

ASX Markets Supervision Pty Ltd
Level 45
South Tower
525 Collins Street
Melbourne VIC 3000

Attention: Mr Gonzalo Valencia

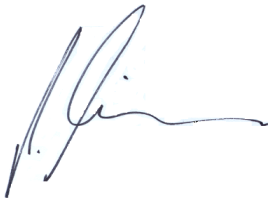
Dear Mr Valencia

Response to ASX query regarding Appendix 3X – Initial Director's Interest Notice

This letter is in response to a query raised by the ASX on the Appendix 3X lodged on 25 January 2010.

1. The consent to be a director was effective from 1 January 2010, with the 3X dated accordingly, but the technical effect of the appointment was made following the sign off of a circular resolution on 19 January 2010.
2. Each director is aware of the requirements regarding their disclosure obligations under listing rule 3.19A. Any amendments to this rule where relevant are communicated and signed off as understood by the directors.
3. Additional steps to ensure compliance with listing rule 3.19B are not required under the arrangements currently in place.

For and on behalf of Global Health Limited,



Peter Curigliano
Company Secretary

For personal use only



ASX Markets Supervision Pty Ltd
ABN 26 087 780 489
Level 45
South Tower
525 Collins Street
Melbourne VIC 3000

GPO Box 1784
Melbourne VIC 3001

Telephone 61 3 9617 8711
Facsimile 61 3 9614 0303
www.asx.com.au

27 January 2010

Mr Peter Curigliano
Company Secretary
Global Health Limited
Level 11
607 Bourke Street
MELBOURNE VIC 3000

By email only

Dear Peter

Global Health Limited (the "Company") Appendix 3X – Initial Director's Interest Notice

We refer to the following;

1. The announcement lodged by Global Health Limited (the "Company") with ASX Limited ("ASX") on 25 January 2010 confirming the appointment of Mr Bruce Higgins as a director of the Company effective 1 January 2010;
2. The Appendix 3X lodged by the Company with ASX on 25 January 2010 for Mr Bruce Higgins.
3. Listing rule 3.19A which requires an entity to tell ASX the following:
 - 3.19A.1 The notifiable interests of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) at the following times.
 - On the date that the entity is admitted to the official list.
 - On the date that a director is appointed.The entity must complete Appendix 3X and give it to ASX no more than 5 business days after the entity's admission or a director's appointment.
 - 3.19A.2 A change to a notifiable interest of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust). The entity must complete Appendix 3Y and give it to ASX no more than 5 business days after the change occurs.
 - 3.19A.3 The notifiable interests of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) at the date that the director ceases to be a director. The entity must complete Appendix 3Z and give it to ASX no more than 5 business days after the director ceases to be a director.
4. Listing rule 3.19B which states as follows.

For personal use only

An entity must make such arrangements as are necessary with a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) to ensure that the director discloses to the entity all the information required by the entity to give ASX completed Appendices 3X, 3Y and 3Z within the time period allowed by listing rule 3.19.A. The entity must enforce the arrangements with the director.

5. The Companies Update dated 27 June 2008, reminding listed entities of their obligation to notify ASX within 5 business days of the notifiable interests in securities held by each director and outlining the action that ASX would take in relation to breaches of listing rules 3.19A and 3.19B.

As the Appendix 3X indicated that the director was appointed on 1 January 2010, it appears that the Appendix 3X should have been lodged with ASX by 8 January 2010. As the Appendix 3X was lodged on 25 January 2010, it appears that the Company may be in breach of listing rules 3.19A and/or 3.19B.

Please note that ASX is required to record details of breaches of the listing rules by listed companies for its reporting requirements.

ASX reminds the Company of its contract with ASX to comply with the listing rules. In the circumstances ASX considers that it is appropriate that the Company make necessary arrangements to ensure there is not a reoccurrence of a breach of the listing rules.

Having regard to listing rules 3.19A and 3.19B and Guidance Note 22: "Director Disclosure of Interests and Transactions in Securities - Obligations of Listed Entities", we ask that you answer each of the following questions:

1. Please explain why the Appendix was lodged late.
2. What arrangements does the Company have in place with its directors to ensure that it is able to meet its disclosure obligations under listing rule 3.19A?
3. If the current arrangements are inadequate or not being enforced, what additional steps does the Company intend to take to ensure compliance with listing rule 3.19B?

Your response should be sent to me by return e-mail or by facsimile on facsimile number (03) 9614 0303. It should not be sent to the Company Announcements Office.

A response is requested as soon as possible and, in any event, not later than half an hour before the start of trading (ie before 9.30 a.m. A.E.S.T.) on Monday, 1 February 2010.

Under listing rule 18.7A, a copy of this query and your response will be released to the market, so your response should be in a form suitable for release and should separately address each of the questions asked. If you have any queries or concerns, please contact me immediately.

Yours sincerely,

Sent electronically without signature

Gonzalo Valencia
Senior Adviser, Issuers (Melbourne)

For personal use only