

NOTICE OF FILING

Details of Filing

Document Lodged: Affidavit - Form 59 - Rule 29.02(1)
Court of Filing: FEDERAL COURT OF AUSTRALIA (FCA)
Date of Lodgment: 20/04/2026 1:51:20 PM AEST
Date Accepted for Filing: 20/04/2026 1:51:30 PM AEST
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



Sia Lagos

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 VID974/2024

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: **Peta Carter Stevenson**

Address: Level 61, Governor Phillip Tower, 1 Farrer Place, Sydney NSW 2000

Occupation: Solicitor

Date: 20 April 2026

Contents

Document number	Details	Paragraph of affidavit	Page
1	Affidavit of Peta Carter Stevenson in support of application for interlocutory application affirmed on 20 April 2026		
2	Annexure PCS-1	[10]	4

Signed:

Taken by:



Filed on behalf of Woolworths Group Limited (ACN 000 014 675), the Respondent

Prepared by Peta Stevenson
Law firm **MALLESONS**
Tel +61 2 9296 2492
Email peta.stevenson@malleasons.com

Fax

Address for service

Level 61, Governor Phillip Tower
1 Farrer Place, Sydney NSW 2000
Ref: P Stevenson:602-0100435

3	Annexure PCS-2	[23]	11
4	Confidential Exhibit PCS-1	[4]	3

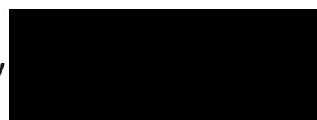
I, PETA CARTER STEVENSON, of Level 61, Governor Phillip Tower, 1 Farrer Place, Sydney NSW 2000, affirm:

- 1 I am a Partner of Mallesons (**Mallesons**), the solicitors for the Respondent, Woolworths Group Limited (**Woolworths**).
- 2 I am authorised to make this affidavit on behalf of Woolworths in support of the interlocutory application to be filed by Woolworths on 20 April 2026 for leave to adduce evidence to contradict or qualify certain facts agreed in Annexures B and C to the statement of agreed facts filed on 13 June 2025 (**SOAF**) (CB Tab 11) in respect of the:
 - (a) Arnott's Biscuits Fmly Assorted 500g (36016-EA), referred to at item 8 of Annexures B and C (**Arnott's Biscuits 500g**);
 - (b) Arnott's Variety Packs 375g price family (**Arnott's Variety Packs Price Family**), which is agreed in row 4 of Annexure D to consist of:
 - (i) Arnott's Shapes Variety 15pk 375g (641532-EA), referred to at item 9 of Annexures B and C (**Arnott's Shapes 15pk**); and
 - (ii) Arnott's Tiny Teddy Variety 15pk 375g (641532-EA), referred to at item 11 of Annexures B and C and item 2 of the Agreed Sample List (dated 13 June 2025) (**Arnott's Tiny Teddy Sample Product**); and
 - (c) Stayfree Ultra Thin Pads 10/12/14/16pk price family (**Stayfree Ultra Thin Pads Price Family**), which is agreed in row 101 of Annexure D to consist of:
 - (i) Stayfree Pad Ultra Thin Wng Night 10pk (44861-EA), referred to at item 233 of Annexures B and C and item 12 of the Agreed Sample List (**Stayfree Sample Product**);
 - (ii) Stayfree Pads Ultr Thin Wing Sup 12pk (58657-EA), referred to at item 234 of Annexures B and C;
 - (iii) Stayfree Pads Ultra Thin Wing Light 16pk (233495-EA), referred to at item 235 of Annexures B and C; and
 - (iv) Stayfree Ultra Thn Wing Regular 14pk (370631-EA), referred to at item 238 of Annexures B and C.

Signed:



Taken by



- 3 Unless otherwise stated, this affidavit is based on my own knowledge and from examination of certain records of, or otherwise in the possession of, Woolworths.
- 4 Shown to me at the time of affirming this affidavit is an electronic bundle of documents marked '**Confidential Exhibit PCS-1**'.

Statement of Agreed Facts filed on 13 June 2025

- 5 On 13 June 2025, the parties filed the SOAF, which included:
- (a) Annexure B, which comprises an Agreed Affected Products Schedule recording pricing data over the Relevant Period for each of the Affected Products; and
 - (b) Annexure C, which comprises (consistently with its title) Affected Product Pricing and Sales Data.
- 6 In agreeing Annexures B and C of the SOAF, Woolworths relied upon pricing and promotional data that it had produced in response to notices issued by the ACCC pursuant to ss 155(1)(a) and (b) of the *Competition and Consumer Act 2010* (Cth).
- 7 When producing data referred to in paragraph 6 above, Woolworths provided the ACCC with an explanatory letter (at [1050794.002.001.0007] (CB Tab 41) of Confidential Exhibit PCS-1) in which it advised that:
- (a) the data produced by Woolworths had been compiled from at least five separate datasets as Woolworths did not hold a single dataset containing all of the data sought under the relevant ACCC notices;
 - (b) whereas retail pricing data produced by Woolworths had been sourced from daily datasets, the promotional data had been sourced from a weekly dataset as:
 - ...(a) *Woolworths' promotional calendars are generally set on a Wednesday to Tuesday weekly basis and promotions are unlikely to be removed, introduced or otherwise altered in the middle of a week, and (b) weekly data is more commonly used, reviewed and validated by Woolworths' teams than the daily promotional data set, therefore likely to be more accurate...*
 - (c) due to the combination of daily retail pricing data and weekly promotional data, the data "*may not always precisely match the weekly data, however Woolworths [believed] this [was] likely to be limited to specific circumstances*".

Signed:



Taken by:



- 8 The above explanation is consistent with the note that appears at the outset of Annexures B and C of the SOAF, which states:

The parties note that the information contained in Annexures B and C has been drawn from separate data sources which store historical pricing and promotional data in different formats (including sources which record data on a weekly, instead of daily, basis). Due to the different formats in which these sources stored the underlying data, and as these systems are reliant on manual inputs, the parties expect that there will be some inconsistencies between the dates and prices set out in Annexures B and C, and the actual dates on which each of the particularised prices were displayed to consumers in Woolworths Supermarkets and on Woolworths Online. However, with a view to efficiently minimising the issues in dispute, the parties have agreed, for the purposes of this Proceeding only, that the information contained in Annexures B and C represents the prices and any pricing programs which took place during each the Price 1, Price 2 and Price 3 periods alleged by the ACCC in respect of each of the 276 Particularised Instances.

- 9 After agreeing to Annexures B and C, and in the course of preparing its evidence, Woolworths located evidence which contradicts some of the data in the SOAF relating to some Arnott's products and some Stayfree products. The evidence is described in detail below with respect to each of the relevant Affected Products.

ARNOTT'S PRODUCTS

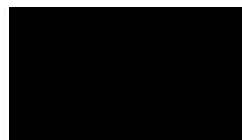
Facts recorded in the SOAF

- 10 Rows 8, 9 and 11 of Annexures B and C record price, promotion and sales data for the Arnott's Biscuits 500g and Arnott's Variety Packs Price Family. Extracts of the relevant facts agreed in those rows of Annexures B and C in respect of these products are annexed and marked "**Annexure PCS-1**".
- 11 For the purposes of this affidavit, the relevant agreed facts for the Arnott's Biscuits 500g and Arnott's Variety Packs Price Family are as follows:
- (a) between 11 May 2022 and 17 May 2022, each product was sold on a yellow Specials ticket at a Special price of \$4.00 (for Arnott's Biscuits 500g) and of \$5.00 (for Arnott's Variety Packs Price Family).
 - (b) the P2 Period commenced on 18 May 2022.
- 12 In the course of preparing its evidence, Woolworths located evidence that contradicts those parts of Annexures B and C.

