European Union Whistleblower Policy

PORTUGAL PROCEDURE

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

Purpose and Scope

This policy is implemented in Portugal by Mastercard SA / Representative Office Portugal (hereafter, Mastercard Portugal).

This policy applies to Mastercard Portugal employees but we also accept reports from persons who have acquired information about the breaches outlined below in the context of a working or professional relationship with Mastercard Portugal or any other Mastercard legal entity.

Individuals may make reports by virtue of their working or professional relationship, in addition to employees of Mastercard Portugal, include independent contractors, sub-contractors, service providers, suppliers, members of the board, members of management, auditing or supervisory corporate bodies, non-executives, volunteers and trainees.

It covers the reporting of:

- 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 violent crime, organized crime and economic and financial crime, together "Breaches."

The policy does not cover reports relating to your personal employment relationship. Such concerns will generally fall outside the scope of this policy, except where the Report concerns serious legal violations and offences under the law of Portugal.
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Internal Reporting
Employees may use the reporting channels identified at section 2.2.1 of the European Whistleblowing Policy.

In Portugal any reports of Breaches (the Report) may also be reported to:
- Senior Managing Counsel located in Lisbon

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

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. 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 calendar days of the Report being made.

Investigation process
Once a Report has been made the Company 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.

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

External Reporting
Mastercard Portugal 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 Public Prosecutor's Office;
b) the criminal police agencies;
c) the Bank of Portugal;
d) the independent administrative authorities;
e) public institutes;
f) inspectorates-general and similar entities and other central services of the direct administration of the State endowed with administrative autonomy;
g) local authorities; and
h) public associations.