

# Whistleblower Policy

## A. Policy Summary and Scope

The Audit Committee of the Board of Directors of TransUnion (“TU”) has established the TU Code of Business Conduct and other TU policies to govern the receipt, retention, investigation and treatment of concerns regarding potential violations of law, regulation or TU policies, with assistance from the Risk & Compliance Committee of the Board. This Policy applies to TU, TransUnion LLC, its domestic and international business units and its direct and indirect majority-owned domestic and international subsidiaries (each a “TransUnion Company”), as well as any officer, director or associate of such TransUnion Company (a “TransUnion Associate”).

There may be instances where this Policy conflicts with the local laws of a particular country. Where local law imposes higher standards than those in this Policy, local law will govern. If by contrast the present Policy provides for a higher standard, it will prevail unless not legally permissible. Should any local requirements not be covered by this Policy, local Legal and Compliance Associates should work with this Policy owner to establish country-specific policies and/or procedures.

The Policy applies to good faith concerns communicated to TransUnion Companies (called “Reports”) by Associates and other interested parties, including shareholders of TransUnion (each referred to in this Policy as a “Reporter”) regarding the following (the Scope):

1. allegations of criminal activity;
2. allegations of questionable accounting, internal accounting controls or auditing matters, including matters regarding attempted or actual circumvention of internal accounting controls or concerns regarding violations of TU’s accounting policies, including, but not limited to:
  - a. fraud or deliberate error in the preparation, recording, review, maintaining or audit of financial statements of TU;
  - b. misrepresentation or false statements regarding a matter contained in TU’s financial records, financial statements, audit reports or any filings TU made with external regulators;
  - c. deviation from full and fair reporting of TU’s financial condition and results; and
  - d. falsification, concealment or inappropriate destruction of corporate or financial records.
3. allegations of non-compliance with applicable legal and regulatory requirements, or concerns regarding non-compliance with TU’s Code of Business Conduct including, but not limited to:
  - a. conflicts of interest;

- b. improper use of TU's assets and information;
  - c. anti-trust, competition laws, fair dealing and fair lending;
  - d. misuse of corporate travel and entertainment card/expense reporting;
  - e. fraud: any activity believed or suspected to constitute misappropriation of assets, forgery, theft, or corruption involving Associates, consultants, vendors, contractors, customers/clients or other third parties of TU;
  - f. bribery and corruption;
  - g. insider trading;
  - h. money laundering; and
  - i. unethical or improper conduct.
4. potential or actual activity impacting the health and safety of TU Associates and visitors, including violations to human rights and non-compliance with TU's policies, including, but not limited to:
- a. discrimination and harassment; and
  - b. anti-slavery and human trafficking.
5. the deliberate concealment of any of the above; or
6. alleged retaliation against associates and other persons who file a Report in good faith.

## B. Filing a Whistleblower Report

1. Under this Policy, a Reporter may make a Report in any of the following manners:
  - a. To their manager or another TU Associate's manager;
  - b. To the TU Human Resources department;
  - c. To the (i) Audit Committee or (ii) Chief Risk and Compliance Officer; Chief Human Resources Officer, or Chief Legal Officer (each a "Code Officer");
  - d. By accessing TransUnion's Global Ethics Helpline ([tuglobalethicshelpline.com](http://tuglobalethicshelpline.com)) website; or
  - e. By calling TransUnion's Global Ethics Helpline telephone numbers located in the Appendix of this Policy.
2. Reports should contain as much specific factual information as possible to allow for proper assessment. In addition, Reporters are encouraged to provide sufficient corroborating information to support the submission, including, for example the following:
  - a. the names of individuals suspected of non-compliance;
  - b. the relevant facts of the potential or actual violations;
  - c. documentation that can help substantiate the report (if unsure if a particular fact is true, the Report should specify that the statement is an assumed fact);
  - d. when and how the Reporter became aware of the non-compliance, and any steps previously taken by the Reporter;
  - e. who may be harmed or affected by the non-compliance;

- f. to the extent possible or applicable, an estimate of the amount misreported or losses to TU as a result of the non-compliance; and
    - g. how the Reporter can be contacted, for reports that were not submitted anonymously.
3. TransUnion's Global Ethics Helpline website and telephone options are managed by an independent service provider bound by strict confidentiality obligation. Where permitted by law, Reporters can submit a Report on an anonymous and confidential basis.

