

ATTACHMENT 1**GUIDANCE AND POLICY MANUAL (GPM)**

Proposed amendments are underlined:

8. PENALTY GUIDANCE

...

8.6 Financial Penalties imposed on an individual

...

Step 3: Mitigating and aggravating factors

8.5.7 We may increase or decrease the amount of the financial penalty arrived at after Step 2 (excluding any amount to be disgorged as set out in Step 1), to take into account factors which aggravate or mitigate the contravention. Any such adjustments will generally be made by way of a percentage adjustment to the figure determined at Step 2.

8.5.8 The following list of factors may have the effect of aggravating or mitigating the contravention:

- (a) the conduct of the individual (whether as a whistleblower or not) in bringing (or failing to bring) quickly, effectively and completely the contravention to our attention (or the attention of other regulatory authorities, where relevant);

[...]