



Whistleblower Protection Policy

Document Information

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Attachments	Appendix A: Australian law specific information Appendix B: Relevant Laws		

Live Nation Entertainment (LNE) Whistleblower Protection Policy

What is LNE Whistleblower Protection Policy?

- Live Nation is committed to upholding the highest standards of integrity, fairness and ethical conduct and recognizes that a whistleblower protection program is an important element in detecting corrupt, illegal or other undesirable conduct.
- Creating a supportive environment where our people feel safe to raise concerns is one of Live Nation's core values and underpins our workplace culture.
- The Board and senior management of LNE encourage reporting actual or likely misconduct. A failure to report these type of activities exposes LNE to risks and undermines our culture and values. The Board will not tolerate anyone being discouraged from reporting or being disadvantaged or victimized because they want to raise concerns, or they have already done so.

The objective of this Policy is to:

- encourage people to report issues if they become aware of actual or likely misconduct;
- explain how to raise concerns and what protections a Discloser will receive;
- outline the company's processes for responding to reported disclosures; and
- promote a workplace environment in which everyone feels safe, supported and encouraged to report concerns.

As this is a Global policy it can provide overall guidelines only and cannot cover all possible circumstances in all our countries in detail. Therefore, although this policy does represent LNE's intentions in whistleblowing cases, it does not form part of any individual contract of employment or engagement, nor does it seek to take precedence over relevant local law in any of the jurisdictions where LNE operates. LNE may vary this policy at any time and the revised version will be published on the Backstage site.

Why do we need an LNE Whistleblower Protection Policy?

LNE is committed to a supportive workplace environment, and you are encouraged to raise concerns that you may have regarding conduct occurring at LNE or in relation to LNE. LNE understands that raising concerns can be difficult and stressful and that employees and others may be worried about the consequences for them of doing so, whether they are factually or legally right or not. The measures and assurances in this policy are aimed at reducing that worry so far as possible.

LNE has a number of formal and informal ways in which concerns can be raised depending on your circumstances and the level of seriousness of the issue. In most cases, your concerns may be able to be addressed informally, through discussions with your manager or division leader or by talking to Human Resources. LNE encourages this route as a usual first step. However, in some cases, you may be more comfortable making a formal report and LNE has adopted this Whistleblower Protection Policy (Policy) to help you with that process.

Who does the LNE Whistleblower Protection Policy apply to?

This policy applies to all LNE globally. It applies to you if:

- You are a full-time, part-time, seasonal or temporary employee; or
- You are a contractor or consultant.

It also applies to:

- Officers, contractors, suppliers, individual associates of a regulated entity or a related body corporate, relatives,

dependents, spouses, or dependents of a spouse of any of the above.

- Additional populations under EU legislation – current or former job candidates, employees of contractors or suppliers.

Please also refer to [Appendix A](#) which contains further information specific to Australia.

Process/Procedure tied to Policy

LNE is committed to a supportive workplace environment and you are encouraged to raise genuine concerns that you may have regarding Potential Misconduct occurring at LNE or in relation to LNE. Set out below are the three main ways in which you may choose to raise your concerns.

1. Speaking to your manager/informally raising concerns

For most issues, you will likely be comfortable discussing your concerns informally with your manager or another trusted person within the business and LNE encourages you to continue to feel empowered to raise issues in this way. LNE is committed to the creation of a supportive workplace environment and it seeks to create a culture where concerns can be discussed openly and transparently.

Accordingly, LNE encourages you to speak to your manager or raise your concerns informally in the first instance. LNE's Code of Conduct contains further details on how you may raise concerns outside of this Policy.

2. Reporting potential misconduct under this Policy

Where you have concerns about Potential Misconduct at LNE and you are not comfortable raising your concerns informally in the ordinary course (as outlined in section 1 above), you are encouraged to formally report it under this Policy. This means telling an appropriate person in a position of influence (examples of these people, called Recipients, are provided in section 6 below) if you have reasonable grounds to suspect that Potential Misconduct has occurred or is occurring or is likely to occur in relation to LNE. The types of conduct that fall within 'Potential Misconduct' for the purposes of this Policy are described in section 4 below. Different countries may use different channels for the receipt and processing of disclosures, and you should follow those directions where they apply if they outline disclosure channels not referred to in this Policy. It is helpful (but not mandatory) for you to state at the time that you are making your disclosure under this Policy – that reduces the possibility that your intentions in making it are misunderstood.

