

Subject	Issue Date	Last Revision Date	Policy No.
European Union Whistleblower Policy	June 10, 2022	December 17, 2023	

European Union Whistleblower Policy

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1. INTRODUCTION

1.1. Purpose & Objective

Mastercard is committed to a culture of compliance that is grounded in decency, honesty, trust and personal accountability. The Company offers multiple channels for employees to raise concerns without the fear of retaliation.

The European Union Whistleblower Policy was established by the General Counsel, International Markets & Europe ("General Counsel, Europe"). The purpose of the Policy is to detail the process within the European Union to receive, retain, investigate and act on certain specific complaints and concerns of employees, shareholders and other parties who have a working relationship with a Mastercard entity. The Policy will apply to Mastercard entities within the European Union and will take effect from the date when the European Union Whistleblowing Directive is implemented and effective for relevant Mastercard entities in the relevant country.

You may also report complaints and concerns under local reporting arrangements, as set out in any Country Procedure or local policies and procedures. Where there is a conflict between those local reporting procedures and this Policy, the local arrangements will prevail.

1.2. Applicability & Scope

This Policy applies in relation to the activities of Mastercard entities established in the European Union.

Each Mastercard employee, including any employee of a Mastercard acquired entity, affiliate or majority-owned subsidiary ("employees"); Contingent Worker (when they are engaged to provide services to Mastercard); and member of the Mastercard Board of Directors, when acting in the capacity as Director ("Directors"); must comply with this Policy.

This Policy must be read together with the Country Procedures to this Policy, where they exist, and the global Whistleblower Policy, to ensure Mastercard's compliance with all applicable laws and requirements globally. Where there is a conflict between those local reporting procedures and this Policy, the local arrangements will prevail.

The Policy specifically covers complaints and concerns of employees, Contingent Workers, shareholders and other parties who have a working or professional relationship with a Mastercard entity (such as members of administrative, management or supervisory bodies, including non-executive directors, volunteers and trainees and other persons working under the supervision or direction of contractors, sub-contractors and suppliers) relating to the following matters ("Reports"):

- 1.2.1. breaches of European Union law (a "Union Law Allegation");
- 1.2.2. retaliation against employees or legal or natural persons connected with employees who raise Union Law Allegations (such as colleagues or relatives of the reporter or legal entities that the reporter owns, works for, or is otherwise connected with) or facilitate the making of a Union Law Allegation (a "Retaliatory Act").

1.3. Why this Policy is Important to Employees

The European Union Whistleblower Policy details the process for the receipt, investigation and action on certain complaints and concerns from employees, shareholders and other parties who have a working or professional relationship with a Mastercard entity (and have

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acquired information in the context of that work-based relationship).

In addition to any procedures available at the local legal entity level (which, if applicable, will be set out in the applicable Country Procedure), the European Union Whistleblower Policy provides multiple avenues to make Reports including directly to the General Counsel, Europe or their designee such as the Chief Compliance Officer ("General Counsel/Designee"); or through the Ethics Helpline (including anonymously where permitted by local law).

It also confirms that retaliation will not be tolerated against someone that makes a Report based on a reasonable belief or against someone who facilitates a Report or who provides assistance in an investigation into a Report. Retaliation will also not be tolerated against legal or natural persons connected with someone who makes a Report based on reasonable belief.

2. POLICY DESCRIPTION

2.1	Policy Statements	<p>This Policy is designed to comply with all applicable laws regarding whistleblower protections in the United States, Europe and elsewhere. Local requirements will be covered in the Country Procedure, or alternatively country-specific policies and/or procedures will be established.</p> <p>The Policy authorizes the General Counsel, Europe/Designee to receive and investigate Reports about certain specific matters regarding (1) breaches of European Union Law and (2) retaliatory acts against anyone who makes such a Report (or is connected with the person who makes the Report) or who facilitates or assists in the investigation of such a Report.</p>
2.2	Roles & Responsibilities	
2.2.1	Reporting Channels	<p>The General Counsel, Europe/Designee is authorized to receive and investigate Reports relating to any of the matters identified above.</p> <p>Reports may be made by employees, shareholders or other parties who have a working or professional relationship with a Mastercard entity as follows:</p> <ul style="list-style-type: none">• in accordance with any local reporting arrangements set out in a Country Procedure and which may be communicated to you from time to time;• in writing or via telephone to the attention of the General Counsel, Europe, or their designee such as the Chief Compliance Officer; or• anonymously (where permitted by local law) and confidentially via the Ethics Helpline, which is administered by an independent third party, at www.mastercard.ethicspoint.com. Easy access to country specific access codes and dialing instructions can be found at www.mastercard.ethicspoint.com. <p>Subject to the application of local reporting arrangements and local legal requirements, any Report received by a Company officer,</p>

