

Our Code of Conduct

Creating
better
experiences
together



WOOLWORTHS GROUP



Our Code of Conduct

Contents

Welcome to Woolworths Group

Working in our team

About our Code of Conduct	03
Purpose, Values & Ways-of-Working	04
Diversity & Inclusion	07
Team Benefits	08

How we act

Safety, health & wellbeing	10
Respectful workplace	11
Social media	13
Media & external stakeholders	14
Political activities	15
Conflicts of interest	16

How we do business

How we do business	18
Woolworths Group property	19
Gifts & entertainment	20
Using information technology	21
Personal & confidential information	22
Trading in shares in Woolworths Group & other companies	23
Record keeping	24
Preferred dress	25

Questions and help

Team Member Speak Up	27
Questions & help	28

Welcome to Woolworths Group

“



I'd like to personally welcome you to Woolworths Group. You've just become part of an amazing team.

You're here to help us continue to create better experiences together - by doing what's right for our customers, our communities and for each other.

To help make Woolworths Group businesses the best places to both work and shop, we've set out some simple guiding principles that outline who we are and what we do.

It's important that we all understand and follow these, because each of us has a key role to play.

Thank you for joining us, it's great to have you along on our journey.

”

Welcome

Brad Banducci
CEO
bradbanduccicomms@woolworths.com.au

Our Code of Conduct

You've joined a team that creates better experiences together. We do this by respecting and supporting each other, and by always doing the right thing for our customers and communities.

About our Code of Conduct	03
Purpose, Values & Ways-of-Working	04
Diversity & Inclusion	07
Team Benefits	08

Working in our team

Working in our team

This document outlines what's expected from all of us as team members (including contractors, board members and everyone working within Woolworths Group).

Whether you're part of Woolworths, Countdown, BWS, Dan Murphy's, BIG W, our Support Team, or any of our other businesses, this document is important as it sets the guiding principles for working at Woolworths Group - to encourage an inclusive, productive and enjoyable workplace for the whole team.

It's everyone's responsibility to follow this Code of Conduct and do the right thing, as well as to encourage each other to do the same. We take this very seriously, so if you don't follow this Code of Conduct that may result in disciplinary action or termination of employment. If you are doing work for Woolworths Group as a contractor or are employed by another company but working alongside Woolworths Group team members, we expect you to follow these guiding principles while you are working with us.

From time to time we will ask you to do training to remain up to date.

If there's anything you're unclear about as you read through this document, please don't hesitate to talk to your team leader or People Advisory.

When you work for one of our businesses, you're making a commitment to conduct yourself in a way that reflects well on you, your team and the Group.



About our Code of Conduct

03

Working in our team

Purpose, Values & Ways- of-Working

Regardless of your role or the business you work for, we're all bound together by our overall Group purpose.



We are constantly innovating to meet changing needs.

We look for ways to improve every day – better for our customers, team and communities.