3. Personal work-related grievances

'Personal work-related grievances' should generally be raised directly with the Human Resources group, as they are not within the scope of this Policy. Personal work-related grievances are issues in relation to a Discloser's current or former employment that has implications for them personally (i.e. matters wholly or mainly related to your personal employment).

Examples of personal work-related grievances include:

- a conflict between you and another employee;
- a decision relating to your engagement, transfer or promotion;
- a decision relating to the suspension or termination of your employment; or
- perceived discriminations or unfairness against you, provided this does not involve a breach of workplace laws.

However, in some cases personal work-related grievances may be covered by this Policy. See further information in [Appendix A \(for Australian law specific information\)](#).

4. Definitions

Potential Misconduct means any suspected or actual misconduct or improper state of affairs or circumstances in relation to LNE. It also means a breach of law or information that indicates a danger to the public. For further information, please see [LNE Code of Business Conduct and Ethics](#) and [Appendix A \(for Australian law specific information\)](#).

Potential Misconduct does not generally include personal-work related grievances as described above in section 3. However, you should speak up even if you are unsure if something is Potential Misconduct.

Examples of Potential Misconduct include:

- breach of laws or regulations;
- breach of LNE’s Code of Conduct;
- criminal activity;
- bribery or corruption;
- conduct endangering health and safety or causing damage to the environment;
- dishonest or unethical behavior;
- conflicts of interest;
- anti-competitive behavior;
- violations of the US Amended Consent Decree pertaining to the LN/TM merger;
- financial fraud or mismanagement;
- insider trading;
- breach of trade sanctions or other trade controls;
- unauthorized use of LNE’s confidential information;
- conduct likely to damage the financial position or reputation of LNE; and
- deliberate concealment of any of the above.

This Policy also refers to a number of key people, who are defined as follows:

Term	Meaning	Role and Responsibilities
Recipients	Those persons identified in section 6, who include: <ul style="list-style-type: none"> - Divisional Management - Chief Compliance Officer, Head of Human Resources, Head of Internal Audit - A member of LNE’s Executive Team 	The role of the Recipients is to ensure that the information is heard by the company and proper follow-up occurs, as well as to take reasonable steps to ensure Disclosers feel supported and protected. Unless they feel that it can more appropriately be dealt with elsewhere, Recipients will refer the disclosure to the Chief Compliance Officer to oversee any investigation.
Whistleblower or Discloser	The person reporting the Potential Misconduct.	
Whistleblower Investigation Officer (WIO)	The Chief Compliance Officer or their delegate	<p>If a report made under this Policy is formally investigated, the WIO will usually carry out or supervise the investigation.</p> <p>The WIO will usually report any investigation outcomes.</p> <p>The WPO and WIO act independently of each other and the responsibilities of these roles do not reside with one person.</p>

Whistleblower Protection Officer (WPO)	The Head of Human Resources	<p>The WPO will safeguard the interests of Employees making reports under the Policy so far as practicable and will ensure the integrity of the reporting mechanism.</p> <p>The WPO would usually act as the contact point for communication with the Whistleblower after raising their concern.</p>
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6. How to Speak Up

If you wish to raise concerns formally, you are encouraged to firstly report the matter internally to one of the following Recipients:

- Your manager, Divisional Management;
- the Chief Compliance Officer, Head of Human Resources, Head of Internal Audit
- any member of LNE's Executive Team

If you do not wish to raise concerns to a Recipient, LNE has engaged third party whistleblower services. This service provides for the ability for you to submit a report via phone or website. Questions or concerns can be reported to the Business Integrity Reporting Line 24 hours a day, 7 days a week:

Website

livenation.ethicspoint.com

North America

1-888-497-2555

International

UK: 0808-234-1231

Australia: 1-800-01-4616

France: 0800-91-6400

[Other countries](#)

You should provide as much information as possible, including details of the potential misconduct, people involved, dates, locations and any more evidence that may exist. LNE may ask you to provide that information at a later stage to assist in its enquiries. Needless to say, the more information you can provide in support of your disclosure, the faster, more focused and more effective LNE's investigation is likely to be.