Signed:



Taken by:



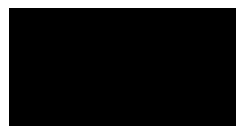
Further evidence relating to the Arnott's products

- 13 The evidence that Woolworths seeks leave to adduce relating to the Arnott's products comprises:
- (a) a Google Chat exchange dated Thursday, 12 May 2022 between Zoe Pivan (Category Manager – Biscuits) and Michelle Nevoa (Assistant Category Manager – Biscuits). A copy of this Google Chat is at [MPL.0095.0001.0009] (CB Tab 269) of Confidential Exhibit PCS-1.
 - (b) three images which were exchanged between Ms Pivan and Ms Nevoa in the 12 May 2022 Google Chat referred to in sub-paragraph (a) above, but which could only be extracted as separate documents, being:
 - (i) an image of the Specials ticket for Arnott's Biscuits 500g displayed on Woolworths Online which appears at 6:56 in the Google chat. A copy of this image is at [MPL.0080.0001.2613_N] (CB Tab 270) of Confidential Exhibit PCS-1;
 - (ii) an image of the Specials ticket for Arnott's Shapes 15pk displayed on Woolworths Online, which appears at 6:58am in the Google chat. A copy of this image is at [MPL.0080.0001.2614_N] (CB Tab 271) of Confidential Exhibit PCS-1; and
 - (iii) an image of Woolworths' internal pricing portal for the "Arnott's Variety Snack Packs 240-375g 12-15pk" products, which appears at 7.03am in the Google chat. A copy of this image is at [MPL.0080.0001.2615_N] (CB Tab 272) of Confidential Exhibit PCS-1). Other evidence establishes that this family of products includes the Arnott's Variety Packs Price Family (for example, the Affidavit of Cormac Deery sworn 21 December 2025, at [26], [52]).
 - (c) A request ticket raised with Woolworths' Business Support Services (**BSS**). A copy of this ticket is at [MPL.0081.0001.0024] (CB Tab 279) of Confidential Exhibit PCS-1.
 - (d) A further Google Chat exchange dated 13 May 2022 between Ms Pivan and Ms Nevoa, a copy of which is at [MPL.0127.0001.0001] (SCB Tab 757) of Confidential Exhibit PCS-1.
 - (e) Paragraphs 52 – 53 of the affidavit of Cormac Deery sworn 15 December 2025 (**Deery Affidavit**) (CB Tab 21).

Signed:




Taken by:



(f) The documents Mr Deery refers to in those paragraphs, being an email which he received [MPL.0002.0027.5080] (CB Tab 280) and the attached Pricing Dashboard [MPL.0094.0001.0006] (CB Tab 281) of Confidential Exhibit PCS-1.


14 After reinsertion of the images referred in paragraph 13, the relevant parts of the 12 May 2022 Google Chat provide as follows:

 @woolworths.com.au 12/5/2022, 6:56 AM
Ummmm this was on Dropped, how is it on Promo?

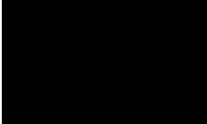
 @woolworths.com.au 12/5/2022, 6:56 AM



 @woolworths.com.au 12/5/2022, 6:58 AM
Same issue with 12/15pks

 @woolworths.com.au 12/5/2022, 6:58 AM
wtf??

Signed: 

Taken by: 



██████████ @woolworths.com.au
HOW

12/5/2022 6:58 AM

██████████ @woolworths.com.au
wtf?

12/5/2022 6:58 AM

██████████ @woolworths.com.au
Please raise with the online team URGENTLY

12/5/2022 6:58 AM

██████████ @woolworths.com.au
It's totally misleading

12/5/2022 6:58 AM

██████████ @woolworths.com.au
onto it

12/5/2022 6:58 AM

██████████ @woolworths.com.au
Need to find out how it happened too

12/5/2022 6:59 AM

...

██████████ @woolworths.com.au
Can you check Portal on Family Assorted & 12/15pks

12/5/2022 7:00 AM

...

██████████ @woolworths.com.au
I'm speculating the website is picking up 'offers' I have loaded with tactics

12/5/2022 7:03 AM

██████████ @woolworths.com.au

12/5/2022 7:03 AM

Signed: 

Taken by: 

Item	Location	Price	Start Date	End Date	Duration (days)	Buy From (Wk)	Buy To (Wk)	Duration (Wk)
	National	5.00	Wed 20-04-2022	Tue 17-05-2022	28	Sat 19-02-2022	Tue 17-05-2022	88
	N1	5.00						
	O1	5.00						
	OG	5.00						
	S1	5.00						
	SS	5.00						
	SE	5.00						
	T1	5.00						
	V1	5.00						
	W1	5.00						
	W3	5.00						

██████████ @woolworths.com.au
 the standard sell price hasnt updated in portal

12/5/2022 7:03 AM

██████████ @woolworths.com.au
 fuck

12/5/2022 7:03 AM

██████████ @woolworths.com.au
 We need to get that updated ASAP.

12/5/2022 7:04 AM

██████████ @woolworths.com.au
 next week is fine

12/5/2022 7:04 AM

██████████ @woolworths.com.au
 its just these weeks offers

12/5/2022 7:04 AM

██████████ @woolworths.com.au
 the website must have scraped them before the price changes

12/5/2022 7:04 AM

██████████ @woolworths.com.au
 This week is more important

12/5/2022 7:04 AM

██████████ @woolworths.com.au
 I would say so.

12/5/2022 7:04 AM

██████████ @woolworths.com.au
 Im getting it fixed

12/5/2022 7:05 AM

Signed:

Taken by: ██████████

██████████@woolworths.com.au
thanks, keep me updated

12/5/2022, 7:05 AM

██████████@woolworths.com.au
I'll flick a note to Sophie so they don't notice and come asking.

12/5/2022, 7:05 AM

15 At 7:07am on 12 May 2022, Ms Nevoa raised the ticket request with the Woolworths BSS team referred to at paragraph 13(c) above ([MPL.0081.0001.0024] (CB Tab 279)). The ticket states "Can I please request the below offers be end-dated ASAP. The offers are still picking up "old" sell prices – 12751092 12751159 12788331 12710109." The "date required" field records "13 May 2022". The "stage" and "state" fields record that the request was "completed" and "closed complete" respectively. Different evidence in the Court Book establishes that offer numbers referred to in the ticket relate to the relevant Arnott's products).

16 The Google Chat on 12 May 2022 continues:

██████████@woolworths.com.au
Has anyone come back to you on multipaks?

12/5/2022, 10:45 AM

██████████@woolworths.com.au
the value pack?

