

## European Union Whistleblower Policy

### IRELAND PROCEDURE

This Country Procedure (the "**Procedure**") supplements the European Union Whistleblowing Policy. In the event of a conflict, this Procedure shall prevail.

#### Purpose and Scope

This Procedure is implemented in Ireland by Mastercard Ireland Limited ("**Mastercard Ireland**").

This Procedure applies to Mastercard Ireland Employees and Contingent Workers (as defined in the European Union Whistleblower Policy), but also to persons who have acquired information about the Breaches (as defined below) in the context of a working or professional relationship with Mastercard Ireland or any other Mastercard legal entity.

This Procedure also applies to those who report a breach of which they became aware during a recruitment process or pre-contractual negotiations.

This Procedure covers the reporting of the following in relation to the activities of Mastercard Ireland:

- criminal offences that have been, are being or are likely to be committed;
- a failure or likely failure to comply with any legal obligation, other than one arising under a contract of employment or a contract to provide services personally;
- a miscarriage of justice that has occurred, is occurring or is likely to occur;
- the actual or likely endangerment of the health or safety of any individual;
- damage or likely damage to the environment;
- an unlawful or otherwise improper use (or likely improper use) of funds or resources of a public body or other public money;
- an act or omission by or on behalf of a public body that is oppressive, discriminatory or grossly negligent or which constitutes gross mismanagement;
- an act or omission that is unlawful or that defeats the object or purpose of certain rules of the European Union in the following areas:
  - public procurement;
  - financial services, products and markets, and prevention of money laundering and terrorist financing;
  - product safety and compliance;
  - transport safety;
  - protection of the environment;
  - radiation protection and nuclear safety;
  - food and feed safety, animal health and welfare;
  - public health;
  - consumer protection;
  - protection of privacy and personal data, and security of network and information systems;
- breaches affecting the financial interests of the European Union as referred to in Article 325 Treaty on the Functioning of the European Union ("TFEU") and as further specified in relevant European Union measures;
- breaches relating to the internal market, as referred to in Article 26(2) TFEU, including breaches of European Union competition and State aid rules, as well as breaches relating to the internal market in relation to acts which breach the rules of corporate tax or to arrangements the purpose of which is to obtain a tax advantage that defeats the object or purpose of the applicable

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corporate tax law; or

- information tending to show that any of the preceding matters has been, is being or is likely to be concealed or destroyed or that an attempt has been, is being or is likely to be made to conceal or destroy such information.

(together, the “**Breaches**”)

The Procedure does not cover reports relating to your own personal circumstances, grievances, complaints or employment relationship. Such concerns will generally fall outside the scope of this Procedure and it may be more appropriate to raise such matters under a different Mastercard Ireland policy or procedure.

### Internal Reporting

Employees may use the reporting channels identified at section 2.2.1 of the European Union Whistleblower Policy.

In Ireland, any reports of Breaches (a “**Report**”) may also be reported to:

- Senior Managing Counsel [Dublin, Ireland]

### Anonymity and Confidentiality

Reports may be made anonymously or on an open basis. However, we strongly encourage Reports to be made on an open basis, where possible. Anonymous reporting may limit the extent to which we are able to fully investigate Reports and take remedial action.

Mastercard, for and on behalf of itself and Mastercard Ireland, will take steps to maintain confidentiality, to the extent reasonable and practicable under the circumstances.

Retaliation against those making Reports, whether direct or indirect, and persons who facilitate or otherwise assist in the making of the Report or the investigation process will not be tolerated. Please refer to Mastercard’s Non-Retaliation Policy for further guidance.

### Making reports and acknowledgement

Employees may make reports orally or in writing. Employees may request a physical meeting. If employees request a physical meeting, this will be set up within a reasonable time-frame.

The Report will be acknowledged within 7 calendar days of the Report being made.

### Investigation process

Once a Report has been made, Mastercard, for and on behalf of itself and Mastercard Ireland, will carry out an initial assessment to determine the scope of any investigation in accordance with Section 2.3.1 of the European Union Whistleblower Policy. Workers may be asked to provide further information in connection with any investigation process. Mastercard will aim to keep you informed of the progress of any investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us from giving you specific details of the investigation or any action taken as a result. You are required to treat any information about the investigation as strictly confidential.

### Feedback

Where possible, Reporters will be provided feedback on the action envisaged or taken as follow-up to

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the Report, subject always to applicable legal and regulatory obligations.

### **External Reporting**

Mastercard Ireland strongly encourages reports to be made internally so that any concerns can be resolved. However, should workers decide to report their concerns externally, the prescribed persons are set out in the Protected Disclosures Act 2014 (Disclosure to Prescribed Persons) Order 2020 (SI 367/2020) which is available [here](#). The worker may also make a Report to the Office of the Protected Disclosures Commissioner or, where relevant, to institutions, bodies offices or agencies of the European Union.

A worker may make a disclosure to a prescribed person if the worker reasonably believes that the Breach is within the remit of the prescribed person and the information the worker discloses and any allegation in it are substantially true.

### **Records**

Records of all Reports made in accordance with this Procedure will be kept in accordance with Section 2.3.3 of the European Union Whistleblower Policy.