	1,919	229	212

¹ Excludes Petrol.

Business High Potential Work-related incidents

BUSINESS	TOTAL COMBINED	CONTRACTORS	AGENCY
Supermarkets	0	0	0
Supply Chain	1	1	0
BIG W	2	2	0
Metro	0	0	0
Endeavour Drinks	0	0	0
Corporate	0	0	0
Woolworths New Zealand	4	4	0
ALH Hotels	0	0	0
Woolworths Group¹	7	7	0

¹ Excludes Petrol.

WORKPLACE ILL HEALTH

'Ill health' indicates damage to health and includes diseases, illnesses, and disorders. The terms 'disease', 'illness', and 'disorder' are often used interchangeably and refer to conditions with specific symptoms and diagnoses

Business Ill Health by Gender for 2019

BUSINESS	FEMALE		MALE		TOTAL	FY19 HOURS WORKED
	COUNT	%	COUNT	%	COUNT	
Supermarkets	438	68%	207	32%	645	125,310,506
Supply Chain	28	19%	120	81%	148	12,394,878
BIG W	36	71%	15	29%	51	17,599,041
Metro	2	22%	7	78%	9	3,383,192
Endeavour Drinks	35	50%	35	50%	70	13,069,384
Corporate	4	80%	1	20%	5	3,294,851
Woolworths New Zealand	6	86%	1	14%	7	29,162,892
ALH Hotels	34	72%	13	28%	47	12,494,719
Woolworths Group¹	583	59%	399	41%	982	216,709,463

¹ Excludes Petrol.

Ill Health TRIs by Nature Group

NATURE GROUP	FEMALE		MALE		TOTAL
	COUNT	%	COUNT	%	COUNT
Musculoskeletal	426	60%	282	40%	708
Psychological	82	67%	40	33%	122
Digestive System Diseases (e.g Hernia)	16	20%	64	80%	80
Other	59	82%	13	18%	72
Woolworths Group¹	583	59%	399	41%	982

¹ Excludes Petrol.

WORK-RELATED FATALITIES

Work-related fatalities include those where Woolworths Group operations have been a contributing factor.

Team member work-related fatalities	0
Contractor/agency fatalities	0

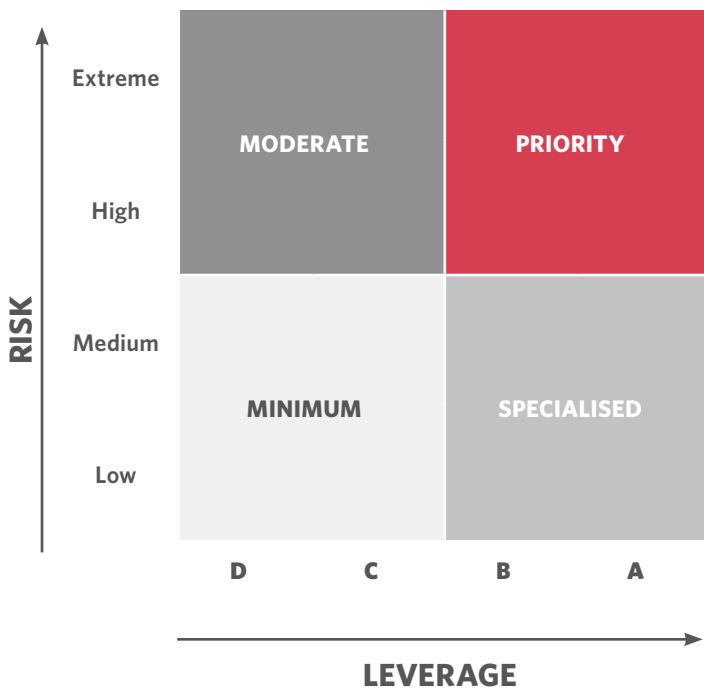


Workplace metrics (continued)

RESPONSIBLE SOURCING RISK SEGMENTATION

While Woolworths Group operations and supply chains are complex, our aim is to ensure that human rights are respected and understood. For us, responsible sourcing is not about auditing all suppliers in scope of the Standards; it is about taking a targeted and informed approach in sectors where there are known risks and where we have limited visibility.

To this end, 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.

