



Mastercard Partner Code of Conduct

Mastercard believes in connecting everyone to *Priceless* possibilities. We believe in unlocking potential for people everywhere, innovating with purpose, nurturing the entrepreneurial spirit, and showing the world that borders aren't boundaries for partnerships.

How we get there matters. We let decency serve as our guide to grow trust at every touchpoint. Mastercard partners, who resell Mastercard products and services, or act on Mastercard's behalf in any capacity to deliver or distribute Mastercard products and services to Mastercard customers, are important to our business. We believe in upholding our principles in how we operate internally and with our communities and stakeholders, whether we engage directly or through our partners.

Mastercard expects its partners and the partners' employees, agents, subcontractors, or any of their representatives (collectively, "Partners") to uphold the same principles and values with which Mastercard operates when serving our customers.

At a minimum, this means we expect Partners will:

- comply with **all applicable laws and regulations**, including, but not limited to
 - **Antitrust.** Mastercard is committed to a fully competitive marketplace. As such, partners are expected to comply with all applicable antitrust and competition laws and regulations. Partners should never discuss with any competitor prices, bids, customers or customer sales, markets, or strategies for competitive products and services or other competitively sensitive information and never engage in any conduct prohibited by antitrust and competition laws, including price fixing, bid rigging, or market allocation.
 - **Anti-corruption and bribery.** Partners should not engage in any form of bribery or corruption, including offering, promising, giving, or accepting any undue advantage to or from any person in order to obtain or retain business or other improper advantage.
 - **Anti-money laundering, Sanctions, and Export Controls.** Mastercard expects Partners to comply with all applicable anti-money laundering, counter-terrorism financing, economic sanctions, and export controls laws and regulations. Mastercard is committed to preventing its products and services from being used to facilitate criminal purposes, finance terrorism, or violate sanctions. Partners are also expected to adopt and implement risk-based control processes to ensure compliance with these laws and regulations.

- **Data privacy and protection.** Partners are expected to comply with all applicable privacy and data protection legal requirements and be accountable, where applicable, for any further data processing for their own business purposes or by their subcontractors.
- **act with integrity** and **avoid conflicts of interest.** Mastercard expects Partners to avoid any situation that could make someone question the Partners' intentions, judgement, honesty, or objectivity. The appearance of a conflict of interest can be just as damaging as an actual conflict. Among other things, Partners may not offer anything of value to Mastercard, any of its employees or their family members, that could influence or appear to influence business decisions or a strategic advantage;
- comply with its **contractual obligations** with Mastercard. Mastercard relies on its Partners to comply with its responsibilities to help Mastercard remain compliant with applicable laws, protect its assets, and uphold its standards in how it operates. Mastercard expects Partners to have systems and processes in place to keep track of its obligations to Mastercard, and perform as agreed to in the contract;
- uphold **Mastercard's data principles.** Mastercard is committed to managing personal information in a manner that places the individual at the center of all of our data practices. Mastercard's stance about consumer data is straightforward: you own it, you control it, you should benefit from the use of it, we protect it. Mastercard expects its Partners to align with the seven principles that guide its practice, which can be found on the [Data Responsibility webpage](#).
- not compromise **Mastercard's reputation.** Our logo is one of the most recognizable brands in the world and, for decades, has represented a reliable, secure, and socially responsible company. Partners who are resellers, referrals, or other type of partners with Mastercard are expected to present the products and services that Mastercard provides in a manner that does not tarnish the trust the community has placed and come to expect from Mastercard.
- share Mastercard's values on **diversity, equity, and inclusion.** Diversity, equity and inclusion makes us better. It helps us grow when we bring in different perspectives to foster meaningful connections and create innovative solutions. Mastercard is committed to enabling a workplace and a world where everyone feels they belong and unlocking potential for people everywhere. Mastercard expects its Partners to help us on our journey to a truly inclusive and equitable society.

This Code is not intended to replace, supersede or conflict with any contractual obligation with Mastercard.

In addition, reports of any behavior that may violate Mastercard's Partner Code of Conduct may be made using the Mastercard Ethics Helpline at 1-800-405-9318 in the United States; to access the Ethics Helpline from outside the United States, visit www.mastercard.ethicspoint.com for

easy access to country-specific dialing instructions or to make a report via the web-based reporting tool. Concerns raised on the Ethics Helpline may be made anonymously, or not, except where restricted by local law.

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