**We create
better
experiences
together.**

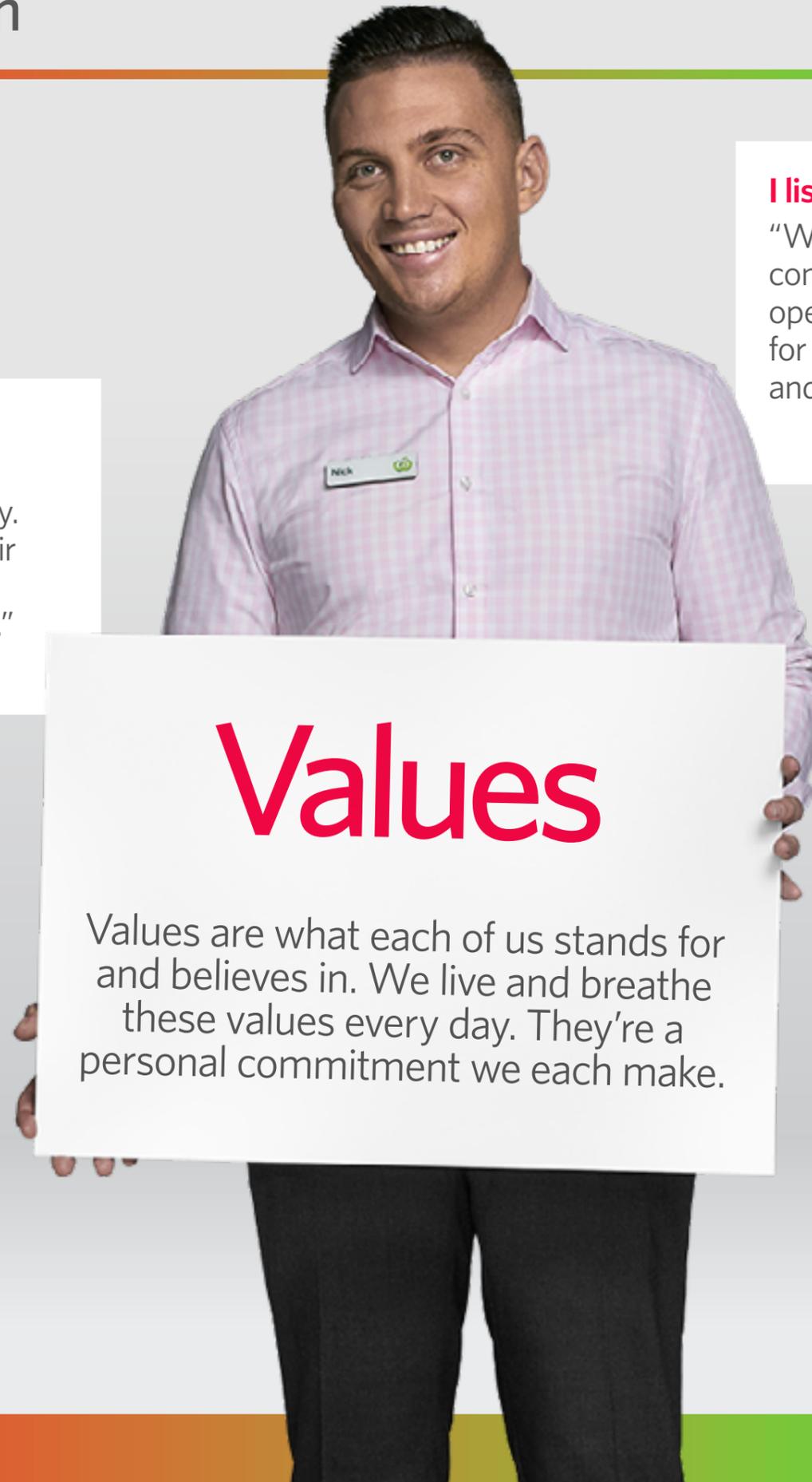
It's both the retail experiences and the experiences we make possible in customers' lives.

We work seamlessly as one team, leveraging our strength as a Group.

WOOLWORTHS GROUP



04



I care deeply

"I care about my team, customers and community. I genuinely care about their wellbeing and the impact our business has on them."

I listen and learn

"When my customers, team or community speak, I listen with an open mind. I'm curious, I actively look for opportunities to learn from others and I learn from my mistakes."

I always do the right thing

"Integrity is the foundation of everything I do. It shows in my attitude, my actions and my interactions with my team, as well as the people and organisations outside the business."

Values

Values are what each of us stands for and believes in. We live and breathe these values every day. They're a personal commitment we each make.

Working in our team

We put our customers 1st

We're all retailers – so we're passionate about creating the best retail experiences for customers, every time they shop with us. Put them first and they'll put us first.

We encourage freedom within a framework

We operate within a framework, but above all we do what's right and use our initiative. If we see a customer experience that could be better, we do what we can to improve it.

We're always improving

Our customers' needs are constantly changing. We need to anticipate change and embrace it, in an endless search for new ways to give our customers and team something better.

We keep things simple, especially for store teams

We understand the power of simplicity. It's what our customers want. It helps us work more nimbly and efficiently, giving us more time to focus on what matters most, our customers.

