

# Marqeta, Inc. Supplier Code of Conduct

Marqeta, Inc. and its subsidiaries (collectively referred to as Marqeta) is committed to being the global standard for modern card issuing, empowering builders to bring the most innovative products to the world. Marqeta believes in treating all workers with respect and dignity, ensuring safe working conditions, and conducting environmentally responsible, ethical operations.

Marqeta is guided by its purpose of frictionless economic empowerment, which is based on lawful, transparent and respectful business dealings. As a vital part of the delivery of Marqeta commitments, we expect that suppliers of products and services to Marqeta, including consulting firms, independent contractors, staffing agencies, contingent workers, and licensees (“Suppliers”), approach business lawfully, ethically, with integrity, good judgment, and fairness. The Marqeta Supplier Code of Business Conduct and Ethics (“Supplier Code”), is based on the following guiding tenets: (a) operating business ethically and compliantly; (b) protecting the labor and human rights of stakeholders; and (c) stewardship of the environment. All Suppliers are expected to conduct business in accordance with this Supplier Code, including instituting appropriate policies and practices, and communicating and enforcing the provisions of this Code throughout their organization and across their supply chains and subcontractors.

The Supplier Code sets out the basic principles and expectations for Suppliers. It is the responsibility of Suppliers to know the requirements of the Supplier Code and operate in accordance with its principles. Suppliers must be aware of the Supplier Code’s provisions and stay informed of any changes. The most current version is available online and effective when posted.

The Supplier Code does not constitute an employment contract, and nothing contractual herein is intended to convey any rights, actions, or remedies to Suppliers or to create an employment relationship between Supplier or Supplier’s employees and Marqeta.

## Scope

A **Supplier** is any third party, company or individual, that provides a product or service to Marqeta. The following persons, entities, and organizations (collectively referred to as Suppliers) are covered by the Supplier Code and thereby subject to its provisions:

- Suppliers, vendors, consultants, agents, contractors, temporary workers, and third parties working on behalf of Marqeta; and
- The owners, officers, directors, employees, consultants, affiliates, contractors, and subcontractors of these organizations and entities.

## Marqeta Code of Business Conduct and Ethics

Marqeta believes certain [Business Conduct](#) is fundamental to success. This conduct includes compliance with laws, rules, and regulations; the ethical handling of conflicts of interest; proper management of confidential information; appropriate pursuit of corporate opportunities;

outperforming competition fairly and honestly; and avoiding bribery and corruption. The Code of Business Conduct and Ethics describes how Marqeta conducts business and the type of culture we expect our Suppliers to foster.

Marqeta is committed to the highest standards of integrity, honesty, openness and professionalism in all its activities wherever they are conducted. Marqeta is committed to complying with applicable laws and does not engage in any form of corrupt practices, including extortion, fraud or bribery, at a minimum. We expect our suppliers to adhere to the highest standards of integrity, transparency and corporate governance. Moreover, as a minimum, we expect our suppliers to comply with all relevant legislation and regulations. Suppliers must not engage in any form of bribery or corruption and must not be associated with any group that supports acts of violence, terrorism, or discrimination.

### **Operating Business Lawfully and Ethically**

- **Bribery and Corruption.** Marqeta does not tolerate bribery or corruption in any form. Suppliers will not make illegal payments directly or indirectly. Suppliers are also responsible for knowing and complying with the anti-corruption and bribery laws in the jurisdictions where the Supplier operates and abiding by the US Foreign Corrupt Practices Act and UK Bribery Act which Marqeta is subject to. Even the appearance of a violation of anti-bribery or anti-corruption laws could cause significant damage to Marqeta's reputation and will be reported to the appropriate authorities at Marqeta's discretion. Should a Marqeta employee ask for any improper payment or incentive in breach of this Code, suppliers are expected to notify Marqeta immediately. Suppliers are also expected to ensure that all of their reports, records and invoices are accurate and complete and that they contain no false or misleading information.
- **Conflicts of Interest.** Suppliers will avoid even the appearance of conflicts of interest in their work with us and will immediately disclose any known family or other close personal relationships with our employees who have an influence over their engagements with us. A conflict may exist when a Supplier is involved in an activity that affects – or could appear to affect – objectivity. In order to identify and manage such conflicts, Suppliers must disclose all actual or potential conflicts of interest with Marqeta due to either: (1) Personal or business relationships with Marqeta clients, suppliers, business associates, and employees with whom they work or support; and/or (2) Outside activities related to Supplier's role and responsibilities at Marqeta. All potential conflicts of interest must be reported to Marqeta through the Hotline.
- **Antitrust and Competition Laws.** Antitrust and competition regulations prohibit anti competitive or collusive agreements among competitors including price-fixing, bid rigging, allocation agreements, and group boycotts. Suppliers are required to be aware of and comply with these antitrust and competition regulations when conducting business with or on behalf of Marqeta. Suppliers must also refuse to participate in any potentially anticompetitive behavior or inappropriate discussions with competitors such as those relating to pricing, bids, or bidding strategies and report any such activity related to Marqeta.

