

European Union Whistleblower Policy – Hungary Procedure

HUNGARY PROCEDURE

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

Purpose and Scope

This Procedure is implemented in Hungary by Mastercard Magyarország Kft and Ekata Global Hungary Kft (together hereafter referred as "**Mastercard Hungary**").

The following individuals associated with Mastercard Hungary are encouraged to use the internal reporting process ("**Reporter**" or "**Reporters**"):

- a) Current employees of Mastercard Hungary;
- b) Employees whose employment relationship was terminated with Mastercard Hungary;
- c) Persons seeking to establish an employment relationship with Mastercard Hungary, provided that the procedure for establishment has been started;
- d) Any self-employed person who has a contractual relationship with Mastercard Hungary;
- e) Persons who have ownership in Mastercard Hungary as a company and/or who are members of the administrative, executive or supervisory body of Mastercard Hungary;
- f) Persons who have initiated the procedure for establishing a contractual relationship with Mastercard Hungary or who is or has been a contractor, subcontractor, supplier or person under the supervision and direction of such contractor;
- g) Trainees and volunteers working for Mastercard Hungary;
- h) Persons who wish to enter into a legal or contractual relationship with Mastercard Hungary within the meaning of points (d), (e) or (g) and for whom the procedure for the establishment of such a legal or contractual relationship has been initiated, and
- i) Persons who ceased to have a legal or contractual relationship with Mastercard Hungary within the meaning of points (d), (e) or (g).

This Procedure covers the reporting of any unlawful or suspected unlawful act or omission or other abuse (the "**Breach**" or "**Breaches**").

Internal reporting

The Reporter may be any individual who wishes to report a Breach in good faith ("**Report**"). The Reporter is expected to act in good faith when reporting Breaches, i.e. he/she must have the reasonable belief that the facts are true to the best of his/her knowledge at the time he/she reports them.

Under the Act XXV of 2023 on complaints, reports on public interests and rules on whistleblowing (the "**Whistleblowing Act**") a Report is lawful, if

- a) the Reporter has made the report through the internal reporting channel operated by Mastercard Hungary or by the external reporting channels provided by the Whistleblowing Act, in accordance with the rules set out in the Whistleblowing Act;
- b) the Reporter obtained the reported information on the circumstances covered by the report in the context of his or her employment-related activities; and
- c) the Reporter had reasonable grounds to believe that the notified information concerning the circumstances covered by the notification was true at the time of notification.

Further, specific cases, in which the Report would qualify as being lawful are set forth in Sections 46-47 of the Whistleblowing Act (e.g., if the Reporter discloses the report publicly in cases where neither the operator of the internal nor the external reporting channels took the required measures in time, or in cases where the Report relates to a matter which clearly harms the public interest).

Reporters may report Breaches through a variety of local channels, by contacting an appropriate person in Mastercard Hungary. If you report Breaches through the local channels, the Breach will be investigated pursuant to the rules as defined herein. If you report any abuse, concern, misconduct or otherwise unlawful act or behavior

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otherwise (e.g., you use the group-wide channel set out in the European Union Whistleblower Policy, or global Whistleblower Policy, or report your concern directly to your supervisor), then instead of the Whistleblowing Act and this Policy, other rules, set out in the relevant policy (or policies) and/or laws, will be applicable to the investigation of your concern, even if such concern would otherwise fall under the definition of Breach under this Policy. Therefore, if you wish to make a report, please always consider, first, which reporting channel's rules would be the most appropriate for your concern, in the light of the relevant circumstances.

Appropriate persons:

The Reporter may contact in writing or orally the Hungarian local reporting contact of Mastercard Hungary; location: Budapest, Hungary (the "[Local Reporting Contact](#)").

External reporting channels:

According to the whistleblowing Act, the Reporter may also use external reporting channels as follows:

1. Reports submitted to certain governmental organizations provided by Section 32 of the Whistleblowing Act;
2. Reports submitted to the classified electronic system of reports of public interest operated by the Office of the Commissioner for Fundamental Rights of Hungary in accordance with Section 39 of the Whistleblowing Act;
3. Reports made publicly available by the Reporter provided that the conditions set forth in Section 46 of the Whistleblowing Act are fulfilled; and
4. Reports made to relevant institutions, bodies, offices or agencies of the Union.

