

NOTICE OF FILING**Details of Filing**

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File Number: VID974/2024
File Title: AUSTRALIAN COMPETITION AND CONSUMER COMMISSION v
WOOLWORTHS GROUP LIMITED (ACN 000 014 675)
Registry: VICTORIA REGISTRY - FEDERAL COURT OF AUSTRALIA

Registrar

Important Information

This Notice has been inserted as the first page of the document which has been accepted for electronic filing. It is now taken to be part of that document for the purposes of the proceeding in the Court and contains important information for all parties to that proceeding. It must be included in the document served on each of those parties.

The date of the filing of the document is determined pursuant to the Court's Rules.

Form 59
Rule 29.02(1)

Affidavit

No VID974 of 2024

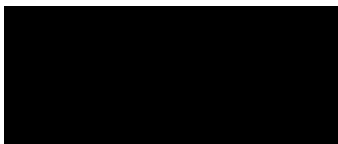
Federal Court of Australia
District Registry: Victoria
Division: General

Australian Competition and Consumer Commission
Applicant

Woolworths Group Limited (ACN 000 014 675)
Respondent

Affidavit of: **Laura Crawford**
Address: 21 Brandl Street, Eight Mile Plains, QLD 4113
Occupation: Manager of HR Advisory Services, Woolworths Group Limited
Date: 19 November 2025

Signed:



Taken by:



Filed on behalf of Woolworths Group Limited, the Respondent

Prepared by Peta Stevenson
Law firm **KING & WOOD MALLESONS**
Tel +61 2 9296 2492
Email peta.stevenson@au.kwm.com

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I, LAURA CRAWFORD, of 21 Brandl Street, Eight Mile Plains, QLD 4113, of Woolworths Group Limited (**Woolworths**), affirm:

- 1 I am the Manager of HR Advisory Services at Woolworths, the Respondent in this Proceeding.
- 2 Unless otherwise stated, this affidavit is based on my own knowledge.
- 3 Shown to me at the time of swearing this affidavit is an electronic bundle of documents marked '**Confidential Exhibit LC-1**'. The documents are sourced from Woolworths' books and records. The bundle is paginated and references to page numbers in this affidavit are to page numbers in 'Confidential Exhibit LC-1'.

Experience and qualifications

- 4 In September 2015, I commenced working at Woolworths as an external contractor and held the role of People Advisor. In December 2015, I became a full-time employee of Woolworths.
- 5 I have held the position of Manager of HR Advisory Services at Woolworths since February 2025.
- 6 Prior to joining Woolworths in 2015, I completed a Bachelor of Aviation from Griffith University.

My role as Manager of HR Advisory Services and employee searches conducted

- 7 In my role as Manager of HR Advisory Services, I have access to:
 - (a) Woolworths' SAP payroll system. The system records all personal, employment and payroll information of Woolworths employees. Employee details are identified by

Signed:



Taken by:



searching by payroll number and using a helpdesk function to generate a certificate of service which, once generated, can then be saved locally by the user. For a former employee, the certificate of service shows each employee's start and end date of employment and their position title at the time their employment ceased (but not earlier position titles);

- (b) Woolworths' employee record management system known as SuccessFactors. The system records details of Woolworths current and former employees, including their position titles while at Woolworths (including the start date for each role) and the start date and, where applicable, end date of the employee's employment with Woolworths. These details can be accessed through the SuccessFactors system by searching for current and former employees by name and identifying the employee by their payroll number. Once the individual is identified in the system, the user can navigate to the 'position history' page within SuccessFactors and review the employee's current information and history of changes on their profile including their start date at Woolworths (and start date for each role held), job titles held and the date they ceased their employment at Woolworths (if relevant).

8 In preparing this affidavit, I accessed and reviewed Woolworths' SAP payroll system and the employment records in SuccessFactors of the following individuals:

- (a) Richard Lowe;
(b) Thomas Rojas;
(c) Nathan Murphy;
(d) Matthew Rolfe; and
(e) Zoe Pipan.

Richard Lowe

9 A copy of the certificate of service for Richard Lowe is at page 1 of Confidential Exhibit LC-1. The certificate of service records that Richard Lowe was employed full-time at Woolworths between 13 July 2015 and 26 July 2024.

10 My review of SuccessFactors showed that Mr Lowe held the role of Senior Commercial Pricing Manager from 4 February 2020 until 14 November 2021 and then held the role of Senior Pricing Manager - Everyday Value from 15 November 2021, a role which he

Signed:



Taken by:



continued to hold throughout the Relevant Period (being 2 September 2021 to 4 May 2023). A copy of the position history report for Richard Lowe is at pages 2-3 of Confidential Exhibit LC-1.

