

Company Name .....

### **Confidentiality - Misuse of Inside Information**

As our employee you are bound by the British Horseracing Authority's rules of racing relating to registered stable staff. Rule (A) 36 relates to the communication of inside information and is set out below.

As our employee you will have inside information, so knowledge as to how likely it is that horse is going to run in a certain race, and if it does, how well it is likely to run and:

1. You must not communicate inside information (as defined in the British Horseracing Authority Rules of Racing ("the Rules of Racing")) directly or indirectly to any person in circumstances which could lead to a breach of the Rules of Racing.
2. You must not place a lay bet with a betting organisation on any horse under our care or control, instruct someone else to place such a bet on your behalf or receive the whole or any part of any proceeds of such a lay bet. This rule applies during your period of employment with us and for a period of 21 days afterwards.
3. You must not discuss the non-participation of a horse trained by us with anyone outside of the yard other than the owner or the owner's representative until such time as the non-participation has been notified to the Racing Calendar Office. If you are uncertain as to when that is, then please ask a senior member of staff.

A breach of 1, 2 or 3 will be dealt with under the disciplinary procedures as gross misconduct.

If you are uncertain as to whether or not something is a misuse of inside information or are uncomfortable with approaches being made to you for information then please speak to .....

This procedure does not give contractual rights to individual employees, workers or anyone else covered by it. We reserve the right to alter any of its terms at any time and will notify you of any changes.

## **BHA Rule (A) 36. Communication of Inside Information**

36.1 **Inside Information** is information about the likely participation or likely performance of a horse in a race, which

- 36.1.1 is known by an Owner, Trainer, Rider, stable employee or any of their service providers as a result of acting as such, and
- 36.1.2 is not information in the public domain.

36.2 A Person must not communicate Inside Information directly or indirectly to any other Person for any material reward, gift, favour or benefit in kind.

36.3 Schedule 5 specifies certain circumstances in which information is regarded as being in the public domain for the purposes of Paragraph 36.1.2.

### **Schedule 5 - Information regarded as in the public domain**

1. This Schedule specifies certain circumstances in which information is to be regarded, for the purposes of Rule 36.1.2 (communication of Inside Information), as being in the public domain.

1.1 It is not, and does not purport to be, an exhaustive statement of such circumstances.

2. Information is regarded as being in the public domain where the information is accessible to the public on a Trainer's or owner's telephone information line or website (whether or not for payment).

3. Information is regarded as being in the public domain if both of the following conditions are satisfied.

3.1 The first condition is that a Trainer or a Rider gives the information or expresses his opinion on a horse in a race in the course of

- 3.1.1 an interview or presentation conducted in the course of television or radio broadcasting;
- 3.1.2 an interview given, or article written, for the purposes of general publication (for example a written article, regular column, or website);
- 3.1.3 a talk or other presentation given to a specific group or groups (such as corporate sponsorship groups) or in the context of corporate hospitality or stable yard public days.

3.2 The second condition is that any fee paid to the Trainer or Rider for the information or opinion is no greater than that which reasonably reflects the occasion and his status

Should you wish to have clarification or discuss the above BHA rules relating to inside information the please speak to .....