12/5/2022, 10:46 AM

██████████@woolworths.com.au
the offer is being end dated today

12/5/2022, 10:46 AM

██████████@woolworths.com.au
shit

12/5/2022, 10:46 AM

██████████@woolworths.com.au
So 24hrs

12/5/2022, 10:46 AM

██████████@woolworths.com.au
Won't update until tomorrow

12/5/2022, 10:46 AM

██████████@woolworths.com.au
still waiting for online to come back with removing it from online

12/5/2022, 10:47 AM

Signed: 

Taken by: 

[REDACTED]@woolworths.com.au 12/5/2022, 10:49 AM
 Can we chat steph or susan?
 [REDACTED]@woolworths.com.au 12/5/2022, 11:03 AM
 Susan usually defers to the content team
 [REDACTED]@woolworths.com.au 12/5/2022, 11:03 AM
 but ill ask
 [REDACTED]@woolworths.com.au 12/5/2022, 11:03 AM
 Ask and me know
 [REDACTED]@woolworths.com.au 12/5/2022, 11:04 AM
 I'll chase her if I need to

- 17 At 8:03AM on Friday, 13 May 2022, Ms Pipan sent Ms Nevoa another Google Chat message which stated “*thanks for fixing the multis & family assorted*” ([MPL.0127.0001.0001] (SCB Tab 757) of Confidential Exhibit PCS-1). There is no further discussion of the ticketing issue in the 13 May 2022 Google Chat.
- 18 Mr Deery’s evidence at [52] is that on 13 May 2022, he received a Pricing Dashboard (a copy of the email is at [MPL.0002.0027.5080] (CB Tab 280) and a copy of the attachment is at [MPL.0094.0001.0006] (CB Tab 281) of Confidential Exhibit PCS-1) which recorded that “[*t*]he most notable increase this week was across the Arnotts range with both WW and Coles moving up in price following a cost increase”, and that the price of “ArntsVartySnckPacks 12 15 Pk 240 375g” (which included the Tiny Teddys Sample Product) had moved from a Prices Dropped Price of \$5.00 in the prior week to a Shelf Price of \$6.50. Mr Deery states at [53] that he believes this was the price change that followed approval of Arnott’s CPI request including for the Tiny Teddys Sample Product.
- 19 Having regard to that evidence, Woolworths wishes now to submit that, contrary to rows 8, 9 and 11 of Annexures B and C, Arnott’s Biscuits 500g and Arnott’s Variety Packs Price Family (including the Tiny Teddy Sample Product):
- (a) were sold on a yellow Specials ticket between 11 May 2022 and 12 May 2022 at a Special price of \$4.00 (for Arnott’s Biscuits 500g) and of \$5.00 (for Arnott’s Variety Packs Price Family), but not after 12 May 2022; and
 - (b) the P2 Period commenced on 13 May 2022, when the ticketing issue was fixed, rather than 18 May 2022.
- 20 The data produced by Woolworths during the investigation indicated that each product was sold at a promotional price of \$5.00 from Wednesday, 11 May 2022 to Tuesday, 17 May 2022.

Signed:



Taken by:



- 21 Due to the data limitations of the weekly promotional dataset set out in paragraph 7(b) above, the removal of the yellow Specials ticket that the evidence points to having occurred on Friday, 13 May 2022, would not have been captured in the data until the start of the next promotional week on Wednesday, 18 May 2022.
- 22 Woolworths will submit that the effect of the contradictory evidence is to increase the period of time at which the relevant Arnott's products were made available to consumers at the Price 2 price from 15 days to 20 days, and to increase the number of units sold of the Tiny Teddy Sample Product at the Price 2 price from 44,7022 to 66,534 units.

STAYFREE PRODUCTS

Facts recorded in the SOAF

- 23 Rows 233 to 235 and 238 of Annexures B and C record price, promotion and sales data for the Stayfree Ultra Thin Pads Price Family. Extracts of the relevant facts agreed in those rows of Annexures B and C are annexed and marked "**Annexure PCS-2**".
- 24 In respect of Woolworths' Interlocutory Application, the relevant agreed facts for the Stayfree Ultra Thin Pads Price Family are as follows:
- (a) the P2 Period occurred from 16 March 2022 to 3 April 2022 (being 19 days);
 - (b) during that P2 Period, each product was placed on a white ticket with a price of \$5.30 from 16 March 2022 to 3 April 2022;
 - (c) each product was placed on a white ticket with a price of \$4.80 from 4 April 2022 to 3 May 2022; and
 - (d) each product placed on a Prices Dropped ticket with a price of \$4.80 from 4 May 2022 to 30 August 2022.
- 25 In the course of preparing its evidence, Woolworths has located evidence that it submits contradicts those parts of Annexures B and C. Specifically, Woolworths wishes to submit that the Prices Dropped Ticket was applied from 29 April 2022, rather than 4 May 2022.

Further evidence relating to the Stayfree products

- 26 The evidence that Woolworths seeks leave to tender relating to the Stayfree products comprises:
- (a) paragraphs 17(d) and 63 of the Affidavit of Timothy Charles Moffatt affirmed on 21 November 2025 (CB Tab 25) (**Moffatt Affidavit**).

Signed:



Taken by:



- (b) an email dated 29 April 2022 from Jade Caton at Johnson & Johnson Pacific Pty Ltd (**J&J**) providing screen shots of the Prices Dropped Tickets displayed on the Stayfree Ultra Thin Pads Price Family products on Woolworths Online showing a price of \$4.80, referred to in the Moffatt Affidavit at paragraph 63. A copy of the email with this image is at **[MPL.0050.0007.4677]** (CB Tab 740) of Confidential Exhibit PCS-1.

27 Woolworths will submit the effect of that evidence, in its context, is as follows:

- (a) On 1 April 2022, Mr Moffatt was copied into an email from his Assistant Category Manager, Nathan Connor, to J&J, which confirmed that the Stayfree Ultra Thin Pads Price Family would be placed on the Prices Dropped Program at \$4.80 on 4 April 2022 (Moffatt Affidavit, [50] (CB Tab 25) and **[MPL.0002.0003.3193]** (CB Tab 737) of Confidential Exhibit PCS-1).
- (b) On 4 April 2022, the retail price of the Stayfree Sample Product was reduced to \$4.80 on a white ticket: Annexure C, row 233 (CB Tab 11).
- (c) Later on 4 April 2022, Mr Moffatt received an email from J&J identifying that the Woolworths Online product listings for the Stayfree Ultra Thin Pads Price Family products did not have a Prices Dropped Ticket applied "*as they [were] supposed to*" (Moffatt Affidavit, [54] (CB Tab 25) and **[MPL.0002.0003.3179]** (CB Tab 734) of Confidential Exhibit PCS-1).
- (d) Mr Moffatt instructed Nathan Connor (Assistant Category Manager) to investigate what had occurred (Moffatt Affidavit, [55] to [60] (CB Tab 25));
- (e) From reviewing the results of that investigation and his experience with using Woolworths' internal pricing system (referred to in his affidavit as the 'SAP System'), Mr Moffatt understands that an instruction to move the Stayfree Sample Product to a Prices Dropped Ticket had been correctly implemented in the SAP System, but a mistake in that system resulted in the ticket not being applied despite the price reduction to \$4.80 taking place as intended (Moffatt Affidavit, [61] (CB Tab 25));
- (f) On 28 April 2022, Mr Moffatt emailed J&J requesting confirmation that the Prices Dropped Tickets had been correctly applied to the Stayfree Sample Product in Woolworths Supermarket Stores and Woolworths Online (Moffatt Affidavit, [62] (CB Tab 25) and **[MPL.0050.0007.2751]** (CB Tab 739) of Confidential Exhibit PCS-1);

Signed:



Taken by:



- (g) On 29 April 2022, J&J responded to that email and provided an image of the Prices Dropped Tickets displayed on the Stayfree Ultra Thin Pads Price Family products on Woolworths Online (Moffatt Affidavit, [63]) (CB Tab 25). A copy of the email with this image is at [MPL.0050.0007.4677] (CB Tab 740) of Confidential Exhibit PCS-1.
- (h) Based on the 29 April 2022 email from J&J, Mr Moffatt believes that a Prices Dropped Ticket was correctly applied to the Stayfree Sample Product on Woolworths Online from at least 29 April 2022 (Moffatt Affidavit, [63]) (CB Tab 25).

