

European Union Whistleblower Policy – Denmark Procedure

DENMARK 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 Denmark by Mastercard Europe SA Branch Office Denmark, Mastercard Payment Services Denmark A/S and AiiA A/S (“**Mastercard Denmark**”).

This Procedure applies to Mastercard Denmark employees, who can as such report to the system, but we also accept reports from persons who have a work relationship or provide services to Mastercard Denmark.

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

- 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 serious legal violations and offences under Danish law (such as serious sexual offences or other serious harassment because of race, political or religious beliefs), together "**Breaches.**"

This Procedure does not cover reports relating to your personal employment relationship. Such concerns will generally fall outside the scope of this Procedure, save where they concern serious legal violations and offences under Danish law.

Internal Reporting

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

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

- [Local Reporting Counsel](#) - Denmark

When making a Report, the information listed below will generally be useful in connection with further investigation of the issue:

- A description of the issue in question, including date, place, and the name(s) of the person(s) involved
- Any documentation or evidence concerning the violation or other information which may assist the investigation

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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 Mastercard Denmark will take steps to maintain confidentiality, to the extent reasonable and practicable under the circumstances.

Mastercard, for and on behalf of Mastercard Denmark, is subject to a special duty of confidentiality with regard to any information that follows from a Report. Further, any person who is involved in the investigations of a Report will be subject to the same special duty of confidentiality in regard to any information that has or is subject of the investigation of the Report received through the whistleblowing system.

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. Where the Report is made orally, 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 days of the Report being made.

Investigation process

Once a Report has been made, Mastercard Denmark will carry out an assessment to determine the scope of any investigation. Employees 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.

Feedback

Where possible, employees will be provided feedback on the action envisaged or taken as follow-up to the Report, subject always to applicable legal and regulatory obligations.

As a general rule, employees will receive feedback concerning the closure of a Report no later than 3 months from receiving the acknowledgement of a Report. If the processing of a Report requires longer than 3 months, the employee will receive a notification regarding the reason why further investigation time is necessary. The employee will, as a general rule, within the limits of Danish legislation, receive information about the outcome 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 Danish law.

Mastercard Denmark will postpone information to 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 also postpone the fulfilment of 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,

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and to protect the Reporter from any form of retaliation. Further details on how Mastercard Denmark 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

Mastercard Denmark strongly encourages Reports to be made internally so that any concerns can be resolved. However, should employees decide to report their concerns externally, the competent authorities are set out below:

- a) The Danish Data Protection Agency;
- b) The Danish Financial Supervisory Authority.