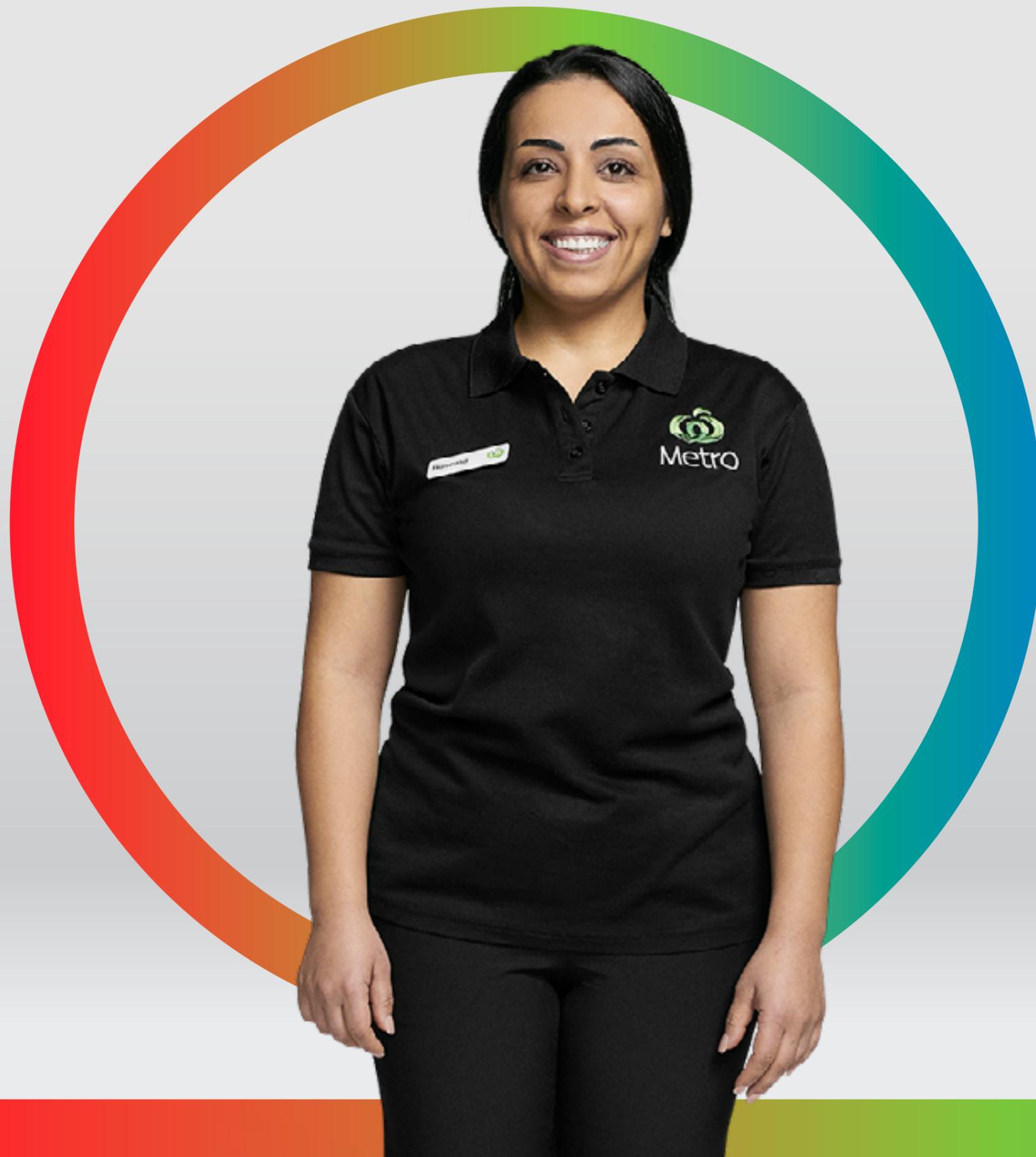
We work end-to-end as one team

Retail is a team game. We meet challenges together, listen to each other and build on each other's ideas and efforts. When we act, we act as one. When we succeed, we succeed together.

Ways-of-Working

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.

06



Diversity & Inclusion

As a diverse team, Woolworths Group team members reflect different ethnicities, genders, sexual orientations, ages and physical abilities. Our customers should see in our team members a reflection of themselves and their communities.

This is why it's important we strive to create an inclusive environment that celebrates the diversity of our team, making sure all team members feel valued, respected and empowered - and free to bring their whole selves to work.

Working in our team



Team

Benefits



08

As a team 1st business, we believe it's important to put our customers and team first. That's why we provide exclusive offers under our Team Benefits program.

As part of this program, we're excited to offer eligible team members a discount card, the Team Benefits PlusCard. This can be used across a number of Woolworths Group businesses in Australia and New Zealand.

To discover more about our Team Benefits, visit teambenefits.woolworths.com.au, or to find out more about the PlusCard see the [Team Benefits PlusCard Policy](#).

