

European Union Whistleblower Policy – Sweden Procedure

SWEDEN PROCEDURE

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

Purpose and Scope

This Procedure is implemented in Sweden by Mastercard Sweden Services AB; and Baffin Bay Networks AB, Private Limited Company (“**Mastercard Sweden**”).

This Procedure applies to Mastercard Sweden employees and persons who have a work relationship or provide services to Mastercard Sweden, as defined in the Swedish Whistleblowing Act (Sw. *lag om skydd för personer som rapporterar om missförhållanden*).

This Procedure covers the reporting of:

- Breaches of European Union law falling within the material scope of the Whistleblowing Directive including:
- Breaches of European Union law relating to:
 - 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 corporate tax law; and
- Reporting of infringements of Swedish law and regulations that implement or supplement the EU law falling within the scope;
- Other misconducts that are such that it is in public interest that they are disclosed, (together "**Breaches**").

The Procedure does not typically cover reports relating to one’s personal employment relationship. Such concerns generally fall outside the scope of this Procedure, unless the disclosure is a one of public interest (e.g. disclosures relating to unlawful treatment of migrant workers, modern slavery or human trafficking).

Internal Reporting

Reporters may use the reporting channels identified at section 2.2.1 of the European Whistleblowing Policy.

In Sweden any reports of Breaches (the “**Report**”) may also be reported to the designated person through the Swedish local reporting channel:

- [Senior Counsel](#)

By using the reporting channel described above and ensuring the concern in question falls within the scope of the country specific provisions, the Reporter is protected against retaliation under the Swedish Whistleblowing Act.

European Union Whistleblower Policy – Sweden Procedure

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 Sweden will take steps to maintain confidentiality, to the extent reasonable and practicable under the circumstances. In furtherance of an investigation, the subject of the Report will typically, at some point, be informed of the investigation and interviewed. The person(s) managing a whistleblower case is bound by confidentiality and cannot disclose the Reporter's identity without their prior consent. Disclosure of this information may be deferred when it is likely to seriously jeopardize the purpose for which the Report is being processed. In addition, the Reporter's identity may be disclosed in the following instances: to persons who have been selected as competent to manage whistleblower cases, for forwarding information to the personnel function in the company for employment law measures and for police reports.

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.

Mastercard Sweden retains records of all reportable concerns received. The records are not retained longer than necessary, and they are deleted within two years from when the follow-up of the reportable concern has been ended.

Making reports and acknowledgement of receipt

Reports may be made orally or in writing. Reporters may also request a physical meeting, by contacting the designated impartial person identified above. If a Reporter requests a physical meeting, one will be arranged within a reasonable timeframe. Receipt of the Report will be acknowledged within 7 days of the Report being made.

Investigation process

Once a Report has been made Mastercard Sweden will carry out an assessment to determine the scope of any investigation. Reporters may be asked to provide further information in connection with the investigation process.

Depending on the nature of the Report, it may be appropriate for the concerns to be investigated by specialist functions within the wider group. Reports will be shared with 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 investigate Reports for the purposes of the European Union Whistleblowing Directive.

Feedback

The Reporter will be provided feedback on the action envisaged or taken as follow-up to the Report, subject always to applicable legal and regulatory obligations, within three months upon the date of receipt of the Report.

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 Swedish law and regulations as applicable.

As a matter of exception from the general GDPR rules, Mastercard Sweden may, subject to due legal considerations in the individual case, not always 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 and justifiable 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 Sweden will process personal data for the purposes of providing the internal reporting channels and

European Union Whistleblower Policy – Sweden Procedure

to investigate reports can be found [here](#) (for Mastercard employees), and [here](#) (for non-Mastercard employees).

Other rights

Please note that under the Swedish Freedom of Press Act (Sw. *tryckfrihetsförordningen*) and the Swedish Fundamental Law on Freedom of Expression (Sw. *yttrandefrihetsgrundlagen*) everyone is free to communicate information on any subject whatsoever for the purpose of publication in programmes or technical recordings (freedom to communicate information, Sw. *meddelarfrihet*) as well as right to procure information on any subject whatsoever in order to communicate or publish it (freedom to procure information, Sw. *anskaffarfrihet*). Your duty of loyalty to your employer may restrict these rights.