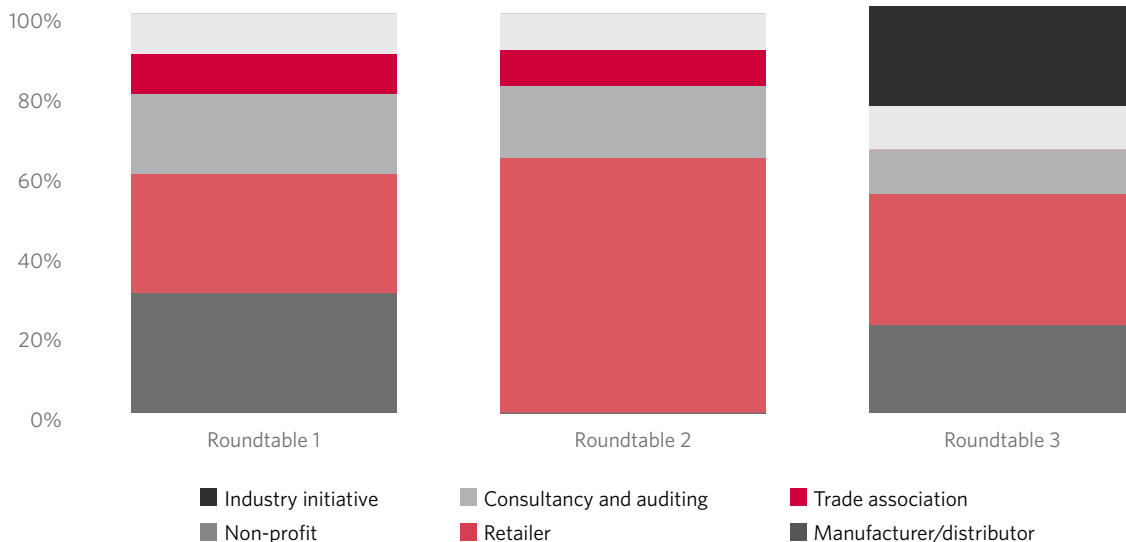


A **risk-based** and **leverage-driven** approach helps to **prioritise supplier engagements** by likelihood of influence supported by information on inherent sourcing risks to **optimise program impacts**.

METHODOLOGY

RISK	LEVERAGE
50% Inherent country risks from public domain data (e.g. World Bank, Global Slavery Index, Transparency International, etc.)	25% Length of business relationship
50% ELEVATE audit data	40% \$ spend amongst peer suppliers in each business unit
	35% \$ spend trend over the past 3 years

STAKEHOLDER GROUPS AT OUR RETAIL ROUNDTABLES



Corporate Governance

GOVERNANCE, THE BOARD AND DIRECTORS

Corporate governance is at the core of Woolworths' and the Board's approach to the enhancement of shareholder value and the protection of shareholder funds. Integral to shareholder value is protecting and enhancing our reputation, which is why the Board oversees the Company's approach to corporate responsibility and sustainability.

The Woolworths Board Sustainability Committee, which meets quarterly, reviews performance on issues of Safety and Health, Sustainability and Community Investment. The Sustainability Committee conducts regular site visits across our businesses.

Information on our Board of Directors and the Board Charter is at:

<https://www.woolworthsgroup.com.au/page/about-us/our-leadership-team/board-of-directors/>

Information on our Sustainability Committee and its charter is at:

<https://www.woolworthsgroup.com.au/page/about-us/our-leadership-team/board-committees/>

More information is in our corporate governance statement:

<https://www.woolworthsgroup.com.au/page/about-us/our-approach/corporate-governance/>

RISK MANAGEMENT FRAMEWORK

The continued growth and success of Woolworths depends on the ability of our Company to understand and respond to the challenges of an uncertain and changing world. As a large, dispersed and complex organisation, this uncertainty generates risk, with the potential to be a source of both opportunities and threats. By understanding and managing risk, the Group provides greater certainty and confidence for all its stakeholders. More information about our approach to risk management is in our risk management policy. See: http://www.woolworthsgroup.com.au/icms_docs/182376_Risk_Management_Policy.pdf

SENIOR MANAGEMENT

The Woolworths Group Executive Committee, chaired by the Chief Executive Officer, provides management oversight of the effectiveness of the Group's implementation of the safety and health vision, principles, policy, standards, strategy and initiatives, risk processes, resources, information, compliance and assurance.

DOING THE RIGHT THING

All of our team members commit to our Code of Conduct to maintain the highest legal, moral and ethical standards in our dealings with customers, suppliers, team members and local communities. This code outlines how employees can meet the highest standards through their everyday behaviours and choices.

We are committed to continuous improvement, transparency and accountability. We don't tolerate workplace misconduct under any circumstances and we need our trade partners to work with us to stamp out any and every instance. We have clear, long-standing and accepted procedures for trade partners to report any issues. However we recognise there is always opportunity to strengthen our systems. Our Speak Up service is available for trade partners to use when normal escalation methods have been exhausted or are inappropriate.

POLITICAL DONATIONS

Woolworths Group participates in policy development and advocacy in a manner that is open, transparent, and compliant with all relevant laws. Any political donations made by the Woolworths Group – such as attendance at events, functions and forums organised by parliamentarians and political parties – are reported publicly in line with relevant electoral laws. This is overseen by the Chief Executive Officer and the Head of Government and Industry Affairs in accordance with the Woolworths Group Political Donations Policy.

