



WOOLWORTHS HOLDINGS LIMITED

2018 GRI Index

WOOLWORTHS HOLDINGS LTD GRI CONTENT INDEX 2018

Our 2018 Good Business Journey report is prepared 'in accordance' with the core option of the Global Reporting Initiative's (GRI) Sustainability Standards 2016. Ernst & Young Inc. (EY) has been engaged to perform a limited assurance service engagement for certain quantitative and qualitative information contained in the 2018 Good Business Journey Report, including management's assertion that the Report has been prepared in accordance with the 'Core' level GRI Standards.

As a large, diversified multinational business, we have also chosen to include information against all disclosures identified by GRI.

To find the information in our report relating to each of the GRI indicators, **download** our full report, accompanying additional documents, and GRI index. For a detailed explanation of the indicators, visit **Global Reporting Initiative**.

ABBREVIATIONS

The following company abbreviations are used:

- WHL: Woolworths Holdings Limited
- WSA: Woolworths SA
- CRG: Country Road Group
- DJ: David Jones

The following abbreviations are used for various sources of information:

- GBJ: Good Business Journey Report for WHL Group 2018
- GBJ: 2018 Carbon Footprint Verification Statement
- GBJ: 2018 Group Employee Information
- GBJ: 2018 Key Stakeholder Groupings
- GBJ: WHL 2017 Carbon Footprint
- GBJ: 2018 Key Sustainability Indicators
- AFS: Annual Financial Statements of the WHL Group 2018
- IR: Integrated Report for WHL Group 2018
- AGM: Annual General Meeting notice for WHL Group 2018
- Web: Pages on our www.woolworths.co.za/goodbusinessjourney

The following abbreviations are used for chapters in the GBJ report:

- GBJ-PT: People and Transformation
- GBJ-SD: Social Development
- GBJ-HW: Health and Wellness
- GBJ-ES: Ethical Sourcing
- GBJ-SF: Sustainable Farming
- GBJ-WR: Water
- GBJ-EN: Energy and Climate Change
- GBJ-WS: Waste

The following abbreviations are used for chapters in the IR:

- IR (GO): Our Governance Report
- IR (RR): Our Remuneration Report
- IR (SEC): Social and Ethics Committee Report

The following abbreviations are used for chapters in the AFS:

- AFS (FDR): Our Group Finance Director's Report

GRI INDEX

MATERIAL TOPIC - GRI 102: GENERAL DISCLOSURES				
INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION
103-1	Explanation of the material topic and its boundary	Risks per material focus area and aspect boundary are defined in the material issues table and are also listed on the second page of each GBJ chapter IR: pp. 9-10 AFS: p. 34		
103-2	The management approach and its components	Throughout the reports. GBJ: pp. 11-16, 21 IR: pp. 17-34, AFS (FDR): pp. 4-13		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp.125-126		
102-1	Name of the organisation	GBJ: p. 11 IR: p. 9 AFS: p. 34 https://www.woolworthsholdings.co.za/overview/whl/		
102-2	Activities, brands, products, and services	GBJ: p. 11 IR: pp.11-12 AFS: p. 34		
102-3	Location of headquarters	AFS: p. 137 https://www.woolworthsholdings.co.za/overview/whl/		
102-4	Location of operations	GBJ: p. 11 GBJ: 2018 Carbon Footprint Verification Statement IR: pp. 70-112		
102-5	Ownership and legal form	GBJ: p. 11 IR: pp. 11-12		
102-6	Markets served	GBJ: p. 11 IR: pp. 11-12 IR: pp. 70-112 AFS: p. 34		

GRI INDEX (CONTINUED)

102-7	Scale of the organisation	GBJ: p. 11 (Number of employees) GBJ: 2018 Group Employee Information IR: pp. 6, 19 (Number of employees for WHL) IR: pp. 73-74 (WSA) IR: pp. 91-92 (DJ) IR: pp. 103-104 (CRG) IR: pp. 6, 54 (Turnover and concession sales) IR: pp. 53-68 (Financial results) AFS: p. 27 (Capitalisation)		
102-8	Information on employees and other workers	GBJ: p. 11 (Number of employees) GBJ: 2018 Group Employee Information GBJ: p. 30 (CRG and DJ proportion of women) 2018 Group Employee information: https://www.woolworthsholdings.co.za/sustainability/reports/ N/A. Performed by workers who are legally recognised as self-employed	DJ and CRG breakdown by employment type and WHL seasonal variation in employment numbers.	Due to the diversity of our operational geographies, consolidating our People reporting has been a challenge and we are working to find better ways of aligning reporting methodologies alongside differing legislative prescripts.
102-9	Supply chain	IR: pp. 19-20 (Business model) GBJ (ES): pp. 53-68		
102-10	Significant changes to the organisation and its supply chain	IR: pp. 41, 44, 49, 55-56 (Restructuring the Australian operations and cost to restructure) AFS (FDR): pp. 6, 7		
102-11	Precautionary principle or approach	GBJ: pp. 5, 52		
102-12	External initiatives	Listed throughout GBJ sections. GBJ: p. 12 GBJ: 2018 Key Stakeholder Groupings Position statements on various sustainability issues: https://www.woolworths.co.za/corporate/cmp206026		
102-13	Membership of associations	Listed throughout GBJ sections. GBJ: p. 12 GBJ: 2018 Key Stakeholder Groupings Position statements on various sustainability issues: https://www.woolworths.co.za/corporate/cmp206026		
102-14	Statement from senior decision-maker	GBJ: p. 10 IR (FDR): pp. 41-54		
102-15	Key impacts, risks, and opportunities	Impacts listed throughout GBJ sections: pp. 17-105 GBJ: pp. 13-14 IR: pp. 27-34		

GRI INDEX (CONTINUED)

102-16	Values, principles, standards, and norms of behavior	GBJ: p. 10 (CEO/Chairman's Report) GBJ: pp. 21-24 IR: p. 13 (Vision and Values) IR: p. 44 (Chairman's Report) IR (GO): p. 126 IR (SEC): pp. 131-132, 136 IR (RR): pp. 142-145 AFS: p. 38 (Opinion)		
102-17	Mechanisms for advice and concerns about ethics	IR (GO): p. 137 Anti-bribery and corruption policy: https://www.woolworthsholdings.co.za/wp-content/uploads/2017/12/Anti-Bribery_and_Corruption_Policy.pdf AFS: p38 (Basis for opinion)		
102-18	Governance structure	IR (GO): pp. 115-117, 129-130 https://www.woolworthsholdings.co.za/governance/the-board-committees/		
102-19	Delegating authority	GBJ: p. 6 (We also have a Group Head of Sustainability who reports to the Group Director: Marketing and Sustainability. A Sustainability Executive Steering Committee has been established in Country Road Group and David Jones and they review Good Business Journey progress on a regular basis) IR (GO): pp. 129-130 Board Charter: https://www.woolworthsholdings.co.za/wp-content/uploads/2017/12/Board_Charter.pdf AFS: p. 62 (Key management personnel)		
102-20	Executive-level responsibility for economic, environmental, and social topics	GBJ: p. 6 (There is also a Group Sustainability Manger who reports to the Executive Group Head of Marketing. Together, they give feedback to the Sustainability Committee on a biannual basis) IR (GO): pp. 129-130 AFS: p. 40 (Other information) Sustainability Committee Terms of Reference: https://www.woolworthsholdings.co.za/wp-content/uploads/2017/12/Sustainability_Committee_Terms_of_Reference.pdf Social and Ethics Committee Terms of Reference: https://www.woolworthsholdings.co.za/wp-content/uploads/2017/12/Social_and_Ethics_Committee_Terms_of_Reference.pdf		

