

Whistleblower Policy

Business unit owner	Compliance	Original version date	06/22/2015
Policy	0246	Current version publication date	10/27/2021
Affected areas	All TransUnion employees	Most recent version(s) dated	11/05/2018 06/30/2015

A. Policy summary and scope

The Audit and Compliance Committee of the Board of Directors of TransUnion (“TU”) has established the following measures for the receipt, retention, investigation and treatment of concerns regarding potential violations of law, the TU Code of Business Conduct, or other TU policies regarding TransUnion. This policy applies to TU, Trans Union 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 employee of such TransUnion Company (a “TransUnion Employee”).

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 apply. 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, country-specific policies and/or procedures will be established.

The policy applies to concerns communicated to TU (called “Reports”) by employees and other interested parties including shareholders of TransUnion (each referred to in this policy as a “Reporter”) regarding the following:

1. criminal activity;
2. 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 made with external regulators;
 - c. deviation from full and fair reporting of TU’s financial condition and results;
 - d. falsification, concealment or inappropriate destruction of corporate or financial records;

3. potential or actual non-compliance with applicable legal and regulatory requirements, including concerns regarding non-compliance to 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. privacy;
 - e. misuse of corporate travel and entertainment card/expense reporting;
 - f. fraud: any activity reasonably believed or suspected to constitute fraudulent financial reporting, misappropriation of assets, forgery, theft, falsification or destruction of TU records, or corruption involving employees (including TU officers or the Board), consultants, vendors, contractors, customers/clients, or other third parties of TU;
 - g. bribery & corruption;
 - h. insider trading;
 - i. money laundering; and
 - j. any unethical or improper conduct that is in violation of any TU policy.
4. any action or behavior that could cause significant damage or harm to the environment in contradiction to TU's sustainability commitments;
5. any potential or actual non-compliance impacting the health and safety of our employees and visitors, including, non-compliance to TU's related policies, including, but not limited to:
 - a. any behaviors in conflict with maintaining a safe, healthy, alcohol-free, drug-free workplace.
6. potential or actual violations to human rights or fundamental freedom, including concerns regarding non-compliance with TU's related policies, including, but not limited to:
 - a. discrimination and harassment; and
 - b. anti-slavery and human trafficking.
7. the deliberate concealment of any of the above, or
8. alleged retaliation against employees and other persons who file a Report in good faith.

In the discretion of the Audit and Compliance Committee, responsibilities of the Audit and Compliance Committee may be delegated to the chairperson of the Audit and Compliance Committee or to a subcommittee of the Audit and Compliance Committee.

B. Filing a Whistleblower Report

1. The Reporter should raise a concern when there is good faith belief that a non-compliance of law or TU policy has occurred.
2. A region may have additional supporting documentation outlining its procedure for making a complaint, report or qualifying disclosure under this Whistleblower Policy.
3. Reports may be made in any of the following manner, openly or confidentially, and or anonymously:
 - a. Managers;
 - b. Human Resources representative;
 - c. Any employee at their sole discretion may report concerns to (i) Audit and Compliance Committee or (ii) Senior Vice President – Global Compliance, Executive Vice President Human Resources, or Executive Vice President Chief Legal Officer (each a “Code Officer”);
 - d. by accessing the TU Hotline website. This website is hosted by an external provider bound by a strict confidentiality obligation;
 - e. For APAC, Canada & Latin America, Puerto Rico and the U.S.:
<https://SpeakUp.webline.saiglobal.com>;
 - i. For UK Only: <http://www.safecall.co.uk/report>
 - f. by calling TU’s Hotline at the numbers located in the Appendix of this policy;
 - g. by mail to TransUnion, Attn: Audit and Compliance Committee or Code Officer, at 555 West Adams Street, Chicago, IL 60661;
4. The Reports should contain as much specific information as possible to allow for proper assessment. In addition, all Reports should contain sufficient corroborating information to support the commencement of an investigation, 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. information on documents 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, an estimate of the misreporting or losses to TU as a result of the non-compliance; and
 - g. how the Reporter can be contacted (refer to 5 below regarding anonymous reports),
5. The telephone hotline and website are managed by an outside, independent service provider and allow any employee or other interested party of TU to make a Report. Reporters are able to submit a Report on an anonymous and confidential basis through the telephone hotline and website and are therefore not required to disclose their names. The telephone hotline and website service provider will explain to each caller procedures for following up on the Report.