Our Code of Conduct

We must all strive to do the right thing, and everyone we come into contact with should be treated with respect. This includes looking out for our own safety and the safety of other team members, customers and partners. If we see something that doesn't look right, we're all empowered to say or do something.

Safety, health & wellbeing	10
Respectful workplace	11
Social media	13
Media & external stakeholders	14
Political activities	15
Conflicts of interest	16

How we act

Safety, health & 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 always, and you have our full support to:

- 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
- always 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

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

We aim to establish a culture where psychological safety is as important as physical safety. We want people to know that it's ok not to feel ok, and it's absolutely ok to ask for help because we care deeply.

If you are in doubt about any health and safety issues you should speak to your team leader for assistance.

For more information please see the [Safety and Health Policy](#), [Safety and Health Standards Handbook](#) and [Drug and Alcohol Policy](#).



What would you do in this situation?

1. 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?

2. Yang notices that a power plug is faulty. She asks another team member about it, and he says that it has been broken for a while but that it is fine to use. What should she do?

Answers

1. 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.

2. Yang should not use the power plug. She should let her team leader know and a danger tag should be put on the power plug so that no one uses it. A call should be placed to organise for it to be repaired or replaced.

Respectful workplace

We're committed to providing a positive workplace where everyone is treated with respect.

That means we all need to:

- treat customers, team members and others with dignity, courtesy and respect
- do the right thing, be fair and be honest
- listen, learn and respond appropriately to the views and concerns of others
- consider how everything we say and do might impact others

Inappropriate behaviour

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

1. Bullying

Bullying is repeated unreasonable behaviour towards another person or group of people that poses a risk to their physical or emotional safety.

This can include:

- abusive, insulting or offensive language or comments (including on social media)
- deliberately and unreasonably excluding someone
- spreading misinformation or rumours
- aggressive and intimidating conduct
- practical jokes or initiations/hazing

It is important to understand that direction, guidance or other reasonable actions by team leaders to manage how work is carried out is not bullying.

This includes:

- informing a team member about unsatisfactory work performance in an honest, fair and constructive way
- informing a team member about inappropriate behaviour in an appropriate way
- setting reasonable performance goals, standards and deadlines
- providing reasonable and lawful directions to a team member

2. Harassment, including sexual harassment

Harassment is any unwanted behaviour that might humiliate, offend, embarrass or intimidate another person.

This can include:

- offensive or demeaning comments or jokes, even if the other person doesn't seem to mind and even if it is not intended to offend
- 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
- unwelcome physical contact, such as shoulder massages or invading someone's personal space
- persistently asking someone on a date after previous refusals

3. Unlawful Discrimination

Discrimination means treating someone less favourably because of a protected attribute.

Examples of treating someone less favourably include 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 you treating someone less favourably, include:

- gender, marital or relationship status, pregnancy, breastfeeding, parental status, carer's or family responsibilities
- sexual orientation, gender identity, intersex status or gender expression
- race, colour, descent, nationality, national origin, ethnicity or religion
- disability
- age

Respectful workplace

4. 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 say something when a situation isn't right, and victimisation is not acceptable. It is also unacceptable to disadvantage someone because they have raised concerns or asked questions about their job or pay, or because they plan to or are taking leave or using other entitlements.

5. Violence

This can include:

- punching, pushing, fighting or other physical violence
- threats of violence to team members, customers and partners – as well as any of their family or friends

What to do if you see any of these behaviours

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

Unwelcome behaviours, such as those just listed, are not only unacceptable in our workplace, they may also be against the law. If you believe this is happening to you (whether by another team member, a team leader, a customer or anybody else in our workplace), or if you think that this is happening to someone else, there are informal and formal ways to properly address this.

Options include:

- speaking to the person in question, if you feel comfortable and safe doing so
- speaking to your team leader, a more senior leader or your Culture & People Partner
- contacting People Advisory ([see page 28](#))
- contacting Speak Up ([see page 27](#))

For more information, please see the [Respectful Workplace Policy](#).

What would you do in this situation?

1. Ben works with Vikram, and often calls Vikram "Tiny" because Vikram is short. He means this as a joke. Is this okay?

2. 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?

3. Ella is a Store Manager. She interviews two potential new team members – one male and one female. She hires the male because he looks stronger. Is this okay?