- Handling Information Appropriately: Confidentiality. Suppliers are expected to comply with all applicable laws and regulations regarding Marqeta confidential information. Suppliers must have programs in place that meet or exceed Marqeta's standards designed to protect Marqeta information. Suppliers have a duty to protect confidential information and to take precautions before sharing with anyone. Suppliers may only use confidential Marqeta information to perform work on behalf of Marqeta and may not disclose such information unless such disclosure is required by law. Suppliers must safeguard the confidential information of third parties, including anything that Suppliers learn or create while providing services to Marqeta and its stakeholders, including its employees. Suppliers will never forward Marqeta information to an external email address for any non-business purpose or to Supplier or Supplier employees' personal email accounts for any reason.
- Privacy and Information Security. Suppliers are expected to comply with all applicable laws and regulations governing personal information. Suppliers will protect the privacy of personal information of everyone with whom they do business, including other Suppliers, customers, consumers, and workers. Suppliers must be aware of and follow the applicable local laws and regulations regarding the protection of an individual's personal information, including Marqeta's employees and other stakeholders. Personal information should never be used in a manner inconsistent with the terms of Supplier's agreement with Marqeta, accessed by Supplier or its employees without appropriate authorization, or disclosed to anyone outside of Marqeta except as required by a legal or regulatory process and as permitted by Supplier's agreement. Where a privacy incident occurs or is suspected (i.e., the unauthorized access to or misuse of any personal information of a Marqeta stakeholder, including an employee, and inclusive of unauthorized or suspicious intrusion into systems storing such personal information), Suppliers must immediately report such incident.
- Protecting Intellectual Property (IP) and Other Marqeta Assets. Suppliers are expected to comply with all applicable laws and regulations governing the protection, use, and disclosure of Marqeta proprietary information. Unless otherwise agreed to by Marqeta, any invention, discovery, development, concept, idea, process, or work related to Marqeta's business belongs to Marqeta and is considered work made for hire or company invention. Suppliers must also properly safeguard and protect all other Marqeta assets from theft, waste, cyber-related attack, or other type of loss.
- Securities Laws Compliance. Suppliers may have access to material, non-public information about Marqeta or other companies. Information is material if a reasonable investor would consider it important in deciding whether to buy, sell, or hold a company's securities. Suppliers are prohibited by law from transacting in securities of a company while in possession of material, non-public information of such company and/or communicating such information to others.

**Labor and Human Rights; Workplace Environment; Social Sustainability**

Marqeta is committed to upholding the human rights of workers and treating them with dignity and respect. This applies to all workers, including temporary, migrant, student, contract, direct employee, and any other type of worker. As a result, Suppliers must manage their own workforce in order to achieve the following results:

