



Mastercard Foundation EthicsLine - Frequently Asked Questions

What is the Mastercard Foundation EthicsLine?

EthicsLine is a comprehensive and confidential reporting tool hosted by an independent third-party, NAVEX Global, to assist Mastercard Foundation senior leadership and its internal and external stakeholders to work together in addressing fraud, abuse, and other misconduct in the Foundation's work.

Why do we need a platform like the Mastercard Foundation EthicsLine (facilitated by NAVEX Global)?

By creating accessible and anonymous reporting channels, Foundation employees and external representatives may share their concerns in a safe and respectful manner.

The platform from NAVEX Global helps to enable a culture of ethics by identifying and quickly addressing concerns.

May I report using either the internet or the telephone?

Yes. With EthicsLine, you can make a confidential, anonymous report via either the telephone or the internet (including on a mobile device).

For reports made from individuals based in Rwanda, Ethiopia or Kenya, only internet reporting is available from EthicsLine.

What type of situations should I report?

The EthicsLine platform is designed for Mastercard Foundation employees and external representatives to report any suspected violation of the Foundation's Global Code of Ethics, Foundation policies, breaches of law or ethical standards, other inappropriate behaviour, or any action, situation or event which could result in adverse consequences for the Foundation or its stakeholders. Examples include:

Accounting and Auditing Matters	The unethical systematic recording and analysis of the business and financial transactions associated with generally accepted accounting practices (examples include: misstatement of revenues, misstatement of expenses, misstatement of assets, misapplications of GAAP principles, wrongful transactions).
Charitable Asset Stewardship	Funds directed to the Foundation have not been handled with the utmost truthfulness or not used in accordance with Mastercard Inc.'s intentions and wishes. Failure to provide due care with respect to the donor, and/or gift. Injury to the public trust.
Conflict of Interest	A conflict of interest is a situation in which a person, such as an employee, or a partner staff member, has a private or personal interest sufficient to appear to influence the objective exercise of his or her official duties (examples include: nepotism, engaging a

	vendor/service provider who is a close friend or family member, providing a scholarship or loan to a program participant who is a friend or family member, someone who acts in their own best interest rather than that of the Foundation).
Disclosure of Confidential Information	Unauthorized or unlawful disclosure of the Foundation's intellectual property or confidential information such as employee, partner or program participant information, strategies or proposals.
Discrimination or Harassment	Uninvited and unwelcome verbal or physical conduct directed at an employee or unlawful treatment on the basis of age, race, gender identity, disability or any other basis protected by law (examples include: bias in hiring, assignments or promotions, wrongful termination, unfair compensation, inappropriate language or jokes, etc.).
Falsification of Records	Falsification of records consists of altering, fabricating, falsifying, or forging all or any part of a document, contract or record, or misrepresenting the value of the document, contract or record.
Misconduct or Inappropriate Behavior / Breach of Law or Policy	Deliberate or reckless violation of a law (e.g. bribery, fraud), Foundation policies (e.g. Global Code of Ethics, other policies) or Foundation values and behaviours.
Safeguarding	Failure to ensure the wellbeing and safety of program participants or staff (examples include: physical, emotional, or sexual abuse, neglect or exploitation, failure to provide adequate support to a survivor, pressure to not report a safeguarding issue, abuse of power).
Safety / Security	Failure to provide a safe and secure environment (examples include: violence in the workplace, failure to meet occupational health and safety standards, environmental damage).
Theft	The act of stealing; specifically taking and removing of property belonging to the Foundation or a colleague with intent to deprive its rightful owner.

I am a Foundation employee – if I see a violation, shouldn't I just report it to my manager or People & Culture?

If you have a disagreement or misunderstanding with a colleague, we encourage you to speak directly and respectfully to the person or people involved, your manager, or a member of the Foundation's People & Culture (P&C) team. If a conversation with the individual(s) is not fruitful and the matter is not resolved, or if you feel uncomfortable having such a conversation, the Mastercard Foundation EthicsLine is available to you at any time.

If the matter involves a violation or suspected violation of applicable laws or the Foundation's Global Code of Ethics or policies, you may report such violations to your manager or a member of the Whistleblower Committee (i.e. Head of Legal and Compliance, Head of Assurance and Enterprise Risk Management, and Head of P&C Operations and Business Partnering). We understand that there may be circumstances when you are not comfortable reporting the issue in this manner. In such circumstances, you can report confidentially via the Mastercard Foundation EthicsLine.

Why is it important to report?

We all have the right to work in a positive environment and we are each responsible for adhering to the highest standards of integrity and respect for those we serve. It is important to promptly report any concerns so that we can quickly and thoroughly investigate to ensure we uphold our integrity and the trust of our partners, stakeholders, program participants and the Board of the Mastercard Foundation. Your report can be the key in minimizing potentially negative impacts on program participants, partner organizations, our people, and the Foundation.

What happens after I submit a report?

Reports are received directly by the EthicsLine platform and depending on the nature of report (Whistleblower Concern or Incident, OR General Concern or Incident) will be escalated to the Whistleblower Committee or incident management team, whose members are authorized to review and evaluate the report impartially and confidentially. Based on the type of incident reported, additional individuals, including external advisors and/or investigators, may be involved in the evaluation of a report or subsequent investigations.

Once the report has been reviewed, a response will be available to you via EthicsLine, including an update on your report and questions for additional information, if applicable.

We strongly encourage you to follow-up through EthicsLine on your report, either online or via telephone, using the report key and password provided when you submit your report.

You can also call back or log-in online to update your report at any time if you have additional information.

If you are a whistleblower, we are committed to taking all reasonable steps to support you and protect you from intimidation, retribution, or other adverse consequences as a result of raising a genuine concern in good faith, even if you are mistaken.

How do I follow-up on a report I submitted?

After you have submitted a report, a report key will be provided. Please securely store the report access information, as it cannot be retrieved or restored if misplaced. You can use the report key and password to check for any follow-up information posted at any time. You can also call back or log-in online using the report access information to update your report at any time if you have additional information.

Is my report really anonymous?

Unless you disclose your name or other identifying information, your report is completely anonymous. NAVEX Global, a third-party service provider contracted by the Mastercard Foundation, receives the reports through the EthicsLine platform. EthicsLine does not trace phone calls, use caller identification, or trace website reports. EthicsLine does not maintain connection logs or monitor internet protocol (IP) addresses. The EthicsLine platform strips away internet addresses so that anonymity is maintained. Furthermore, EthicsLine is contractually committed not to pursue a reporter's identity.