Answers

1. No. Even though Ben does not intend to offend Vikram, Vikram may find this offensive so it is not okay.

2. 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 she can do a particular shift.

3. No. As long as both potential team members can fulfil the inherent requirements of the job, she should not choose the male candidate just because he is male and she thinks he might be stronger. She should choose the best person for the job, irrespective of gender.

How we act

We all need to make sure we're using social media safely and effectively, and always ensure we're doing the right thing online.

When using social media 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 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 should:

- treat everyone with dignity, courtesy and respect, even if they have made negative, inflammatory or untrue comments about you or Woolworths Group
- not make insulting, demeaning, threatening, sexual or discriminatory comments to or about someone (even if the other person is not mentioned by name)
- not send sexual or offensive pictures or videos
- not disclose personal information about other team members or customers
- not 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

Some information you come across at work can be sensitive or confidential, so it's important that you never share this on social media (other than appropriate sharing for work purposes on internal-only forums such as private work Google+ pages) or '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 22.

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.

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 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 (not the Group's). Team members can only comment on behalf of Woolworths Group or use logos and branding with approval from one of our Social Media teams.

Check before posting

Before posting anything related to work, we encourage you to 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?

During work hours

Use of social media during work hours should not impact your ability to do your job. 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).

Need more information? Please see the [Social Media Policy and Guidelines](#).

What would you do in this situation?

1. Sarah hears from another team member that Woolworths will be stocking an innovative new product in the lead up to Christmas. 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?

2. Tom hears that Dan Murphy's will be dropping prices on a range of products on Saturday. He posts on Facebook that people should hold off on buying alcohol until then. Is this okay?

Social media

Answers

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

2. 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 Dan Murphy's competitive advantage.

How we act

As Woolworths Group is a well-known business in Australia and New Zealand, the media, politicians, industry associations, community groups and regulators 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.

So 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 don't:

- 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 Media team listed on this page
- provide information to politicians or government officials, unless approved by the Government Relations team
- reference Woolworths Group negatively in any online social medium or public forum

We also 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 Media team at media@woolworths.com.au or (02) 8885 1033 in Australia, or media@countdown.co.nz if you're in New Zealand.



Media & external stakeholders

How we act

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

It's also 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 also notify your team leader.

If you have any questions or concerns, contact the Head of Government Relations and Industry Affairs. For more information please see the [Political Donations Policy](#) and the [Fraud, Anti-Bribery and Corruption Policy](#).



Political activities

15

Conflicts of interest

We are all expected to act in the best interests of Woolworths Group. This means that we should all avoid conflicts between our own interests and the Group's interests wherever possible.

Conflicts of interest can be any personal interests, relationships or activities that may influence you (or even 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 if 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.

Some examples of conflicts of interest include:

- your sibling holding a sales role with a supply partner, who you may end up negotiating a contract with
- having a material financial interest in a business which is seeking to do business with Woolworths Group
- your spouse holding a senior position with a major competitor
- you working for Woolworths Group and having a second job with a competitor

If you have a 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). You should seek help from your team leader with this. You mustn't use your position with Woolworths Group to obtain personal benefit (other than remuneration and other Woolworths Group benefits) or to benefit any other business or person.

Generally, you shouldn't have influence over someone's job or career if you are in a close personal or romantic relationship with them, unless this is approved by your team leader.

Need more information? See the [Conflict of Interest Policy](#) and the [Close Personal Relationships Policy](#).

What would you do?

1. Bill, a Store Manager, wants to hire his son, Max, to work in store over Christmas. Max has no prior retail experience, and Bill has interviewed stronger candidates for the role. Is it okay for Bill to hire Max?

2. 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 what the market pay for the role is. Is it okay for Sally to hire Nick?

Answers

1. Although it's great that Bill wants Max to join the team, he needs to ensure that the best candidate for the role is selected and that Max is not given unfair preference over others. Bill should seek advice from the Talent Acquisition team and his Culture and People Partner. It may be better for Max to work at another store, where there were fewer experienced applicants and where Max would not be managed by his father.

2. 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 let her team leader and her Culture & People Partner know about the potential conflict and seek their advice. 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.

How we do business

We're committed to acting fairly and honestly in all dealings with our partners, our customers and our communities. And within Woolworths Group we always make sure we are protecting property, technology and information. As a member of the team, you're expected to uphold and support this commitment alongside your team members.

