

Woolworths Group Limited (Woolworths)

TICKER
WOW

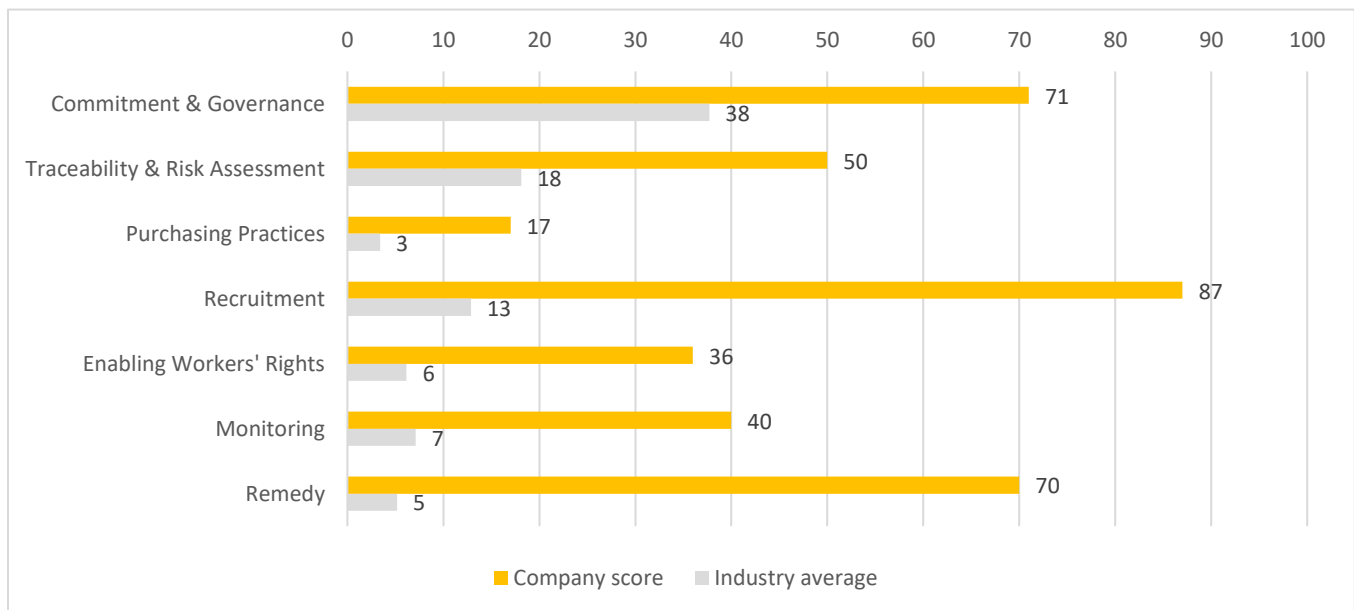
MARKET CAPITALISATION
US\$32.1 billion

HEADQUARTERS
Australia

DISCLOSURES
UK Modern Slavery Act: Not applicable

California Transparency in Supply Chains Act: Not applicable

Australia Modern Slavery Act: [Yes](#)
OVERALL RANKING
1 out of 45

 2023 Rank: [1 out of 60](#)
OVERALL SCORE
56 out of 100
THEME-LEVEL SCORES

KEY DATA POINTS
FIRST-TIER SUPPLIER LIST
 No

RISK ASSESSMENT

Yes

ENGAGED WITH KNOWTHECHAIN¹


Yes

NO-FEE POLICY

Yes (Employer Pays Principle)

REMEDY FOR SUPPLY CHAIN WORKERS

Yes

HIGH-RISK COMMODITIES²
 Beans, cattle, coffee, palm oil

SUMMARY

Woolworths Group Limited (Woolworths), Australia's biggest supermarket retailer, ranks first out of 45 companies.³ The company's score is based on its stronger performance on the themes such as Commitment and Governance, Recruitment, and Remedy. It discloses a supplier code of conduct that aligns with the ILO core labour standards, information on the labour recruiters identified, and details of ethical recruitment schemes and training that strengthen recruitment standards. Furthermore, the company discloses two examples of outcomes of its remedy related to incorrect payments and reductions, including the amount repaid to workers.