TRANSPARENCY AND REPORTING

Woolworths uses the globally recognised reporting framework developed by the Global Reporting Initiative (GRI). The GRI reporting framework sets out the principles and indicators that organisations can use to measure and report their economic, environmental, and social performance. This report has been prepared in accordance with the GRI Standards: Core option. More information can be found in the GRI Index starting on [page 91](#).

We continue to report to the Carbon Disclosure Project (CDP), an investor-driven disclosure initiative enabling companies to report on risk identification and mitigation processes related to climate change.

We are a signatory to the United Nations Global Compact (UNGC). The Index on [page 90](#) shows our approach to the UNGC core values.



Materiality

The issues that matter

To focus our efforts and maximise our impact, we need to understand the issues that matter most to our stakeholders. This is done through our materiality assessment process. A robust sustainability materiality process can help us to:

- Build better relationships with stakeholders
- Ensure global megatrends and local market conditions are being used to assess and approach risks and opportunities
- Prioritise what to focus on strategically.

The chart maps the 11 most material issues identified in our recent materiality assessment, grouping them into our three strategic pillars of people, planet and prosperity.

These are the current focus of our sustainability efforts. Other material issues such as safety and health, cyber security/privacy, customer/product safety and quality are more mature and are embedded into the business-as-usual processes.

STRATEGIC PILLAR	MATERIAL ISSUE	DEFINITION	RELEVANT SDGS
People	Employee engagement and development	The success of our business is built on our people, therefore we must continue to focus on attracting, retaining and developing talented teams, today and into the future, as the nature of work continues to evolve. This also includes our continued focus on maintaining a safe environment for our team members and customers.	
People	Diversity and inclusion	We are committed to creating and maintaining a diverse and inclusive workforce in terms of gender, age, ethnicity, disability, sexual orientation, etc.	 
Planet	Sustainable supply chain	Assessing and managing “ethical” and “responsible” issues embedded within our supply chain and other third-party partnerships, including both social and environmental issues.	 
Planet	Waste and packaging	Implementing effective and meaningful waste management strategies, including our activities to help our customers manage their own waste and recycling.	 
Planet	Climate risk	Organisational responses to risks of climate change; both physical and transitional.	  
Prosperity	Corporate conduct and ethics	Maintaining a values-based business with a culture of good governance and ethical conduct, where culture supports the effective functioning of core systems and processes.	
Prosperity	Trust in Woolworths Group	We understand the responsibility that comes with the role our business plays in communities across Australia and New Zealand. We put our customers at the heart of everything we do at Woolworths Group and are committed to getting it right, and to make things better when we don't.	 
Prosperity	Responsible gaming	Providing a healthy and ethical environment, where customer (and community) interests are protected from the harmful consequences of problem gambling.	 
Prosperity	Responsible sourcing and human rights	Upholding human rights across all aspects of our operations, encompassing labour rights associated with our workforce, contractor and third-party relationships and in the supply chain; in addition to protecting rights to privacy for our own workforce and customers.	  
Prosperity	Community engagement and development	Sponsoring a meaningful role in the local communities where our businesses operate, including activities to engage, invest and develop local communities.	
Prosperity	Third-party relationships	Partnering throughout the supply chain to build collaborative relationships with suppliers, interest groups, media, government and other stakeholders, for the purpose of delivering sustainable development outcomes.	

UN 2030 Sustainable Development Goals

17 global goals set by the United Nations in 2015, the SDGs define global sustainable development priorities and aspirations for the planet. They seek to mobilise global efforts around a common set of goals and targets. We believe that the business community has a role to play in progressing these important issues, and we have aligned our material issues with the relevant SDGs.