How we do business	18
Woolworths Group property	19
Gifts & entertainment	20
Using information technology	21
Personal & confidential information	22
Trading in shares in Woolworths Group & other companies	23
Record keeping	24
Preferred dress	25

How we do business

One of our 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
- complete the training applicable to your role and raise anything that you don't understand with your team leader
- not engage in behaviour, or ignore 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, by:

- listening to and valuing customer feedback
- addressing customer concerns regarding products that are faulty, unfit or mislabelled
- ensuring our marketing, promotional information, product packaging and labelling is legal, clear, truthful and always carefully checked

You should treat product safety as paramount, by:

- ensuring that the products we supply are safe and meet regulatory requirements, including with regard to safety warnings and labelling
- taking accountability for your part in the delivery and quality of products
- treating product recalls as a priority, being thorough in preventing the sale of recalled products, and informing our customers of a recall in a timely way

We all need to make sure we buy goods and services fairly and responsibly. This means:

- obtaining the best value for money, but never by acting unethically or unfairly
- rejecting, and never asking for, any form of inducement or bribe in return for business
- not placing undue and inappropriate pressure on our partners
- complying with the Food and Grocery Code of Conduct wherever applicable
- never cutting corners on the implementation of our Responsible Sourcing Policy and Responsible Sourcing Standards

- regularly reviewing our contractual arrangements with partners
- ensuring that our buying and procurement processes are transparent and in line with our Fair Trading Principles

As a business, we need to comply with competition laws. We do this by:

- ensuring we trade independently of our competitors
- ensuring we price our products and services to provide a compelling offer to our customers in the spirit of sound competitive behaviour

Need more information? See the:

- [Compliance Policy](#)
- [Responsible Sourcing Policy](#)
- [Fair Trading Principles](#)
- Food and Grocery Code of Conduct
- [Fraud, Anti-Bribery and Corruption Policy](#)
- [Environmental Claims Policy](#)
- Quality Assurance Methodology and Principles

What would you do in this situation?

1. 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?

2. 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?

Answers

1. 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 Culture & People Partner, or through Speak Up. 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).

2. Tara may give the sales rep the over-and-above display if it will be justified by sales, but Tara should not accept or be influenced by the inducement of a bottle of wine.

Woolworths Group property

We're all responsible for the property that belongs to Woolworths Group, and 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
- never take any stock 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
- 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 situation?

1. 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?

2. Phil has been given samples of new nappies from a 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?

3. 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?

Answers

1. 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.
2. 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.
3. 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 – and may have created a food safety risk.

Gifts & entertainment

We're committed to being honest, unbiased and behaving 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 and entertainment include things like physical products, partner-paid trips, tickets to sport or entertainment events, and any other personal favours.

If you are offered a gift, 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

If you are offered entertainment:

- it can be accepted if the value does not exceed AU/NZ\$100 per person
- if the value exceeds \$100 per person and you would like to accept the entertainment, you should pay the value greater than \$100 and notify your team leader (exceptions apply for partner award dinners – see the Gifts and Entertainment Policy)

*Need more information?
See the [Gifts and Entertainment Policy](#)*

What would you do in this situation?

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

Answer
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.



20

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, internet and intranet) may be monitored
- if you receive a suspicious email, do not respond or click on any links, instead report the email to the IT Service Desk immediately on 1800 008 584 (Australia) or 0800 501 801 (New Zealand) or forward the email to hoax@woolworths.com.au
- familiarise yourself with and always act in accordance with the Acceptable Use of Information Systems Policy

[Need more information? See the Acceptable Use of Information Systems Policy](#)

What would you do in this situation?

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?



Personal & 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.

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 part in complying with these rules.

Customers

Woolworths Group places great importance on protecting our customers' information. You must ensure you 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 it, and the personal information on it, secure, as strict rules apply for dealing with credit card data.

For more information, see the [Acceptable Use of Information Systems Policy](#) and the [Payment Card Industry standards](#).

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
- only share it with other team members on a need-to-know basis
- not share it with people outside of Woolworths Group without the owner's permission
- 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 the Group, including 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 situation?

1. Andrew, a Store Manager, has received a completed workers compensation form from a team member. Andrew then shared some of the medical information on this form 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?

2. 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?

3. 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?

Answers

1. 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.

