

Gifts and Entertainment Policy

1. Purpose

As a business we pride ourselves on the relationships we have with the organisations and people we do business with, and the difference we make together in creating better experiences for our customers. One of our core values is 'We do the right thing' and this important core value applies to every aspect of our business, including the way we interact with our suppliers and other stakeholders

We are committed to being honest and objective and acting with integrity every day. To help our team remain objective, avoid the perception of impropriety, and create a level playing field for all of our partners, our Gift and Entertainment (G&E) Policy is to not accept gifts, and only to accept entertainment in accordance with this Policy. This includes from any supplier, potential supplier, government, or any person we believe may be seeking to influence our business decisions or transactions. Examples of gifts and entertainment include things such as physical products, supplier-paid trips, tickets to sport or entertainment events, and any other personal favours.

2. Scope

This Policy applies to all team members who work for Woolworths Group in Australia, New Zealand and overseas.

3. Principles

- Modesty and reciprocity, are foundational principles of the Woolworths Gifts and Entertainment policy
- When working with partners you are acting as a representative of Woolworths. Therefore the standards of behaviour covered in the Code of Conduct and Appropriate Workplace Behaviour and other policies, apply
- We want our relationships with partners, consisting of product suppliers, service supplier agencies, partners, and consultants to be a positive point of difference for Woolworths and to be a reflection of our core values

4. Gifts

- No team member in Woolworths is permitted to accept a gift of any monetary value from a supplier or other stakeholder.
- We understand it may be difficult in some circumstances to decline a gift, however every effort should be made to do so courteously, by reference to Woolworths' policy.



- Any gift which is received, must be logged in the **G&E Register** (see section 9 below) It should ideally be returned to the gift giver, or, if this is impossible or inappropriate, should be used for charity or raffle prizes.
- Team members should not accept donations from suppliers, examples include donations paid to charities or local kids sports clubs on the team member's behalf

5. Entertainment

- Attendance at supplier paid events and other entertainment (including meals, drinks, concerts, sporting and other events) is only acceptable if it is modest; i.e does not exceed \$100 per head.
- Where the value of entertainment exceeds \$100, and team members wish to accept it, the team member should pay the value greater than \$100, and notify their Manager. In exceptional circumstances, Woolworths may pay the value greater than \$100 (with the relevant Exco member approval).
- Team members can attend supplier award dinners as long as they are approved by the relevant Exco member and travel and accommodation are paid for by Woolworths (if applicable)
- Woolworths should seek to reciprocate hospitality where possible.

6. Samples

- Samples are intended to serve a specific purpose - to allow the business to test new products and are not for personal use. Excess samples should be used for business tastings or for raffle prizes

7. Conferences and trade events

- We recognise team members attendance to some events can positively contribute to Woolworths
- Conferences and events should be relevant to the team members area of responsibility and must be approved by the relevant General Manager. All travel and accommodation must be paid for by Woolworths
- We do not accept fees or gifts to talk at events

8. Travel

- All travel and hotel accommodation must be paid for by Woolworths
- Team members must not accept accommodation upgrades to or from events or accept offers to use during personal vacation (this includes a team members extended family)

9. Logging System - G&E Register

- All gifts and gratuities received must be recorded in a centralised Google sheet doc by the PA of the relevant Manager or delegated authority holder.

10. Breach of policy

- Compliance with this policy is mandatory. Team members dealing with suppliers, product

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suppliers, service supplier agencies, partners, and consultants are to emphasise and reinforce these requirements as a condition of our continued relationship with them

- Any breach of this policy by a Team member will result in disciplinary action, may lead to their termination and may have serious consequences for the supplier company concerned

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| Policy Changes | This policy may be rescinded, changed or replaced at any time at the absolute discretion of the Chief People Officer or authorised delegate. |
| Date approved: | 13 June 2017 |
| Accountable: | Chief People Officer |
| Contact: | People Advisory via: Email: peopleadvisory@woolworths.com.au Phone: 1800 008 584 (Select option 5) |
| Related policies: | Code of Conduct Appropriate Workplace Behaviour |