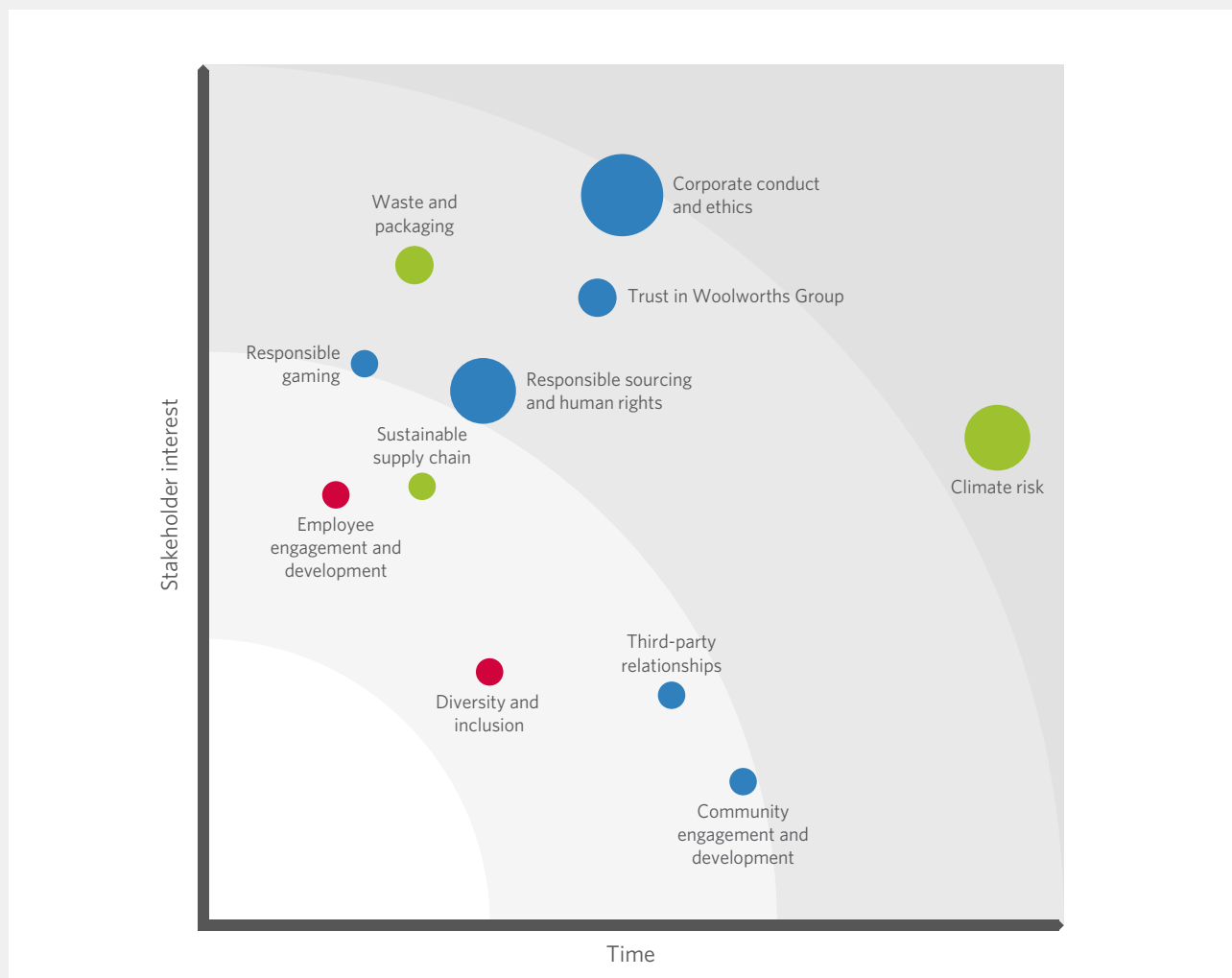
The Approach

The approach we have taken to analyse Woolworths Group’s material issues aligns to the Global Reporting Initiative Standards¹ reporting requirements and includes the following steps:

- Desktop review of a range of information sources
- Engaging with both internal and external stakeholders
- Prioritising what the most material issues are, including analysis of whether these present risks/opportunities over the short or longer-term time horizons
- Internal validation by senior leaders and board.

Materiality Matrix

The Materiality Matrix shows the interest stakeholders had in the issue (y-axis), the time of potential impact (x-axis) and the consequence of the issue to Woolworths Group (size of the bubble).



KEY: ● People ● Planet ● Prosperity

1 Refer to appendix for GRI Index.



Industry association

INDUSTRY ASSOCIATION MEMBERSHIPS

Principles for engagement

- Industry Associations are an important component of Woolworths Group's overall public policy advocacy effort. Our broad set of memberships - from core economy-wide memberships such as the BCA and Ai Group (see below) to sector specific memberships such as the Green Building Council of Australia, the Australian Logistics Council and the Data Institute - reflect the breadth of policy issues relevant to the Group.
- Our overriding ambition is that memberships help promote pro sustainable growth, productivity enhancing economic reforms that deliver broad societal benefit.
- We seek broad alignment with the policy positions of our industry associations, but recognise this is not always possible. Membership does not preclude Woolworths Group from holding different policy positions, especially where this better reflects expectations of our customers, shareholders, team and the community.
- We seek to participate as a constructive partner on the priority policy making forums of each Industry Association, including through the relevant Committee and Working Group structures. Support can extend to technical advice and to public campaigns designed to better inform public debate.
- Each Membership has an internal relationship owner, the responsibility of which includes ensuring any major policy misalignments are identified and referred to our Group Government Relations and Industry Affairs team for review. Where any divergence persists, and is of a material misalignment with our own view, Woolworths Group will review our membership, evaluating that misalignment with the wider benefits of membership of that industry association.
- On an annual basis (at the time of membership renewal) Woolworths Group has begun reviewing its key industry association memberships to ensure alignment with our key areas of policy interest. This includes a focus on advocacy activities related to climate change and Woolworths Group's 2020 commitments on sustainability.

