

GLYNDEBOURNE

Whistleblowing - Disclosure of Information Policy

Glyndebourne aims to conduct its business honestly and with integrity at all times. This whistleblowing policy seeks to encourage company members, contractors, volunteers, agents and others with whom Glyndebourne does business to bring to the attention of appropriate Glyndebourne management any concerns they may have about possible wrongdoing or malpractice involving Glyndebourne, whether at Glyndebourne's premises or off site.

Wrongdoing/malpractice

Wrongdoing or malpractice includes violations of Glyndebourne policies, breach of national or local laws; fraudulent conduct; breaches of professional codes of conduct; malpractice; acts creating risk to health and safety or damage to the environment; breaches of any other legal obligation; and efforts to conceal such wrongdoing.

Complaints or concerns relating to a company member's own treatment should generally be raised through the Grievance Procedure details of which can be found on the Intranet or in one of the Company Policy folders on site in staff rooms and the Green Room.

Who to contact if you have a concern

Glyndebourne's designated whistleblowing contacts are:

- Sally Davies, Head of HR sally.davies@glyndebourne.com
- Carolyn Collard, Head of Governance & Compliance
carolyn.collard@glyndebourne.com
- Sarah Hopwood, Managing Director sarah.hopwood@glyndebourne.com

The overall responsibility for the policy lies with the Glyndebourne Productions Board. If the disclosure is extremely serious it should be reported directly to the Chairman of the Glyndebourne Productions Ltd. Board, currently Lord Davies of Abersoch (Interim Chair). He can be contacted by email via his assistant Deborah Hilderly Hilderly@corsair-capital.com, or by phone 020 7152 6536.

These contacts are known as designated whistleblowing officers (DWO).

If you are unsure about whether to raise a concern through this procedure and would like independent external advice, you may wish to contact:

- Protect, the whistleblowing charity. Phone 020 3117 2520 or email whistle@protect-advice.org.uk.
- Claire Ashby, Internal Auditor claire@ashbyassociates.co.uk

Whistleblowing Procedure

Concerns should be raised promptly with a DWO either in person or in writing. Reports of wrongdoing should be supported by as much factual detail as is reasonably possible, including, where applicable, names, dates, places and events that form the basis for the
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suspected wrongdoing. Those raising concerns should also make it clear that the disclosure is being made under this Whistleblowing Policy.

The DWO will determine what, if any, steps should be taken in response to a disclosure pursuant to this policy, and will lead any investigation that is considered appropriate. Those raising concerns may be interviewed for the purposes of an investigation, but will generally have no right to be informed of the outcome of the investigation, or of any resulting remedial steps (given the privacy rights of those involved, and/or confidentiality requirements).

PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

Confidentiality. The DWO will be sensitive to confidentiality concerns when investigating reports of suspected wrongdoing and where the whistleblower has expressed a wish to remain anonymous. However, there may be situations in which the identity of the whistleblower must be disclosed in order to conduct a fair and thorough investigation. In such cases, efforts will be made to limit the disclosure and to reiterate Glyndebourne's no-retaliation policy. Company members will also be expected to keep the fact that they have raised a concern, the nature of the concern and the identity of those involved confidential, so as not to jeopardise the investigation.

No Retaliation. Glyndebourne prohibits retaliation against any person for reporting wrongdoing pursuant to the whistleblower policy or for participating in an investigation resulting from such a report. This includes retaliatory employment actions such as termination, compensation decreases, or poor work assignments. Any whistleblower who believes he/she has been subjected to retaliation for this reason should promptly report such concerns to the DWO. Questions regarding this policy should be directed to the Head of Governance and Compliance.

This policy will be reviewed biennially by the DWO and Board from a legislative and operational perspective.