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1. Introduction

1.1 Employees may, in the course of their duties, have access to, or come into contact with, confidential information of a confidential nature. Their terms and conditions provide for the confidentiality of such information. In order to ensure proper performance of their duties, employees are forbidden from disclosing such information or making use of it in any form whatsoever, such as in the course of their duties.

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1.2 However, the law allows for the disclosure of certain information. In order for such a disclosure to be a 'protected disclosure' of certain information, the disclosure must relate to a specific subject matter (classified as such in the law). A disclosure must also be made in an appropriate way (defined in the law). The protection is confined to a disclosure which, in the interest of the public, is made in the belief of the employee making the disclosure, is made in the belief of the employee making the disclosure, is made in the belief of the employee making the disclosure.

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1.3 [<<Insert Company Name>>] is committed to compliance with the Bribery Act 2010. [<<Insert Company Name>>] actively encourages a culture of honesty and openness. Employees are required to bring up to their manager or other appropriate person any issue that, in the employee's opinion, might constitute a breach of the Bribery Act 2010.]

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2. Specific Subject Matter

If, in the course of employment, an employee becomes aware of information which they reasonably believe to be a breach of the following, they must use the Company's disclosure procedure.

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2.1 That a criminal offence is being committed or is likely to be committed.

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2.2 That a person has failed to comply with any legal obligation to which he or she is bound.

That a person has failed to comply with any legal obligation to which he or she is bound.

2.3 That a miscarriage of justice has occurred, is occurring, or is likely to occur.

That a miscarriage of justice has occurred, is occurring, or is likely to occur.

2.4 That the health or safety of any person is being, or is likely to be, endangered.

That the health or safety of any person is being, or is likely to be, endangered.

2.5 That the environment is being, or is likely to be, damaged.

That the environment is being, or is likely to be, damaged.

2.6 That information to which the above applies has been, is being, or is likely to be, deliberately concealed.

That information to which the above applies has been, is being, or is likely to be, deliberately concealed.

2.7 [That the business of the Company has been, is being, or is likely to be, receiving or offering a bribe.]

[That the business of the Company has been, is being, or is likely to be, receiving or offering a bribe.]

2.8 That any foreign or domestic bribery is being, or is likely to be, committed or offered.

That any foreign or domestic bribery is being, or is likely to be, committed or offered.

facilitation payment

associated person.]

3. Disclosure Procedure

3.1 Information which is more of the above should be reported to any appropriate authority

who believes tends to show one or more of the above should be reported to <<e.g. manager>> so that

3.2 If it is inappropriate to report to the manager, the employee should speak to <<e.g. HR>>

in confidence to the manager, the employee should speak to <<e.g. HR>>

3.3 Employees will suffer no detriment or disadvantage in accordance with this policy for making such a disclosure in confidence

in confidence to the manager, the employee should speak to <<e.g. HR>>

3.4 However, failure to report information losing it to the manager, the employee should speak to <<e.g. HR>>

may result in the disclosure of information to the manager, the employee should speak to <<e.g. HR>>

3.5 For further guidance on the disclosure procedure employees should speak in confidence to <<e.g. manager>>.

in confidence to the manager, the employee should speak to <<e.g. HR>> matter or concerning the use of the disclosure procedure employees should speak in confidence to <<e.g. manager>>.

This policy has been approved & signed by:

Name: <<Insert Name>>

Position: <<Insert Position>>

<<Resources Manager>>

Date: <<Date>>

Signature:

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