

Complaints Policy

The New Zealand Merino Company Limited (NZM)

Approved by the Board 4 Decemeber 2024

The Complaints Policy sets out the process for internal and external stakeholders to make complaints related to NZM or ZQ/ZQRX. It is intended to encourage and enable concerns to be raised and addressed in an efficient and streamlined manner.

This policy should be read in conjunction with Code of Business Ethics and Conduct and the Whistleblower Policy. This policy does not cover serious grievances (covered in the Whistleblower Policy) or general feedback that is provided to NZM.

Objective

The objective of this policy is to provide a clear process on how complaints should be addressed and resolved, including response timelines, roles and responsibilities and protection of confidentiality.

NZM's complaints process has been developed in line with UNGP 31 effectiveness criteria of being legitimate, accessible, predictable, equitable, transparent, rights-compatible, based on dialogue and engagement, and a source of continuous learning.

Eligibility

This policy applies to employees and directors of NZM, growers and their employees, and the general public.

This policy seeks to provide internal and external stakeholders with a process to make a confidential complaint with respect to:

- The New Zealand Merino Company
- Our sourcing programmes: ZQ/ZQRX

Definitions

For clarity, the following definitions will apply throughout this policy.

- Complaint: any act, treatment, behaviour or state which is perceived as unfair or unjust.
- Feedback: a positive or negative response to actions or behaviour of NZM or ZQ/ZQRX to be used as a basis for improvement.

1.0 Policy

1.1

Complaints are an important source of feedback to help raise awareness of potential issues and problems and support the company's broader responsibility to respect people, communities, and the environment.

1.2

NZM is committed to maintaining an accessible and transparent complaints process and to respect the confidentiality of complainants.

1.3

NZM values its people, growers and their communities and will resolve complaints in a timely and respectful manner.

1.4

NZM will address and resolve complaints with a focus on continual learning and improvement.

1.5

NZM will report the outcomes of complaint resolution to the Senior Leadership Team and Board of Directors. NZM's leadership maintains that addressing and resolving complaints are an important factor in enhancing and maintaining NZM's reputation.

2.0 Confidentiality and Accessibility

2.1

Confidentiality is key to building trust in the complaints process. Any person who makes a complaint will be protected by anonymity, unless they choose to disclose their personal information.

2.2

All complaints must be received in writing. The complaints process is advertised where NZM and ZQ/ZQRX operations occur including NZM offices and grower properties.

2.3

NZM will protect individuals who make complaints from negative actions including retaliation.

3.0 Timeline for Addressing and Resolving Complaints

3.1

Upon receipt, the complaint is allocated to the appropriate Senior Leader for substantiation, review and investigation.

3.2

An action plan for substantiating all complaints received will be completed within 14 days.

3.3

All substantiated complaints will be investigated within a month of confirmation of the legitimacy of the complaint.

3.4

Once investigated, all substantiated complaints will be resolved and closed within 90 business days. others (NZM people, contractors, growers, brands and other stakeholders);

3.5

NZM will confirm the receipt, process and outcome of the complaint when requested by the complainant.

4.0 Resolving Complaints

4.1

NZM's response will depend on the nature and severity of the complaint and the underlying circumstances.

4.2

Where necessary, NZM will partner with third party experts to support further investigation, remediation or resolution.

5.0 Reporting of Complaints

5.1

To maintain transparency and continuous learning, incidences and outcomes of complaints will be reported quarterly to the Senior Leadership Team.

5.2

NZM will monitor the following metrics to ensure the effectiveness of the process:

- Number of complaints received
- Number of complaints substantiated
- Number of complaints by type or category
- Percentage of complaints dealt with in the timeline specified above

5.3

The success of the complaints process will be measured by:

- Action taken to resolve and/or mitigate future similar incidents
- Lessons learned or continuous improvement

6.0 Roles and Responsibilities

6.1

Complaints received about The New Zealand Merino Company and its operations will be received and reviewed by COO, with the COO being accountable for complaint resolution.

6.2

Complaints regarding the ZQ and ZQRX Sourcing Programme (including complaints that related to grower properties) will be received and reviewed by GM Integrity System, with the GM Integrity Systems being accountable for complaint resolution.

6.3

Operational managers in their relevant subject matter expertise will be called upon to support, substantiate, investigate and resolve complaints.

6.4

Quarterly reports summarising the complaints metrics will be sent to the Board and Senior Leadership Team. The Senior Leadership Team has oversight of substantiated complaints and supports the NZM team with complaint resolution.

6.5

The Sustainability and Community Impact Advisor will oversee the running of the complaints process and the People and Culture Advisor manages staff training on the complaints process.

7.0 Summary

7.1

This document is intended to provide policy and an overview of the process for receiving, substantiating and resolving complaints.

7.2

If you require any clarification on any item included within this document, or indeed not mentioned in the document, do not hesitate to discuss this with the Chief Executive or the Chief Operations Officer.

Angus Street

CHIEF EXECUTIVE

A handwritten signature in black ink, consisting of a stylized 'A' with a horizontal line extending to the right.