GRI INDEX (CONTINUED)

102-21	Consulting stakeholders on economic, environmental, and social topics	IR: p. 125-127 IR (GO): p. 129 (Risk and Compliance Committee)		
102-22	Composition of the highest governance body and its committees	IR (GO): pp. 115-117, 121-122.	Stakeholder representation.	None of the directors represent specific stakeholder groupings.
102-23	Chair of the highest governance body	IR (GO): p. 115		
102-24	Nominating and selecting the highest governance body	IR (GO): pp. 124, 129-30 Board Charter: https://www.woolworthsholdings.co.za/wp-content/uploads/2017/12/Board_Charter.pdf		
102-25	Conflicts of interest	IR (GO): pp. 124, 126 Board Charter: https://www.woolworthsholdings.co.za/wp-content/uploads/2017/12/Board_Charter.pdf Conflict of Interest policy: https://www.woolworthsholdings.co.za/wp-content/uploads/2017/12/Conflicts_of_Interest_Policy_2017.pdf		
102-26	Role of highest governance body in setting purpose, values, and strategy	IR (GO): pp. 119, 123-124 https://www.woolworthsholdings.co.za/wp-content/uploads/2017/12/Board_Charter.pdf		
102-27	Collective knowledge of highest governance body	https://www.woolworthsholdings.co.za/wp-content/uploads/2017/12/Board_Charter.pdf		
102-28	Evaluating the highest governance body's performance	IR: p. 24		
102-29	Identifying and managing economic, environmental, and social impacts	GBJ: p. 6 IR (SEC): pp. 131-138 IR (GO): pp. 129-130		
102-30	Effectiveness of risk management processes	GBJ: p. 6 IR: p. 27 IR: p. 122 (frequency of social and ethics committee meetings) IR (GO): pp. 125-130		
102-31	Review of economic, environmental, and social topics	GBJ: p. 6 IR (GO): pp. 122, 125-130		

GRI INDEX (CONTINUED)

102-32	Highest governance body's role in sustainability reporting	GBJ: p. 6 IR (SEC): p. 131-138		
102-33	Communicating critical concerns	IR: pp. 125-127 (Risk and compliance management) IR (GO): p.129 (Risk and Compliance Committee)		
102-34	Nature and total number of critical concerns	IR: pp. 125-127 IR (GO): p. 129 (Risk and Compliance Committee)	Number of critical concerns	Currently not disclosed
102-35	Remuneration policies	IR (RR): pp.139-168		
102-36	Process for determining remuneration	GBJ (PT): p. 28 IR (RR): pp. 139-168		
102-37	Stakeholders' involvement in remuneration	IR (RR): pp.141-142		
102-38	Annual total compensation ratio	-	Ratio of total compensation for the organisation's highest-paid individual/s to the median annual total compensation	GINI as an indicator is inconsistently applied across the world as no clear guidelines are available on the inclusion of total reward elements, i.e., guaranteed pay, benefits and variable pay. On this basis, WHL is not using the GINI and has instead develop a barometer for fair and responsible pay which is aligned to internal remuneration strategies of the Group. The barometer for fair and responsible pay can be found on IR (RR): pp. 147, 155-156
102-39	Percentage increase in annual total compensation ratio	-	Ratio of % increase for the organisation's highest-paid individual/s to the median annual total compensation	GINI as an indicator is inconsistently applied across the world as no clear guidelines are available on the inclusion of total reward elements, i.e., guaranteed pay, benefits and variable pay. On this basis, WHL is not using the GINI and has instead develop a barometer for fair and responsible pay which is aligned to internal remuneration strategies of the Group. The barometer for fair and responsible pay can be found on IR (RR): pp. 147, 155-156

GRI INDEX (CONTINUED)

102-40	List of stakeholder groups	GBJ: p. 12 GBJ: 2018 Key Stakeholder Groupings IR: p. 21-27		
102-41	Collective bargaining agreements	GBJ: p. 30		
102-42	Identifying and selecting stakeholders	Listed throughout GBJ sections. GBJ: p. 12 GBJ: 2018 Key Stakeholder Groupings IR: p. 21-27		
102-43	Approach to stakeholder engagement	Listed throughout GBJ sections. GBJ: p. 12 GBJ: 2018 Key Stakeholder Groupings IR: pp. 21-26 https://www.woolworthsholdings.co.za/overview/our-stakeholders/	Frequency of engagement	This has not been publically reported to date.
102-44	Key topics and concerns raised	GBJ: 2018 Key Stakeholder Groupings IR: pp. 21-26		
102-45	Entities included in the consolidated financial statements	GBJ: p. 5 IR: pp. 6, 9, 11-12 IR: pp. 41-68 AFS (FDR): pp. 4-19		
102-46	Defining report content and topic boundaries	WHL subscribes to the principles of stakeholder inclusiveness, materiality, sustainability context and completeness when defining report content. These principles have been incorporated into the development of the 2018 reporting suite. GBJ: pp. 5, 11-16 GBJ: 2018 Key Stakeholder Groupings AFS: pp. 35, 48-49 IR: pp.11-12 AFS (FDR): pp. 4-19		
102-47	List of material topics	GBJ: pp. 13-14 IR: p27-34		

GRI INDEX (CONTINUED)

