

WOOLWORTHS HOLDINGS LIMITED 2019 GRI Content Index

# GRI CONTENT INDEX

Our 2019 Good Business Journey references various disclosures from the Global Reporting Initiative (GRI) Standards. The disclosures referenced are listed in the table that follows.

To find the information in our report relating to each of the GRI disclosures, download our full Good Business Journey Report and accompanying additional documents that form part of our sustainability and integrated reporting suite. For a detailed explanation of the GRI disclosures, visit the Global Reporting Initiative website.

# **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 2019
- GBJ: Group Employee Information
- GBJ: Stakeholder Engagement
- GBJ: Carbon Footprint Overview
- GBJ: Carbon Footprint Verification Statement
- GBJ: Glossary
- GBJ: Assurance Summary
- GBJ: Position statements, Guidelines and Policies
- GBJ: Awards, Recognition, Highlights and Achievements
- AFS: Annual Financial Statements of the WHL Group 2019
- IR: Integrated Report for WHL Group 2019
- AGM: Annual General Meeting notice for WHL Group 2019
- Web: Pages on our www.woolworths.co.za/goodbusinessjourney website

### THE FOLLOWING ABBREVIATIONS ARE USED FOR CHAPTERS IN THE GBJ REPORT:

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

### 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: Group Finance Director's Report

INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION
	GRI 102: GENERAL D	SCLOSURES		I
102-1	Name of the organisation.	Woolworths Holdings Limited		
102-2	a. A description of the organisation's activities. b. Primary brands, products, and services, including an explanation of any products or services that are banned in certain markets.	GBJ-MS: p. 7 IR: p. 3-4		
102-3	Location of organisation's headquarters	Cape Town, South Africa AFS: p: 141 www.woolworthsholdings.co.za/overview/whl/		
102-4	Number of countries where the organisation operates, and names of countries where it has significant operations and/or that are relevant to the topics covered in the report.	GBJ-MS: p. 7 GBJ: Carbon Footprint Overview IR: p. 3-4		
102-5	Nature of ownership and legal form.	GBJ-MS: p. 7 IR: p. 3-4		
102-6	Markets served (including geographic breakdown where products and services are offered, sectors served and types of customers/beneficiaries)	GBJ-MS: p. 7 IR: p. 3-4, 75-76, 91-92, 105-106		
102-7	Scale of the reporting organisation, including:  Total number of employees.  Total number of operations.  Net sales (for private sector organisations) or net revenues (for public sector organisations).  Total capitalisation broken down in terms of debt and equity (for private sector organisations).  Quantity of products or services provided.	GBJ-PT: p. 17 GBJ: Group Employee Information IR: p. 3-4, 56, 60, 75-76, 91-92, 105-106 AFS: 9, 34, 43, 85-95		
102-8	The organisation shall report the following information: a. Total number of employees by employment contract (permanent and temporary), by gender. b. Total number of employees by employment contract (permanent and temporary), by region. c. Total number of employees by employment type (full-time and part-time), by gender. d. Whether a significant portion of the organisation's activities are performed by workers who are not employees. If applicable, a description of the nature and scale of work performed by workers who are not employees. e. Any significant variations in the numbers reported in Disdosures 102-8-a, 102-8-b, and 102-8-c (such as seasonal variations in the tourism or agricultural industries). f. An explanation of how the data have been compiled, including any assumptions made.	GBJ-PT: p. 17 GBJ: Group Employee Information	DJ and CRG breakdown by employment contract by gender, 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	a. A description of the organisation's supply chain, including its main elements as they relate to the organisation's activities, primary brands, products, and services.	GBJ-MS: p. 13 GBJ-ES: p. 53-66 GBJ-SF: p. 67-76 IR: p. 13-18		
102-10	Significant changes to the organisation's size, structure, ownership or supply chain, including: i. changes in the location of, or changes in, operations, including facility openings, closings, and expansions; ii. changes in the share capital structure and other capital formation, maintenance, and alteration operations (for private sector organisations); iii. changes in the location of suppliers, the structure of the supply chain, or relationships with suppliers, including selection and termination.	No significant changes		
102-11	Whether and how the organisation applies the Precautionary Principle or approach.	GBJ: Inside front cover (Our Good Business Journey Report)		
102-12	List externally developed economic, environmental and social charters, principles, or other initiatives to which the organisation subscribes or which it endorses.	Listed throughout GBJ Report and appendices		
102-13	A list of the main memberships of industry or other associations, and national or international advocacy organisations.	Listed throughout GBJ Report and appendices		
102-14	Statement from the most senior decision-maker of the organisation (such as CEO, chair, or equivalent senior position) about the relevance of sustainability to the organisation and the organisation's strategy for addressing sustainability.	GBJ-MS: p. 1 IR: p. 41-54		

INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION		
GRI 102: GENERAL DISCLOSURES (Continued)						
102-16	Organisation's values, principles, standards and norms of behaviour.	IR: p. 5 IR-GO: p. 115-152				
102-18	a. Governance structure, including committees of the highest governance body. b. Committees responsible for decision-making on economic, environmental and social topics.	GBJ-MS: p. 2 IR-GO: p. 127, 133-134				
102-40	Provide a list of stakeholder groups engaged by the organisation.	GBJ-MS: p. 14 GBJ: Stakeholder Engagement IR: p. 13-20				
102-41	Percentage of total employees covered by collective bargaining agreements.	GBJ: p.26 (for WSA)				
102-42	Basis for identification and selection of stakeholders with whom to engage.	GBJ-MS: p. 14 GBJ: Stakeholder Engagement IR: p. 11-20				
102-43	The organisation's approach to stakeholder engagement, including frequency of engagement by type and by stakeholder group, and an indication of whether any of the engagement was undertaken specifically as part of the report preparation process.	GBJ-MS: p. 14 GBJ: Stakeholder Engagement IR: p. 11-20	Frequency of engagement.	This has not been publically reported to date.		
102-44	Key topics and concerns that have been raised through stakeholder engagement, including how the organisation has responded to those key topics and concerns, including through its reporting. Report the stakeholder groups that raised each of the key topics and concerns.	GBJ-MS: p. 2, 14 GBJ: Stakeholder Engagement IR: p. 11-20				
102-45	a. List all entities included in the organisation's consolidated financial statements or equivalent documents. b. Whether any entity included in the organisation's consolidated financial statements or equivalent documents is not covered by the report.	GBJ-MS: p. 7 IR: p. 1, 3-4 AFS: 132-134				
102-46	a. Explain the process for defining the report content and the topic Boundaries. b. Explain how the organisation has implemented the Reporting Principles for Defining Report Content.	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 2019 reporting suite.  The value chain is disclosed on p. 13 of the GBJ Report, and the impact of each GBJ focus area is explained in the relevant sections of the report GBJ-MS: p. 9-10, 13 GBJ-PT: p. 18 GBJ-SD: p. 32 GBJ-HW: p. 46 GBJ-ES: p. 56 GBJ-SF: p. 70 GBJ-WS: p. 80 GBJ-WR: p. 94 GBJ-EN: p. 106				
102-47	a. A list of the material topics identified in the process for defining report content.	GBJ-MS: p. 9-10 IR: p. 23-24				
102-48	The effect of any restatements of information given in previous reports and the reasons for such restatements.	GBJ-WR: p 95 (restated David Jones water figure due to change in reporting periods and availability of data)  GBJ: Carbon Footprint Overview (restated intensity figure: (Emissions per million turnover) due to a reclassification of trunking revenue from turnover and concession sales to cost of sales)				

AFS: p13, 27, 42, 44, 61, 64, 136

INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION	
GRI 102: GENERAL DISCLOSURES (Continued)					
102-49	Significant changes from previous reporting periods in the list of material topics and topic Boundaries.	GBJ: Carbon Footprint Overview (Changed carbon footprint reporting timeline from calendar year to align to financial year. This means that the current carbon footprint timeline overlaps with the previous one by six months and has affected our figures.)			
102-50	Reporting period for the information provided.	53 weeks ended 30 June 2019			
102-51	Date of most recent previous report.	2018			
102-52	Reporting cycle.	Annual			
102-53	Contact point for questions regarding the report or its contents.	GoodBusinessJourney@woolworths.co.za			
102-54	a. The claim made by the organisation, if it has prepared a report in accordance with the GRI Standards, either: i. 'This report has been prepared in accordance with the GRI Standards: Core option'; or ii. 'This report has been prepared in accordance with the GRI Standards: Comprehensive option'.	N/A – the report is GRI referenced.			
102-55	a. The GRI content index, which specifies each of the GRI Standards used and lists all disclosures included in the report. b. For each disclosure, the content index shall include: i. the number of the disclosure (for disclosures covered by the GRI Standards); ii. the page number(s) or URL(s) where the information can be found, either within the report or in other published materials; iii. if applicable, and where permitted, the reason(s) for omission when a required disclosure cannot be made.	www.woolworthsholdings.co.za/sustainability/reports			
102-56	<ul> <li>a. A description of the organisation's policy and current practice with regard to seeking external assurance for the report.</li> <li>b. If the report has been externally assured:</li> <li>i. A reference to the external assurance report, statements, or opinions. If not included in the assurance report accompanying the sustainability report, a description of what has and what has not been assured and on what basis, including the assurance standards used, the level of assurance obtained, and any limitations of the assurance process;</li> <li>ii. The relationship between the organisation and the assurance provider;</li> <li>iii. Whether and how the highest governance body or senior executives are involved in seeking external assurance for the organisation's sustainability report.</li> </ul>	GBJ: Inside front cover (Our Good Business Journey Report) GBJ: Assurance Summary Assurance reports: www.woolworthsholdings.co.za/sustainability/reports			

sustainability report.

INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION		
	GRI 103: MANAGEMENT APPROACH					
103-1	For each material topic, the reporting organisation shall report the following information:  a. An explanation of why the topic is material.  b. The Boundary for the material topic, which includes a description of:  i. where the impacts occur;  ii. the organisation's involvement with the impacts. For example, whether the organisation has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.  c. Any specific limitation regarding the topic Boundary.	GBJ-MS: p. 9-14  Each material topic is included in its relevant GBJ focus area. For each focus area, a strategy and management approach is disclosed along with the impact in the value chain:  GBJ-PT: p. 18  GBJ-SD: p. 32  GBJ-HW: p. 46  GBJ-ES: p. 56  GBJ-SF: p. 70  GBJ-WS: p. 80  GBJ-WR: p. 94  GBJ-EN: p. 106				
103-2	For each material topic, the reporting organisation shall report the following information: a. An explanation of how the organisation manages the topic. b. A statement of the purpose of the management approach. c. A description of the following, if the management approach includes that component: i. Policies; ii. Commitments; iii. Goals and targets; iv. Responsibilities; v. Resources; vi. Grievance mechanisms; vii. Specific actions, such as processes, projects, programmes and initiatives.	Each material topic is included in its relevant GBJ focus area. For each focus area, a strategy and management approach is disclosed along with the impact in the value chain:  GBJ-PT: p. 18 GBJ-SD: p. 32 GBJ-HW: p. 46 GBJ-ES: p. 56 GBJ-SF: p. 70 GBJ-WS: p. 80 GBJ-WR: p. 94 GBJ-EN: p. 106  Furthermore, throughout the whole GBJ Report, information is provided on: i. Policies; ii. Commitments; iii. Goals and targets; iv. Responsibilities; v. Resources; vi. Grievance mechanisms; vii. Specific actions, such as processes, projects, programmes and initiatives.				
103-3	For each material topic, the organisation should report:  a. An explanation of how the organisation evaluates the management approach:  i. The mechanisms for evaluating the management approach;  ii. The results of the evaluation of the management approach;  iii. any related adjustments to the management approach.	GBJ-MS: p. 9-10  In addition, the key performance indicators (KPIs) under each high-level goal are disclosed throughout the GBJ Report and are used to evaluate the management approach and inform management's decision-making.				

INDICATOR DISCLOSURE

REFERENCE

OMISSION

**REASON FOR OMISSION** 

INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION		
GRI 201: ECONOMIC PERFORMANCE						
201-2	<ul> <li>a. Risks and opportunities posed by climate change that have the potential to generate substantive changes in operations, revenues, or expenditure, including: <ol> <li>a description of the risk or opportunity and its classification as either physical, regulatory or other;</li> <li>a description of the impact associated with the risk or opportunity;</li> <li>the financial implications of the risk or opportunity before action is taken;</li> <li>the methods used to manage the risk or opportunity;</li> <li>the costs of actions taken to manage the risk or opportunity.</li> </ol> </li> </ul>	GBJ-MS: p. 9-12 GBJ-EN: p. 103-114  Also in our CDP climate response found here:  www.cdp.net/en				
	GRI 202: MARKET I	PRESENCE				
202-1	<ul> <li>a. When a significant proportion of employees are compensated based on wages subject to minimum wage rules, report the relevant ratio of the entry level wage by gender at significant locations of operation to the minimum wage.</li> <li>b. When a significant proportion of other workers (excluding employees) performing the organisation's activities are compensated based on wages subject to minimum wage rules, describe the actions taken to determine whether these workers are paid above the minimum wage.</li> <li>c. Whether a local minimum wage is absent or variable at significant locations of operation, by gender. In circumstances in which different minimums can be used as a reference, report which minimum wage is being used.</li> <li>d. The definition used for 'significant locations of operation'.</li> </ul>	GBJ-PT: p. 22 IR-RR: p. 159, 172	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 does not use GINI and has instead developed a barometer for fair and responsible pay which is aligned to the internal remuneration strategies of the Group.		
202-2	a. Percentage of senior management at significant locations of operation that are hired from the local community. b. The definition used for "senior management". c. The organisation's geographical definition of "local". d. The definition used for "significant locations of operation".	GBJ-PT: p. 23 GBJ: Group Employee Information	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.		
203-1	a. Extent of development of significant infrastructure investments and services supported. b. Current or expected impacts on communities and local economies, including positive and negative impacts where relevant. c. Whether these investments and services are commercial, in-kind, or pro-bono engagements.	GBJ-PT: p. 27-28 GBJ-SD: p. 29-42 IR-SEC: p. 147, 150				
	GRI 204: PROCUREMEN	NT PRACTICES				
204-1	a. Percentage of the procurement budget used for significant locations of operation that is spent on suppliers local to that operation (such as percentage of products and services purchased locally).  b. The organisation's geographical definition of "local".  c. The definition used for "significant locations of operation".	GBJ-PT: p. 27 GBJ-ES: p. 57 IR-SEC: p. 144	Percentage of the procurement budget used for significant operations that is spent on suppliers local to David Jones and Country Road Group.	We report publicly on Woolworths SA procurement spend with enterprise development beneficiaries.		

INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION			
	GRI 205: ANTI-CORRUPTION						
205-1	a. Total number and percentage of operations assessed for risks related to corruption. b. Significant risks related to corruption identified through the risk assessment.	GBJ-ES: p. 56-60 IR: p. 33 IR-GO: p. 132, 133, 136-137, 148	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 206: ANTI-COMPETIT	IVE BEHAVIOUR					
206-1	<ul> <li>a. Number of legal actions pending or completed during the reporting period regarding anti-competitive behaviour and violations of anti-trust and monopoly legislation in which the organisation has been identified as a participant.</li> <li>b. Main outcomes of completed legal actions, including any decisions or judgements.</li> </ul>	N/A. No legal actions for anticompetitive behaviour, anti-trust, and monopoly practices					
	GRI 301: MATE	RIALS					
301-3	a. Percentage of reclaimed products and their packaging materials for each product category. b. How the data for this disclosure have been collected.	GBJ-WS: p. 77-90	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.			
	GRI 302: ENE	RGY					
302-1	a. Total fuel consumption within the organisation from non-renewable sources, in joules or multiples, and including fuel types used. b. Total fuel consumption within the organisation from renewable sources, in joules or multiples, and including fuel types used. c. In joules, watt-hours or multiples, the total: i. electricity consumption; ii. heating consumption; iii. cooling consumption. d. In joules, watt-hours or multiples, the total: i. electricity sold; ii. heating sold; iii. cooling sold; iv. steam sold. e. Total energy consumption within the organisation, in joules or multiple. f. Standards, methodologies, assumptions, and/or calculation tools used. g. Source of the conversion factors used.	GBJ-EN: p. 103-114 GBJ: Carbon Footprint Overview Also in our CDP climate response found here: www.cdp.net/en					
302-2	a. Energy consumption outside of the organisation, in joules or multiples. b. Standards, methodologies, assumptions and/or calculation tools used. c. Source of the conversion factors used.	GBJ: Carbon Footprint Overview Full reporting on energy and carbon emission data (scope 3) in our CDP dimate response found here: www.cdp.net/en					
302-3	a. Energy intensity ratio for the organisation. b. Organisation-specific metric (the denominator) chosen to calculate the ratio. c. Types of energy included in the intensity ratio, whether fuel, electricity, heating, cooling, steam or all. d. Whether the ratio uses energy consumption within the organisation, outside of it, or both.	GBJ-EN: p. 103-114 GBJ: Carbon Footprint Overview Also in our CDP climate response found here: www.cdp.net/en					

INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION	
	a. Amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives, in joules or multiples.	GBJ-EN: p. 103-114			
302-4	b. Types of energy included in the reductions; whether fuel, electricity, heating, cooling, steam or all.  c. Basis for calculating reductions in energy consumption, such as base year or baseline, including the rationale for choosing it.  d. Standards methodologies, assumptions, and/or calculation tools used.	Also in our CDP climate response found here:  www.cdp.net/en			
	GRI 303: W	ATER	1		
303-1	a. Total volume of water withdrawn, with a breakdown by the following sources: i. Surface water, including water from wetlands, rivers, lakes, and oceans; ii. Ground water; iii. Rainwater collected directly and stored by the organisation; iv. Waste water from another organisation; v. Municipal water supplies or other public or private water utilities. b. Standards, methodologies, and assumptions used.	GBJ-WR: p. 91-102 (Woolworths uses limited borehole water as well as harvested rain water)  Also in our CDP water response found here:  www.cdp.net/en			
	GRI 304: BIODI	VERSITY			
304-2	a. Nature of significant direct and indirect impacts on biodiversity with reference to one or more of the following: i. Construction or use of manufacturing plans, mines, and transport infrastructure; ii. Pollution (introduction of substances that do not naturally occur in the habitat from point and non-point sources); iii. Introduction of invasive species, pests and pathogens; v. Habitat conversion; vi. Changes in ecological processes outside the natural range of variation (such as salinity or changes in groundwater level). b. Significant direct and indirect positive and negative impacts with reference to the following: i. Species affected; ii. Extent of areas impacted; iii. Duration of impacts; iv. Reversibility or irreversibility of the impacts.	GBJ-ES: p. 53-66 GBJ-SF: p. 67-76 GBJ-WR: p. 91-102			
304-3	<ul> <li>a. Size and location of all habitat areas protected or restored, and whether the success of the restoration measure was or is approved by independent external professionals.</li> <li>b. Whether partnerships exist with third parties to protect or restore habitat areas distinct from where the organisation has overseen and implemented restoration or protection measures.</li> <li>c. Status of each area based on its condition at the close of the reporting period.</li> <li>d. Standards, methodologies, and assumptions used.</li> </ul>	GBJ-ES: p. 53-66 GBJ-SF: p. 67-76 GBJ-WR: p. 91-102			
	GRI 305: EMI	SSIONS			
305-1	a. Gross direct (Scope 1) GHG emissions in metric tons of CO <sub>2</sub> equivalent. b. Gases included in the calculation, whether CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>4</sub> , NF <sub>3</sub> or all. c. Biogenic CO <sub>2</sub> emissions in metric tons of CO <sub>2</sub> equivalent. d. Base year for the calculation, if applicable, including: i. the rationale for choosing it; ii. the emissions in the base year; iii. the context for any significant changes in emissions that triggered recalculations of base year emissions. e. Source of the emission factors and the GWP rates used, or a reference to the GWP source. f. Consolidation approach for emissions, whether equity share, financial control or operational control. g. Standards, methodologies, assumptions, and/or calculation tools used.	GBJ-EN: p. 103-114 GBJ: Carbon Footprint Overview  Also in our CDP climate response found here:  www.cdp.net/en			

	GRI 305: EMISSIONS	(Continued)	
305-2	a. Gross location-based energy indirect (Scope 2) GHG emissions in metric tons of CO <sub>2</sub> equivalent. b. If applicable, gross market-based energy indirect (Scope 2) GHG emissions in metric tons of CO <sub>2</sub> equivalent. c. If available, the gases included in the calculation; whether CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , or all. d. Base year for the calculation, if applicable, including: i. the rationale for choosing it; ii. emissions in the base year; iii. the context for any significant changes in emissions that triggered recalculations of base year emissions. e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source. f. Consolidation approach for emissions; whether equity share, financial control, or operational control. g. Standards, methodologies, assumptions, and/or calculation tools used.	GBJ-EN: p. 103-114 GBJ: Carbon Footprint Overview Also in our CDP climate response found here: www.cdp.net/en	
305-3	a Gross other indirect (Scope 3) GHG emissions in metric tons of CO <sub>2</sub> equivalent. b. If available, the gases included in the calculation, whether: CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> or all. c. Biogenic CO <sub>2</sub> emissions in metric tons of CO <sub>2</sub> equivalent. d. Other indirect (scope 3) GHG emissions categories and activities included in the calculation. e. Base year for the calculation, if applicable, including: i. the rationale for choosing it; ii. emissions in the base year; iii. the context for any significant changes in emissions that triggered recalculation of base year emissions. f. Source of the emission factors and the GWP rates used, or a reference to the GWP source. g. Standard, methodologies, assumptions, and/or calculation tools used.	GBJ-EN: p. 103-114 GBJ: Carbon Footprint Overview Also in our CDP climate response found here: www.cdp.net/en	
305-4	a. Greenhouse gas (GHG) emissions intensity. b. Organisation-specific metric (the denominator) chosen to calculate the ratio. c. Types of GHG emissions included in the intensity ratio; whether direct (Scope 1); energy indirect (Scope 2); and/or other indirect (Scope 3). d. Gases included in the calculation, whether CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , or all.	GBJ-EN: p. 103-114 GBJ: Carbon Footprint Overview  Also in our CDP climate response found here:  www.cdp.net/en	
305-5	a GHG emissions reduced as a direct result of reduction initiatives, in metric tons of CO <sub>2</sub> equivalent. b. Gases included in the calculation; whether CO <sub>2</sub> CH <sub>4</sub> , HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , or all. c. Base year or baseline, including the rationale for choosing it. d. Scope in which reductions took place; whether direct (Scope 1); energy indirect (Scope 2); and/or other indirect (Scope 3), e. Standards, methodologies, assumptions and/or calculation tools used.	GBJ-EN: p. 103-114 GBJ: Carbon Footprint Overview  Also in our CDP dimate response found here:  www.cdp.net/en	
305-6	a. Production, imports and exports of ODS in metric tons of CFC-11 equivalent. b. Substances included in the calculation. c. Source of the emission factors used. d. Standards, methodologies, assumptions, and/or calculation tools used.	GBJ-EN: p. 103-114 GBJ: Carbon Footprint Overview  Also in our CDP climate response found here:  www.cdp.net/en	
305-7	a. Significant air emissions, in kilograms or multiples, for each of the following: i. NO, ii. SO, iii. POP; iv. VOC; v. HAP; vi. PM. vii. Other standard categories of air emissions identified in relevant regulations. b. Source of emission factors used. c. Standards, methodologies, assumptions, and/or calculation tools used.	Not deemed material to our operations as we do not have any significant point source emissions.	

