

Whistleblower Policy

Why this is Important

1. This Policy sets out the requirements in relation to whistleblowing at Global Health. It is important because:
 - a) Global Health is committed to the highest standards of conduct and to 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) Encouraging the reporting of any suspected unethical, illegal or undesirable conduct involving Global Health,
 - b) Establishing measures to protect people who make a report, so that they can do so confidentially and without fear of intimidation or reprisal, and
 - c) Promoting Global Health's values of honesty and respect.
3. This Policy is designed to produce these outcomes:
 - a) Any unethical, illegal or undesirable conduct involving Global Health is identified, reported and properly investigated,
 - b) Anybody who observes suspected unethical, illegal or undesirable conduct involving Global Health reports it and is appropriately protected,
 - 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 in relation to whistleblowing.

Who this applies to and When

4. This Policy applies to all directors and employees of Global Health.
5. It applies whenever you may observe behaviour that you consider may be unethical, illegal or undesirable, or whenever such behaviour may be reported to you.

Requirements

Reporting Conduct

6. You should make a report under this Policy if you have reasonable grounds to believe that a Global Health director, officer, employee, contractor, supplier, customer or other person who has business dealings with Global Health has engaged in conduct that:
 - a) Is dishonest, fraudulent or corrupt, including bribery,
 - b) Is illegal (such as theft, violence, harassment or criminally damaging property),
 - c) Is unethical (such as dishonestly changing records or data, or breaching Global Health's policies),
 - d) Is potentially damaging to Global Health or its employees (such as unsafe work practices or abuse of Global Health's resources),
 - e) Is harmful to Global Health's reputation and standing as a good corporate citizen,
 - f) Is an abuse of authority or involves harassment, discrimination or bullying (other than personal work-related grievances).



TIP: Attachment 1 sets out the special protections for whistleblowers who disclose information about misconduct involving Global Health under the Corporations Act.

7. If you want to report conduct under this Policy, you should report it to one of the people shown below (each a **Whistleblower Officer**):

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

You can also send reports by post to one of these people at: Level 2, 696 Bourke St, Melbourne 3000 Australia, or to Sam Butcher at: 8 Kilmuir Road, Malvern East, Victoria 3145 Australia.

Global Health is committed to ensuring confidentiality of all matters reported under this Policy and that people who make a report are treated fairly and do not suffer reprisal or detriment. Detriment includes dismissal, demotion, disciplinary action, harassment, discrimination, threats or unfair treatment connected with making a report. If you suffer detriment in connection with making a report, you should report it to one of the people listed above.

Global Health will:

- a) Only share your identity as a whistleblower, or information that is likely to reveal your identity with your consent, or if the concern is reported to the Australian Securities and Investments Commission, Australian Federal Police or a lawyer for the purpose of obtaining legal advice,
- b) Only share your identity or information that is likely to reveal your identity on a strictly confidential basis and only to those who need to know it,
- c) If it investigates your report, take reasonable steps to reduce the risk of your identity being revealed,
- d) Keep all records in relation to your report and any investigation of it securely and confidentially, and
- e) Treat very seriously any unauthorised disclosure of your identity or information about a report or investigation, and take disciplinary action where appropriate.

Investigations and Monitoring

8. Global Health will promptly investigate any matter reported under this Policy in a way that is objective, fair and reasonable and appropriate in the circumstances.
9. A person to whom you report a matter may, with your consent, appoint someone to assist in the investigation.
10. Where appropriate, Global Health will give you feedback about the progress and outcomes of an investigation into a report you make (having regard to the privacy of someone about whom an allegation is made).
11. If a report is made anonymously, Global Health will investigate the matter based on the information that has been provided but will not be able to provide feedback to the person making the report.
12. Global Health will confidentially (on a 'no names' basis) report to the Board about reports

and investigations made under this Policy, and the Board will monitor these, having regard to the requirements of this Policy.