Since 2023, the company significantly improved on the theme of Purchasing Practices, disclosing responsible purchasing practices including supplier payment policy committing to shorter payment periods for small suppliers.

The company has an opportunity to improve its performance and disclosure on the themes of Traceability and Risk Assessment, and Enabling Workers' Rights.

LEADING PRACTICES

Purchasing Practices: Woolworths was the only company to link mapping recruitment corridors and costs to a change in purchasing practices: mapping of labour suppliers and recruitment agencies in both origin and destination countries (and during transit) should be undertaken expressly to inform costs calculated by the supplier. In practice, this means the final cost to the recruiter covers the full costs of recruitment. Further, Woolworths requires suppliers to monitor the practices of labour providers by reviewing workers' payslips, establishing a process for worker feedback, monitoring recruiter-provided accommodation, and reviewing how labour recruiters verify fee non-payment in origin countries.

Recruitment: Woolworths explicitly disclosed that mapping of recruitment corridors and recruitment costs incurred by labour recruiters in both origin and destination countries (and during transit) should be undertaken with the express purpose of informing the cost to the supplier of using a particular labour recruiter. In practice, this should ensure the final cost to the recruiter is sufficient to cover the full costs of recruitment. Further, Woolworths discloses it requires suppliers to monitor the practices of labour providers by reviewing workers' payslips, establishing a process for worker feedback, reviewing accommodation if provided by recruiters, and reviewing how labour recruiters are verifying that workers didn't pay fees in sending countries.

Enabling Workers' Rights: Woolworths disclosed investigating 73 grievances raised by supply chain workers in FY2024 (a 59% increase since 2023), including 30 alleged breaches of its Responsible Sourcing Policy or Standards. The company disaggregates data by business unit categories receiving grievances – including 45% in horticulture – and whether grievances were open/closed. Topics included underpayments, bullying and harassment, poor working conditions, physical abuse, deceptive recruitment and child labour. These last two included potential incidents of modern slavery. Disclosed remediation included “repayment of money withheld or underpaid; clearly communicating to our suppliers, and their subcontractors, our expectations under our RS Standards; and, with complainants' consent, referral of some matters for further investigation by Woolworths' direct supplier.” Regarding horticulture specifically, Woolworths disclosed an increase compared to the previous year and states this might relate to operational pressures on suppliers, the high-risk nature of the horticultural sector, or increased engagement and outreach to workers through the distribution of Speak Up posters and participation in biannual worker forums.

OPPORTUNITIES FOR IMPROVEMENT

Traceability and Risk Assessment: The company is encouraged to demonstrate a strong understanding of its supply chains by disclosing the names and addresses of its first-tier suppliers (either across high-risk raw materials or across all first-tier suppliers) and the names and locations of below-first-tier suppliers. The company is further encouraged to disclose additional data on its supply chain workforce, such as the percentage of women and migrant workers and the percentage of workers being paid a living wage.

Purchasing Practices: While the company discloses trialling a tool to better identify and inform costing considerations, including wage inputs, enabling the cost of labour to be factored into the proposed cost of goods, it is unclear how this works in practice. As such the company is encouraged to disclose improvements in planning and forecasting and prompt payment, and quantitative data evidencing the implementation of responsible purchasing practices. The company should consider integrating [responsible buying practices in its contracts](#) with suppliers, to ensure that the responsibility for respecting human rights is shared.

Enabling Workers' Rights: The company is encouraged to disclose additional examples, covering different supply chain contexts, of how it improved freedom of association and/or collective bargaining for its suppliers' workers. The company is also encouraged to disclose the percentage of suppliers' workers covered by collective bargaining agreements. To guarantee protections for supply chain workers on freedom of association and collective bargaining, the company may consider entering into a global framework agreement or enforceable supply chain labour rights agreements with trade unions or worker organisations.

¹ Research conducted through April - September 2025, where companies provided additional disclosure or links. For more information, see the full dataset [here](#). For information on a company's positive and negative human rights impact, see the Business and Human Rights Centre [website](#).

² For further details on high-risk raw materials and sourcing countries, see KnowTheChain's 2026 food and beverage benchmark [findings report](#).

³ The number of companies assessed in the ranking has decreased from 60 in 2022 to 45 in 2026.