	BUSINESS COUNCIL OF AUSTRALIA	AUSTRALIAN INDUSTRY GROUP
Involvement	Member / Committee / Working Groups	Member / Working Groups
Core Activity	Consider public policy in relation to economy-wide issues impacting the nation and businesses, including energy policy, tax policy and indigenous affairs	Consider public policy in relation to economy-wide issues impacting the nation and businesses, including workplace relations, data policy and energy policy
Contribution	<ul style="list-style-type: none"> • Membership fee • Non-financial contributions to projects of strategic relevance eg. Strong Australia campaign 	<ul style="list-style-type: none"> • Membership fee • Technical advice on key policy issues

Glossary

TERM	MEANING
Carbon dioxide equivalent (CO₂-e)	A standard measure used to compare the emissions from various greenhouse gases based on their global warming potential. For example, one tonne of methane emissions is equivalent to 21 tonnes of carbon dioxide emissions.
EBIT	Earnings Before Interest and Tax - total earnings before provisions are deducted. This measures a company's performance and is often used in preference to net profit as it excludes the effects of borrowings and tax benefits and adjustments.
Forest Stewardship Council (FSC)	FSC is an independent, not-for-profit organisation which promotes responsible management of the world's forests. Refer to fsc.org or fscaustralia.org.au
MWh	Megawatt hours is a unit of measurement for electricity use, referring to the amount of electricity needed to supply power to 1,000 homes for one hour.
National Greenhouse and Energy Reporting Act 2007 (NGER)	NGER establishes a national framework for Australian corporations to report greenhouse gas emissions, reductions, removals and offsets, and energy consumption and production. Refer to climatechange.gov.au/reporting/publications
Scope 1 emissions	Direct greenhouse gas emissions from sources owned or controlled by the company, such as combustion facilities (e.g. generators) and combustion of fuels in company-owned or company-controlled transport (e.g. cars and trucks).
Scope 2 emissions	Indirect greenhouse gas emissions from the generation of purchased electricity, heat, cooling or steam. Purchased electricity is defined as electricity that is bought or otherwise brought into the organisational boundary of the entity.
Scope 3 emissions	Other indirect greenhouse gas emissions that are a consequence of a company's activities, but that arise from sources that other entities own or control. Scope 3, like Scope 2, is a category of indirect emissions and covers all other indirect emissions from sources that are not owned or controlled by a company, but that occur as a result of its activities. Examples include emissions from waste disposal to landfill.
Sustainable Development Goals (SDG)	17 global goals set by the United Nations in 2015 to define global sustainable development priorities and aspirations for the planet
Total Recordable Injury (TRI) and Total Recordable Injury Frequency Rate (TRIFR)	A Total Recordable Injury (TRIFR) is the sum of the total number of employee fatalities, lost time injuries, restricted work injuries or medical treatment injuries per million hours worked



United Nations Global Compact

PRINCIPLES	ACTIONS	PAGE
Human Rights		
Principle 1		
Protection of Human Rights	Responsible Sourcing Program	50-61
Principle 2		
No Complicity in Human Rights Abuse	Responsible Sourcing Program	50-61
Labour		
Principle 3		
Freedom of Association and Collective Bargaining	Responsible Sourcing Program Freedom of association and union engagement	50-61 77
Principle 4		
Elimination of Forced and Compulsory Labour	Responsible Sourcing Program	50-61
Principle 5		
Abolition of Child Labour	Responsible Sourcing Program	50-61
Principle 6		
Elimination of Discrimination	Diversity and equal opportunity	12-19, 22-25
Environment		
Principle 7		
Precautionary Approach	No explicit reference to precautionary approach Approach to risk management	85
Principle 8		
Environmental Responsibility	Planet	26-45
Principle 9		
Environmentally Friendly Technologies	Technology addressing climate change, water conservation, transport and packaging	26-45
Anti-Corruption		
Principle 10		
Work against Corruption	Anti-corruption	85