Further information on the external reporting channels and their procedures are in the Whistleblowing Act.

Making reports and acknowledgement

In addition to the procedural rules as defined in Section 2.3 of the European Union Whistleblower Policy, the following rules apply to the procedure conducted under the local reporting channel.

The Report may be submitted to the Local Reporting Contact in writing or orally. The Reporter has a choice to request a meeting with an appropriate person to report orally through face-to-face meeting, telephone or any other voicemail system (e.g. Teams).

In the case of an oral report, the Reporter will be made aware of the consequences of reporting in bad faith, the procedural rules governing the investigation of the Report and that his/her identity, if he or she provides the information necessary to establish it, will be treated confidentially at all stages of the investigation.

Investigation process

Whether the Breach is reported orally or in writing, the Reporter will receive a written acknowledgement of receipt within 7 days. The acknowledgement must include general information to the Reporter on the procedural and data processing rules under the Whistleblowing Act.

The Report will be assessed by the Local Reporting Contact. If the Report contains valid reference to Breach, it will be appropriately investigated by the Case Manager. If necessary, the Case Manager may refer the investigation to the the Global Compliance Investigations Team in line with the applicable laws of Hungary. If the Report is not qualified as a valid Report, the Report will be closed or waived, and the Reporter will be informed in writing.

According to the Whistleblowing Act, the investigation of a Report may be waived if:

- a) the Report was made anonymously;
- b) the Report was not filed by a person entitled to do so;
- c) the Report is a repeated Report by the same Reporter with the same content as the previous Report; or
- d) the prejudice to the public interest or to an overriding private interest would not be proportionate to the restriction of the rights of the natural or legal person (the "person concerned by the notification") resulting from the investigation of the Report.

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You may be asked to provide further information in connection with any investigation process. Mastercard Hungary will aim to keep you informed of the progress of any investigation and its likely timescale. However, the investigation must be completed within 30 days after receiving the Report. Such deadline may be extended in a particularly justified case, provided that the Reporter is informed at the same time. In this case, the reporter must be informed of the expected date of the investigation and the reasons for the extension. The deadline for the investigation of the Report and the information of the Reporter must not exceed three months in the case of an extension. The Report is managed by the Local Reporting Contact (the "**Case Manager**").

Feedback

Once the investigation is complete, the investigation team will notify the Case Manager. If the Breach included in the Report has legitimate basis, the Case Manager may take steps to ensure that appropriate measures may apply depending on local disciplinary policies and law. If the initiation of criminal proceedings is justified on the basis of the Report, arrangements must be made for the filing of a criminal complaint.

Mastercard Hungary will inform the Reporter in writing of the investigation or non-investigation of the Report. The written information may be waived if the Reporter has been informed orally by Mastercard Hungary of these matters and the Reporter acknowledged such information.

Anonymity and Confidentiality of the Reporter

Anonymity

When reporting a Breach, the Reporter may choose to do so anonymously. However, according to the Whistleblowing Act, the investigation of a Report may be waived if it was submitted anonymously.

Confidentiality

The identity of the Reporter is kept confidential and may only be accessible to the restricted list of persons involved in the case management (subject to obligations arising from the law or the applicable legal proceedings), e.g., the Case Manager, the appointed investigator(s), and any external or internal person mandated to support the investigation or next steps following the closing of the case. No one else will be informed.

The identity of the Reporter must be kept confidential at any circumstances (regardless of the job position or seniority in Mastercard Hungary) and, if necessary for the investigation to inform another person, the Case Manager should be consulted and approve. An unauthorized disclosure may lead to disciplinary actions. In all cases, the identity of the Reporter will not be provided to the Reported Person, unless expressly agreed by the Reporter or required by law or in the framework of legal proceedings.

Confidentiality of the Reported Person, witnesses and all third parties mentioned in the Report

Confidentiality

All persons involved are entitled to confidentiality in order to avoid unnecessary damage to their privacy and reputation. Therefore, the identity of the Reported Person, the facts reported, and the subsequent investigation and findings are kept confidential and limited to the strict necessity of the management of the Breach (subject to obligations arising from the law or the applicable legal proceedings).