- 28 Paragraph 10 of the SOAF states that Woolworths pricing was generally aligned between Woolworths Supermarkets and Woolworths Online. This is consistent with Woolworths's response to a voluntary information request issued by the ACCC on 20 June 2022, a copy of which is at [1050794.001.001.0023] (CB Tab 34) of Confidential Exhibit PCS-1.
- 29 Woolworths will submit that the effect of the Stayfree evidence reduces the period during which a white ticket was incorrectly displayed by 5 days, and leads to consequential changes to the P3 Period, and to the number of units sold during the P3 Period.
- 30 The correction of the ticketing issue that impacted the Stayfree Pads Ultra Thins Price Family, and the application of the Prices Dropped Tickets, occurred in the middle of the promotional week and as such was not captured in the data that formed the basis of Annexures B and C.

Relevant correspondence with the ACCC

- 31 On 24 February 2026, Mallesons wrote to the solicitors for the Applicant, Johnson Winter & Slattery (**JWS**) in respect of further evidence filed by Woolworths between 21 November 2025 and 15 December 2025 which Woolworths considered necessitated corrections to the SOAF for precision and accuracy. A copy of this letter is at [MPL.0129.0001.0001] of Confidential Exhibit PCS-1.
- 32 On 2 March 2026, JWS wrote to Mallesons with the ACCC's initial response to Mallesons' 24 February 2026 letter. JWS advised that the ACCC was still considering the proposed amendments to the SOAF and requested an extension to the timetabling orders for the filing of its evidence in reply, and its outline of opening submissions, on the basis that the proposed amendments may require the ACCC to prepare and file further evidence. A copy of this letter is at [MPL.0129.0001.0002] of Confidential Exhibit PCS-1.

Signed:



Taken by:



- 33 On 3 March 2026, JWS sent an email to Mallesons identifying further aspects of Woolworths' evidence in respect of the Sakata Sample Product that the ACCC considered to be potentially inconsistent with the SOAF. In that email, JWS requested that Woolworths confirm how it planned to deal with the Sakata Sample Product items, and whether any other aspect of its evidence was inconsistent with facts agreed in the SOAF. A copy of this email is at [MPL.0129.0001.0004] of Confidential Exhibit PCS-1.
- 34 On 20 March 2026, Mallesons responded to JWS' 3 March 2026 email confirming that Woolworths' position was that the evidence raised with respect to the Sakata Sample Product was not inconsistent with facts agreed in the SOAF and that it was not aware of any inconsistencies with facts agreed in the SOAF other than those identified in Mallesons' 24 February 2026 letter. A copy of this email is at [MPL.0129.0001.0005] of Confidential Exhibit PCS-1.
- 35 On 2 April 2026, Mallesons sent a further email to JWS at 9:57AM seeking a response to its 24 February 2026 letter and requesting that JWS confirm the ACCC's position by 8 April 2026 to enable the parties to resolve the ACCC's objections to Woolworths' evidence and enable Woolworths to prepare its written opening submissions. A copy of this email is at [MPL.0129.0001.0006] of Confidential Exhibit PCS-1.
- 36 Subsequently, at 2:33PM on 2 April 2026, JWS wrote to Mallesons with the ACCC's response to the 24 February 2026 letter, advising that, inter alia, the ACCC did not consent to the proposed amendments in respect of the Tiny Teddy Sample Product or Stayfree Sample Product. A copy of this letter is at [MPL.0129.0001.0008] of Confidential Exhibit PCS-1.

AFFIRMED by the deponent
at Sydney
in New South Wales
on 20 April 2026
Before me:

)
)
)
)
)



.....
Signature of deponent

.....
Signature or witness

Hannah Ahern
Solicitor of the Supreme
Court of NSW with a
current practicing certificate

Federal Court of Australia
District Registry: Victoria
Division: General

Australian Competition and Consumer Commission

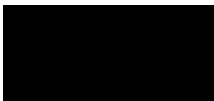
Applicant

Woolworths Group Limited (ACN 000 014 675)

Respondent

ANNEXURE "PCS-1"

This is the annexure marked "PCS-1" referred to in the affidavit of **PETA CARTER STEVENSON** sworn at 1 Farrer Place, Sydney NSW 2000 on 20 April 2026.

Before me:..... 

Australian Legal Practitioner

*Hannah Ahern
Solicitor of the Supreme Court
of NSW with a current practicing
certificate*

Filed on behalf of Mallesons, the Respondent

Prepared by Peta Stevenson
Law firm **MALLESONS**
Tel +61 2 9296 2492
Email peta.stevenson@mallesons.com

Fax

Address for service

Level 61, Governor Phillip Tower,
1 Farrer Place, Sydney NSW 2000 Australia
Ref: P Stevenson:602-0051665

Extracts of the relevant facts agreed in rows 9, 8 and 11 of Annexures B and C of the SOAF

Annexure B (CB Tab 11, p 120-121)

No	A	B	C		D	E	F		G	H	I		K
			Price 1 (P1)	Period ³			% change P1 vs P2 ¹	P2			Price 2 (P2)	Period ⁴	
8	Amolts Biscuits Fmly Assorted 500g (36016-EA)	\$4.00	01/01/21 - 10/05/22 ⁸ (495 days)	+30%	\$5.20	18/05/22 ⁹ - 01/06/22 (15 days)	-13%	\$4.50	02/06/22 - 04/05/23 (337 days)	337 days	+13%		
9	Amolts Shapes Variety 15pk 375g (641532-EA)	\$5.00	01/01/21 - 10/05/22 ¹⁰ (495 days)	+30%	\$6.50	18/05/22 ¹¹ - 01/06/22 (15 days)	-15%	\$5.50	02/06/22 - 04/05/23 (337 days)	337 days	+10%		
8	A short-term Special occurred from 11 May 2022 to 17 May 2022 (see row 8 of Annexure C). No admission is made that this short-term Special occurred outside of either the P1 Period or P2 Period.												
9	A short-term Special occurred from 11 May 2022 to 17 May 2022 (see row 8 of Annexure C). No admission is made that this short-term Special occurred outside of either the P1 Period or P2 Period.												
10	A short-term Special occurred from 11 May 2022 to 17 May 2022 (see row 9 of Annexure C). No admission is made that this short-term Special occurred outside of either the P1 Period or P2 Period.												
11	A short-term Special occurred from 11 May 2022 to 17 May 2022 (see row 9 of Annexure C). No admission is made that this short-term Special occurred outside of either the P1 Period or P2 Period.												

