



### Preamble

*This policy is established to monitor the organisations information management systems and the necessary restrictions on the circulation of information by employees. This policy ensures the organisation's commitment to confidentiality that Bega maintains is upheld to a highly professional standard.*

### Definitions

**Confidential information** includes, but is not limited to:

- business methods, marketing strategies, financial affairs, budgets and accounting methods;
- supplier, funding agreements and MoUs;
- client information, lists and other personal information;
- manuals, procedures, maintenance scheduling, training materials, computer programming information, strategies, research, plans and development;
- information about employees, Board members, stakeholder or clients of Bega; or
- any information that could reasonably be assumed to amount to confidential information.

### Policy Statement

Bega collects and administers a range of information for a variety of purposes. Some of this information is restricted in its circulation for commercial, privacy, or ethical reasons.

Bega will place the minimum of restrictions on the information it holds but will ensure that such restrictions as are considered necessary are observed by its employees and volunteers.

All employees are expected to abide by the procedures that ensure confidentiality is maintained in accord with all relevant legislation and laws.

Confidential company information is considered Bega property and may be used or disclosed only with proper authorisation and only in the exercise of an employee's duties.

Bega maintains confidentiality in regard to the following principles:

- Bega will keep the amount of information it considers confidential to a minimum. However, it has the right to protect certain types of information especially that which might jeopardise the company's clients and suppliers, give competitors advantages and harm company members and employees;
- Each employee must protect confidential information to which he or she has authorised access, or to which he or she gains inadvertent access. Access never confers the privilege of disclosing the information;
- Employees must protect confidential information of clients and other employees; and
- The protection of confidential Bega information extends to confidential information of all employees, suppliers and clients, stakeholders and Board members of Bega.



### Personal Use of Company Property

Employees may not use, divert or appropriate Bega property, equipment, services or assets for personal use or benefit. The improper and unauthorised use of any of these will be treated as theft. Under no circumstances is Bega's intellectual property to be taken from Bega's premises without prior authorisation from the Chief Executive Officer (CEO) only.

### Access to Employee Files

Employee information is confidential and will be securely stored with Human Resources. Only the following authorised positions can access a complete Employee file:

- Chief Executive Officer (CEO), Chief Operations Officer (COO), Chief Financial Officer (CFO), and Human Resource Officer (HRO); and
- the individual whose records they are.

Payroll Officers have limited access to employee files for the purposes of setting up payroll related information for employees.

An employee's direct Manager may review limited access of these records with the approval of the COO or CEO for purposes of performance reviews only.

### Employee request for Information to be supplied to others

An employee may request written confirmation of their personal employment and salary for personal reasons. They must do so in writing or via email. These requests should be referred to the HRO who will coordinate information from Payroll. The CEO, COO or CFO can authorise any such letter stating facts of current workplace conditions/contract periods.

Only the CEO has the authority to authorise changes or alterations to an employee's terms and conditions of employment.

### Approvals and Advice

Employees are encouraged to discuss issues and concerns pertaining to Bega's commitment to ethical business practices with their Managers. All Managers shall be responsible for the enforcement of compliance with this policy.

Any questionable circumstances requiring investigation or interpretation under this policy should be referred to the HRO who will seek clarification from the COO.

### Breach of Policy

If an employee does not meet the expectations set out in this policy, they may be subject to disciplinary action in accordance with the organisation's **Performance Counselling** and **Disciplinary** policies up to and including possible termination of their employment.



## Related Documents

- Privacy Policy and Procedure;
- Code of Conduct;
- AGPAL Manual.