External Reporting

Mastercard Sweden strongly encourages Reports to be made internally so that any concerns can be resolved. However, should a Reporter decide to report their concerns externally, a list of competent authorities in Sweden who maintain external reporting channels can be found below. The best way to obtain the authority's contact details is to access their website.

European Union Whistleblower Policy – Sweden Procedure

Authority	The Authority's Area of Responsibility
Konkurrensverket	Breaches falling within the scope of public procurement that is covered by the authority's supervisory responsibility.
Fastighetsmäklarinspektionen, Finansinspektionen, länsstyrelserna i Stockholms, Västra Götalands och Skåne län, Revisorsinspektionen och Spelinspektionen.	Breaches falling within the scope of financial services, products and markets, and prevention of money laundering and terrorist financing that is covered by the authority's supervisory responsibility.
Arbetsmiljöverket, Boverket, Elsäkerhetsverket, Folkhälsomyndigheten, Inspektionen för strategiska produkter, Kemikalieinspektionen, Konsumentverket, Livsmedelsverket, Läkemedelsverket, länsstyrelserna, Myndigheten för samhällsskydd och beredskap, Naturvårdsverket, Post- och telestyrelsen, Statens energimyndighet, Statens jordbruksverk, Styrelsen för ackreditering och teknisk kontroll och Transportstyrelsen.	Breaches falling within the scope of product safety and compliance that is covered by the authority's supervisory responsibility.
Transportstyrelsen	Breaches falling within the scope of transport safety that is covered by the authority's supervisory responsibility.
Havs- och vattenmyndigheten, Kemikalieinspektionen, Livsmedelsverket, länsstyrelserna, Naturvårdsverket, Skogsstyrelsen och Statens jordbruksverk.	Breaches falling within the scope of protection of the environment that is covered by the authority's supervisory responsibility.
Livsmedelsverket och Strålsäkerhetsmyndigheten.	Breaches falling within the scope of radiation protection and nuclear safety that is covered by the authority's supervisory responsibility.
Livsmedelsverket och Statens jordbruksverk.	Breaches falling within the scope of food and feed safety, animal health and welfare that is covered by the authority's supervisory responsibility.
Folkhälsomyndigheten, Inspektionen för vård och omsorg, Konsumentverket och Läkemedelsverket.	Breaches falling within the scope of public health that is covered by the authority's supervisory responsibility
Finansinspektionen och Konsumentverket.	Breaches falling within the scope of consumer protection that is covered by the authority's supervisory responsibility
Finansinspektionen, Inspektionen för vård och omsorg, Integritetsskyddsmyndigheten, Livsmedelsverket, Post- och telestyrelsen, Statens energimyndighet och Transportstyrelsen.	Breaches falling within the scope of protection of privacy and personal data, and security of network and information systems that is covered by the authority's supervisory responsibility

European Union Whistleblower Policy – Sweden Procedure

Ekobrottsmyndigheten	Breaches falling within the scope of the union's financial interests as referred to in 2.1 b Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019, regarding fraud.
Skatteverket	Breaches falling within the scope of the union's financial interests as referred to in 2.1 b Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019, regarding taxes.
Regeringskansliet	Breaches falling within the scope of the union's financial interests as referred to in 2.1 b Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019, regarding state aid.
Konkurrensverket	Breaches falling within the scope of the union's financial interests as referred to in 2.1 b Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019, regarding the area of competition.
Regeringskansliet	Breaches falling within the scope of the union's financial interests as referred to in 2.1 b Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019, regarding the area of state aid.
Skatteverket	Breaches falling within the scope of the union's financial interests as referred to in 2.1 b Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019, regarding corporate taxes.
Arbetsmiljöverket	Breaches not covered by another authority's supervisory responsibility.