

# Anti-Bribery & Corruption Policy

## Why this is Important

1. This Policy sets out Global Health's zero tolerance for bribery or corruption. It is important because:
  - a) Global Health is committed to the highest standards of conduct and promoting a culture of honest and ethical behaviour, compliance and good governance, and
  - b) Legislative requirements apply that must be complied with.
2. This Policy supports Global Health's purpose and strategy by:
  - a) Prohibiting bribery or corruption in any form, and
  - b) Promoting a culture of honest, ethical behaviour and compliance.
3. This Policy is designed to produce these outcomes:
  - a) Nobody working at Global Health engages in bribery or corrupt practices in any form,
  - b) Nobody working at Global Health makes a facilitation payment,
  - c) Global Health's reputation and trust in the community is enhanced, and
  - d) Global Health and its directors and employees comply with their obligations under laws about bribery and corruption.

## Who this applies to and When

4. This Policy applies to all directors and everybody who works at Global Health.
5. It applies whenever you are:
  - a) Considering payments or other benefits to other parties, including to people who are public officials or their family members,
  - b) Offered gifts, entertainment or other benefits as a director or employee of Global Health,
  - c) Concerned that conduct by someone who works at Global Health could involve bribery or corruption, or
  - d) Keeping records of transactions with other parties.

## Requirements

### *Dealing with Other Parties*

6. When you are considering payments or giving benefits to other parties:
  - a) Do not offer or give a bribe in any form,
  - b) Do not offer or give a facilitation payment,
  - c) Do not offer to sponsor an event or make a donation unless the CEO has approved it, and
  - d) Do not offer or give anything of value to a public official or any member of their family to influence a decision, get or keep business, or get an improper advantage for Global Health or anyone else.



**TIP:** Offering anything of value includes offering gifts, entertainment, sponsored travel, employment, a donation, rebate or commission or other payment.

*A facilitation payment is a modest payment made to an official to speed up an administrative process such as a passport clearance, work permit, release of goods from customs. In some countries it is accepted and expected. In other countries it is illegal, including in Australia unless strict requirements are met. Global Health does not tolerate facilitation payments.*

7. When you are considering a business relationship with a new party (such as a supplier, agent or partner), do appropriate checks to make sure they will not engage in bribery or corruption.

**Receiving Gifts or Entertainment**

8. If you are offered gifts, entertainment or anything of value by a party that does business with Global Health:
  - a) Only accept it if it is modest and appropriate and will not affect your decisions about doing business with that party,
  - b) Do not accept it if it is worth more than \$200 and tell the CEO, CFO or Company Secretary, and
  - c) Remember that your decisions reflect on the integrity and reputation of Global Health.

**Reporting Conduct**

9. If you think that someone who works at Global Health, or a party that Global Health does business with might have engaged in bribery or corruption, you should make a report under the Whistleblower Policy to one of the people listed below:

Michael Davies Chief Executive Officer	Phone: +61 3 9675 0614 Email: michael.davies@global-health.com
Ershad Ali Chief Financial Officer	Phone: +61 3 9675 0604 Email: ershad.ali@global-health.com
Sam Butcher Company Secretary	Phone: +61 (0) 418 339 578 Email: sam.butcher@drascombe.com.au

**Recording Transactions**

10. If you are recording Global Health’s transactions with other parties:
  - a) Make sure that proper, accurate records are kept of each transaction, and
  - b) If you think bribery or corruption might be involved, tell the CEO, CFO or Company Secretary.

## Accountabilities

11. The accountabilities specific to this Policy appear in the table below:

POSITION	ACCOUNTABILITIES
<b>Board</b>	Approve changes to this Policy and make sure that the Policy is adequate to produce the desired outcomes set out above (paragraph 3) and is implemented effectively. Monitor reports and investigations made under the Policy and make sure appropriate action is taken.
<b>Employee or Director</b>	Follow this Policy and report any conduct that should be reported in accordance with this Policy.
<b>Executive Committee</b>	Make sure this Policy is communicated to all employees and that people are trained appropriately in relation to whistleblowing.
<b>Company Secretary (Policy Owner)</b>	Review this Policy as often as required and at least every two years. Make sure that reports made under this Policy are reported to the Board and appropriately investigated.

## Contacts for Questions & more Information

12. This Policy is owned by the Company Secretary. If you would like more information or have any questions about this Policy, you should contact:

Sam Butcher, Company Secretary  
Phone: +61 (0) 418 339 578  
Email: sam.butcher@drascombe.com.au

### Policy Information:

<b>Effective from</b>	25 August 2020		
<b>Owner</b>	Company Secretary	Sam Butcher	28 July 2020
<b>Approver</b>	Board		25 August 2020
<b>NEXT Review due:</b>	October 2022		
<b>Related documents</b>	Code of Conduct Whistleblower Policy		

### Document History

Version	Date	Amended by	Details of amendment
1	25 August 2020	Sam Butcher	Initial Policy prepared