- 11 Based on my review of the certificate of service, Mr Lowe ceased to be an employee of Woolworths on 26 July 2024 and has not been an employee of Woolworths since that time.

Thomas Rojas

- 12 A copy of the certificate of service for Thomas Rojas is at page 4 of Confidential Exhibit LC-1. The certificate of service records that Mr Rojas was employed full-time at Woolworths between 13 March 2017 and 31 December 2024.
- 13 My review of SuccessFactors showed that Mr Rojas held the role of Category Manager in the period between 13 September 2021 to 28 April 2022. A copy of the position history report for Thomas Rojas is at page 5 of Confidential Exhibit LC-1.
- 14 Based on my review of the certificate of service, Mr Rojas ceased to be an employee of Woolworths on 31 December 2024 and has not been an employee of Woolworths since that time.

Nathan Murphy

- 15 A copy of the certificate of service for Nathan Murphy is at page 6 of Confidential Exhibit LC-1. The certificate of service records that Mr Murphy was employed at Woolworths between 31 August 2020 to 18 April 2022.
- 16 My review of SuccessFactors showed that Mr Murphy held the role of Strategic Sourcing Manager in the period between 13 September 2021 to 18 April 2022. A copy of the position history report for Nathan Murphy is at page 7 of Confidential Exhibit LC-1.
- 17 Based on my review of the certificate of service, Mr Murphy ceased to be an employee of Woolworths on 18 April 2022 and has not been an employee of Woolworths since that time.

Matthew Rolfe

- 18 A copy of the certificate of service for Matthew Rolfe is at page 8 of Confidential Exhibit LC-1. The certificate of service records that Mr Rolfe was employed full-time at Woolworths between 26 October 2020 to 7 October 2022.

Signed: 

Taken by: 

- 19 My review of SuccessFactors showed that Mr Rolfe held the role of Buyer in the period between 13 September 2021 to 28 April 2022. A copy of the position history report for Matthew Rolfe is at page 9 of Confidential Exhibit LC-1.
- 20 Based on my review of the certificate of service, Mr Rolfe ceased to be an employee of Woolworths on 7 October 2022 and has not been an employee of Woolworths since that time.

Zoe Pipan

- 21 A copy of the certificate of service for Zoe Pipan is at page 10 of Confidential Exhibit LC-1. The certificate of service records that Ms Pipan was employed full-time at Woolworths between 1 August 2011 to 18 May 2023.
- 22 My review of SuccessFactors showed that Ms Pipan held the role of Category Manager - Biscuits in the period between 1 January 2022 to 18 May 2023. A copy of the position history report for Zoe Pipan is at pages 11-12 of Confidential Exhibit LC-1.
- 23 Based on my review of the certificate of service, Ms Pipan ceased to be an employee of Woolworths on 18 May 2023 and has not been an employee of Woolworths since that time.

Signed:



Taken by:



AFFIRMED by the deponent
at Brisbane
in Queensland
on **19 NOVEMBER 2025**

)
)
)
)
)
) Signature of deponent

Before me:

.....
[Redacted Signature]
.....
Signature of witness

SOPHIE CHRISTINE CROWE
.....
Name of authorised witness (block letters)

1 EAGLE ST, BRISBANE QLD 4000
.....
Address of authorised witness

AUSTRALIAN LEGAL PRACTITIONER
.....
Capacity (eg Justice of the Peace)

No VID 974 of 2024

Federal Court of Australia

District Registry: Victoria

Division: General

Australian Competition and Consumer Commission

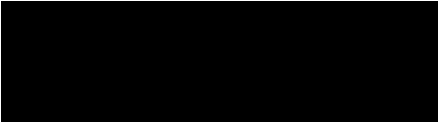
Applicant

Woolworths Group Limited (ACN 000 014 675)

Respondent

Certificate identifying Confidential Exhibit LC-1

This is **Confidential Exhibit LC-1** to the affidavit of **Laura Crawford** affirmed at 21 Brandl Street, Eight Mile Plains, QLD on 19 November 2025 before me:

.....


Signature of witness
Sophie Christine Crowe, Australian Legal Practitioner

Filed on behalf of Woolworths Group Limited, the Respondent

Prepared by Peta Stevenson
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Form approved 01/08/2011