7. Reporting anonymously

Where applicable by law, you can make an anonymous disclosure if you do not want to reveal your identity. While you are encouraged to provide your name when raising your concern because it will make it easier for LNE to address your disclosure (for example, the context in which you may have observed the potential misconduct is likely to be useful information) you are not required to do so.

If you do not provide your name, LNE will do its best to assess your disclosure in the same way as if you had revealed your identity, and any investigation will be conducted as best as possible in the circumstances. However, please be aware that an investigation may not be possible unless sufficient information is provided. You will still be entitled to protections under the law if a protected disclosure is made, as described in [LNE Code of Business Conduct and Ethics](#).

Information received from anyone will be held in the strictest of confidence. More information on protecting your identity is contained in section 10.

8. LNE's commitment to Employees who Report Concerns

Disclosures made under this Policy will be received and treated sensitively and seriously and will be dealt with fairly and objectively.

The key steps involved after LNE receives a disclosure include:

- (a) investigating the disclosure;
- (b) keeping a disclosure informed; and
- (c) documenting, reporting internally and communicating to the Discloser the investigation findings.

While raising a concern does not guarantee that the disclosure will be formally investigated, all reports will be assessed and considered by LNE and a decision made as to whether they should be investigated. LNE's response to a disclosure will vary depending on the nature of the disclosure (including the amount of information provided).

Recipients will keep in contact with Disclosers until the matter is resolved by LNE. If appropriate, Disclosers will be told how LNE has decided to respond to their disclosure, including whether an investigation will be conducted. This may not occur until after an investigation has been concluded. However, it may not always be appropriate to provide Disclosers with this information, and it may not be possible unless contact details are provided when raising concerns or Disclosers continue to keep in contact through the third-party whistleblower provider.

Any investigations commenced will be conducted in a timely manner and will be fair and so far as practicable independent from any persons to whom the disclosure relates. Investigations will generally be overseen by the Head of Internal Audit or Chief Compliance Officer, depending on the nature of the matter. Other people, including employees (for example, the Human Resources, Compliance Audit or Internal Legal Counsel teams) or external advisers, may also be asked to assist or run the investigation.

LNE will need to assess each disclosure to determine whether it qualifies for protection and a formal, in-depth investigation is required.

All employees and contractors must cooperate fully with any investigations, including (if requested) the person making the disclosure which led to it. That does not include carrying out your own investigation either before or in parallel with that conducted by LNE. This may tip off a wrong-doer and/or obscure or taint relevant evidence. It is LNE's decision alone as to whether an investigation (or a particular depth or style of investigation) is required.

Without the Discloser's consent, LNE cannot disclose information that is likely to lead to the identification of the Discloser as part of its investigation process unless:

- (a) the information does not include the Discloser's identity;
- (b) LNE removes information relating to the Discloser's identity or other information that is likely to lead to the identification of the Discloser (e.g. the Discloser's name, position title and other identifying details); and
- (c) it is reasonably necessary for investigating the issues raised in the disclosure.

Unless there are confidentiality or other reasons not to do so, persons to whom the disclosure relates will be informed of the allegation at an appropriate time and will be given a chance to respond to any allegations made against them.

Your identity will be protected as described in section 10 of this Policy.

9. What happens after an investigation?

The results of any investigation will be recorded in writing in a formal internal report that will be confidential and is the property of LNE. The outcome of any investigation will be reported to the Audit Committee of the Board in accordance with section 13 below.

Disclosers who report will generally be informed, at least in an outline, of the investigation outcome. However, it may not always be appropriate to provide Disclosers with this information in which case it will not be shared. That may be, for example, if the outcome includes matters which are properly confidential as between LNE and the person accused of wrongdoing or where there are material issues of commercial confidentiality. The question of what remedial measures (if any) are required is for LNE (not the Discloser) to determine, but LNE will seek to consult with the Discloser where appropriate. Where appropriate, the persons to whom the disclosure relates will also be informed of the findings of any investigation. The full formal report recording the results of an investigation will not usually be provided to a Discloser or any other person subject to investigation.