- Human Rights. Marqeta expects Suppliers to promote and respect human rights by working to prevent child and/or forced labor and human trafficking in their operations and supply chains.
- Freely Chosen Employment and Combating Modern Slavery. Suppliers will not use or permit any form of forced, bonded, or indentured labor. All work must be voluntary, and all workers must be free to terminate their employment at any time.
- Young Workers. Suppliers must comply with all labor laws and will not use child labor. “Child” means any person under age 15, under the age for completing compulsory education, or under the applicable minimum age for employment in the country or jurisdiction, whichever is greatest. Workers under the age of 18 will not perform work that is likely to jeopardize their health or safety, including night shifts and overtime.
- Wages and Working hours. Suppliers must comply with all applicable wage and hour labor laws and regulations governing employee compensation, reimbursements, and taxes.
- Health and Safety. Suppliers will at all times provide and maintain their employees with a safe and healthy workplace and should ensure that a senior management representative is responsible for health and safety and that appropriate policies and procedures are in place that meet, and preferably exceeds, applicable standards and legal requirements.
  - Occupational Safety and Health. Suppliers will comply with all applicable safety and health laws and regulations and identify, evaluate, and control worker exposure to safety and health hazards, including chemical, biological, physical, and ergonomic stressors, through proper design, engineering controls, maintenance, safe work procedures, and ongoing health and safety guidance.
  - Emergency Preparedness. Suppliers will identify and plan for potential emergencies, implement emergency plans, and provide guidance to workers on emergency response procedures, including emergency reporting, working notification and evacuation, drills, fire detection and suppression equipment, exit facilities, and recovery plans.

### **Environmental Sustainability**

Marqeta recognizes that our business decisions have the potential to impact surrounding communities and the environment. Suppliers will strive to create regenerative processes and will minimize adverse effects on the community, environment, and natural resources while safeguarding the health and safety of the public. In addition:

- Environmental Sustainability in General. Suppliers must comply with all applicable environmental laws and regulations in the countries where Supplier operates. Suppliers must also ensure that potential impacts to community health, safety, and security – such as accidents, impacts on natural resources, exposure to pollution, or other community issues – that may arise from business operations are appropriately mitigated and managed.
- Environmental Permits and Reporting. Suppliers will obtain and keep current all required environmental permits, approvals, and registrations and follow their operational and reporting requirements.

### **Consequences of Violations**

- Suppliers agree that a breach of any of their obligations or undertakings under this Code can be considered a material breach of contract. If a supplier does not meet the expectations and standards Marqeta may, as a first step, encourage the supplier to take necessary remedies, including implementing appropriate corrective actions within a reasonable time, so as to remedy the violation and to prevent similar occurrences in the future. Corrective measures for critical deviation should be implemented without undue delay. Upon Marqeta's request, the Supplier shall provide documentation to Marqeta supporting its fulfillment of this Code, for Marqeta's consideration and review.

### **Marqeta Rights to Audit and Monitoring**

- Marqeta reserves the right to monitor, record, review, access, and disclose all data and communications created, sent, received, stored, or downloaded using Marqeta resources as it deems appropriate, subject to applicable laws and regulations. Marqeta also retains the right to audit Supplier compliance with the Supplier Code and other Marqeta policies at any time. This includes technical, legal, regulatory, financial, and operational audits of Supplier policies and procedures, including subcontractors if necessary, and in some cases may require an on-site inspection of Supplier's books, records, systems, controls, processes, and procedures related to the Marqeta engagement for adherence to the Supplier Code.

### **Raising Questions and Reporting Concerns**

- Marqeta expects Suppliers to have a process through which their employees, customers and clients can raise workplace concerns without fear of retaliation. In addition, Marqeta is committed to maintaining a business environment in which Suppliers feel comfortable raising any good faith concern, free of retaliation. Accordingly, we do not tolerate any retaliation against any individual for reporting or participating in good faith in the investigation of any suspected fraudulent activity or violation of law or the Supplier Code. This also means that Suppliers should communicate with us if they are unsure of what to do or have concerns regarding a potential violation. Suppliers (or their

employees, agents or representatives) may report such a concern via our reporting hotline:

Reporting System Website	marqeta.ethicspoint.com
Toll-Free Reporting System Phone Number	(833) 581-0334
Reporting System Availability	24 hours/day, 7 days/week

**Cooperation in Investigations**

- Should violations of the Supplier Code be reported, suspected, uncovered or otherwise arise, Suppliers are expected to cooperate in good faith and provide truthful information in connection with an inquiry or investigation by Marqeta, an external investigator, a court, an arbitrator, law enforcement, or any other government agency or official.