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		<p>director or employee from any source inside or outside the Company within the European Union should be immediately forwarded to the General Counsel, Europe/Designee after obtaining the Reporter's consent.</p> <p>Reports will be shared with the Global Compliance Investigations Team and may be shared with the Mastercard data privacy team and/or Employee Relations, who form part of the staff members authorized to receive or follow up on Reports for the purposes of the European Union Whistleblowing Directive.</p>
2.2.2	Company Officers, Directors or Employees	<p>Employees of the Company are expressly authorized to make Reports using the procedures described in 2.2.1 on a confidential basis. All Reports received from employees will be treated confidentially to the extent reasonable and practicable under the circumstances.</p>
2.3	Monitoring, Reporting & Escalation	
2.3.1		<p>Promptly upon receipt, the General Counsel, Europe/Designee will evaluate whether a complaint constitutes a Report. All investigations will be conducted in a confidential manner, so that information will be disclosed only as needed to facilitate review of the investigation materials or otherwise as required by law. The General Counsel, Europe/Designee may, if they deem it reasonably necessary, require the assistance of the Chief Compliance Officer, Chief Financial Officer, Controller, General Auditor, Executive Vice President of Employee Relations, any of their staffs, or any other employees of the Company in investigating and resolving any Report. The General Counsel, Europe/Designee may, if they deem it reasonably necessary, engage outside auditors, counsel or other experts to assist in the evaluation of any results of any investigation into a Report.</p> <p>The parameters of any investigation will be determined by the General Counsel, Europe/Designee in their discretion, and the Company and its employees will cooperate as necessary in connection with any such investigation.</p> <p>Note that any information provided under this subsection may be subject to local laws protecting the confidentiality of reporters and other third parties mentioned in the Report.</p> <p>The Company will respond to Reports as appropriate under the circumstances. The General Counsel, Europe/Designee will have the authority to direct that the appropriate corrective action be taken by the Company in response to any particular Report.</p> <p>If the General Counsel, Europe/Designee deems the complaint a Report under the global Whistleblower Policy, it will be investigated as per section 2.3 of the global Whistleblower Policy.</p>

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2.3.2		Consistent with the policies of the Company, the General Counsel, Europe/Designee and the Company's management will not retaliate or attempt to retaliate, and will not tolerate any retaliation or attempted retaliation by any other person or group, directly or indirectly, against anyone who, based on a reasonable belief, makes a Report or provides assistance to the General Counsel, Europe/Designee or the Company's management or any other person or group, including any governmental, regulatory or law enforcement body, investigating or otherwise helping to resolve a Report.
2.3.3		The General Counsel, Europe/Designee will retain on a strictly confidential basis, as required under the Company's record retention schedules in effect from time to time, all records relating to any Report and to the investigation and resolution thereof. In appropriate cases reasonable measures will be taken to ensure that attorney client privilege is retained for such documents, as applicable.
2.4	Communication & Training	The Company will cause this Policy to be communicated to all Employees in the European Union on the internal intranet Policies page.
2.5	External reporting	<p>The Company encourages employees to use internal reporting procedures to make a Report.</p> <p>There may also be occasions where it is appropriate for employees to make a Report to an external body. If the relevant competent authority in the employee's country has set up an independent external reporting channel, employees may raise their concerns through those means as well. Details of the authorities competent to receive a Report will be set out in the applicable Country Procedure.</p> <p>The Company strongly encourages employees to use the reporting channels outlined in this Policy, so that the Company has an opportunity to investigate and remediate any concerns.</p>

3. KEY POLICY INFORMATION

3.1. Compliance

Under the Code of Conduct, employees are encouraged to promptly report if they suspect or know of actual violations of the law, the Code or other Company policies. Failure to report a known or suspected violation of the law, Code of Conduct or other Company Policies is itself a violation of the Code of Conduct and may result in disciplinary action up to and including termination of employment.

3.2. Ownership, Review & Approval

This Policy is owned by the Senior Vice President, Counsel, Business Conduct Office and must be reviewed for updates every three years or as circumstances dictate. Policy revisions are at the sole discretion of the Senior Vice President, Counsel, Business Conduct Office.

3.3. Key Definitions

Contingent Worker: a non-Mastercard employee resource who is engaged to provide services to a Mastercard European legal entity, or to provide services to Mastercard customers in the European Union on our behalf. In order to be classified as a Contingent Worker, the non-employee resource must have either physical, unescorted access to Mastercard premises via a Mastercard badge or systems access, access to our networks, application, and or data to be able to deliver the work or services.

Employee: Any employee who is employed by a Mastercard European legal entity.

General Counsel, Europe/Designee: the General Counsel, Europe and any of their designees, such as the Chief Compliance Officer, Senior Vice President, Counsel, Business Conduct Office (and attorneys within the Business Conduct Office on the Global Compliance Investigations Team) and Executive Vice President of Employee Relations

Report: complaints and concerns directed to the Company related to matters described in 1.2

Retaliatory Act: retaliation against employees who make Reports concerning Union Law Allegations including but not limited to: (a) suspension, lay-off, dismissal or equivalent measures; (b) demotion or withholding of promotion; (c) transfer of duties, change of location of place of work, reduction in wages, change in working hours; (d) withholding of training; (e) a negative performance assessment or employment reference; (f) imposition or administering of any disciplinary measure, reprimand or other penalty, including a financial penalty; (g) coercion, intimidation, harassment or ostracism; (h) discrimination, disadvantageous or unfair treatment; (i) failure to convert a temporary employment contract into a permanent one, where the worker had legitimate expectations that they would be offered permanent employment; (j) failure to renew, or early termination of, a temporary employment contract; (k) harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income; (l) blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may entail that the person will not, in the future, find employment in the sector or industry; (m) early termination or cancellation of a contract for goods or services; (n) cancellation of a license or permit; (o) psychiatric or medical referrals.

European Union Law: (a) public procurement; (b) financial services, products and markets, and prevention of money laundering and terrorist financing; (c) product safety and compliance; (d) transport safety; (e) protection of the environment; (f) radiation protection and nuclear safety; (g) food and feed safety, animal health and welfare; (h) public health; (i) consumer protection; (j) protection of privacy and personal data, and security of network and information systems; (k) 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; and (l) 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.

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3.4. Cross References

3.4.1. Policies

Code of Conduct

Supplemental Code of Ethics for the CEO and Senior Officers

Whistleblower Policy

Non-Retaliation Policy

3.5. Version History

December 17, 2023 – Updated name of Chief Compliance Officer and added additional countries to the list of Country Specific Procedures

Country Specific Procedures

Belgium

Czech Republic

Denmark

France

Germany

Greece

Hungary

Ireland

Italy

Netherlands

Portugal

Spain

Sweden