102-48	Restatements of information	GBJ: p. 91 (restatement for WSA relative water reduction in South African Stores) GBJ: p. 101 (restatement for WSA relative electricity reduction in South African stores) GBJ: 2018 Key Sustainability Indicators restatement of relative water and electricity reduction for South African stores IR: p. 162 (restated remuneration) AFS: p. 22 (revenue, turnover and concession sales, cost of sales), p. 24 (restatement gross margin, operating margin, return on equity), p. 25 (Woolworths logistics), p. 27 (restatement of revenue) AFS: p. 10 (restated intangible assets and deferred tax liabilities), p. 76 (restatement of Goodwill)		
102-49	Changes in reporting	N/A. No material changes		
102-50	Reporting period	Provided in the AFS, IR and GBJ report. This reporting covers the financial reporting period: 52 weeks to 24 June 2018.		
102-51	Date of most recent previous report	2017		
102-52	Reporting cycle	Annual		
102-53	Contact point for questions regarding the report	Located on inside back cover of all the reports		
102-54	Claims of reporting in accordance with the GRI Standards	GBJ: p. 5 IR: p. 10		
102-55	GRI content index	https://www.woolworthsholdings.co.za/sustainability/reports/		
102-56	External assurance	GBJ: p. 6 IR: p. 10 AFS: p32 (combined assurance) Assurance report: https://www.woolworthsholdings.co.za/sustainability/reports/		

GRI INDEX (CONTINUED)

MATERIAL TOPIC – GRI 201: ECONOMIC PERFORMANCE				
INDICATOR	DISCLOSURE	REFERENCE		
103-1	Explanation of the material topic and its boundary	Risks per material focus area and aspect boundary are defined in the material issues table and are also listed on the second page of each GBJ chapter AFS (FDR): pp. 4-19		
103-2	The management approach and its components	GBJ: pp. 11-16, 21 GBJ (SD): pp. 33-42 GBJ (EN): pp. 97-105 IR: pp. 17-34, 53-68 AFS (FDR): pp. 4-19		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach are located on: GBJ: p. 6 IR: pp. 125-126		
201-1	Direct economic value generated and distributed	GBJ (SD): pp. 33-42 IR: pp. 17-18 (creating value) IR: pp. 73-86 (WSA) IR: pp. 91-100 (DJ) IR: pp. 103-112 (CRG)		
201-2	Financial implications and other risks and opportunities for the organisation's activities due to climate change	Full reporting on climate change risks and opportunities available at www.cdp.net GBJ (EN): pp. 97-105		
201-3	Coverage of the organisation's defined benefit plan obligations	AFS: pp. 93-95 (retirement benefits)		
201-4	Financial assistance received from government	N/A. No financial assistance received from government		

GRI INDEX (CONTINUED)

MATERIAL TOPIC – GRI 202: MARKET PRESENCE				
INDICATOR	DISCLOSURE	REFERENCE		
103-1	Explanation of the material topic and its boundary	Risks per material focus area and aspect boundary are defined in the material issues table and are also listed on the second page of each GBJ chapter		
103-2	The management approach and its components	GBJ: pp. 21-24		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
202-1	Ratios of standard entry level wage by gender compared to local minimum wage	-	Ratios of standard entry level wage by gender compared to local minimum wage	GINI as an indicator is inconsistently applied across the world as no clear guidelines are available on the inclusion of total reward elements, i.e. guaranteed pay, benefits and variable pay. On this basis WHL are not using the GINI and has instead develop a barometer for fair and responsible pay which are aligned to internal remuneration strategies of the Group. The barometer for fair and responsible pay can be found on IR (RR): p147, 155-156
202-2	Proportion of senior management hired from the local community.	GBJ (PT): p. 25 (WSA and CRG internal hire rate) GBJ: 2018 Group Employee Information – Employment Equity, focusing on the historically disadvantaged individuals from South Africa. https://www.woolworthsholdings.co.za/sustainability/reports/	Proportion of local hires for CRG and DJ.	Due to the diversity of our operational geographies, consolidating our People reporting has been a challenge and we are working to find better ways of aligning reporting methodologies alongside differing legislative prescripts. At Woolworths South Africa, our transformation strategy continues to focus on retaining, developing, and growing our talent from within. This means also hiring from the local pool of talent in South Africa.

GRI INDEX (CONTINUED)

MATERIAL TOPIC – GRI 203: INDIRECT ECONOMIC IMPACTS				
INDICATOR	DISCLOSURE	REFERENCE		
103-1	Explanation of the material topic and its boundary	Risks per material focus area and aspect boundary are defined in the material issues table and are also listed on the second page of each GBJ chapter		
103-2	The management approach and its components	GBJ: p. 12 GBJ (PT): pp. 25-26, 28 GBJ (SD): p. 33-42 IR: p. 25		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
203-1	Infrastructure investments and services supported	GBJ (PT): p. 32 IR: pp. 23-25		
203-2	Significant indirect economic impacts	GBJ (PT): pp. 25-26, 28, 32 IR: pp. 23-25		
MATERIAL TOPIC – GRI 204: PROCUREMENT PRACTICES				
INDICATOR	DISCLOSURE	REFERENCE		
103-1	Explanation of the material topic and its Boundary	Risks per material focus area and aspect boundary are defined in the material issues table and are also listed on the second page of each GBJ chapter		
103-2	The management approach and its components	Preferential procurement is identified as a vehicle for transformation, which is vital to the sustainability of our operations. We work constantly with our supplier base in agriculture, non-trade, clothing, and logistics to engage on their transformation journey. We have helped create numerous small back owned business which form a meaningful part of our supplier base. See GBJ (PT): p. 32, GBJ (ES): pp. 53-68 For South Africa, our 2017/2018 BEE scorecard (reported in arrears) is available here: https://www.woolworthsholdings.co.za/sustainability/reports/		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
204-1	Proportion of spending on local suppliers	GBJ (PT): p. 32 (spend on local suppliers through Broad-based black economic empowerment) GBJ (ES): p56 (WVA % of Fashion, Beauty and Home products sourced from SADC) AFS: pp. 80, 101		We report on Woolworths SA total procurement spend with enterprise development beneficiaries.

GRI INDEX (CONTINUED)

MATERIAL TOPIC – GRI 205: ANTI-CORRUPTION				
INDICATOR	DISCLOSURE	REFERENCE		
103-1	Explanation of the material topic and its boundary	Risks per material focus area and aspect boundary are defined in the material issues table and are also listed on the second page of each GBJ chapter		
103-2	The management approach and its components	<p>The Group maintains a number of governance policies on gifts, entertainment, insider trading and conflict of interests, and a zero-tolerance policy towards fraud, theft, corruption or any similar illegal behaviour. The Group has adopted a whistle-blowing policy and an anti-corruption and sanctions policy to align with the OECD guidelines on corruption.</p> <p>IR: p. 137</p> <p>Anti-bribery and corruption policy: https://www.woolworthsholdings.co.za/wp-content/uploads/2017/12/Anti-Bribery_and_Corruption_Policy.pdf</p> <p>AFS: p. 38 (Basis for opinion)</p> <p>United Nations Global Compact: https://www.unglobalcompact.org/what-is-gc/participants/21731</p>		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
205-1	Operations assessed for risks related to corruption	IR (GO): p. 132	Total number and % of operations	All of our operations are bound by our corporate policies. We have a zero-tolerance policy towards fraud, theft, corruption or any similar illegal behaviour. These are covered in the induction programmes. We have a consolidated WHL whistle-blowing reporting which now supports quarterly reports to the Board on alleged fraud incidences and investigations across the Group. We will continue to reinforce the governance of ethics throughout our business and our value chain.