Where an investigation identifies a serious or repeated breach of law or LNE's Code of Conduct, appropriate disciplinary action may be taken. This may include but is not limited to terminating or suspending the employment or engagement of the person(s) involved in the misconduct.

10. Protection of Whistleblowers

LNE is committed to protecting and respecting the rights of any person who raises concerns under this Policy so far as it can. This section outlines the policy on protecting those who raise those concerns. The law also contains additional protections, which are summarized in [LNE Code of Business Conduct and Ethics](#) and [Appendix A \(under Australian law\)](#).

Protecting your identity

The priority at LNE is to protect people who raise concerns. If you report, your identity (and any information that we have because of your disclosure that someone could likely use to work out your identity) will only be disclosed if:

- you give your consent for LNE to disclose that information;
- the disclosure is allowed or required by law (for example, disclosure by LNE to a lawyer to get legal advice relating to the law on whistleblowing);
- in the case of information likely to identify you, it is reasonably necessary to disclose the information for the purposes of an investigation, but all reasonable steps are taken to prevent someone from working out your identity; or
- any legal or judicial process requires your identity (or documents which may reveal it) to be disclosed.

Please refer to [Appendix A](#) for specific requirements and exceptions applicable under Australian law.

Protecting you from detriment

LNE will not tolerate any detrimental conduct against any person who has or may raise concerns or who is believed to have done so, including conduct against that person's colleagues, employer (if a contractor) or relatives.

- Examples of detrimental conduct include the following:
 - discrimination, detriment or damage to a person's reputation;
 - threats, harassment, intimidation or retaliation;
 - failing to hire or rehire;
 - denying overtime or promotion;
 - reassignment to a less desirable position or less favorable work opportunities;
 - reducing pay or changing hours;

- disciplining or denying benefits;
- a demotion, lay off or dismissal; or
- threats of any of the above.

Any person involved in detrimental conduct may be subject to disciplinary action (including but not limited to termination of employment or engagement). In some circumstances, this may also be a criminal offence punishable by imprisonment. LNE may refer any person who has engaged in detrimental conduct to law enforcement authorities for further investigation.

If you are concerned that you may be, are being, or have been subject to detrimental conduct as a result of raising concerns you should immediately report this matter to the Chief Compliance Officer.

For the purposes of this Policy, detrimental conduct does not include actions or decisions unfavorable to you where these are not in consequence of your disclosure, especially where they are part of the ordinary management of the employment relationship.

Other protections available

LNE is committed to making sure that you do not suffer detriment because you raise concerns. The protections offered will be determined by LNE and depend on things such as the potential misconduct and people involved. Protections may include the following, at LNE's discretion:

- monitoring and managing the behavior of other employees;
- relocating employees (which may include the people alleged to have been involved in the potential misconduct or detrimental conduct) to a different division, group or office or revising the reporting lines of employees;
- offering you flexible workplace arrangements while a matter is investigated;
- rectifying any detriment that you have suffered.

A Discloser who is a current or former employee may access LNE's Employee Assistance Program (EAP) which can be contacted at **1 (877) 207-8833**.

LNE will look for ways to support all people who raise concerns, but it will of course not be able to provide non-employees with the same type and level of support that it provides to employees. Where this Policy cannot be applied to non-employees (for example, because LNE cannot itself offer flexible workplace arrangements to a supplier), LNE will still seek to offer as much support as practicable.

11. False or misleading disclosures

When raising concerns, you will be expected to have reasonable grounds to suspect the information you are disclosing is true, but you will not be penalized if, having reported it in good faith, the information turns out to be incorrect. However, you must not make a report that you know is not true or is misleading. Where it is found that a Discloser has knowingly made a false report, this may be a breach of LNE's Code of Conduct and will be considered a serious matter that may result in disciplinary action. There may also be legal consequences if you make a knowingly false report, and the protections against detrimental conduct above will not apply.

12. Record keeping and personnel files

All reports will be tracked.

