

15 January 2016

Company Announcements Office
Australian Stock Exchange Limited
Level 4, Stock Exchange Centre
20 Bridge Street
SYDNEY NSW 2000.

Attention: John Johansson
Email: john.johansson@asx.com.au

Dear John

GLOBAL HEALTH LIMITED
Change of Director's Interest Notice Appendix 3Y

We refer to the Appendix 3Y lodged with the ASX on 12 January 2016 in relation to the holdings of non-executive director Stuart Grant Smith.

In response to your queries, we wish to explain as follows:

1. Please explain why the Appendix was lodged late.

[The late lodgement of the Appendix 3Y was due to a genuine oversight on the Director's behalf.](#)


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?

[All Directors are notified on acceptance of appointment to the Board of their disclosure obligations and periodically reminded of same during their tenure.](#)

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?

[The current arrangements are considered to be adequate, however all Directors have again been reminded of their continuous disclosure obligations. The Board is of the opinion that no other steps are required to be taken.](#)

Yours faithfully
Global Health Limited



Peter Curigliano
Company Secretary



13 January 2016

Mr. Peter Curigliano
CFO and Company Secretary
Global Health Limited
Level 2, 607 Bourke Street
Melbourne VIC 3000

By email: Peter.Curigliano@global-health.com

Dear Peter,

Global Health Limited (the “Company”)

We refer to the following;

1. The Appendix 3Y lodged by the Company with ASX on 12 January 2016 for Mr. Stuart Grant Smith.
2. 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) including whether the change occurred during a closed period where prior written clearance was required and, if so, whether prior written clearance was provided. 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.*



3. Listing rule 3.19B which states as follows.

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.

4. 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 listings rules 3.19A and 3.19B.

The Appendix 3Y indicates that changes in Mr. Stuart Grant Smith's notifiable interest occurred on 6 December 2013, 17 December 2013, 7 February 2014 and 18 December 2015. It appears that the Notice should have been lodged with ASX 5 business days from date of acquisition. Consequently, the Company may be in breach of listing rules 3.19A and/or 3.19B. It also appears the director concerned may have breached section 205G of the Corporations Act.

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 on john.johansson@asx.com.au. 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 (**i.e. before 9.30 a.m. A.E.D.T.) on Monday, 18 January 2016.**



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]

John Johansson

Adviser, Listings Compliance (Melbourne)