GRI INDEX (CONTINUED)

205-2	Communication and training about anti-corruption policies and procedures	Anti-bribery and corruption policy: https://www.woolworthsholdings.co.za/wp-content/uploads/2017/12/Anti-Bribery_and_Corruption_Policy.pdf	Training on anti-corruption policies	Not reported. Group Risk and Compliance are required to design and establish appropriate training and awareness programmes.
205-3	Confirmed incidents of corruption and actions taken	N/A. No known instances of corruption during FY		

MATERIAL TOPIC – GRI206: ANTI-COMPETITIVE BEHAVIOUR

INDICATOR	DISCLOSURE	REFERENCE		
103-1	Explanation of the material topic and its boundary	Risks per material focus area and aspect boundary are defined in the material issues table and are also listed on the second page of each GBJ chapter.		
103-2	The management approach and its components	The Group maintains a number of governance policies on conflicts of interest, gifts, entertainment, insider trading and price-sensitive information. There is a zero-tolerance policy toward fraud, theft, corruption, or any illegal behaviour. IR (GO): p. 137. Governance Policies: https://www.woolworthsholdings.co.za/governance/the-board-committees/		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	N/A. No legal actions for anti-competitive behaviour, anti-trust, and monopoly practices		

MATERIAL TOPIC – GRI 301: MATERIALS

INDICATOR	DISCLOSURE	REFERENCE		
103-1	Explanation of the material topic and its boundary	The consumption of materials (resources) within our business is particularly relevant in terms of the packaging we use for our products and the waste streams associated with these. An explanation of the importance of this aspect is provided in the review on of risks associated with our materials consumption is discussed in GBJ (WS): pp. 77-86		

GRI INDEX (CONTINUED)

103-2	The management approach and its components	The consumption of materials (resources) within our business is particularly relevant in terms of the packaging we use for our products and the waste streams associated with these. An explanation of the importance of this aspect is provided in the review on of risks associated with our materials consumption is discussed in GBJ (WS): pp. 77-86 IR: pp. 19-20 <u>Position statement on packaging</u> United Nations Global Compact signatories: https://www.unglobalcompact.org/what-is-gc/participants/21731		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
301-1	Materials used by weight or volume	GBJ (WS): pp. 77-86	Weight/volume of all packaging/ materials	Due to sheer number of products and materials sold by us, we are not able to quantify this
301-2	Recycled input materials used	GBJ (WS): pp. 77-86 IR: p. 96 (case study)	Total % of materials	Due to sheer number of products and materials sold by us, we are not able to quantify this
301-3	Reclaimed products and their packaging materials	GBJ (WS): pp. 77-86	A general description of the approach to packaging innovation is provided.	Due to the sheer number of products and customers that Woolworths services. this is not deemed feasible
MATERIAL TOPIC – GRI 302: ENERGY				
INDICATOR	DISCLOSURE	REFERENCE		
103-1	Explanation of the material topic and its Boundary	An explanation of the importance of this aspect is provided in the review of risks associated with our energy consumption: GBJ: p. 14 (material issues on Energy and Climate Change) GBJ (EN): pp. 97-105 <u>Climate Change position statement</u>		
103-2	The management approach and its components	GBJ: p. 14 (material issues on Energy and Climate Change) GBJ (EN): pp. 97-105 IR: pp. 19-20 <u>Climate Change position statement</u> United Nations Global Compact signatories: https://www.unglobalcompact.org/what-is-gc/participants/21731		

GRI INDEX (CONTINUED)

103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
302-1	Energy consumption within the organisation	GBJ (EN): p. 101 WHL 2017 Carbon Footprint: https://www.woolworthsholdings.co.za/sustainability/reports/		
302-2	Energy consumption outside of the organisation	Full reporting on energy and carbon emission data (scope 3) available at www.cdp.net		
302-3	Energy intensity	GBJ (EN): p. 101 WHL 2017 Carbon Footprint: https://www.woolworthsholdings.co.za/sustainability/reports/		
302-4	Reduction of energy consumption	GBJ (EN): p. 101 GBJ: Key sustainability indicators and Achievements - https://www.woolworthsholdings.co.za/sustainability/reports/		
302-5	Reduction in energy requirements of products and services	-	Total energy requirement	Sheer number of products and materials sold by Woolworths not able to quantify this.
MATERIAL TOPIC – GRI 303: WATER				
INDICATOR	DISCLOSURE	REFERENCE		
103-1	Explanation of the material topic and its Boundary	An explanation of the importance of this aspect is provided in the review of risks associated with our energy consumption: GBJ: p. 13 (material issues on water)		
103-2	The management approach and its components	An explanation of the importance of this aspect is provided at GBJ (VWR): pp. 87-96 and IR: pp. 19-20 Water position statement United Nations Global Compact signatories: https://www.unglobalcompact.org/what-is-gc/participants/21731		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		

GRI INDEX (CONTINUED)

303-1	Interactions with water as a shared resource	<p>GBJ (WRI): pp. 87-96 (Woolworths uses limited borehole water as well as rain harvested water. Only municipal water is included on page 91)</p> <p>Full reporting on water use data available at www.cdp.net</p>		
303-2	Management of water discharge-related impacts	No water sources significantly affected by our direct operations		
303-3	Water withdrawal	<p>GBJ (WRI): p. 91 (This reports only municipal water usage across some of our facilities. At our head office in Cape Town, we have upgraded our grey water system to provide 60% of the building's water requirements)</p> <p>Full reporting on water use data available at www.cdp.net</p>		
303-4	Water discharge	No water discharged		
303-5	Water consumption	<p>GBJ (WRI): p. 91 (This reports only municipal water usage across some of our facilities. At our head office in Cape Town, we have upgraded our grey water system to provide 60% of the buildings water requirements)</p> <p>Full reporting on water use data available at www.cdp.net</p>		

GRI INDEX (CONTINUED)