Global Reporting Initiative

DISCLOSURE NUMBER	DISCLOSURE TITLE	REFERENCE
GENERAL DISCLOSURES		
102-1	Name of the organization	Front cover
102-2	Activities, brands, products, and services	2019 annual report
102-3	Location of headquarters	Inside back cover
102-4	Location of operations	Contents
102-5	Ownership and legal form	2019 annual report
102-6	Markets served	2019 annual report
102-7	Scale of the organization	2019 annual report
102-8	Information on employees and other workers	76-84
102-9	Supply chain	48-49, 50-51
102-10	Significant changes to the organization and its supply chain	2019 annual report
102-11	Precautionary Principle or approach	GRI Index
102-12	External initiatives	10-25, 26-45, 46-73, 85, 90
102-13	Membership of associations	88
102-14	Statement from senior decision-maker	2
102-16	Values, principles, standards, and norms of behavior	3
102-18	Governance structure	2019 annual report, GRI Index
102-40	List of stakeholder groups	85-87
102-41	Collective bargaining agreements	77
102-42	Identifying and selecting stakeholders	86-87
102-43	Approach to stakeholder engagement	85, 86-87
102-44	Key topics and concerns raised	85, 86-87
102-45	Entities included in the consolidated financial statements	2019 annual report
102-46	Defining report content and topic Boundaries	85, GRI Index
102-47	List of material topics	86-87
102-48	Restatements of information	GRI Index
102-49	Changes in reporting	GRI Index
102-50	Reporting period	Contents
102-51	Date of most recent report	June 2018
102-52	Reporting cycle	Annual
102-53	Contact point for questions regarding the report	97
102-54	Claims of reporting in accordance with the GRI Standards	GRI Index
102-55	GRI content index	91-93, GRI Index
102-56	External assurance	94-96
MANAGEMENT APPROACH		
103-1	Explanation of the material topic and its Boundary	86-87, 10-25, 26-45, 46-73
103-2	The management approach and its components	3, 86-87, 85, GRI Index
103-3	Evaluation of the management approach	2019 annual report, 10-25, 26-45, 46-73, 85



Global Reporting Initiative (continued)

DISCLOSURE NUMBER	DISCLOSURE TITLE	REFERENCE
ECONOMIC PERFORMANCE		
201-1	Direct economic value generated and distributed	2019 annual report
ANTI-CORRUPTION		
205-3	Confirmed incidents of corruption and actions taken	GRI Index
ANTI-COMPETITIVE BEHAVIOR		
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	GRI Index
ENERGY		
302-1	Energy consumption within the organization	26-45, 74-75, GRI Index
302-2	Energy consumption outside of the organization	26-45, 74-75, GRI Index
302-3	Energy intensity	26-45, 74-75, GRI Index
302-4	Reduction of energy consumption	26-45, 74-75, GRI Index
EMISSIONS		
305-1	Direct (Scope 1) GHG emissions	26-45, 74-75, GRI Index
305-2	Energy indirect (Scope 2) GHG emissions	26-45, 74-75, GRI Index
305-3	Other indirect (Scope 3) GHG emissions	26-45, 74-75, GRI Index
305-4	GHG emissions intensity	26-45, 74-75, GRI Index
305-5	Reduction of GHG emissions	26-45, 74-75, GRI Index
EFFLUENTS AND WASTE		
306-2	Waste by type and disposal method	28-31, 75, GRI Index
ENVIRONMENTAL COMPLIANCE		
307-1	Non-compliance with environmental laws and regulations	GRI Index
EMPLOYMENT		
401-1	New employee hires and employee turnover	78-79
401-3	Parental leave	79, GRI Index
LABOR/MANAGEMENT RELATIONS		
402-1	Minimum notice periods regarding operational changes	GRI Index
OCCUPATIONAL HEALTH AND SAFETY		
403-1	Occupational health and safety management system	80, GRI Index
403-2	Hazard identification, risk assessment, and incident investigation	GRI Index
403-3	Occupational health services	GRI Index
403-4	Worker participation, consultation, and communication on occupational health and safety	GRI Index
403-5	Worker training on occupational health and safety	GRI Index
403-6	Promotion of worker health	GRI Index
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	GRI Index
403-8	Workers covered by an occupational health and safety management system	80
403-9	Work-related injuries	20-21, 80-82 GRI Index
403-10	Work-related ill health	83, GRI Index

DISCLOSURE NUMBER	DISCLOSURE TITLE	REFERENCE
TRAINING AND EDUCATION		
404-2	Programs for upgrading employee skills and transition assistance programs	14
DIVERSITY AND EQUAL OPPORTUNITY		
405-1	Diversity of governance bodies and employees	76-79
405-2	Ratio of basic salary and remuneration of women to men	76
NON-DISCRIMINATION		
406-1	Incidents of discrimination and corrective actions taken	76, GRI Index
FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING		
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	50-61, 77, GRI Index
CHILD LABOR		
408-1	Operations and suppliers at significant risk for incidents of child labor	50-61, GRI Index
FORCED OR COMPULSORY LABOR		
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	50-61, GRI Index
HUMAN RIGHTS ASSESSMENT		
412-1	Operations that have been subject to human rights reviews or impact assessments	50-61, 84, GRI Index
PUBLIC POLICY		
415-1	Political contributions	85
CUSTOMER HEALTH AND SAFETY		
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	GRI Index
MARKETING AND LABELING		
417-1	Requirements for product and service information and labeling	GRI Index
CUSTOMER PRIVACY		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	85, GRI Index



