

European Union Whistleblower Policy – Czech Republic Procedure

CZECH REPUBLIC PROCEDURE

This Country Procedure (the “**Procedure**”) has been issued by the entities, Mastercard Europe S.A., Czech Republic Branch and Session M Czech Republic s.r.o. (“**Mastercard Czech Republic**”).

This Procedure supplements the European Union Whistleblowing Policy. In the event of a conflict, this Procedure will prevail.

Purpose and Scope

This Procedure applies to Mastercard Czech Republic Employees and job candidates based in the Czech Republic who report a Breach (as defined below) as well as the individuals which are set out in the European Union Whistleblowing Policy.

This Procedure covers the reporting of the following in the relation to Mastercard Czech Republic:

- Violation which qualifies as a criminal offence;
- Violation which qualifies as an administrative offence punishable by a fine with upper limit of at least CZK 100,000;
- Violation of the Czech Whistleblowing Act, such as a failure to adhere to this Procedure;
- Violation of Czech or European Union law in the areas specified in the definition of the "European Union Law" in the European Union Whistleblowing Policy;
- Retaliation for reporting a violation covered by this Procedure and/or the European Union Whistleblowing Policy.

(together, the “**Breaches**”)

However, the following are expressly excluded from the scope of this Procedure: the report could immediately threaten the essential security interest of the Czech Republic; the report contains information about the activities of the intelligence services of the Czech Republic; or the report would constitute a violation of the obligation to maintain the confidentiality of clergy in connection with the exercise of confessional secrecy or a right similar to confessional secrecy.

Internal Reporting

Employees must report any Breaches of which they are aware by using the reporting channels identified at section 2.2.1 of the European Union Whistleblower Policy. Alternatively, if you prefer, any concerns can be reported to the [Local Reporting Contact](#).

Anonymity and Confidentiality

In addition to the information provided in the European Union Whistleblowing Policy, please note that:

- An anonymous report does not trigger the mandatory steps under the Czech Whistleblowing Act;
- If you want to be covered by the Act, the person reporting (“**Reporter**”) must share their identify.
- If an anonymous Reporter is identified, the Reporter becomes protected, and the report will be properly investigated.

Non-Retaliation

Retaliation against Reporters related to any Breaches indicated in this Procedure, whether direct or indirect, and person who facilitate or otherwise assist in making of the Report or the investigation process will not be tolerated. Please refer to Mastercard’s Non-Retaliation Policy for further guidance.

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Making Reports, Acknowledgement, and Feedback

In addition to the information provided in the European Union Whistleblowing Policy, please note that:

- If requested by the Reporter, the designated person must allow a personal filing of the report within 14 days.
- The designated person must confirm the receipt of the report in writing, within 7 days. Furthermore, subject to applicable legal and regulatory obligations (including confidentiality obligations), the designated person shall inform the Reporter of any action taken, the status of the internal investigation as well as the outcome thereof within a reasonable period of time, but no later than 30 days from the confirmation of receipt. In the event of factually or legally complex cases, this period may be extended once or at most twice with each extension lasting up to 30 days. The designated person is obligated to inform the Reporter in writing of the extended deadline and the reasons for its extension before the deadline expires.

External reporting locally

The external reporting channel is available on this website: <https://oznamovatel.justice.cz/>.

Archiving of report and handling of personal data

Personal data is processed while the case is ongoing and for a period of 5 years from the date of receipt of the report.

You have the right to report any complaints about the processing of personal data to your local supervisory authority, the Office for Personal Data Protection, www.uoou.cz.

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 Czech Republic law.

As a matter of exception from the general GDPR rules, Mastercard Czech Republic 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 Czech Republic 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).