MATERIAL TOPIC – GRI304: BIODIVERSITY				
INDICATOR	DISCLOSURE	REFERENCE		
103-1	Explanation of the material topic and its boundary	An explanation of the importance of this aspect is provided in the review of risks associated with our biodiversity management: GBJ: pp. 13-14 (material issues on ethical sourcing and sustainable farming sections)		
103-2	The management approach and its components	We have sustainable sourcing strategies around key risk commodities such as timber, cocoa, cotton, coffee, palm oil, etc. to minimise supply chain impacts on biodiversity and deforestation. See various position statements (e.g. cocoa, palm oil, deforestation, GMO). We also have sustainable farming and fishing programmes geared at ensuring that these farming practices do not pose adverse impacts to our natural environment: GBJ (SD): pp. 33-42 and IR: pp. 19-20. GBJ (SFI): pp. 69-76 GBJ (IES): pp. 53- 68 United Nations Global Compact signatories: https://www.unglobalcompact.org/what-is-gc/participants/21731		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	N/A no sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas		
304-2	Significant impacts of activities, products, and services on biodiversity	GBJ (IES): pp. 53-68 GBJ: (SFI): pp. 69-76		
304-3	Habitats protected or restored	GBJ (WRI): pp. 93-94 (catchment rehabilitation)		
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	N/A - No known Red List species and national conservation list species with habitats in areas affected by our operations		

GRI INDEX (CONTINUED)

MATERIAL TOPIC – GRI305: EMISSIONS				
INDICATOR	DISCLOSURE	REFERENCE		
103-1	Explanation of the material topic and its boundary	An explanation of the importance of this aspect is provided in the review of risks associated with our energy consumption: GBJ: p. 14 (material issues on Energy and Climate Change) GBJ (EN): pp. 101-105 <u>Climate Change position statement</u>		
103-2	The management approach and its components	GBJ: p. 14 (material issues on Energy and Climate Change) GBJ (EN): pp. 97-105 IR: pp. 19-20 <u>Climate Change position statement</u> United Nations Global Compact signatories: <u>https://www.unglobalcompact.org/what-is-gc/participants/21731</u>		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
305-1	Direct (Scope 1) GHG emissions	GBJ (EN): p. 103 GBJ: WHL 2017 Carbon Footprint overview - <u>https://www.woolworthsholdings.co.za/sustainability/reports/</u>		
305-2	Energy indirect (Scope 2) GHG emissions	GBJ (EN): p. 103 GBJ: WHL 2017 Carbon Footprint overview - <u>https://www.woolworthsholdings.co.za/sustainability/reports/</u> Full reporting on water use/ discharge data available at <u>www.cdp.net</u>		
305-3	Other indirect (Scope 3) GHG emissions	GBJ (EN): p. 103 GBJ: WHL 2017 Carbon Footprint overview - <u>https://www.woolworthsholdings.co.za/sustainability/reports/</u>		
305-4	GHG emissions intensity	GBJ: WHL 2017 Carbon Footprint overview - <u>https://www.woolworthsholdings.co.za/sustainability/reports/</u>		

GRI INDEX (CONTINUED)

305-5	Reduction of GHG emissions	GBJ (EN): pp. 99-100,103 GBJ: WHL 2017 Carbon Footprint overview - https://www.woolworthsholdings.co.za/sustainability/reports/		
305-6	Emissions of ozone-depleting substances (ODS)	GBJ (EN): p. 103 GBJ: WHL 2017 Carbon Footprint overview - https://www.woolworthsholdings.co.za/sustainability/reports/		
305-7	Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions	Not deemed material to our operations as we do not have any significant point source emissions.		
MATERIAL TOPIC – GRI306: EFFLUENTS AND WASTE				
INDICATOR	DISCLOSURE	REFERENCE		
103-1	Explanation of the material topic and its boundary	An explanation of the importance of this aspect is provided in the review on of risks associated with our energy consumption: GBJ: p. 14 (material issues on waste and water management) GBJ (WS): pp. 77-86		
103-2	The management approach and its components	An explanation of the importance of this aspect is provided in the review of risks associated with our materials consumption is discussed in GBJ (WS): pp. 77-86 <u>Position statement on packaging</u> United Nations Global Compact signatories: https://www.unglobalcompact.org/what-is-gc/participants/21731		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
306-1	Water discharge by quality and destination	Full reporting on water use/ discharge data available at www.cdp.net		
306-2	Waste by type and disposal method	GBJ (WS): p. 84 (food waste and surplus clothing) GBJ (WS): p. 85 (non-hazardous waste and recycling)	No hazardous waste disposal disclosed. Weight of waste.	WSA currently reports % of waste to landfill in line with internal targets.
306-3	Significant spills	N/A. No significant spills		
306-4	Transport of hazardous waste	N/A. No hazardous waste imported or exported		
306-5	Water bodies affected by water discharges and/or runoff	N/A. No water bodies significantly affected by the organisation's discharges of water and runoff		

GRI INDEX (CONTINUED)

MATERIAL TOPIC – GRI307: ENVIRONMENTAL COMPLIANCE				
INDICATOR	DISCLOSURE	REFERENCE		
103-1	Explanation of the material topic and its boundary	An explanation of the importance of this aspect is provided in the review on of risks associated with our environmental management: GBJ: pp. 13-14 (material issues on all topics) as well as GBJ: pp. 33-105		
103-2	The management approach and its components	As mentioned in our ethical sourcing position statement, we support compliance with all applicable environmental laws and regulations and a commitment to environmental efficiency and improvement over time. See various <u>position statements</u> IR: pp. 19-20 See also in GBJ: pp. 33-105 United Nations Global Compact signatories: https://www.unglobalcompact.org/what-is-gc/participants/21731		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
307-1	Non-compliance with environmental laws and regulations	N/A No significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations		

GRI INDEX (CONTINUED)

MATERIAL TOPIC – GRI308: SUPPLIER ENVIRONMENTAL ASSESSMENT				
INDICATOR	DISCLOSURE	REFERENCE		
103-1	Explanation of the material topic and its boundary	An explanation of the importance of this aspect is provided in the review of risks associated with our supplier relationships: GBJ; pp. 13-14 (material issues on all topics) as well as GBJ; pp. 53-105		
103-2	The management approach and its components	As a diversified retailer, a high proportion of the impact associated with our business exists in our supply chain. We therefore take a strong interest in working with our suppliers to ensure that their operations meet our minimum ethical, environmental and social standards. We describe approaches to supplier environmental assessment in GBJ (ES) pp. 53-68 and GBJ (SF); pp. 69-76 See various <u>position statements</u> IR; pp. 19-20 United Nations Global Compact signatories: https://www.unglobalcompact.org/what-is-gc/participants/21731		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ; p. 6 and IR; pp. 125-126		
308-1	New suppliers that were screened using environmental criteria	GBJ (ES); pp. 53-68 (9% of suppliers screened for WSA Fashion, David Jones Private Label and Country Road Group) GBJ (SF); pp. 67-76	New suppliers Woolworths Foods suppliers screened	We report on total supplier base. A business wide process is underway to convert our supply base from our existing social and ethical compliance audit protocol to the SEDEX Members Ethical Trade Audit (SMETA), which is one of the most widely used ethical audit formats in the world. Currently, Woolworths Food has converted 10% of its SA supply base to SEDEX.
308-2	Negative environmental impacts in the supply chain and actions taken	GBJ (ES); pp. 53-68		