C. Report Handling

1. All Reports are handled directly by an authorized TU Whistleblower Program designee, who is bound by a strict confidentiality obligation, with oversight by the Audit and Compliance Committee;
2. An acknowledgement of the receipt of the report is sent to the Reporter;
3. All Reports must go through an initial review by an Assigning Manager, who must:
 - a. promptly forward to the Chief Accounting Executive and the Chief Audit Executive any Report alleging fraud, involving officers or fraud (whether committed by officers or other employees) that results or could result in a material misstatement of TU's financial statements; and
 - b. promptly determine whether to commence an investigation of all other Reports. A Case Manager, bound by a strict confidentiality obligation, will be assigned to be in charge of handling the Report. The Audit and Compliance Committee supervises the handling of the Report.
4. The handling of the Report will comply with all applicable legislation. It shall be handled neutrally and without bias towards parties involved.
5. In order to conduct a comprehensive investigation, the Case Manager may need to contact the Reporter for additional information. TU will comply with all applicable legal and regulatory requirements relating to whistleblowing.
6. The Reporter and individuals subject to the investigation may be informed of the conclusions. 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

1. Upon completion of the investigation, the Audit and Compliance Committee Code Officer will contact, to the extent appropriate, each Reporter who files a Report to inform him or her of the results of the investigation and what, if any, corrective action was taken.
2. Where alleged facts disclosed pursuant to this policy are not substantiated, the conclusions of the investigation shall, to the extent appropriate, be made known to the Reporter who made the Report.
3. No adverse action shall be taken against any Reporter who makes a Report in good faith, even if the facts alleged are not confirmed by subsequent investigation. However, if after investigation, a Report is found to be without substance and to have been made for malicious or frivolous reasons, an employee Reporter could be subject to disciplinary action, including termination of employment.

E. Communication to Employees and Other Interested Parties

TransUnion must disclose to employees and other interested parties, including shareholders that they may, in their discretion, report whistleblower concerns openly or confidentially and/or anonymously.

TransUnion must also disclose on its website that interested parties may report whistleblower Reports.

F. Protection of Whistleblowers

1. Neither the Company, the Code Officers, nor any director, officer, employee, contractor, subcontractor or agent of TransUnion 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 and Compliance Committee, management or any other person or group, including any governmental, regulatory or law enforcement body, in investigating a Report. A Reporter is considered to be acting “in good faith” when they provide information which they believe is comprehensive, fair and accurate, allowing them to reasonably believe in the truthfulness of the information without any expectations of financial compensation or other gain. These prohibitions also apply to the Company’s subsidiaries and affiliates whose financial information is included in the consolidated financial statements of the Company.
2. Unless necessary to conduct an adequate investigation or compelled by judicial or other legal process, neither the Company, the Audit and Compliance Committee nor any director,

officer or employee 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

TransUnion must maintain a log of all records relating to reported concerns, or a notification by the Chief Legal Officer of an extended retention period. If the report has resulted in disciplinary or legal proceedings, the elements of the report will be kept for the duration of the proceedings in line with any local document retention requirements.

H. Related documents

- Code of Business Conduct
- Enterprise Issue Management Policy #245
- Corporate Investigations Policy #165

I. Appendix A- International Reporting Hotline Numbers

Most international locations use a two-stage dialing process. First dial the AT&T Access Code listed below and then 844-691-8137.

The service provider will explain to each caller procedures for following up on the Report. The hotline is available 24 hours a day, 7 days a week.

Most TU locations EXCEPT the U.S, Puerto Rico, Canada, United Kingdom and Lithuania use the following two-stage dialing process to reach the third party:

1. Step 1: Dial the Direct Access Code
2. Step 2: Wait for a second dial tone or listen to international operator instructions say “dial the number you are calling”
3. Step 3: Dial “844-691-8137”
4. Step 4: Automated voice will be heard indicating the line is owned by ComplianceLine. Stay on the line and a live operator will answer

The Access Codes by country are:

Country	Direct Access Codes
Brazil (Landline* Only)	0-800-890-0288
Brazil (TIM)	0-800-888-8288
Canada	844-691-8137
Chile (Claro Carrier) (Landline* Only)	800-225-288
Chile (ENTEL)	800-360-312
Chile (Easter Island via ENTEL Carrier)	800-360-311
Chile (Easter Island) (Landline* Only)	800-800-312
Chile (Telefonica) (Landline* Only)	800-800-288
Colombia	01-800-911-0010
Colombia	01-800-911-0011
Dominican Republic (Claro)	1-800-225-5288
Dominican Republic (Claro)	1-800-872-2881
El Salvador	800-1785
Guatemala (Claro) (Landline Only)	999-9190
Honduras	800-0123
Hong Kong (Hong Kong Broadband)	800-93-2266
India **	000-117
Ireland (From Northern Ireland use UK Access Code)	1-800-550-000

Kenya	0-207-602-020
Lithuania	8-800-00651 (or +370 (8) 800 00651 if dialing from outside Lithuania)
Mexico (Telmex Phones Only)	001-800-462-4240
Mexico	01-800 288-2872
Mexico (Collect Call - Spanish)	01-800-112-2020
Mexico	001-800-658-5454
Nicaragua (Landline* Only)	1-800-0174
Nicaragua	1-800-0164
Philippines (PLDT)	1010-5511-00
South Africa	0-800-99-0123
Trinidad and Tobago ***	1-800-872-2881
United Kingdom	0800-915-1571 (or +44 (0) 800 915 1571 if dialing from outside the UK)
United States	844-691-8137

* Fixed line phones only. Not available from cellular phones.

** Only available from phones allowing international access; not available from public phones.

*** Calls must be made from Hotel Landline Only.