Information shared must be kept confidential at any circumstances (regardless of the job position or seniority in Mastercard Hungary) and, if necessary for the investigation to inform another person, the Case Manager should be consulted and approve. An unauthorized disclosure may lead to disciplinary actions.

Non-retaliation

The non-retaliation protection defined in European Union Whistleblower Policy and the Whistleblowing Act shall be applicable to the investigation of Reports under local reporting channel.

The non-retaliation protection is also extended to the following persons:

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- "Facilitators", i.e. anyone who helped the Reporter in the reporting process (e.g. obtaining the information, evidence, etc.);
- Investigation cooperators (e.g. witnesses);
- People connected with the Reporter and who could suffer retaliation in a work-related context (in particular co-workers);
- Legal entities that the Reporter owns, works for or is otherwise connected in a work-related context. Protection applies even if the alleged violation is unfounded after investigation is closed.

Other protecting measures and the examples of measures adversely affecting the Reporter can be found under Subtitle 8 of the Whistleblowing Act.

Privacy

Only those personal data of the Reporter, the Reported Person and any persons who have material information on the case reported may be processed that is essential to the investigation of the Report and may only be processed for the of investigating the Report and remedying or stopping the conduct that is subject of the Report. All other personal data must be deleted from the file without undue delay.

The personal data of the Reporter may be disclosed only to the body competent to conduct the proceedings initiated on the basis of the Report, if that body is entitled to process the data by law or if the Reporter has consented to the disclosure of the data. The personal data of the Reporter shall not be disclosed to the public without their consent.

Mastercard Hungary will prevent access to the personal data of the Reporter who reveals their identity, as well as of the Reported Person for persons other than those so authorized. Until the conclusion of the investigation or the opening of proceedings for incurring formal liability as a result of the investigation, the persons investigating the Report shall be allowed to share information about the content of the Report and the Reported Person - apart from informing the Reported Person - with other organizational units or employees of Mastercard Hungary to the extent absolutely necessary for conducting the investigation. These provisions are also applicable to persons who may have material information on the subject matter of the Report.

At the beginning of the investigation, the Reported Person shall be informed in detail about the Report, about their rights in relation to the protection of their personal data, and about the rules for processing their data. In accordance with the principle of fair trial, the Reported Person shall be given the opportunity to express their position regarding the Report also through their legal representative, and to provide evidences. In exceptional cases, the Reported Person may be informed at a later time if immediate information would preclude the investigation of the Report. These provisions are also applicable to persons who may have material information on the subject matter of the Report.

Where it has become apparent that the Reporter has communicated false data or information in bad faith and

- i. circumstances suggesting that a criminal offence or infringement has been committed, his or her personal data will be handed over to the body or person entitled to conduct the proceedings,
- ii. there are reasonable grounds to believe that the Reporter has caused unlawful damage or other harm to a third person, the Reporter's personal data must be handed over to the authority or person entitled to initiate or conduct the proceedings, at the third person's request.

The Reporter's personal data may not be made available for the Reported Person when such Reported Person exercises their rights for information and access based on relevant data privacy rules.

Personal data processed under this whistleblowing system may be transferred to a third country or an international organization only if the recipient of the transfer has given a legal commitment to comply with the rules on reporting set out in the Whistleblowing Act and subject to the provisions on the protection of personal data.

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 relevant Hungarian laws.

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Mastercard Hungary will not inform at the beginning of the investigation the person who is referred to in the report or any third party mentioned in the report about the report, their privacy rights and data processing only in exceptional cases, if immediate information would preclude the investigation of the report. Such individuals may not satisfy their relevant rights (right to access, rectification, erasure, etc.), as long as this is against the relevant laws (e.g., in the assessment of Mastercard Hungary this is necessary to prevent attempts to obstruct the report, to protect the investigation, to protect the Reporter's identity, or to protect the Reporter from any form of retaliation, etc.). Further details on how Mastercard Hungary 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).