

GLYNDEBOURNE

Whistleblowing - Disclosure of Information Policy

Glyndebourne is committed to upholding the highest standards of practice, behaviour and integrity, as well as to complying fully with regulations governing the operation of our business.

This whistleblowing policy gives those working with and visiting Glyndebourne (including volunteers, members and contractors) a safe opportunity to disclose information where they have concerns 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 and codes of conduct, including bullying or discriminatory treatment of others; any activities that might suggest fraud or dishonesty; acts creating risk to health and safety or damage to the environment; breaches of any other legal obligation; and efforts to conceal such wrongdoing.

Whistleblowing is the provision of information that is in the public interest because it potentially affects a number of people. 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, from your line manager or from HR.

Who to contact if you have a concern

Information regarding potential wrongdoing should be shared internally in the first instance. 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
- Richard Davidson-Houston, Managing Director richard.dh@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 Chair of the Glyndebourne Productions Ltd. Board, currently Lord Davies of Abersoch. 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, however, you have good reason for believing that an internal disclosure could have negative consequences for you or for the company and would like independent external guidance, 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 suspected wrongdoing. We also ask that those raising concerns 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. Given the sensitivity of the issues, however, whistleblowers 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, and/or regulatory outcomes).

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. Any whistleblower raising genuine concerns need have no fear of negative consequences. 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. 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.