Assurance report

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LIMITED ASSURANCE REPORT ON THE 2019 SUSTAINABILITY REPORT TO THE DIRECTORS OF WOOLWORTHS GROUP LIMITED

We have undertaken a limited assurance engagement relating to the application of Global Reporting Initiative ('GRI') information and other criteria contained in Woolworths Group Limited's ('Woolworths') 2019 Sustainability Report as detailed in the table below (the 'Subject Matter').

SUBJECT MATTER AND REPORTING CRITERIA

The Subject Matter and Reporting Criteria for our limited assurance engagement for the year ended 30 June 2019 is as follows:

SUBJECT MATTER	REPORTING CRITERIA
<p>GRI Standards Disclosures</p> <p>GRI Standards Disclosures prepared in accordance with the 'Core' requirements of the GRI Standards as set out in the GRI Index on pages 91 to 93 of the 2019 Sustainability Report</p>	<p>GRI Standards and related information, publicly available at GRI's global website at www.globalreporting.com.</p>
<p>Selected Indicator Disclosures</p> <p>The following selected Sustainability Performance Indicators for 2019 included within the 2019 Sustainability Report for the specific standard disclosure requirements of the GRI Standards:</p> <ul style="list-style-type: none"> • Energy (302-1, 302-2, 302-3 and 302-4) on page 92 of the 2019 Sustainability Report • Emissions (305-1, 305-2, 305-3, 305-4 and 305-5) on page 92 of the 2019 Sustainability Report • Effluents and waste (306-2) on page 92 of the 2019 Sustainability Report • Employment (401-1 and 401-3) on page 92 of the 2019 Sustainability Report • Occupational Health & Safety (403-2 and 403-9) on page 92 of the 2019 Sustainability Report • Non-discrimination (406-1) on page 93 of the 2019 Sustainability Report 	<p>Relevant GRI Standards and Woolworths' definitions, and approaches as described in the GRI Index on pages 91 to 93 of the 2019 Sustainability Report and on Woolworths' website at www.woolworthsgroup.com.au.</p>
<p>Sustainability Targets</p> <p>The following 2019 performance data included within Woolworths' Sustainability Targets and commitments as contained in the People, Planet and Prosperity sections within the 2019 Sustainability Report:</p> <ul style="list-style-type: none"> • People <ul style="list-style-type: none"> - 'Total team members', on page 10 of the 2019 Sustainability Report - 'Successful applicants to the Refugee Program' on page 14 of the 2019 Sustainability Report 	<p>Woolworths' definitions, and approaches as described in the People, Planet and Prosperity sections of Woolworths' 2019 Sustainability Report and on Woolworths website at www.woolworthsgroup.com.au.</p>

SUBJECT MATTER

REPORTING CRITERIA

Sustainability Targets (continued)

- Planet
 - 'Food saved for meals / Total food relief diverted to people in need' on [page 29](#) and [page 75](#) of the 2019 Sustainability Report
 - 'Stores with Transcritical or waterloop systems' on [page 26](#) and [page 45](#) of the 2019 Sustainability Report
 - 'Solar power generated' on [page 26](#) the 2019 Sustainability Report
- Prosperity
 - 'Own brand products undergone a nutritional renovations' on [page 46](#) and [73](#) of the 2019 Sustainability Report
 - 'Woolworths own brand products with a health star rating' on [page 72](#) of the 2019 Sustainability Report
 - 'Cash donations' on [page 46](#) and [62](#) of the 2019 Sustainability Report

RESPONSIBILITIES OF THE DIRECTORS

The Directors of Woolworths are responsible for:

- Ensuring that the Subject Matter is properly prepared and presented in accordance with the Reporting Criteria
- Confirming the measurement or evaluation of the underlying subject matter against the applicable criteria, including that all relevant matters are reflected in the subject matter information; and
- Designing establishing and maintaining internal controls relevant to ensure that the Subject Matter is properly prepared and presented in accordance with the Reporting Criteria

It is our understanding that Woolworths intends to electronically present the Subject Matter, including our limited assurance report thereon, on its internet website. Responsibility for the electronic presentation of the Subject Matter, including our limited assurance report thereon, on Woolworths' website is that of the Directors of the Woolworths. The security and controls over information on the web site should be addressed by Woolworths to maintain the integrity of the data presented. The examination of the controls over the electronic presentation of the Subject Matter and our limited assurance report thereon on Woolworths' website is beyond the scope of our limited assurance engagement.

