



# Whistleblower Standard

## INTRODUCTION

Cotton Seed Distributors Limited and its subsidiaries (CSD) are committed to exemplary corporate citizenship. As part of this commitment, it expects its officers, contractors and employees (CSD Representatives) to maintain the highest levels of probity in their dealings on behalf of CSD and their management of CSD. This includes strict compliance with CSD's Code of Conduct Standard and all Laws and Regulations applying to the business.

CSD seeks to encourage the reporting of corrupt or illegal practices by CSD or CSD Representatives regardless of position. Whilst such disclosure is encouraged to occur through the normal hierarchy of the business any person may report incidents pursuant to this Whistleblower Standard in circumstances where they consider the gravity of the issue warrants such approach or where they have fear of reprisal in the event of raising the matter with their operational contact.

Compliance with this Standard is an obligation owed by all employees to each other and to CSD. Breach of this Standard will result in disciplinary action or dismissal. Because of the continuing need to reassess and clarify our practices, the contents of this Standard will be kept on the F:/user/OH&S Shared Drive and updated as required. It is the responsibility of all employees of CSD and its subsidiaries to remain aware of, and comply with, this Standard.

## STANDARD

The aim of this Standard is to provide CSD stakeholders, internal and external, with a mechanism for highlighting any concerns related to suspected corrupt or illegal practices by CSD or any employee, agent or officer of CSD regardless of position.

The Whistleblower Standard applies to complaints regarding corrupt or illegal practices by CSD or CSD Representatives including, but not limited, to the following:-

- Fraud or deliberate error in the recording and maintenance of CSD's financial records
- Deficiencies in or non-compliance with CSD's internal controls
- Disclosure or misuse of CSD's confidential information for personal gain
- offering, paying, soliciting or receiving any form of bribe, payoff, unlawful gratuity or kickback, directly or indirectly through third parties
- Theft of any monies or property of CSD
- Any unlawful acts

## Whistleblower Procedure

1. All advices communicating an incident/s of corrupt or illegal conduct should be addressed to:-  
**Whistleblowing Officer, Cotton Seed Distributors Limited, 2952 Culgoora Road (P.O. Box 117), Wee Waa NSW 2388** or by email to **pgraham@csd.net.au**

All communications to the Whistleblowing Officer will be dealt with by the Managing Director or their delegate. Where the incident/s of corrupt or illegal conduct relate to the Managing Director, then address correspondence to either:-

- **CSD Chairman, P.O. Box 10, Wee Waa NSW 2388** or by email to **jdkahl@bigpond.com**
  - **CSD Whistleblowing, Nexia Australia, Level 17, 1 Market Street, Sydney NSW 2000** or by email to **LWills@nexiacourt.com.au**.
2. Upon receipt of a complaint, the Whistleblowing Officer (Managing Director or their delegate, Chairman or Nexia Australia (whichever is appropriate)) will forward a copy of the complaint to an Oversight Officer. The Oversight Officer is the Chair of the Board Audit Committee (BAC), provided the BAC Chair is not the accused. If the BAC Chair is the accused, then the Oversight Officer is the most senior Director (based on years of service) not involved in the complaint.

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3. The Whistleblowing Officer and Oversight Officer will determine whether the complaint actually pertains to a matter covered by the Whistleblower Standard. If so, an investigation strategy will be developed. If not, the complaint will be delegated back to CSD management.
4. All Whistleblower communications will be acknowledged within fourteen days of their receipt, except for anonymous complaints.
5. Confidentiality will be maintained to the fullest extent possible. All dealings with whistleblower disclosures will be handled in such a manner as to preserve the anonymity of the whistleblower
6. Prompt and appropriate corrective action will be taken as warranted by the judgement of the Whistleblowing Officer and the Oversight Officer.
7. Subject to members of the CSD Board not being accused, all whistleblower complaints, investigation strategies and outcomes plus any corrective actions taken will be reported to the CSD Board.
8. Whistleblowers advising incidents of corrupt or illegal conduct shall be protected from harassment or retaliation as a consequence of their disclosure in accordance with the Corporations Act 2001. To effect this protection CSD requires the Whistleblowing Officer to maintain ongoing contact with the Whistleblower as circumstances warrant and facilitate the Whistleblower raising any issues of concern with the Whistleblowing Officer at any time.
9. False reporting shall not attract any protection under this policy.

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