



## Protected Disclosure Policy (Whistleblowing)

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### 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 or the appropriate team members.

### 2. What Could Be Reported

For the purposes of making a report under this policy, this is subject to instances of serious wrongdoing, 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;
- Bullying or 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
- Any action which is a serious risk to public or individual health and safety or the environment

Green Cross Health considers and will take such allegations seriously. It equally expects and assumes that allegations are made in good faith, and the person making the allegation has reasonable grounds for making the allegation.

### 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)
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.

Green Cross Health encourages all disclosures to be raised through the means outlined above, however, you may contact an appropriate external agency such as the Human Rights Commission, the Ombudsman or Ministry of Health at any time during the process if you are unhappy with the response from GXH. Please refer to schedule 1 for a full list of external agencies who may be contacted.

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#### 4. Process

Current and former 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.

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#### 5. Protection from Retaliation

Green Cross Health acknowledges that employees making disclosures may be concerned about reprisals, discriminations and harassment. 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 cooperate in internal investigations of misconduct or unethical behaviour.

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## 6. Amendments

GXH reviews its policies regularly 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.

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## 7. Relevant Law

Protected Disclosures (Protection of Whistleblowers) Act 2022

Employment Relations Act 2000

Health and Safety at Work Act 2015

Human Rights Act 1993

Harassment Act 1997

Privacy Act 2020

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## 8. Publication

8.1 This policy is available on the company website [www.greencrosshealth.co.nz](http://www.greencrosshealth.co.nz).

## Schedule 1

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### Examples of concerns and examples of appropriate authorities

**Nature of concerns**

Anticompetitive conduct  
 Banks (registered banks)  
 Bullying or harassment, including sexual harassment  
  
 Charities  
  
 Child welfare and child protection  
  
 Consumer protection  
 Crime  
  
 Discrimination  
 Education service  
  
 Energy safety  
  
 Environment  
  
 Financial reporting (private sector—issuers and large companies)  
 Financial reporting (public sector)  
 Financial service providers' conduct  
 Health  
  
 Health and safety (work-related)  
  
 Housing  
  
 Insurers (licensed insurers)  
 Intelligence and security or classified information  
  
 International relations  
 Local Government  
  
 Police

**Appropriate authority**

Commerce Commission  
 Reserve Bank of New Zealand  
 WorkSafe New Zealand (where work-related)  
 Human Rights Commission  
 Department of Internal Affairs  
 Solicitor-General  
 Oranga Tamariki—Ministry for Children  
 Ombudsman  
 Commerce Commission  
 Commissioner of Police  
 Director of the Serious Fraud Office  
 Human Rights Commission  
 Ministry of Education  
 Education Review Office  
 WorkSafe New Zealand (where work-related)  
  
 Ministry for the Environment  
 Department of Conservation  
 Financial Markets Authority  
  
 Controller and Auditor-General  
 Financial Markets Authority  
 Ministry of Health  
 Health and Disability Commissioner  
 Ministry of Business, Innovation, and Employment  
 WorkSafe New Zealand  
 Ministry of Housing and Urban Development  
 Ombudsman  
 Reserve Bank of New Zealand  
 Inspector-General of Intelligence and Security only (see section 27)  
 Ombudsman only (see section 28)  
 Ombudsman  
 Controller and Auditor-General Department of Internal Affairs  
 Commissioner of Police  
 Independent Police Conduct Authority



**Nature of concerns**

Privacy of individuals or security of personal information

Professional or trade conduct

Prosecutions

Public sector

Public service

Racism

Sector regulation

Social support or benefits

State services

Transport and transport safety issues

Whistleblowing and protected disclosures

**Appropriate authority**

Privacy Commissioner

Ministry of Business, Innovation, and Employment  
Solicitor-General

Ombudsman  
Controller and Auditor-General

Public Service Commission  
Human Rights Commission

Commerce Commission

Ombudsman

Public Service Commission  
The Treasury (for State-owned enterprises, Crown companies, and organisations named or described in Schedule 4 of the Public Finance Act 1989)

Ministry of Transport

Ombudsman