OUR INDEPENDENCE AND QUALITY CONTROL

We have complied with the relevant ethical requirements relating to assurance engagements, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

The firm applies Auditing Standard ASQC 1, and accordingly Deloitte Touche Tohmatsu maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

OUR RESPONSIBILITIES

Our responsibility is to express a limited assurance conclusion on the Subject Matter based on the procedures we have performed and the evidence we have obtained.

We conducted our procedures in accordance with Australian Standards on Assurance Engagements ASAE 3000 'Assurance Engagements Other than Audits or Reviews of Historical Financial Information' (ASAE 3000), issued by the Australian Auditing and Assurance Standards Board in order to express a conclusion whether, based on the procedures performed and the evidence obtained, anything has come to our attention that causes us to believe that the Subject Matter has not been reported, in all material respects, in accordance with the Reporting Criteria. That standard requires that we plan and perform this engagement to obtain limited assurance about whether the Subject Matter is free from material misstatement.

A limited assurance engagement in accordance with ASAE 3000 involves identifying areas where a material misstatement of the Subject Matter information is likely to arise, addressing the areas identified and considering the process used to prepare the Subject Matter. A limited assurance engagement is substantially less in scope than a reasonable assurance engagement in relation to both the risk assessment procedures, including an understanding of internal control, and the procedures performed in response to the assessed risks.

The procedures that we performed were based on our professional judgement and included:

- A review of Woolworths' processes relating to stakeholder identification, engagement and responsiveness, including an assessment of stakeholder engagement outcomes and how this process and the outcomes have been presented in the 2019 Sustainability Report.
- A review of Woolworths' process to identify and determine material issues to be included in the 2019 Sustainability Report with examination of underlying assessments and evidence on a sample basis.



Assurance report (continued)

- Interviews with a selection of Woolworths' executives and senior management, including Woolworths' Sustainability management team concerning the overall governance structure, corporate sustainability strategy and policies used for managing and reporting sustainability performance across the business.
- In respect of the selected Sustainability Performance Indicators and Sustainability Targets:
 - Interviews with a selection of Woolworths' management responsible for the Sustainability Targets and Selected Indicator Data to understand the compilation and review processes.
 - Applying analytical and other review procedures including assessing relationships between the reported information and other financial and non-financial data.
 - Examination of evidence for a small number of transactions or events.
 - Analysing and inspecting on a sample basis, the key systems, processes and procedures and controls relating to the collation, validation, presentation and approval process of the information included in the Report.
 - Reviewing underlying evidence on a sample basis to corroborate that the information is prepared and reported in line with the relevant Reporting Criteria.
- Comparison of the content of Woolworths' 2019 Sustainability Report against the criteria for a GRI self-declaration.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had we performed a reasonable assurance engagement. Accordingly, we do not express a reasonable assurance opinion about whether Woolworths' subject matter has been prepared, in all material respects with the criteria.

INHERENT LIMITATIONS

Non-financial information, including the Subject Matter may be subject to more inherent limitations than financial information, given both its nature and the methods used for determining, calculating and sampling or estimating such information. Qualitative interpretations of relevance, materiality and the accuracy of data are subject to individual assumptions and judgements. The Subject Matter should be read in the context of Woolworths' Reporting Criteria as set out in the 2019 Sustainability Report.

Additionally, non-financial data may be subject to more inherent limitations than financial data, given both its nature and the methods used for determining, calculating and sampling or estimating such data.

USE OF OUR REPORT

Our assurance report has been prepared solely for the Directors of Woolworths'. We disclaim any assumption of responsibility for any reliance on this report or on the Subject Matter to which it relates, to any person other than the directors of Woolworths or for any purpose other than that for which it was prepared.

MATTERS RELATING TO ELECTRONIC PRESENTATION OF INFORMATION

Our limited assurance engagement included web-based information that was available via web links as of the date of this statement. We provide no assurance over changes to the content of the Report after the date of this assurance statement.

LIMITED ASSURANCE CONCLUSION

Based on the procedures performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that Woolworths':

- GRI Standards Disclosures as set out in the GRI Index, have not been prepared, in all material respects, in accordance with the requirements of the GRI Standards;
- Selected Indicator Disclosures has not been prepared, in all material respects, in accordance with the specific standard disclosure requirements of the relevant GRI Standards and Woolworths' definitions, and approaches as described in the GRI Index; and
- Sustainability Targets data, has not been prepared, in all material respects, in accordance with the Woolworths' definitions, and approaches as described in the People, Planet and Prosperity section of Woolworths' 2019 Sustainability report referenced in the Subject Matter table above.

Deloitte Touche Tohmatsu

DELOITTE TOUCHE TOHMATSU



Paul Dobson
Partner

Sydney, 29 August 2019