GRI INDEX (CONTINUED)

MATERIAL TOPIC – GRI401: EMPLOYMENT				
INDICATOR	DISCLOSURE	REFERENCE		
103-1	Explanation of the material topic and its boundary	An explanation of the importance of this aspect is provided in the review of risks associated with our people and transformation management : GBJ: p. 13 (material issues on people and transformation) as well as GBJ: pp. 17-32		
103-2	The management approach and its components	Approach to people and transformation on GBJ (PTI): pp. 17-32. Fair and responsible remuneration is described on IR (RR): pp.147, 155-156. United Nations Global Compact signatories: https://www.unglobalcompact.org/what-is-gc/participants/21731		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
401-1	New employee hires and employee turnover	GBJ (PTI): p. 25 (employee turnover), GBJ: 2018 Group Employee Information	New hires by age and gender	Due to the diversity of our operational geographies, consolidating our People reporting has been a challenge and we are working to find better ways of aligning reporting alongside differing legislative prescripts.
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	GBJ (PTI): p. 28 (general approach to remuneration) IR (RR): pp. 139-168	Specific reporting on full-time vs. part-time employee benefits	Not publically reported, part of standard terms of employment
401-3	Parental leave	-	Return to work and retention rates after parental leave, by gender	Not publically reported

GRI INDEX (CONTINUED)

MATERIAL TOPIC – GRI402: LABOUR MANAGEMENT RELATIONS				
INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION
103-1	Explanation of the material topic and its boundary	An explanation of the importance of this aspect is provided in the review of risks associated with our people and transformation management: GBJ: p. 13 (material issues on people and transformation) GBJ: pp. 17-32		
103-2	The management approach and its components	Approach to people and transformation: GBJ (PT): pp. 17-32 Fair and responsible remuneration: IR (RR): pp. 147, 155-156 United Nations Global Compact signatories: https://www.unglobalcompact.org/what-is-gc/participants/21731		
103-3	Evaluation of the management approach	Details on how we monitor the effectiveness of our approach: GBJ: p. 6, and IR: pp.125-126		
402-1	Minimum notice periods regarding operational changes	-	Minimum notice periods regarding operational changes	Not publically reported, part of standard terms of employment
MATERIAL TOPIC – GRI403: OCCUPATIONAL HEALTH AND SAFETY				
INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION
103-1	Explanation of the material topic and its boundary	An explanation of the importance of this aspect is provided in the review of risks associated with our environmental management: GBJ: p. 13 (material issues on health and wellness) GBJ: pp. 43-52		
103-2	The management approach and its components	GBJ (HW): p. 49 (employee health and wellness) United Nations Global Compact signatories: https://www.unglobalcompact.org/what-is-gc/participants/21731		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p 6 and IR: pp. 125-126		

GRI INDEX (CONTINUED)

403-1	Occupational health and safety management system	All employees represented by health and safety committees in line with OHS legislative requirements in South Africa and Australia		
403-2	Hazard identification, risk assessment, and incident investigation	No specific disease risks identified associated with occupations within WHL		
403-3	Occupational health services	GBJ: p. 49		
403-4	Worker participation, consultation, and communication on occupational health and safety	-	Health and safety communication	Not publically reported. Health and safety topics covered in formal agreements with trade unions.
403-5	Worker training on occupational health and safety	GBJ: pp. 49-50 (awareness)		
403-6	Promotion of worker health	GBJ: pp. 43-52		
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	GBJ: p. 49		
403-8	Workers covered by an occupational health and safety management system	GBJ: pp. 49-50		
403-9	Work-related injuries	GBJ: 2018 Group employee information (employee health indicator)		
403-10	Work-related injuries	GBJ: pp. 49-50 GBJ: 2018 Group employee information (employee health indicator)		

GRI INDEX (CONTINUED)

MATERIAL TOPIC – GRI404: TRAINING AND EDUCATION				
INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION
103-1	Explanation of the material topic and its boundary	An explanation of the importance of this aspect is provided in the review of risks associated with our people and transformation management: GBJ: p. 13 (material issues on people and transformation) and GBJ: pp. 17-32		
103-2	The management approach and its components	Approach to training and education at GBJ (PT): pp. 25-28 United Nations Global Compact signatories: https://www.unglobalcompact.org/what-is-gc/participants/21731		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
404-1	Average hours of training per year per employee	GBJ (PT): p. 25 GBJ: 2018 Group Employee Information (training and skills development breakdown for WSAI)	Average hours of training per year per employee by gender, and by employee category for CRG and DJ.	Due to the diversity of our operational geographies, consolidating our People reporting has been a challenge and we are working to find better ways of aligning reporting alongside differing legislative prescripts.
404-2	Programs for upgrading employee skills and transition assistance programs	GBJ (PT): pp. 25-28 IR: pp. 21, 133		
404-3	Percentage of employees receiving regular performance and career development reviews	GBJ (PT): p. 25	Percentage of employees	All our employees receive individual performance management discussions and reviews

GRI INDEX (CONTINUED)

MATERIAL TOPIC – GRI405: DIVERSITY AND EQUAL OPPORTUNITY				
INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION
103-1	Explanation of the material topic and its boundary	An explanation of the importance of this aspect is provided in the review of risks associated with our people and transformation management: GBJ: p. 13 (material issues on people and transformation) and GBJ: pp. 17-32		
103-2	The management approach and its components	Approach to people and transformation: GBJ (PT): pp. 17-32 Composition and nominations: IR (GO): pp. 115-123 IR: p. 23 (Equal employment) Fair and responsible remuneration is described in IR (RR): pp. 139-168 United Nations Global Compact signatories: https://www.unglobalcompact.org/what-is-gc/participants/21731		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
405-1	Diversity of governance bodies and employees	GBJ:2018 Group employee information IR (GO): pp. 115-123	Breakdown by age group	Not publically reported.
405-2	Ratio of basic salary and remuneration of women to men	IR: pp. 155-156	Ratio of basic salary to gender	GINI as an indicator is inconsistently applied across the world as no clear guidelines are available on the inclusion of total reward elements, i.e., guaranteed pay, benefits and variable pay. On this basis, WHL is not using the GINI and has instead developed a barometer for fair and responsible pay which is aligned to the internal remuneration strategies of the Group. The barometer for fair and responsible pay can be found in IR (RR): pp. 147, 155-156

GRI INDEX (CONTINUED)

MATERIAL TOPIC – GRI406: NON-DISCRIMINATION				
INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION
103-1	Explanation of the material topic and its boundary	An explanation of the importance of this aspect is provided in the review of risks associated with our people and transformation management as well as human rights and ethics in our supply chain: GBJ: p. 13 (material issues on people and transformation) GBJ: pp. 17-32 GBJ (ES): pp. 53-68		
103-2	The management approach and its components	We have embedded non-discrimination practices throughout our operations, policies and procedures as per the requirements of the national Employment Equity Act, the Labour Relations Act and our Code of Business Principles - see GBJ (PT) pp. 17-32 and GBJ (ES) pp. 53-68. We support that discrimination should never be permitted or tolerated, see our Ethical trade position statement United Nations Global Compact signatories: https://www.unglobalcompact.org/what-is-gc/participants/21731		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
406-1	Incidents of discrimination and corrective actions taken	-	Number of incidents of discrimination and corrective action	This is Internally measured but not publically reported.