2. Rohan should tell his team leader, Culture & People Partner, the Cyber Security Team or the Incident Management Centre immediately. They may be able to recover the email or can take steps 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.

3. 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.

Trading in Woolworths Group & 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 should never be used or shared for personal gain. In addition to being a breach of our policies, this may also be against the law.

Our processes protect team members from inadvertently trading shares when confidential, price-sensitive information is known within the Group. There are blackout periods where team members should not buy or sell Woolworths Group shares.

From time to time, you may also be asked not to buy or sell shares in other companies. Buyers must not buy or sell shares in a partner they are overseeing.

Need more information? See the [Securities Trading Policy](#) and [Securities Trading Blackout Periods](#).

What would you do in this situation?

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?

Answer

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.

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
- all of our financial transactions and funds need to be recorded correctly and supported by proper paperwork 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. No 'off book' transactions can be made

What would you do in this situation?

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?



Answers

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 Speak Up for advice.

Preferred dress

Team members are expected to dress appropriately during work hours or when representing Woolworths Group. This means wearing a professional and appropriate style of clothing at all times. Attire must never present a safety issue and must be in line with the dress standards of your business.

This includes:

- wearing preferred clothing or professional business attire. It's always okay to wear cultural and religious garments, and you may wear clothing of the gender with which you identify
- 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, for example when working in a fresh food department

What would you do in this situation?

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

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



Answers

1. Yes. It's absolutely fine for Amar to wear a turban at work, irrespective of where he works.
2. No. Team members are expected to wear professional business attire at our support offices, even on Fridays, when professional and business-appropriate smart casual can be worn.

Our Code of Conduct

If you have any questions, or need help with anything, we encourage you to speak up. We're all here to help each other.

Team Member Speak Up

27

Questions & help

28

Questions & help

Team Member Speak Up

At Woolworths Group, one of our core values is that we always do the right thing – by acting with integrity, honesty and trust at all times. If you see something that's not right, it's important that you speak up.

There are a number of different ways you can raise concerns. This includes speaking to your team leader or People Advisory. If you don't feel comfortable raising concerns with them, or if the matter is serious, contact Speak Up.

Speak Up

Woolworths Group Team Member Speak Up is an independent whistleblowing service hosted by an external company.

When making a report, you have the opportunity to remain anonymous. Even if you do give your name, reports are dealt with sensitively and are only shared with those who have a need to know in order to properly investigate and address them. These people must not disadvantage you for making that report.

The service is open to all current and former Woolworths Group team members, as well as their families, both in Australia and overseas.

You can use this service to report serious matters that don't seem right or that you think could be a breach of the law or our policies. This might include risk and safety breaches, theft, fraud, corruption, bullying or harassment.

Woolworths Group is committed to investigating matters raised where sufficient information is provided to warrant an investigation. Our leaders are committed to dealing fairly and honestly with any reports that are brought to their attention, and to working with team members to resolve issues.

[Our Team Member Speak Up Policy provides more information.](#)

Telephone:
Australia - 1800 334 319
New Zealand - 0800 393 76736

Other countries – please refer to woolworthsspeakup.ethicspoint.com

For more details on how to report please visit:
woolworthsspeakup.ethicspoint.com

Questions & help

Always feel free to ask questions, provide feedback, and importantly, to speak up when you feel that something isn't right.

Your team leader

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

People Advisory

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

Call 1800 008 584, or use webchat or a service request through the People Portal (Aus) or call 0800 735 477 (NZ)

Speak Up

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 1800 334 319 (Aus) / 0800 393 76736 (NZ).

For more details on how to report please visit: woolworthsspeakup.ethicspoint.com

Assist

For confidential, independent and free counselling and support for you and your family.

Call 1300 360 364 (Aus) or 0800 360 364 (NZ) or go to benestar.com/user/login (company identifier is WOW, and token is WOW01) In Asia, call 400 650 6605 (China), 800 900 319 (Hong Kong) or +66990904454 (Thailand), or email connect@santulan.co.in (Bangladesh)

Financial Wellbeing Program

For information and support with finances, including interest-free loans.

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

People Portal

For people policies, processes and guidance material.

Go to wowpeople.woolworths.com.au or <https://sites.google.com/a/countdown.co.nz/countdown-people-portal/>

Culture & People Partner

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

Your enterprise agreement

For more information about your entitlements and responsibilities. On the People Portal or in your team room.

