



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 unethical, 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 seek confidentiality and without fear of intimidation, disadvantage or reprisal.

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 CSD's internet as well as the F:/user/HSEQ Shared Drive and updated as required. It is the responsibility of all employees of CSD 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 (Reportable Conduct) by CSD or any employee, agent, contractor, supplier or officer of CSD regardless of position.

1. What is Reportable Conduct?

The Whistleblower Standard applies to complaints regarding unethical, 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 including abuse of authority as well as harassment, discrimination, victimisation or bullying not covered under CSD's Anti-Discrimination, Harassment and Bullying Standard;
- Disclosure or misuse of CSD's confidential information for personal gain;
- Potential damage to CSD such as unsafe work practices, environmental damage or health risks;
- 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; and
- Any unlawful acts

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2. How can I make a report ?

CSD has several channels for making a report if you become aware of any issue or behaviour which you consider to be Reportable Conduct. To ensure your anonymity, appropriate escalation and timely investigation, reports are to be directed to CSD's independent Whistleblower hotline (Grapevine).

Report by phone: 1300 933 977

Report online at: <https://www.csd.net.au/speakup>

Report by post: P.O. Box 119, Carlton South VIC 3053

3. How will CSD investigate Reportable Conduct?

Upon receipt of a complaint, Grapevine will forward a copy of the complaint to the Chief Financial Officer and Managing Director provided that these employees are not the accused (Whistleblowing Officers). The Whistleblowing Officers will inform the Oversight Officers. The Oversight Officers are the Chair of the CSD Board and the Chair of the Audit and Risk Committee (ARC), provided these Directors are not the accused. If the Whistleblowing Officers and Oversight Officers are all accused, then Grapevine will advise CSD's audit partner at Nexia Sydney Audit Pty Limited.

The Whistleblowing Officers and Oversight Officers 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.

All Whistleblower communications will be acknowledged within fourteen days of their receipt, except for anonymous complaints.

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.

Prompt and appropriate corrective action will be taken as warranted by the judgement of the Whistleblowing Officers and the Oversight Officers. This may include disciplinary action for the accused if warranted and/or criminal proceedings initiated.

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.

4 How will CSD support whistleblowers and protect them from harm?

Whistleblowers advising incidents of Reportable Conduct shall be protected from harassment or retaliation as a consequence of their disclosure in accordance with the Corporations Act 2001 and Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019. This involves ensuring that those who report are protected from detrimental conduct (i.e. dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats or any unfavourable treatment). 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.

False reporting shall not attract any protection under this Standard.

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