



## Protected Disclosure Policy (Whistleblowing)

---

### 1. Introduction and Purpose

This policy and process is designed to ensure that people can raise concerns regarding actual or suspected wrongdoing with regard to ethical, clinical, professional and legal standards without fear of reprisal or feeling threatened by doing so.

The policy aims to facilitate disclosure of questionable practices, encourage proper individual conduct and alert appropriate Senior Management of potential problems before they have serious consequences. This policy aims to support and reinforce Green Cross Health's core values, Professional and Clinical Standards, and the Respect in Workplace Policy.

Along with other policies and processes to identify and manage risk, improve quality and compliance, this policy will be published openly to communicate to all employees the procedures for submitting allegations of concern. If an employee or any other person has an allegation, such persons are encouraged to report these complaints or concerns to OCP/EAP or the appropriate team members.

### 2. What Could Be Reported

For the purposes of making a report under this policy, matters may include, but are not limited to, any actual or suspected:

- Conduct or practices which are dishonest, illegal or breach any law;
- Breach of any company policy including the GXH's code of conduct and ethics;
- Breach of professional clinical standards and ethics;
- Breach of patient confidentiality;
- Breach of the pharmacist, clinician or nursing standard of behaviour or treatment of patients;
- Sexual harassment;
- Inappropriate accounting, internal accounting controls or auditing matters;
- Corrupt activities;
- Theft, fraud or misappropriation of assets;
- Significant mismanagement or waste of funds or resources;
- Abuse of authority; or
- Unsafe work practice or environment.

Green Cross Health considers and will take such allegations seriously. It equally expects and assumes that allegations are made in good faith, are truthful and can be substantiated.

### 3. How to Report

Concerns may be communicated by any of the following means:

1. Via an independent and externally hosted telephone line managed by professionals:  
Pharmacy/Medical: OCP Ph: 0800 377 990 Web: [www.ocp.co.nz](http://www.ocp.co.nz)  
Access: EAP Ph: 0800 327 669 Web: <https://www.eapservices.co.nz>
2. By email to [protecteddisclosure@gxh.co.nz](mailto:protecteddisclosure@gxh.co.nz)
3. By contacting a senior member of the Human Resources team
4. By contacting a member of Senior Management



All allegations received will be forwarded to the divisional Human Resources Manager (unless the allegation involves them, in which case that role will be excluded from the forward), who will then consider whether to escalate to the Group CEO.

The Human Resources Manager will then discuss and decide the appropriate action to take to investigate and validate the allegation. They may request special treatment of any allegation, including the retention of outside counsel, accountants, or other advisors.

At the time of making the disclosure, the complainant is encouraged to disclose his or her identity and the identity of the person or persons whom the employee believes to be involved in the serious wrongdoing and must specify the nature of the wrongdoing. All complainant identities will be held confidentially until full disclosure is received.

---

#### 4. Process

Both employees and non-employees may submit an allegation they wish to be investigated if they believe on reasonable grounds that the information disclosed is true or likely to be true.

An allegation should include enough information about the incident or situation to allow Green Cross Health to investigate it properly. Should the complainant wish to retain protected disclosure, he or she may send or discuss the complaint in a way that does not reveal his or her identity.

During the investigation, the identity of the complainant must be kept confidential if at all possible, unless the complainant has agreed to have his or her identity revealed, or this is essential for the purposes of the investigation, or to prevent serious risk to public health or safety, or to comply with the principles of natural justice.

Should, however, the complainant wish to co-operate in further investigation of the complaint, he or she should submit his or her name and contact details together with the complaint. If the complainant identified him or herself in the report, both parties of an investigation might contact him or her to ask for further information about the matters reported in the complaint.

Every report of a possible violation, compliance concern, complaint or other information relating to an allegation will be retained in written or electronic form.

The company will not be held liable for subsequent outcomes for the submitter.

---

#### 5. Protection from Retaliation

Green Cross Health acknowledges that employees making disclosures may be concerned about reprisals, discriminations, harassment or retribution in making a disclosure. GXH is committed to minimising those possibilities, as much as possible, with the following:

- Protection of the identity of the person making the disclosure.
- Protection from personal disadvantage for having made the disclosure where the discloser has acted in good faith and has not engaged in misconduct or illegal activities or made a malicious disclosure.
- Protection from victimisation for having made the disclosure.
- A complainant is not protected, however, if the information disclosed is protected by legal privilege.



GXH intends to investigate thoroughly any report, concern or complaint made in good faith that it receives relating to a suspected violation. Every director or employee will be required to co-operate in internal investigations of misconduct or unethical behaviour.

---

## 6. Amendments

GXH reviews its policies from time to time to ensure compliance with applicable law and conformity with industry practice. Therefore, this policy may be amended, modified or waived at the discretion of GXH in accordance with applicable law and regulation.

---

## 7. Relevant Law

Protected Disclosures Act 2000

Employment Relations Act 2000

Health and Safety at Work Act 2015

Human Rights Act 1993

Harassment Act 1997