The Recipient (or other responsible person receiving your disclosure) will seek your consent before recording your name. You are encouraged to feel supported and safe in providing information, and to consent to the limited sharing

within LNE of your identity. This will assist LNE to protect and support you in relation to your disclosure and facilitate LNE in investigating, reporting and taking action arising as a result of your disclosure.

All reporting is confidential and, subject to any legal obligation, can only be accessed by the Chief Compliance Officer or designee and appropriate parties (depending on investigation needs), who will use that information to determine the appropriate response to disclosures made and to inform any investigation that has commenced.

All information, documents, records and reports relating to the investigation of reported conduct will be confidentially stored and retained in an appropriate and secure manner.

13. Reporting and Review of this Policy and the Whistleblower Program

The Audit Committee will receive a summary of disclosures made under this Policy quarterly, including metrics on disclosures made and the types of issues raised.

LNE's Whistleblower Program is to be reviewed annually. Any country-specific changes required by law or good practice guidance in any particular jurisdiction will be notified locally only. Any changes to the Policy will be made available on LNE's Backstage site.

14. Availability of this Policy and training

LNE will seek to ensure that employees (including new employees) and contractors are informed about and understand this Policy. Each employee will have access to this Policy. Training will also be provided to individuals who are likely to receive whistleblowing disclosures or otherwise have a role under this Policy, including in relation to how to respond to disclosures.

A copy of this Policy will also be available on LNE's Backstage site.

Any questions about this Policy can be referred to the Chief Compliance Officer.

Associated Documents

- [LNE Code of Business Conduct and Ethics](#)
- [Anti-Bribery and Corruption Policy](#)
- [Fraud Policy](#)
- [Appendix A \(Australian law specific information\)](#)

Violation of the LNE Whistleblower Protection Policy

Failure to adhere to LNE's Whistleblower Protection Policy could result in disciplinary action being taken against you in accordance with local disciplinary rules and applicable LNE disciplinary policies. Such action could include informal and formal action, and serious breaches of LNE's Whistleblower Protection Policy could constitute gross misconduct and potentially result in immediate dismissal. You should speak to your local HR representative if you require further information about the disciplinary policies and procedures applicable in your market.

Revision History

Version number	Date	Author	Change description
CC-016 V1.0	02/20/2020	Emily Wall	New policy created for Whistleblower protection for US employees.
CC-016 V2.0	09/05/2023	Emily Wall Byron Escobar	Consolidated US and Australia policies and updated the appendix to reflect Whistleblower policies from other countries; Created one global policy for all employees.

Appendix B - Relevant Laws

Country	Regulation
Australia	Corporations Act 2001(Corporations Act)
Belgium	Law of 31 July 2017
Croatia	Whistleblower Protection Act
Denmark	The Whistleblowing Act
France	Sapin II
Hungary	Act CLXV of 2013 on Complaints and Public Interest Disclosures
India	Whistleblowers Protection Act, 2014
Ireland	Protected Disclosures Act 2014
Italy	Law 179/2017
Japan	Whistleblower Protection Act
Kenya	Whistleblower Protection Bill 2021
Lithuania	Lithuania Whistleblower Law
Macedonia	The Macedonian Law on Whistleblower Protection
Malaysia	The Whistleblower Protection Act 2010
Malta	Protection of the Whistleblower Act (Cap 527)
Netherlands	Dutch Whistleblowers (Safe Haven) Act (Wet Huis voor Klokkeluiders, the Act)
Scotland	Public Interest Disclosure Act 1998
Serbia	Off. Gazette of RS", no. 128/2014
South Africa	The Protected Disclosures Act 26 of 2000
South Korea	Whistleblower Protection Act
Spain	BOE-A-2023-4513: Law 2/2023
Sweden	Implementation of the Whistleblowing Directive
United Kingdom	Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998 and the Employment and Regulatory Reform Act 2013).
United States of America	<ul style="list-style-type: none"> • The Whistleblower Protection Act of 1989 • Occupational Safety and Health Administration (OSHA) • Office of Federal Contract Compliance Programs (OFCCP) • Wage and Hour Division (WHD) • Veterans' Employment and Training Service (VETS)