



COMPETITION AND CONSUMER LAW COMPLIANCE POLICY

Purpose

At Cotton Seed Distributors Ltd (**CSD**), we are committed to complying with our legal obligations. We will conduct ourselves in compliance with applicable laws and regulations, in particular, the *Competition and Consumer Act 2010* (Cth) (**CCA**).

Failure to comply with our obligations under the CCA can result in significant monetary penalties, damages, court injunctions, personal liability (including jail terms), loss of business, reputation damage and other consequences for CSD.

This Policy outlines our objectives and commitment to CCA compliance at an organisational level, in addition to obligations at an individual level for CSD directors, officers, employees, representatives and agents whose duties for CSD could result in them being concerned with conduct that may breach the CCA (**Representatives**).

This Policy has been endorsed by the CSD Board.

Scope

This Policy applies to all Representatives, and to all business activities undertaken by or on behalf of CSD.

Related Policy and Frameworks

Risk Policy

Complaints Handling Policy

Applicable Legislation

Competition and Consumer Act 2010 (Cth)

Objectives

We aim to be an organisation where:

- our Representatives demonstrate a commitment to compliance with the CCA;
 - we have useful systems and procedures in place to support and assist our Representatives in achieving our compliance goals;
 - we provide relevant, effective and ongoing training on the CCA for our Representatives and accessible internal policies, systems and procedures for dealing with issues that might arise in this area; and
 - our Representatives are held accountable for their performance and their conduct.
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Our commitment to compliance

We are committed to providing our Representatives with appropriate resources by way of systems, training and support to enable them to meet their legal obligations under the CCA and therefore, limit risk to themselves and to CSD.

We will regularly monitor our performance against this Policy.

We will not tolerate non-compliance with the CCA and will take action against any of our Representatives who are knowingly or recklessly involved in breaches of the CCA. This action may include dismissal of a relevant employee.

We will not indemnify any person against penalties imposed for a contravention of the CCA or legal costs incurred in defending or resisting legal proceedings in which such a penalty is imposed.

Your obligations

As part of this Policy, when carrying out duties for CSD, our Representatives are required to:

- read and understand this Policy;
- make proper use of the systems, training and support we provide and maintain a good understanding of the business obligations, and your individual obligations, under the CCA;
- remain mindful of key risk areas being competition law obligations such as misuse of market power, cartel conduct, anti-competitive behaviour and consumer law obligations such as misleading conduct, unconscionable conduct and unfair contract terms when carrying out duties for CSD; and
- report any concerns in relation to CSD's compliance with the CCA or any issues relating to CSD's compliance program to CSD's Compliance Officer.

Roles and Responsibilities

Board of Directors: Provides oversight of CSD's compliance with competition and consumer law and monitors the effectiveness of the Competition and Consumer Law Compliance Program.

Audit and Risk Committee: Supports the Board by overseeing competition and consumer law risks, reviewing compliance reporting, and monitoring the effectiveness of related controls.

Chief Executive Officer (CEO): Is accountable for implementing this Policy and ensuring adequate resources, systems and a culture of compliance across CSD.

Compliance Officer: Administers and maintains the Competition and Consumer Law Compliance Program, including monitoring compliance, coordinating training, reporting to the Board, and, following consultation with the CEO, exercising delegated authority to escalate matters to the ACCC and/or seek legal advice in relation to identified or potential breaches of the CCA.

Executives, Managers and Team Leaders: Ensure compliance with this Policy within their areas of responsibility and promptly escalate potential risks or issues.

Employees, Contractors, Agents and Other Representatives: Must comply with this Policy, complete required training, act lawfully and ethically, and report concerns or suspected breaches to the Compliance Officer.

Supporting Procedures, Protocols and Tools

Compliance Law Manual

Risk Register

Compliance Monitoring and Assurance

CSD will monitor and assure compliance with this Policy through its Competition and Consumer Law Compliance Program, including regular reporting to senior management and the Board. Compliance monitoring may include training completion tracking, targeted reviews of high-risk activities, internal compliance assessments, incident and complaint analysis, and review of business practices with competition and consumer law risk exposure. Any

identified non-compliance will be investigated, remediated, and reported in accordance with CSD's governance and risk management frameworks, including escalation to the Audit and Risk Committee and Board where required.

Non-Compliance

Failure to comply with this Policy, the Competition and Consumer Act 2010 (Cth), or CSD’s Competition and Consumer Law Compliance Program may expose CSD and individuals to significant legal, financial and reputational risk. Any actual or suspected non-compliance must be reported promptly to the Compliance Officer and will be investigated in accordance with CSD’s governance, risk and compliance frameworks. Confirmed non-compliance may result in corrective actions, including process improvements, additional training, and disciplinary action, which may include dismissal of a relevant employee..

Review and Continuous Improvement

CSD is committed to the continuous improvement of its competition and consumer law compliance arrangements. This Policy, and the broader Competition and Consumer Law Compliance Program, will be reviewed at least every three years, or earlier where required due to changes in legislation, regulatory guidance, business operations, risk profile, organisational structure, or following identified non-compliance, emerging risks, assurance outcomes or regulatory engagement.

Document Name	Document Owner	Revision Date	Reason for Review	Board Approval
Competition and Consumer Law Policy	Compliance Officer	Aug-23	Document Created	
Competition and Consumer Law Policy	Compliance Officer	Jan-24	Scheduled Review	Feb-24
Competition and Consumer Law Policy	Compliance Officer	Jan-25	Scheduled Review	Feb-25
Competition and Consumer Law Policy	Compliance Officer	Jan-26	Scheduled Review	
Competition and Consumer Law Policy	Compliance Officer	Jan-27	Next Scheduled Review	