

European Union Whistleblower Policy – Greece Procedure

GREECE PROCEDURE

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

Purpose and Scope

This Procedure is implemented in Greece by Mastercard Europe Greece Single Member S.A. (“**Mastercard Greece**”).

This Procedure applies to Mastercard Greece employees and persons who have a work relationship or provide services to Mastercard Greece who have obtained information regarding Breaches within the scope of their work with Mastercard Greece. Such employees include full or part-time employees, indefinite or fixed term employees; self-employed persons; consultants and home workers; shareholders and persons belonging in the administrative, management or supervisory bodies of Mastercard Greece, including non-executive members; as well as volunteers and paid or unpaid trainees; any person working under the supervision and direction of contractors, subcontractors and suppliers.

This Procedure also applies to those who report a Breach of which they became aware of during a recruitment process, or pre-contractual negotiations, or to persons who wish to report information concerning Breaches obtained within the scope of their employment with Mastercard Greece which has ended (for any reason, including retirement). (together, the “**Reporters**”).

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

- Breaches falling within the scope of EU law that concern the following areas: (i) public procurement; (ii) financial services, products and markets, and prevention of money laundering and terrorist financing; (iii) product safety and compliance; (iv) transport safety; (v) protection of the environment; (vi) radiation protection and nuclear safety; (vii) food and feed safety, animal health and welfare; (viii) public health; (ix) consumer protection; and (x) protection of privacy and personal data, and security of network and information systems;
- Breaches affecting the financial interests of the EU as referred to in Article 325 TFEU and as further specified in relevant EU measures; and
- Breaches relating to the internal market, as referred to in Article 26 (2) TFEU, including breaches of EU 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 corporate tax law.

(together, the “**Breaches**”).

Internal Reporting

Mastercard Greece appoints an Officer for the Receipt and Follow Up on Reports (the “**Officer**”), who is [legal counsel](#) and will be responsible for the receipt and follow up on the Reporters’ reports. Reporters can report a Breach in writing or via telephone to the attention of the Officer or via a physical meeting with the Officer, which will be arranged within a reasonable timeframe following the receipt of the request or via the Ethics Helpline, as mentioned at section 2.2.1 of the European Union Whistleblower Policy.

Anonymity and Confidentiality

Reports can be submitted anonymously and confidentially. A report may also be made anonymously if the Reporter wishes to do so. However, anonymous reporting may limit the extent to which reports may be fully investigated and the extent protection may be provided to the Reporter under the Law.

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

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Acknowledgement and investigation process

The Officer is responsible for processing the report received and the report will be acknowledged within seven (7) working days of receipt.

Once a report has been made, the Officer will either forward it to the Global Compliance Investigations Team and may be shared with the Mastercard data privacy team and/or Employee Relations, who form part of the staff members authorized to receive or follow up on reports for the purposes of the European Union Whistleblowing Directive, or applicable law enforcement or judicial agencies. The Officer will terminate the investigation process where the report is unintelligible, or abusive, or does not include facts constituting a breach of EU law, or there are no serious indications of such breach.

Feedback

The Reporter will be provided with information on the measures envisaged or taken to assess the accuracy of the allegations and where appropriate, to remedy the issues provided in the report, as well as the reasons for such measures within a reasonable timeframe, which shall not exceed three (3) months from the receipt of the report or from the deadline for acknowledging the receipt. Sometimes the need for confidentiality may prevent the disclosure of specific details of the investigation or any action taken as a result.

Personal Data Processing

The personal data processed in the context of a disclosure pursuant to the Procedure shall be processed in compliance with applicable data protection legislation, including the EU Regulation 679/2016 (“**GDPR**”) and Greek law 4624/2019.

As a matter of exception from the general GDPR rules, Mastercard Greece will not inform the person who is referred to in the report as a person to whom the Breach is attributed or any third party mentioned in the report regarding their personal data processing and may not satisfy their relevant rights (right to access, rectification, erasure, etc.), as long as this is necessary to prevent attempts to obstruct the report, to protect the investigation, to protect the Reporter's identity, and to protect the Reporter from any form of retaliation. Further details on how Mastercard Greece will process personal data for the purposes of providing the internal reporting channels and to investigate reports can be found [here](#) (for Mastercard employees), and [here](#) (for non-Mastercard employees).

External Reporting Procedure

The Reporter always has the option to file a report to the National Transparency Authority (“**NTA**”). In particular, the Reporter can report a breach of EU law directly to the NTA (NTA’s reporting channel available here: <https://extwhistle.acad.gr>), in case they reasonably believe that their report cannot be effectively addressed by the Officer (e.g., in case of conflict of interest), or there is a risk of retaliation. Reports can be made in writing, orally by telephone or request a face-to-face meeting with the person appointed by the NTA, or through the electronic platform of the NTA. Also, the Reporter, where applicable, can also make a report to institutions, bodies, offices or agencies of the Union that are competent, in each instance, for the subjects that are the object of the report.