REFERENCE

OMISSION

REASON FOR OMISSION

INDICATOR DISCLOSURE

INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION			
	GRI 306: EFFLUENTS AND WASTE						
306-2	a. Total weight of hazardous waste, with a breakdown by the following disposal methods where applicable: i. Reuse; ii. Recycling; iii. Composting; iv. Recovery, including energy recovery; v. Incineration Imass burnl; vi. Deep well injection; vii. Landfill; viii. On-site storage; ix. Other It to be specified by the organisationl. b. Total weight of non-hazardous waste, with a breakdown by the following disposal methods where applicable: i. Reuse; ii. Recycling; iii. Composting; iv. Recovery, including energy recovery; v. Incineration Imass burnl; vi. Deep well injection; vii. Landfill; viii. On-site storage; ix. Other It to be specified by the organisationl. c. How the waste disposal method has been determined: i. Disposed of directly by the organisation, or otherwise directly confirmed; ii. Information provided by the waste disposal contractor; iii. Organisational defaults of the waste disposal contractor.	GBJ-WS: p. 77-90	No hazardous waste disposal disclosed. Weight of waste.	Waste is tracked and reported internally.			
	GRI 307: ENVIRONMENT	AL COMPLIANCE					
307-1	a. Significant fines and non-monetary sanctions for non-compliance with environmental laws and/or regulations in terms of: i. total monetary value of significant fines; ii. total number of non-monetary sanctions; iii. cases brought through dispute resolution mechanisms. b. If the organisation has not identified any non-compliance with environmental laws and/or regulations, a brief statement of that fact is sufficient.	N/A. No significant fines and total number of non- monetary sanctions for non-compliance with environmental laws and regulations					
	GRI 308: SUPPLIER ENVIRONA	MENTAL ASSESSMENT					
308-1	Percentage of new suppliers that were screened using environmental criteria.	GBJ-ES: p. 56-60 GBJ-SF: p. 67-76		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 ISMETAI, which is one of the most widely used ethical audit formats in the world.			
GRI 401: EMPLOYMENT							
401-1	Total number and rates of new employee hires and employee turnover by age group, gender and region.	GBJ-PT: p. 21 GBJ: Group Employee Information	Turnover by age and gender. Number and rates of new employee hires.	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 differin legislative prescripts.			