GRI INDEX (CONTINUED)

MATERIAL TOPIC – GRI407: FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING				
INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION
103-1	Explanation of the material topic and its boundary	An explanation of the importance of this aspect is provided in the review of risks associated with our people and transformation management as well as human rights and ethics in our supply chain: GBJ: p. 13 (material issues on people and transformation) GBJ: pp. 17-32 GBJ (ES): pp. 53-68		
103-2	The management approach and its components	We adhere to the provisions of the national Employment Equity Act (Act No. 55 of 1998) on collective bargaining, as well as the Labour Relations Act. We adhere to the principle of freedom of association and collective bargaining through our code of business principles - see GBJ (PT): p. 30 on employee union membership IR: p. 136 We support that freedom of association and the right to collective bargaining are respected. Read our Ethical trade position statement . United Nations Global Compact signatories: https://www.unglobalcompact.org/what-is-gc/participants/21731		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	GBJ (ES): p. 57 (Mandatory compliance to Code of Business Principles, which enforces freedom of association and collective bargaining). IR: p.136 Ethical trade position statement	We do not report on individual suppliers/ operations.	All our suppliers and service providers, whatever their location, are bound by the WHL Group operating company supplier codes of conduct. All our suppliers are regularly assessed against it. This means that all WHL suppliers must adhere to the principles set out.

GRI INDEX (CONTINUED)

MATERIAL TOPIC – GRI408: CHILD LABOUR				
INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION
103-1	Explanation of the material topic and its boundary	An explanation of the importance of this aspect is provided in the review of risks associated with human rights and ethics in our operations and supply chain management: GBJ: p. 13 (ethical sourcing) GBJ: pp. 17-32 GBJ (ES): pp. 53-68		
103-2	The management approach and its components	All our suppliers and service providers, whatever their location, are bound by the WHL Group operating company supplier codes of conduct. All our suppliers are regularly assessed against it. This means that all WHL suppliers must adhere to the principles set out, including that child labour will not be permitted. See GBJ (ES) pp. 53-68 IR: p. 136 We support that child labour will not be permitted. Read our Ethical trade position statement United Nations Global Compact signatories: https://www.unglobalcompact.org/what-is-gc/participants/21731		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
408-1	Operations and suppliers at significant risk for incidents of child labour	GBJ (ES): p. 57 (Mandatory compliance to Code of Business Principles, which enforces child labour laws).	We do not report on individual suppliers/ operations	All our suppliers and service providers, whatever their location, are bound by the WHL Group operating company supplier codes of conduct. All our suppliers are regularly assessed against it. This means that all WHL suppliers must adhere to the principles set out.

GRI INDEX (CONTINUED)

MATERIAL TOPIC – GRI409: FORCED OR COMPULSORY LABOUR				
INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION
103-1	Explanation of the material topic and its boundary	An explanation of the importance of this aspect is provided in the review of risks associated with human rights and ethics in our operations and supply chain management: GBJ: p. 13 (ethical sourcing) GBJ: pp. 17-32 GBJ (ES): pp. 53-68		
103-2	The management approach and its components	All our suppliers and service providers, whatever their location, are bound by the WHL Group operating company supplier codes of conduct. All our suppliers are regularly assessed against it. This means that all WHL suppliers must adhere to the principles set out, including that child labour will not be permitted. See GBJ (ES) pp. 53-68. IR: p. 136 We also support the principle that employment be freely chosen, not forced, bonded or resulting in involuntary prison labour. Read our Ethical trade position statement United Nations Global Compact signatories: https://www.unglobalcompact.org/what-is-gc/participants/21731		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	GBJ (ES): p. 57 (Mandatory compliance to Code of Business Principles, which enforces forced and compulsory labour requirements)	We do not report on individual suppliers/ operations	All our suppliers and service providers, whatever their location, are bound by the WHL Group operating company supplier codes of conduct. All our suppliers are regularly assessed against it. This means that all WHL suppliers must adhere to the principles set out.

GRI INDEX (CONTINUED)

MATERIAL TOPIC – GRI410: SECURITY PRACTICES				
INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION
103-1	Explanation of the material topic and its boundary	An explanation of the importance of this aspect is provided in the review of risks associated with human rights and ethics in our operations and supply chain management: GBJ: p. 13 (ethical sourcing) GBJ: pp. 17-32 GBJ (ES): pp. 53-68		
103-2	The management approach and its components	GBJ (ES): pp. 53-68 United Nations Global Compact signatories: https://www.unglobalcompact.org/what-is-gc/participants/21731		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
410-1	Security personnel trained in human rights policies or procedures	-	Percentage of security personnel trained in the organisation's human rights policies or procedures that are relevant to operations	Part of terms of agreement with security service providers. All suppliers are bound by our Code of Business Principles, and are periodically assessed against it.
MATERIAL TOPIC – GRI411: INDIGENOUS RIGHTS				
INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION
103-1	Explanation of the material topic and its boundary	An explanation of the importance of this aspect is provided in the review of risks associated with our people and transformation management as well as human rights and ethics in our supply chain: GBJ: p. 13 (material issues on people and transformation) GBJ: pp. 17-32 GBJ (ES): pp. 53-68		
103-2	The management approach and its components	GBJ (ES): pp. 53-68 Ethical trade position statement United Nations Global Compact signatories: https://www.unglobalcompact.org/what-is-gc/participants/21731		

GRI INDEX (CONTINUED)

103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp.125-126		
411-1	Incidents of violations involving rights of indigenous peoples	N/A. No known incidents or violations involving rights of indigenous peoples and actions taken.		
MATERIAL TOPIC – GRI412: INVESTMENT				
INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION
103-1	Explanation of the material topic and its boundary	An explanation of the importance of this aspect is provided in the review of risks associated with the communities we operate in: GBJ: p. 13 (material issues on social development)		
103-2	The management approach and its components	GBJ (ES): pp. 53-68,		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
412-1	Operations that have been subject to human rights reviews or impact assessments	GBJ (ES): p. 57 IR (SECI): pp. 132, 136	Number of operations	We do not yet report this consistently for the WHL Group. We have embedded good governance practices throughout our operations, policies and procedures as per the requirements of the national Employment Equity Act, the Labour Relations Act, and our Code of Business Principles.
412-2	Employee training on human rights policies or procedures	GBJ (ES): pp. 55, 57-58		
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	GBJ (ES): pp. 57-64	% of contracts/ agreements	We have good governance practices throughout our operations, policies and procedures as per the requirements of national labour relation laws in our regions of operation, and our Code of Business Principles to which all of our suppliers are bound.