No	A	B	C		D	E	F		G	H	I		K
			Price 1 (P1)	Period ³			% change P1 vs P2 ¹	P2			Price 2 (P2)	Period ⁴	
11	Amolts Tiny Teddy Variety 15pk 375g (641537-EA)	\$5.00	01/01/21 - 10/05/22 ¹² (495 days)	+30%	\$6.50	18/05/22 ¹³ - 01/06/22 (15 days)	-15%	\$5.50	02/06/22 - 04/05/23 (337 days)	337 days	+10%		
12	A short-term Special occurred from 11 May 2022 to 17 May 2022 (see row 11 of Annexure C). No admission is made that this short-term Special occurred outside of either the P1 Period or P2 Period.												
13	A short-term Special occurred from 11 May 2022 to 17 May 2022 (see row 11 of Annexure C). No admission is made that this short-term Special occurred outside of either the P1 Period or P2 Period.												

ANNEXURE PCS-1

Annexure C (CB Tab 11, p 164)

APS Row	Affected Product	Start Date	End Date	Price	Status	Days	Units Sold
8	Arnotts Biscuits Fmly Assorted 500g (36016-EA)	01/01/2021	10/05/2022	\$4.00	Prices Dropped	495	1451294
		11/05/2022	17/05/2022	\$4.00	Special	7	19883
		18/05/2022	01/06/2022	\$5.20	white ticket only	15	31280
9	Arnotts Shapes Variety 15pk 375g (641532-EA)	02/06/2022	04/05/2023	\$4.50	Prices Dropped	337	1229962
		01/01/2021	10/05/2022	\$5.00	Prices Dropped	495	2543883
		11/05/2022	17/05/2022	\$5.00	Special	7	39139
11	Arnotts Tiny Teddy Variety 15pk 375g (641537-EA)	18/05/2022	01/06/2022	\$6.50	white ticket only	15	66257
		02/06/2022	04/05/2023	\$5.50	Prices Dropped	337	1885646
		01/01/2021	10/05/2022	\$5.00	Prices Dropped	495	1823052
		11/05/2022	17/05/2022	\$5.00	Special	7	27116
		18/05/2022	01/06/2022	\$6.50	white ticket only	15	47022
		02/06/2022	04/05/2023	\$5.50	Prices Dropped	337	1407851

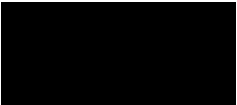
Federal Court of Australia
District Registry: Victoria
Division: General

Australian Competition and Consumer Commission
Applicant

Woolworths Group Limited (ACN 000 014 675)
Respondent

ANNEXURE "PCS-2"

This is the annexure marked "PCS-2" referred to in the affidavit of **PETA CARTER STEVENSON** sworn at 1 Farrer Place, Sydney NSW 2000 on 20 April 2026.

Before me: 

Australian Legal Practitioner

*Hannah Ahern
Solicitor of the Supreme Court
of NSW with a current practicing
certificate*

Filed on behalf of Mallesons, the Respondent

Prepared by Peta Stevenson
Law firm **MALLESONS**
Tel +61 2 9296 2492
Email peta.stevenson@mallesons.com

Fax

Address for service
Level 61, Governor Phillip Tower,
1 Farrer Place, Sydney NSW 2000 Australia
Ref: P Stevenson:602-0051665

ANNEXURE PCS-2

Extracts of the relevant facts agreed in rows 233, 234, 235 and 238 of Annexures B and C of the SOAF

Annexure B (CB Tab 11, p 151-152)

No	A	B		C	D	E		F		G	H		I	J	K
		Price 1 (P1)	Price 2 (P2)			Price 3 (P3)	change P1 vs P2 ¹	P1	Period ³		P2	Period ⁴			
233	Stayfree Pad Ultra Thin Wing Night10pk (44861-EA)	\$4.50	01/01/21 - 01/03/22 ⁸⁶ (425 days)	+18%	\$5.30	16/03/22 ⁸⁷ - 03/04/22 (19 days)	-9%	\$4.80	04/05/22 - 30/08/22 ⁸⁸ (119 days)	84 days	+7%				
234	Stayfree Pads Ultr Thin Wing Sup 12pk (58657-EA)	\$4.50	01/01/21 - 01/03/22 ⁸⁹ (425 days)	+18%	\$5.30	16/03/22 ⁹⁰ - 03/04/22 (19 days)	-9%	\$4.80	04/05/22 - 30/08/22 ⁹¹ (119 days)	84 days	+7%				
235	Stayfree Pads Ultra Thin Wing Light 16pk (233495-EA)	\$4.50	01/01/21 - 01/03/22 ⁹² (425 days)	+18%	\$5.30	16/03/22 ⁹³ - 03/04/22 (19 days)	-9%	\$4.80	04/05/22 - 30/08/22 ⁹⁴ (119 days)	91 days	+7%				

⁸⁶ A short-term Special occurred from 2 March 2022 to 8 March 2022, and from 9 March 2022 to 15 March 2022 (see row 233 of Annexure C). No admission is made that this short-term Special occurred outside of either the P1 Period or P2 Period.

⁸⁷ A short-term Special occurred from 2 March 2022 to 8 March 2022, and from 9 March 2022 to 15 March 2022 (see row 233 Annexure C). No admission is made that this short-term Special occurred outside of either the P1 Period or P2 Period.

⁸⁸ Woolworths' pricing data indicates that a short-term Special occurred from 31 August 2022 to 6 September 2022. No admission is made that this short-term Special occurred outside of the P3 Period.

⁸⁹ A short-term Special occurred from 2 March 2022 to 8 March 2022, and from 9 March 2022 to 15 March 2022 (see row 234 of Annexure C). No admission is made that this short-term Special occurred outside of either the P1 Period or P2 Period.

⁹⁰ A short-term Special occurred from 2 March 2022 to 8 March 2022, and from 9 March 2022 to 15 March 2022 (see row 234 of Annexure C). No admission is made that this short-term Special occurred outside of either the P1 Period or P2 Period.

⁹¹ Woolworths' pricing data indicates that a short-term Special occurred from 31 August 2022 to 6 September 2022. No admission is made that this short-term Special occurred outside of the P3 Period.

⁹² A short-term Special occurred from 2 March 2022 to 8 March 2022, and from 9 March 2022 to 15 March 2022 (see row 235 of Annexure C). No admission is made that this short-term Special occurred outside of either the P1 Period or P2 Period.

⁹³ A short-term Special occurred from 2 March 2022 to 8 March 2022, and from 9 March 2022 to 15 March 2022 (see row 235 of Annexure C). No admission is made that this short-term Special occurred outside of either the P1 Period or P2 Period.

⁹⁴ Woolworths' pricing data indicates that a short-term Special occurred from 31 August 2022 to 6 September 2022. No admission is made that this short-term Special occurred outside of the P3 Period.