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INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION		
	GRI 402: LABOUR MANAGEMENT RELATIONS					
402-1	<ul> <li>a. Minimum number of weeks' notice typically provided to employees and their representatives prior to the implementation of significant operational changes that could substantially affect them.</li> <li>b. For organisations with collective bargaining agreements, report whether the notice period and provisions for consultation and negotiation are specified in collective agreements.</li> </ul>	Not publicly reported, part of standard terms of employment.				
	GRI 403: OCCUPATIONAL H	EALTH AND SAFETY				
403-2	<ul> <li>a. Types of injury, injury rate (IR), occupational disease rate (ODR), lost day rate (LDR), absentee rate (AR), and work-related fatalities, for all employees, with a breakdown by: <ol> <li>i. region;</li> <li>ii. gender.</li> </ol> </li> <li>b. Types of injury, injury rate (IR), and work-related fatalities, for all workers (excluding employees) whose work, or workplace, is controlled by the organisation, with a breakdown by: <ol> <li>i. region;</li> <li>ii. gender.</li> </ol> </li> <li>c. The system of rules applied in recording and reporting accident statistics.</li> </ul>	GBJ: Group Employee Information.	Data broken down by 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.		
	GRI 404: TRAINING AN	D EDUCATION				
404-1	Average hours of training per year per employee by gender, and by employee category.	GBJ-PT: p. 21 GBJ: Group Employee Information	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.		
	GRI 405: DIVERSITY AND EG	UAL OPPORTUNITY				
405-1	<ul> <li>a. Percentage of individuals within the organisation's governance bodies in each of the following diversity categories: <ol> <li>i. Gender;</li> <li>ii. Age group: under 30 years old, 30-50 years old, over 50 years old;</li> <li>iii. Other indicators of diversity where relevant (such as minority or vulnerable groups).</li> </ol> </li> <li>b. Percentage of employees per employee category in each of the following diversity categories: <ol> <li>i. Gender;</li> <li>ii. Age group: under 30 years old, 30-50 years old, over 50 years old;</li> <li>iii. Other indicators of diversity where relevant (such as minority or vulnerable groups).</li> </ol> </li> </ul>	IR-GO: p. 115-152 GBJ: Group Employee Information	Percentages are not disclosed for age groups.	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.		
405-2	a. Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation. b. The definition used for "significant location of operation".	IR-RR: p. 159, 172	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 does not use 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		

INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION		
	GRI 407: FREEDOM OF ASSOCIATION	AND COLLECTIVE BARGAINING				
407-1	<ul> <li>a. Operations and suppliers in which workers' rights to exercise freedom of association or collective bargaining may be violated or at significant risk either in terms of: <ol> <li>type of operation (such as manufacturing plant) and supplier;</li> <li>countries or geographic areas with operations and suppliers considered at risk.</li> </ol> </li> <li>b. Measures taken by the organisation in the reporting period intended to support rights to exercise freedom of association and collective bargaining.</li> </ul>	GBJ-PT: p. 26 GBJ-ES: p. 53-66 GBJ: Position statements, guidelines and policies IR-GO: p. 115-152	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 408: CHILD	LABOUR				
408-1	<ul> <li>a. Operations and suppliers considered to have a significant risk for incidents of: <ol> <li>i. child labour;</li> <li>ii. young workers exposed to hazardous work.</li> </ol> </li> <li>b. Operations and suppliers considered to have significant risk for incidents of child labour either in terms of: <ol> <li>i. type of operation (such as manufacturing plant) and supplier;</li> <li>ii. countries or geographic areas with operations and suppliers considered at risk.</li> </ol> </li> <li>c. Measures taken by the organisation in the reporting period to contribute to the effective abolition of child labour.</li> </ul>	GBJ-ES: p. 53-66 GBJ: Position statements, guidelines and policies IR-GO: p. 115-152	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 409: FORCED OR COM	MPULSORY LABOUR				
409-1	<ul> <li>a. Operations and suppliers considered to have a significant risk for incidents of forced or compulsory labour either in terms of: <ol> <li>i. type of operation lsuch as manufacturing plantl and supplier;</li> <li>ii. countries or geographic areas with operations and suppliers considered at risk.</li> </ol> </li> <li>b. Measures taken by the organisation in the reporting period to contribute to the elimination of all forms of forced or compulsory labour.</li> </ul>	GBJ-ES: p. 53-66 GBJ: Position statements, guidelines and policies IR-GO: p. 115-152	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 411: INDIGENO	OUS RIGHTS				
411-1	<ul> <li>a. Total number of identified incidents or violations involving the rights of indigenous peoples during the reporting period.</li> <li>b. Status of the incidents and actions taken, with reference to the following: <ol> <li>i. Incident reviewed by the organisation;</li> <li>ii. Remediation plans going forward;</li> <li>iii. Remediation plans that have been implemented, with results reviewed through routine internal management review processes;</li> <li>iv. Incidents no longer subject to action.</li> </ol> </li> </ul>	No known incidents or violations involving rights of indigenous peoples and actions taken. GBJ-PT: p. 24, 25 (David Jones Reconciliation Action Plan)				
	GRI 412: INVESTMENT					
412-1	Total number and percentage of operations that have been subject to human rights reviews or impact assessments, by country.	GBJ-ES: p. 53-66 GBJ: Position statements, guidelines and policies IR-GO: p. 115-152	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 Supplier Codes of Conduct.		

INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION			
	GRI 413: LOCAL COMMUNITIES						
413-1	a. Percentage of operations with implemented local community engagement, impact assessments, and/or development programmes, including the use of: i. social impact assessments, including gender impact assessments, based on participatory processes; ii. environmental impact assessments and ongoing monitoring; iii. public disclosure of results of environmental and social impact assessments; iv. local community development programmes based on local communities' needs; v. stakeholder engagement plans based on stakeholder mapping; vi. broad-based local community consultation committees and processes that include vulnerable groups; vii. works councils, occupational health and safety committees, and other worker representation bodies to deal with impacts; viii. formal local community grievance processes.	GBJ-PT: p. 27-28 GBJ-HW: p. 48 GBJ-SD: p. 29-42	Percentage of operations	Although almost all of our operations engage in some form of community engagement, we do not report this specifically as a percentage.			
	GRI 414: SUPPLIER SOCIA	AL ASSESSMENT					
414-1	a. Percentage of new suppliers that were screened using social criteria.	GBJ-ES: p. 53-66		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 13% of its SA supply base to SEDEX.			
	GRI 415: PUBLIC	POLICY					
415-1	<ul> <li>a. Total monetary value of financial and in-kind political contributions, made directly and indirectly by the organisation by country and by recipient/beneficiary.</li> <li>b. If applicable, how the monetary value of in-kind political contributions was estimated.</li> </ul>	N/A. No political donations were made during the 2019 financial year.					
	GRI 416: CUSTOMER HEA	LTH AND SAFETY					
416-2	<ul> <li>a. Total number of incidents of non-compliance with regulations and/or voluntary codes concerning the health and safety impacts of products and services within the reporting period by: <ol> <li>i. incidences of non-compliance with regulations resulting in a fine or penalty;</li> <li>ii. incidences of non-compliance with regulations resulting in a warning;</li> <li>iii. incidences of non-compliance with voluntary codes.</li> </ol> </li> <li>b. If the organisation has not identified any non-compliance with regulations and/or voluntary codes, a brief statement of that fact is sufficient.</li> </ul>	GBJ-HW: p.51					
	GRI 417: PRODUCT SERVICE LABELLING						
417-2	<ul> <li>a. Total number of incidents of non-compliance with regulations and/or voluntary codes concerning product and service information and labelling, by: <ol> <li>i. incidences of non-compliance with regulations resulting in a fine or penalty;</li> <li>ii. incidences of non-compliance with regulations resulting in a warning;</li> <li>iii. incidences of non-compliance with voluntary codes.</li> </ol> </li> <li>b. If the organanisation has not identified any non-compliance with regulations and/or voluntary codes, a brief statement of that fact is sufficient.</li> </ul>	N/A. No incidents of non-compliance.					

INDICATOR	DISCLOSURE	REFERENCE	OMISSION	REASON FOR OMISSION
GRI 417: PRODUCT SERVICE LABELLING (Continued)				
417-3	<ul> <li>a. Total number of incidents of non-compliance with regulations and/or voluntary codes concerning marketing communications, including advertising, sponsorship and promotion, by:</li> <li>i. incidences of non-compliance with regulations resulting in a fine or penalty;</li> <li>ii. incidences of non-compliance with regulations resulting in a warning;</li> <li>iii. incidences of non-compliance with voluntary codes.</li> <li>b. If the organisation has not identified any non-compliance with regulations and/or voluntary codes, a brief statement of that fact is sufficient.</li> </ul>	N/A. No incidents of non-compliance.		
GRI 418: CUSTOMER PRIVACY				
418-1	<ul> <li>a. Total number of substantiated complaints regarding breaches of customer privacy categorised by:</li> <li>i. complaints received from outside parties and substantiated by the organisation;</li> <li>ii. Complaints from regulatory bodies.</li> <li>b. Number of identified leaks, thefts or losses of customer data.</li> <li>c. If the organisation has not identified any substantiated complaints, a brief statement of this fact is sufficient.</li> </ul>	N/A. No substantiated complaints received.		
GRI 419: COMPLIANCE				
419-1	<ul> <li>a. Significant fines and non-monetary sanctions for non-compliance with laws and/or regulations in the social and economic area in terms of:         <ol> <li>i. total monetary value of significant fines;</li> <li>ii. total number of non-monetary sanctions;</li> <li>iii. cases brought through dispute resolution mechanisms.</li> </ol> </li> <li>b. If the organisation has not identified any non-compliance with laws and/or regulations, a brief statement of this fact is sufficient.</li> <li>c. The context against which significant fines and non-monetary sanctions were incurred.</li> </ul>	N/A. No significant fine or noncompliance.		

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We appreciate any feedback on our Good Business Journey Report. Please contact <u>GoodBusinessJourney@woolworths.co.za</u>