Accountabilities

13. Different people have different accountabilities in relation to whistleblowing. The accountabilities specific to this Policy appear in the table below:

POSITION	ACCOUNTABILITIES
Board	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.
Employee or Director	Follow this Policy and report any conduct that should be reported in accordance with this Policy.
Executive Committee	Make sure this Policy is communicated to all employees and that people are trained appropriately in relation to whistleblowing.
Whistleblower Officer (see para 7)	Follow this Policy and make sure that any matter reported to you is treated, investigated and reported in accordance with this Policy.
Company Secretary (Policy Owner)	Review this Policy as often as required and at least every two years. Make sure that reports and investigations made under this Policy are appropriately reported to the Board.

Contacts for Questions & more Information

14. 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

Effective from	19 December 2019		
Owner	Company Secretary	Sam Butcher	13 December 2019
Approver	Board		19 December 2019
NEXT Review due:	October 2022		
Related documents	Code of Conduct		

Document History

Version	Date	Amended by	Details of amendment
1	19 December 2019	Sam Butcher	Initial Policy prepared

Attachment 1 – protections under the Corporations Act

The Corporations Act gives special protection to disclosures about any misconduct or improper state of affairs involving Global Health if the following conditions are satisfied:

- a) the whistleblower is or has been:
 - (i) an officer or employee of a Global Health company,
 - (ii) a person who supplies goods or services to a Global Health company or an employee of a person who supplies goods or services to a Global Health company,
 - (iii) a person who is an associate of a Global Health company, or
 - (iv) a relative, dependent or dependent of the spouse of any person referred to above,
- b) the report is made to:
 - (i) a Whistleblower Officer,
 - (ii) an officer or senior manager of Global Health concerned,
 - (iii) a member of Global Health's external audit team,
 - (iv) the Australian Securities and Investments Commission (**ASIC**),
 - (v) the Australian Prudential Regulation Authority (**APRA**), or
 - (vi) a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Corporations Act,
- c) the whistleblower has reasonable grounds to suspect that the information being disclosed concerns misconduct, or an improper state of affairs or circumstances in relation to Global Health. This may include a breach of legislation including the Corporations Act, an offence against the Commonwealth punishable by imprisonment for 12 months or more, or conduct that represents a danger to the public or financial system.

Examples of conduct that may amount to a breach of the Corporations Act include: insider trading, insolvent trading, breach of continuous disclosure rules, failure to keep accurate financial records, falsification of accounts, failure of a director or other officer of the Group to act with the care and diligence that a reasonable person would exercise, or to act in good faith in the best interests of the company or failure of a director to give notice of any material personal interest in a matter relating to the affairs of the company.

The protections given by the Corporations Act when these conditions are satisfied are:

- a) the whistleblower is immune from any civil, criminal or administrative legal action (including disciplinary action) for making the disclosure,
- b) no contractual or other remedies may be enforced, and no contractual or other right may be exercised, against the whistleblower for making the report,
- c) in some circumstances, the reported information is not admissible against the whistleblower in criminal proceedings or in proceedings for the imposition of a penalty,
- d) anyone who causes or threatens to cause detriment to a whistleblower or another person believing that a report has been made, may have been made, or could be made, may be guilty of an offence and may be liable for damages,
- e) a whistleblower's identity cannot be disclosed to a Court or tribunal except where considered necessary, and
- f) the person receiving the report commits an offence if they disclose the substance of the report or the whistleblower's identity, without the whistleblower's consent, to anyone except ASIC, APRA, the Australian Federal Police or a lawyer for the purpose of obtaining legal advice or representation in relation to the report.

If a report is made, the identity of the discloser must be kept confidential unless one of the following exceptions applies:

- a) the discloser consents to the disclosure of their identity,

- b) disclosure of details that might reveal the discloser's identity is reasonably necessary for the effective investigation of the matter,
- c) the matter is reported to ASIC, APRA, or the AFP, or
- d) the matter is raised with a lawyer for the purpose of obtaining legal advice or representation.