ANNEXURE PCS-2

No	A	B		C		D	E		F		G	H		I	J	K
		Price 1 (P1)	Period ³	% change P1 vs P2 ¹	P2		Price 2 (P2)	Period ⁴	% change P2 vs P3	P3		Price 3 (P3)	Period			
238	Stayfree Ultra Thin Wing Regular 14pk (370631-EA)	\$4.50	01/01/21 - 01/03/22 ⁹⁶ (425 days)	+18%	\$5.30	16/03/22 ⁹⁸ - 03/04/22 (19 days)	-9%	\$4.80	04/05/22 - 30/08/22 ⁹⁹ (119 days)	84 days	+7%					

⁹⁸ A short-term Special occurred from 2 March 2022 to 8 March 2022, and from 9 March 2022 to 15 March 2022 (see row 238 of Annexure C). No admission is made that this short-term Special occurred outside of either the P1 Period or P2 Period.

⁹⁹ Woolworths' pricing data indicates that a short-term Special occurred from 31 August 2022 to 6 September 2022. No admission is made that this short-term Special occurred outside of the P3 Period.

Annexure C (CB Tab 11, p 273-278, 280-281)

APS Row	Affected Product	Start Date	End Date	Price	Status	Days	Units Sold
233	Stayfree Pad Ultra Thin Wng Night10pk (44861-EA)	01/01/2021	05/01/2021	\$4.50	white ticket only	5	2138
		06/01/2021	12/01/2021	\$3.70	Special	7	7894
		13/01/2021	26/01/2021	\$4.50	white ticket only	14	5569
		27/01/2021	02/02/2021	\$3.70	Special	7	6673
		03/02/2021	16/02/2021	\$4.50	white ticket only	14	6026
		17/02/2021	23/02/2021	\$2.70	Special	7	17685
		24/02/2021	09/03/2021	\$4.50	white ticket only	14	5853
		10/03/2021	16/03/2021	\$2.70	Special	7	8381
		17/03/2021	23/03/2021	\$4.50	white ticket only	7	2903
		24/03/2021	30/03/2021	\$3.70	Special	7	6252
		31/03/2021	13/04/2021	\$4.50	white ticket only	14	5586
		14/04/2021	20/04/2021	\$2.70	Special	7	14455
		21/04/2021	04/05/2021	\$4.50	white ticket only	14	5880
		05/05/2021	11/05/2021	\$3.70	Special	7	5433
		12/05/2021	18/05/2021	\$4.50	white ticket only	7	2845

ANNEXURE PCS-2

APS Row	Affected Product	Start Date	End Date	Price	Status	Days	Units Sold
		19/05/2021	25/05/2021	\$3.70	Special	7	5811
		26/05/2021	01/06/2021	\$4.50	white ticket only	7	3239
		02/06/2021	08/06/2021	\$2.25	Special	7	26597
		09/06/2021	15/06/2021	\$4.50	white ticket only	7	3189
		16/06/2021	22/06/2021	\$2.70	Special	7	13936
		23/06/2021	06/07/2021	\$4.50	white ticket only	14	6618
		07/07/2021	13/07/2021	\$3.60	Special	7	6250
		14/07/2021	03/08/2021	\$4.50	white ticket only	21	9623
		04/08/2021	10/08/2021	\$3.15	Special	7	7352
		11/08/2021	17/08/2021	\$4.50	white ticket only	7	3508
		18/08/2021	24/08/2021	\$3.15	Special	7	10211
		25/08/2021	31/08/2021	\$4.50	white ticket only	7	3489
		01/09/2021	07/09/2021	\$3.15	Special	7	9407
		08/09/2021	28/09/2021	\$4.50	white ticket only	21	9492
		29/09/2021	05/10/2021	\$2.70	Special	7	14845
		06/10/2021	19/10/2021	\$4.50	white ticket only	14	6251
		20/10/2021	26/10/2021	\$3.15	Special	7	7490
		27/10/2021	02/11/2021	\$4.50	white ticket only	7	2972
		03/11/2021	09/11/2021	\$3.60	Special	7	6155
		10/11/2021	16/11/2021	\$4.50	white ticket only	7	3156
		17/11/2021	23/11/2021	\$3.15	Special	7	7864
		24/11/2021	30/11/2021	\$4.50	white ticket only	7	3043
		01/12/2021	14/12/2021	\$3.60	Special	14	12271
		15/12/2021	28/12/2021	\$4.50	white ticket only	14	6228
		29/12/2021	04/01/2022	\$3.15	Special	7	10372
		05/01/2022	11/01/2022	\$4.50	white ticket only	7	4729
		12/01/2022	18/01/2022	\$3.60	Special	7	7604
		19/01/2022	15/02/2022	\$4.50	white ticket only	28	12690
		16/02/2022	22/02/2022	\$3.60	Special	7	8647
		02/03/2022	08/03/2022	\$4.50	white ticket only	7	3291
		23/02/2022	01/03/2022	\$3.60	Special	7	7097
		09/03/2022	15/03/2022	\$3.15	Special	7	7564
		16/03/2022	03/04/2022	\$5.30	white ticket only	19	7453
		04/04/2022	03/05/2022	\$4.80	white ticket only	30	13579
		04/05/2022	10/05/2022	\$4.80	Prices Dropped	7	4291
		11/05/2022	17/05/2022	\$3.35	Special	7	7093
		18/05/2022	07/06/2022	\$4.80	Prices Dropped	21	12459
		08/06/2022	14/06/2022	\$4.24	Special	7	4234

ANNEXURE PCS-2

APS Row	Affected Product	Start Date	End Date	Price	Status	Days	Units Sold
234	Slayfree Pads Ultr Thin Wing Sup 12pk (58657-EA)	15/06/2022	28/06/2022	\$4.80	Prices Dropped	14	7027
		29/06/2022	05/07/2022	\$2.85	Special	7	18382
		06/07/2022	02/08/2022	\$4.80	Prices Dropped	28	14027
		03/08/2022	09/08/2022	\$3.35	Special	7	6954
		10/08/2022	16/08/2022	\$4.80	Prices Dropped	7	6180
		17/08/2022	23/08/2022	\$3.35	Special	7	6445
		24/08/2022	30/08/2022	\$4.80	Prices Dropped	7	3996
		31/08/2022	06/09/2022	\$2.85	Special	7	14979
		01/09/2021	05/01/2021	\$4.50	white ticket only	5	1195
		06/01/2021	12/01/2021	\$3.70	Special	7	6760
		13/01/2021	26/01/2021	\$4.50	white ticket only	14	3028
		27/01/2021	02/02/2021	\$3.70	Special	7	5550
		03/02/2021	16/02/2021	\$4.50	white ticket only	14	3241
		17/02/2021	23/02/2021	\$2.70	Special	7	16358
		24/02/2021	09/03/2021	\$4.50	white ticket only	14	3249
		10/03/2021	16/03/2021	\$2.70	Special	7	6675
		17/03/2021	23/03/2021	\$4.50	white ticket only	7	1537
		24/03/2021	30/03/2021	\$3.70	Special	7	5153
		31/03/2021	13/04/2021	\$4.50	white ticket only	14	3067
		14/04/2021	20/04/2021	\$2.70	Special	7	12689
		21/04/2021	04/05/2021	\$4.50	white ticket only	14	3322
		05/05/2021	11/05/2021	\$3.70	Special	7	3538
		12/05/2021	18/05/2021	\$4.50	white ticket only	7	1576
19/05/2021	25/05/2021	\$3.70	Special	7	4344		
26/05/2021	01/06/2021	\$4.50	white ticket only	7	2380		
02/06/2021	08/06/2021	\$2.25	Special	7	26792		
09/06/2021	15/06/2021	\$4.50	white ticket only	7	3204		
16/06/2021	22/06/2021	\$2.70	Special	7	13637		
23/06/2021	06/07/2021	\$4.50	white ticket only	14	6458		
07/07/2021	13/07/2021	\$3.60	Special	7	6610		
14/07/2021	03/08/2021	\$4.50	white ticket only	21	10657		
04/08/2021	10/08/2021	\$3.15	Special	7	7235		
11/08/2021	17/08/2021	\$4.50	white ticket only	7	3863		
18/08/2021	24/08/2021	\$3.15	Special	7	10956		
25/08/2021	31/08/2021	\$4.50	white ticket only	7	3855		
01/09/2021	07/09/2021	\$3.15	Special	7	9064		
08/09/2021	28/09/2021	\$4.50	white ticket only	21	10780		
29/09/2021	05/10/2021	\$2.70	Special	7	15022		