## C. Report Handling

1. All Reports are reviewed by TransUnion's Corporate Investigations Department, and assigned to the appropriate internal stakeholder, with oversight from the Audit Committee and Risk & Compliance Committee of the Board;
2. The Reporter will receive an acknowledgement of the receipt of the Report;
3. All Reports go through an initial review by the Global Ethics Helpline Program, which follows a defined escalation process and assigns the Report to a Case Manager;
4. The handling of the Report will be managed neutrally and without bias towards parties involved;
5. To conduct a comprehensive investigation, the Case Manager may need to contact the Reporter for additional information; and
6. Sometimes the need for confidentiality, legal requirements or the protection of the individuals may prevent specific details of the Report, its handling or any measures taken as a result from being shared.

## D. Results of Investigation

Upon completion of the investigation, the Case Manager will inform the Reporter of the results of the investigation unless the need for confidentiality, legal requirements, or the protection of the individuals prohibits such disclosure.

## E. Communication to Other Interested Parties

Nothing in this Policy, or any other TransUnion policy or procedure, prohibits or restricts any person in any way from reporting possible violations of law or regulation to any governmental agency or entity, or otherwise prevents anyone from participating, assisting, or testifying in any proceeding or investigation by any such agency or entity or from making other disclosures that are protected and/or permitted under law or regulation or from collecting an award in connection with a government whistleblower program.

## F. Protection of Whistleblowers

1. Neither the Company, nor any TU Associate may discharge, demote, suspend, threaten, harass, directly or indirectly, or in any other manner discriminate or retaliate, against any person who, in good faith, makes a Report to or otherwise assists the Audit Committee, management or any other person or group, including any governmental, regulatory or law enforcement body, in investigating a Report. A Reporter is acting “in good faith” when they provide information which they believe is comprehensive, fair, and accurate, allowing them to believe in the truthfulness of the information.
2. Unless necessary to conduct an adequate investigation or compelled by judicial or other legal process, neither the Company, the Audit Committee nor any director, officer or associate of the Company shall (i) reveal the identity of any person who makes a Report and asks that his or her identity remain confidential, or (ii) make any effort, or tolerate any effort made by any other person or group, to ascertain the identity of any person who makes a Report anonymously. If the situation arises where the Report cannot be investigated without revealing the reporter’s identity (e.g., because evidence is needed in court), a discussion will take place with the Reporter to determine whether and how TU can proceed.

## G. Records

All records related to the requirements of this Policy must be maintained pursuant to the appropriate TransUnion record retention schedule.

## H. Related documents

- LRC 1 – Code of Business Conduct
- LRC 239 – Enterprise Records Management Policy
- LRC 245 – Enterprise Issue Management Policy

# I. Appendix A – Global Ethics Helpline Telephone Numbers

The Global Ethics Helpline telephone numbers are available 24 hours a day, 7 days a week, and are managed by an independent third-party service provider. The service provider will explain to each caller the procedures for following up on the Report. If translation services are needed, a translator is available upon request.

Location	Telephone Number
U.S. / Canada	1800 245 8341
UK	0800 102 6754
India	000 800 050 3896
South Africa	080 098 2229
Costa Rica	0800 542 5600
Philippines	1800 1322 0149
Hong Kong	800 902 144
Colombia	01 800 518 5288
Brazil	0800 200 3510
London*	44 20 7099 0385
Singapore*	65 3163 1063
Luanda*	244 226 434 587

\*The London, Singapore, and Luanda telephone numbers are regional hubs, available to anyone that lives in a country without a dedicated telephone line.