



## **Namoi Cotton Limited**

### **Whistleblower Policy**



## **1. INTRODUCTION**

This Namoi Cotton Whistleblower Policy (“**WP**”) has been adopted to ensure concerns regarding any illegal conduct or unethical behaviour in relation to Namoi Cotton can be raised without the person raising the concern being subject to victimisation, harassment or discriminatory treatment.

## **2. APPLICATION**

This WP applies to all Directors, Management, Employees, Contractors, Consultants and Service Providers.

## **3. MATTERS THAT SHOULD BE REPORTED**

Namoi Cotton employees are encouraged to report the following unacceptable conduct:

- (a) harassment or bullying;
- (b) fraudulent activity;
- (c) deliberate breach of OH&S laws;
- (d) substance abuse;
- (e) misuse of company information or assets;
- (f) corruption and bribes;
- (g) theft of money or company assets; and
- (h) fraudulent disbursements of payroll.

## **4. WHISTLEBLOWER PROTECTION**

Any employee making a report in accordance with this WP (a “**Whistleblower**”) will not be discriminated against or disadvantaged in their employment with Namoi Cotton. Namoi Cotton will take reasonable steps to ensure the Whistleblower will not be subject to victimisation, discrimination or harassment.

Employees are reminded any reports made under the Whistleblower Policy are to be based on fact and must be genuine reports for the conduct specified in point 3 above. Unfounded reports can lead to reputation damage and claims for defamation. Namoi Cotton encourages the reporting process however reports under this policy should not be for personal reasons. The reports must be of substance and material in nature. Reporting under this policy must be made in good faith.

## **5. WHISTLEBLOWER PROTECTION OFFICER (“WPO”)**

Namoi cotton has appointed a Whistleblower Protection Officer.

The WPO is the person to whom reports can be directed. The WPO will review all reports and carry out the necessary investigations if the circumstances warrant. In respect of this policy the WPO has a direct reporting line to the Chief Executive

Officer (“CEO”) and the Board. The WPO also has access to independent advisers as and when required. The current WPO is the Company Secretary.

## **6. DISCLOSURE**

A whistleblower seeking to make a report can do so through one of the following means:

- (a) Phone call to WPO – 0746316103
- (b) An email to – [whistleblower@namoicotton.com.au](mailto:whistleblower@namoicotton.com.au)
- (c) Mail marked “Confidential” to the Company Secretary at 1B Kitchener Street Toowoomba Qld 4350

Namoi Cotton treats all information provided by a Whistleblower as confidential.

## **7. REPORTS CONCERNING THE CEO OR WHISTLEBLOWER PROTECTION OFFICER**

The investigation process in the situation of a complaint made against either the CEO or WPO will be undertaken by the Chairperson for Namoi Cotton. Any concerns about the CEO or the WPO should be directed to the Chairperson of Namoi Cotton and marked “Confidential”.

## **8. INVESTIGATING A REPORT**

The WPO will review all claims made in conjunction with any evidence provided by the Whistleblower. If the claim warrants an investigation it will be conducted. It may be necessary to conduct interviews with Employees. This will be undertaken confidentially.

## **9. REVIEW OF THE POLICY**

This policy will be reviewed every two years or when required by the Board.

## **10. PUBLICATION**

A copy of the Namoi Cotton Whistleblower Policy is available on the Namoi Cotton website.