ANNEXURE PCS-2

AFS Row	Affected Product	Start Date	End Date	Price	Status	Days	Units Sold
		06/10/2021	19/10/2021	\$4.50	white ticket only	14	6880
		20/10/2021	26/10/2021	\$3.15	Special	7	6912
		27/10/2021	02/11/2021	\$4.50	white ticket only	7	3369
		03/11/2021	09/11/2021	\$3.60	Special	7	5924
		10/11/2021	16/11/2021	\$4.50	white ticket only	7	3527
		17/11/2021	23/11/2021	\$3.15	Special	7	7809
		24/11/2021	30/11/2021	\$4.50	white ticket only	7	3242
		01/12/2021	14/12/2021	\$3.60	Special	14	11772
		15/12/2021	28/12/2021	\$4.50	white ticket only	14	6639
		29/12/2021	04/01/2022	\$3.15	Special	7	10390
		05/01/2022	11/01/2022	\$4.50	white ticket only	7	4775
		12/01/2022	18/01/2022	\$3.60	Special	7	7049
		19/01/2022	15/02/2022	\$4.50	white ticket only	28	14649
		16/02/2022	22/02/2022	\$3.60	Special	7	8564
		23/02/2022	01/03/2022	\$4.50	white ticket only	7	3634
		02/03/2022	08/03/2022	\$3.60	Special	7	6881
		09/03/2022	15/03/2022	\$3.15	Special	7	7534
		16/03/2022	03/04/2022	\$5.30	white ticket only	19	8164
		04/04/2022	03/05/2022	\$4.80	white ticket only	30	14511
		04/05/2022	10/05/2022	\$4.80	Prices Dropped	7	4490
		11/05/2022	17/05/2022	\$3.35	Special	7	6806
		18/05/2022	07/06/2022	\$4.80	Prices Dropped	21	13226
		08/06/2022	14/06/2022	\$4.24	Special	7	4333
		15/06/2022	28/06/2022	\$4.80	Prices Dropped	14	7532
		29/06/2022	05/07/2022	\$2.85	Special	7	16770
		06/07/2022	02/08/2022	\$4.80	Prices Dropped	28	15588
		03/08/2022	09/08/2022	\$3.35	Special	7	6589
		10/08/2022	16/08/2022	\$4.80	Prices Dropped	7	6342
		17/08/2022	23/08/2022	\$3.35	Special	7	6438
		24/08/2022	30/08/2022	\$4.80	Prices Dropped	7	4197
		31/08/2022	06/09/2022	\$2.85	Special	7	14154
		01/01/2021	05/01/2021	\$4.50	white ticket only	5	1529
		06/01/2021	12/01/2021	\$3.70	Special	7	5367
		13/01/2021	28/01/2021	\$4.50	white ticket only	14	4034
		27/01/2021	02/02/2021	\$3.70	Special	7	5035
		03/02/2021	16/02/2021	\$4.50	white ticket only	14	4346
		17/02/2021	23/02/2021	\$2.70	Special	7	9888
		24/02/2021	09/03/2021	\$4.50	white ticket only	14	4036
235	Stayfree Pads Ultra Thin Wing Light 16pk (233495-EA)						

ANNEXURE PCS-2

APS Row	Affected Product	Start Date	End Date	Price	Status	Days	Units Sold
		10/03/2021	16/03/2021	\$2.70	Special	7	6643
		17/03/2021	23/03/2021	\$4.50	white ticket only	7	2022
		24/03/2021	30/03/2021	\$3.70	Special	7	4280
		31/03/2021	13/04/2021	\$4.50	white ticket only	14	3967
		14/04/2021	20/04/2021	\$2.70	Special	7	8432
		21/04/2021	04/05/2021	\$4.50	white ticket only	14	4055
		05/05/2021	11/05/2021	\$3.70	Special	7	4008
		12/05/2021	18/05/2021	\$4.50	white ticket only	7	2054
		19/05/2021	25/05/2021	\$3.70	Special	7	4353
		26/05/2021	01/06/2021	\$4.50	white ticket only	7	2308
		02/06/2021	08/06/2021	\$2.25	Special	7	16258
		09/06/2021	15/06/2021	\$4.50	white ticket only	7	2567
		16/06/2021	22/06/2021	\$2.70	Special	7	8726
		23/06/2021	06/07/2021	\$4.50	white ticket only	14	5066
		07/07/2021	13/07/2021	\$3.60	Special	7	4863
		14/07/2021	03/08/2021	\$4.50	white ticket only	21	7892
		04/08/2021	10/08/2021	\$3.15	Special	7	5948
		11/08/2021	17/08/2021	\$4.50	white ticket only	7	2749
		18/08/2021	24/08/2021	\$3.15	Special	7	7116
		25/08/2021	31/08/2021	\$4.50	white ticket only	7	2856
		01/09/2021	07/09/2021	\$3.15	Special	7	6760
		08/09/2021	28/09/2021	\$4.50	white ticket only	21	7775
		29/09/2021	05/10/2021	\$2.70	Special	7	10766
		06/10/2021	19/10/2021	\$4.50	white ticket only	14	5025
		20/10/2021	26/10/2021	\$3.15	Special	7	6099
		27/10/2021	02/11/2021	\$4.50	white ticket only	7	2505
		03/11/2021	09/11/2021	\$3.60	Special	7	5229
		10/11/2021	16/11/2021	\$4.50	white ticket only	7	2480
		17/11/2021	23/11/2021	\$3.15	Special	7	5983
		24/11/2021	30/11/2021	\$4.50	white ticket only	7	2449
		01/12/2021	14/12/2021	\$3.60	Special	14	10087
		15/12/2021	28/12/2021	\$4.50	white ticket only	14	5142
		29/12/2021	04/01/2022	\$3.15	Special	7	7652
		05/01/2022	11/01/2022	\$4.50	white ticket only	7	3725
		12/01/2022	18/01/2022	\$3.60	Special	7	6201
		19/01/2022	15/02/2022	\$4.50	white ticket only	28	10733
		16/02/2022	22/02/2022	\$3.60	Special	7	5847
		23/02/2022	01/03/2022	\$4.50	white ticket only	7	2721