GRI INDEX (CONTINUED)

MATERIAL TOPIC – GRI413: LOCAL COMMUNITIES				
INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION
103-1	Explanation of the material topic and its boundary	An explanation of the importance of this aspect is provided in the review of risks associated with the communities we operate in: GBJ: p. 13 (material issues on social development)		
103-2	The management approach and its components	Development of local communities is one of our core focus areas, and is discussed in the GBJ (SD): pp. 33-42.		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
413-1	Operations with local community engagement, impact assessments, and development programs	GBJ (PT): pp. 17-32 GBJ (SD): pp. 33-42 IR: p. 135	Percentage of operations	Although almost all of our operations engage in some form of community engagement, we do not report this specifically as a %.
413-2	Operations with significant actual and potential negative impacts on local communities	N/A. We do not believe that any of our operations have significant actual negative impacts on local communities.		
MATERIAL TOPIC – GRI414: SUPPLIER SOCIAL ASSESSMENT				
INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION
103-1	Explanation of the material topic and its boundary	An explanation of the importance of this aspect is provided in the review of risks associated with human rights and ethics in our operations and supply chain management: GBJ: p. 13 (ethical sourcing) GBJ (ES): pp. 53-68		
103-2	The management approach and its components	GBJ: pp. 55, 57-58 <u>Position statement on ethical trade</u> United Nations Global Compact signatories: https://www.unglobalcompact.org/what-is-gc/participants/21731		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		

GRI INDEX (CONTINUED)

414-1	New suppliers that were screened using social criteria	GBJ (ES): pp. 53-68 GBJ (SF): pp. 69-76	New Woolworths Food suppliers screened	We report on total supplier base. A business-wide process is underway to convert our supply base from our existing social and ethical compliance audit protocol to the SEDEX Members Ethical Trade Audit (SMETA), which is one of the most widely used ethical audit formats in the world. Currently, Woolworths Food has converted 10% of its SA supply base to SEDEX.
414-2	Negative social impacts in the supply chain and actions taken	GBJ (ES): pp. 53-68	Significant or potential impacts, % suppliers screened for significant or potential impact, supplier relationships terminated	We currently do not disclose any significant or potential impacts found from our routine audits. In addition, we do not disclose the number of terminations done for non-compliant suppliers. As per our Code of Business Principles, we have systems in place to remedy any issues found during the audits. If we are unable to resolve the issues, there are processes in place for termination of contracts.

MATERIAL TOPIC – GRI415: PUBLIC POLICY

INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION
103-1	Explanation of the material topic and its boundary	GBJ: pp. 13-14 Risks per material focus area and aspect boundary are defined in the material issues table and are also listed on the second page of each GBJ chapter		
103-2	The management approach and its components	GBJ: 2018 Stakeholder Groupings		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
415-1	Political contributions	N/A. No political donations during FY. (GBJ (SD): p. 42		

GRI INDEX (CONTINUED)

MATERIAL TOPIC – GRI416: CUSTOMER HEALTH AND SAFETY				
INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION
103-1	Explanation of the material topic and its boundary	GBJ: pp. 13-14 Risks per material focus area and aspect boundary are defined in the material issues table and are also listed on the second page of each GBJ chapter		
103-2	The management approach and its components	GBJ (IHW): pp. 43-52 (this includes addressing health issues associated with over- and under-nutrition as well as safety associated with our key product categories: food, clothing and general merchandise)		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
416-1	Assessment of the health and safety impacts of product and service categories	-	Percentage of products with health and safety impacts.	Our full product range is continuously reviewed to establish where they may have to be assessed for health and safety impacts for improvement. This is particularly true in the case of our Food products. We have rigorous food safety checks and audits in place for all products we sell.
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	GBJ (IHW): p. 52		
MATERIAL TOPIC – GRI417: PRODUCT SERVICE LABELLING				
INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION
103-1	Explanation of the material topic and its boundary	GBJ: p. 13-14 Risks per material focus area and aspect boundary are defined in the material issues table and are also listed on the second page of each GBJ chapter		
103-2	The management approach and its components	We promote effective product stewardship in our products through labelling. Our approach to product labelling: GBJ (IHW): pp. 43-52 and GBJ (SF): p. 73 .		

GRI INDEX (CONTINUED)

103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
417-1	Requirements for product and service information and labeling	GBJ (SF): p. 73 (rBST labelling) GBJ (WS): p. 82 (on-pack recycling labels)	% of products	Due to the sheer number of products and customers that Woolworths services this is not deemed feasible.
417-2	Incidents of non-compliance concerning product and service information and labeling	N/A. No incidents of non-compliance		
417-3	Incidents of non-compliance concerning marketing communications	N/A. No incidents of non-compliance		
MATERIAL TOPIC – GRI418: CUSTOMER PRIVACY				
INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION
103-1	Explanation of the material topic and its boundary	GBJ: pp. 13-14 Risks per material focus area and aspect boundary are defined in the material issues table and are also listed on the second page of each GBJ chapter		
103-2	The management approach and its components	We have a responsibility to treat the information that people give us with respect. Information is one of our greatest assets and it must be properly managed. We are making sure that it is protected from unauthorised access and use, and we must also be transparent about what personal information we have, why we need it, and what we do with it. Our approach to risk management in the digital world is provided on IR: p. 32. Online: https://www.woolworths.co.za/corporate/cmp205289		
103-3	Evaluation of the management approach	Details of how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	N/A. No substantiated complaints received.		

GRI INDEX (CONTINUED)

MATERIAL TOPIC – GRI419: COMPLIANCE				
INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION
103-1	Explanation of the material topic and its boundary	GBJ: pp. 13-14 Risks per material focus area and aspect boundary are defined in the material issues table and are also listed on the second page of each GBJ chapter		
103-2	The management approach and its components	IR: pp. 96, 107, 112, 125-126 (ERM process)		
103-3	Evaluation of the management approach	Details on how we monitor the effectiveness of our approach: GBJ: p. 6 and IR: pp. 125-126		
419-1	Non-compliance with laws and regulations in the social and economic area	N/A. No significant fine or non-compliance. IR (GO): p. 138		