ANNEXURE PCS-2

APS Row	Affected Product	Start Date	End Date	Price	Status	Days	Units Sold
		02/03/2022	08/03/2022	\$3.60	Special	7	5855
		09/03/2022	15/03/2022	\$3.15	Special	7	6684
		16/03/2022	03/04/2022	\$5.30	white ticket only	19	5995
		04/04/2022	03/05/2022	\$4.80	white ticket only	30	10968
		04/05/2022	10/05/2022	\$4.80	Prices Dropped	7	3346
		11/05/2022	17/05/2022	\$3.35	Special	7	6863
		18/05/2022	07/06/2022	\$4.80	Prices Dropped	21	9280
		08/06/2022	14/06/2022	\$4.24	Special	7	3603
		15/06/2022	28/06/2022	\$4.80	Prices Dropped	14	5496
		29/06/2022	05/07/2022	\$2.85	Special	7	12239
		06/07/2022	02/08/2022	\$4.80	Prices Dropped	28	10662
		03/08/2022	09/08/2022	\$3.35	Special	7	5602
		10/08/2022	30/08/2022	\$4.80	Prices Dropped	21	8570
		31/08/2022	06/09/2022	\$2.85	Special	7	7600
238	Stayfree Ultra Thn Wing Regular 14pk (370631-EA)	01/01/2021	05/01/2021	\$4.50	white ticket only	5	1321
		06/01/2021	12/01/2021	\$3.70	Special	7	8637
		13/01/2021	26/01/2021	\$4.50	white ticket only	14	3401
		27/01/2021	02/02/2021	\$3.70	Special	7	6679
		03/02/2021	16/02/2021	\$4.50	white ticket only	14	3700
		17/02/2021	23/02/2021	\$2.70	Special	7	18617
		24/02/2021	09/03/2021	\$4.50	white ticket only	14	3615
		10/03/2021	16/03/2021	\$2.70	Special	7	7196
		17/03/2021	23/03/2021	\$4.50	white ticket only	7	1679
		24/03/2021	30/03/2021	\$3.70	Special	7	6376
		31/03/2021	13/04/2021	\$4.50	white ticket only	14	3526
		14/04/2021	20/04/2021	\$2.70	Special	7	14007
		21/04/2021	04/05/2021	\$4.50	white ticket only	14	3526
		05/05/2021	11/05/2021	\$3.70	Special	7	4115
		12/05/2021	18/05/2021	\$4.50	white ticket only	7	1750
		19/05/2021	25/05/2021	\$3.70	Special	7	4698
		26/05/2021	01/06/2021	\$4.50	white ticket only	7	2134
		02/06/2021	08/06/2021	\$2.25	Special	7	31698
		09/06/2021	15/06/2021	\$4.50	white ticket only	7	2912
		16/06/2021	22/06/2021	\$2.70	Special	7	15078
		23/06/2021	06/07/2021	\$4.50	white ticket only	14	5742
		07/07/2021	13/07/2021	\$3.60	Special	7	6388
		14/07/2021	03/08/2021	\$4.50	white ticket only	21	9346
		04/08/2021	10/08/2021	\$3.15	Special	7	6748
		11/08/2021	17/08/2021	\$4.50	white ticket only	7	3302
		18/08/2021	24/08/2021	\$3.15	Special	7	12320
		25/08/2021	31/08/2021	\$4.50	white ticket only	7	3407
		01/09/2021	07/09/2021	\$3.15	Special	7	10220
		08/09/2021	28/09/2021	\$4.50	white ticket only	21	9217

ANNEXURE PCS-2

APS Row	Affected Product	Start Date	End Date	Price	Status	Days	Units Sold
		29/09/2021	05/10/2021	\$2.70	Special	7	16653
		06/10/2021	19/10/2021	\$4.50	white ticket only	14	6151
		20/10/2021	26/10/2021	\$3.15	Special	7	6801
		27/10/2021	02/11/2021	\$4.50	white ticket only	7	2977
		03/11/2021	09/11/2021	\$3.60	Special	7	5482
		10/11/2021	16/11/2021	\$4.50	white ticket only	7	3055
		17/11/2021	23/11/2021	\$3.15	Special	7	8512
		24/11/2021	30/11/2021	\$4.50	white ticket only	7	2969
		01/12/2021	14/12/2021	\$3.60	Special	14	11432
		15/12/2021	28/12/2021	\$4.50	white ticket only	14	6074
		29/12/2021	04/01/2022	\$3.15	Special	7	11249
		05/01/2022	11/01/2022	\$4.50	white ticket only	7	4410
		12/01/2022	18/01/2022	\$3.60	Special	7	6793
		19/01/2022	15/02/2022	\$4.50	white ticket only	28	13002
		16/02/2022	22/02/2022	\$3.60	Special	7	9276
		23/02/2022	01/03/2022	\$4.50	white ticket only	7	3277
		02/03/2022	08/03/2022	\$3.60	Special	7	6947
		09/03/2022	15/03/2022	\$3.15	Special	7	6243
		16/03/2022	03/04/2022	\$5.30	white ticket only	19	7225
		04/04/2022	03/05/2022	\$4.80	white ticket only	30	12942
		04/05/2022	10/05/2022	\$4.80	Prices Dropped	7	4252
		11/05/2022	17/05/2022	\$3.35	Special	7	6069
		18/05/2022	07/06/2022	\$4.80	Prices Dropped	21	11536
		08/06/2022	14/06/2022	\$4.24	Special	7	3935
		15/06/2022	28/06/2022	\$4.80	Prices Dropped	14	6400
		29/06/2022	05/07/2022	\$2.85	Special	7	16669
		06/07/2022	02/08/2022	\$4.80	Prices Dropped	28	13008
		03/08/2022	09/08/2022	\$3.35	Special	7	6023
		10/08/2022	16/08/2022	\$4.80	Prices Dropped	7	6017
		17/08/2022	23/08/2022	\$3.35	Special	7	6202
		24/08/2022	30/08/2022	\$4.80	Prices Dropped	7	3686
		31/08/2022	06/09/2022	\$2.85	Special	7	14951

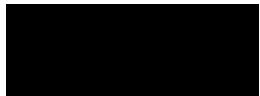
Federal Court of Australia
District Registry: Victoria
Division: General

Australian Competition and Consumer Commission
Applicant

Woolworths Group Limited (ACN 000 014 675)
Respondent

Certificate identifying Confidential Exhibit PCS-1

This is **Confidential Exhibit PCS-1** to the affidavit of **PETA CARTER STEVENSON** affirmed at 1 Farrer Place, Sydney NSW 2000 on 20 April 2026.

Before me: ... 

Australian Legal Practitioner

*Hannah Ahern
Solicitor of the Supreme Court
of NSW with a current practicing
certificate*

Filed on behalf of Mallesons, the Respondent

Prepared by Peta Stevenson
Law firm **MALLESONS**
Tel +61 2 9296 2492
Email peta.stevenson@mallesons.com

Fax

Address for service
Level 61, Governor Phillip Tower,
1 Farrer Place, Sydney NSW 2000 Australia
Ref: P Stevenson:602-0051665