



# Conflicts of Interest Policy FAQ

## **What is considered a conflict of interest at Marqeta?**

A conflict of interest at Marqeta is if there is a real or perceived interest that could interfere with the interests of Marqeta.

## **Why do these potential conflicts of interest need to be disclosed?**

All conflicts of interest need to be disclosed and reviewed by the Legal, Risk, and Compliance team ("LRC") to identify if the private interests of a Marqetan would create a reputational risk to Marqeta or put into question the integrity or high ethical standards that are required of all Marqetans.

## **How and when do I disclose a potential or actual conflict of interest?**

Upon implementation of the Policy, you will be required to complete a Conflicts of Interest Disclosure Form and submit it to LRC. All Marqetans who are Senior Directors and above will need to complete the Disclosure Form on an annual basis. In addition, all new hires will be required to complete the form when they join Marqeta. You will also be required to complete and submit a Disclosure Form prior to engaging in any activities that may constitute a conflict of interest. The Disclosure Form will be available as a link in the Policy and at [go/policies](#).

## **Does this apply to family members? How do I know which family to include?**

Yes. Conflicts may also arise out of the interests of your immediate family members and/or close relatives that share the same household with you. The conflict may arise out of their investment in, or employment by, a supplier, vendor, bank partner, customer or competitor of Marqeta.

## **How does the Policy define Immediate Family Member and Relative?**

**Immediate Family Member**—includes an employee's spouse, domestic partner, child or stepchild, parent, parent-in-law, sibling, and anyone sharing the employee's household (other than a tenant or employee).

**Relative**—includes an employee's grandparents, spouse's grandparents, grandchildren, great-grandchildren, step siblings, half-sibling, uncles, aunts, nephews, nieces and cousins.

## **What happens when I disclose a conflict of interest? What will happen if my conflict of interest disclosure causes an issue?**

All potential conflicts of interest are reviewed by LRC. If there is no issue with the conflict of interest disclosed, the activity will be approved and the employee will be notified. If there is an issue, LRC may implement restrictions on your involvement in the activity (for instance, recusing yourself from certain contract negotiations); or, if necessary, prohibit you from engaging in the activity.

## **I own shares in companies and I'm not sure if there's a potential conflict of interest. In what cases do I need to disclose these investments?**

You are required to disclose your investment if your ownership is greater than 1% of the public float of a listed company.

## **Do I need to disclose real estate investments?**

You are required to disclose direct or indirect ownership, trading or dealing in real estate, materials, supplies, equipment or other property with the intent of selling or renting to Marqeta, or its clients.

## **I'm consulting on some projects outside of Marqeta. Does that need to be disclosed?**

Yes, if you are acting as an employee, officer, director, partner, consultant, representative, agent, auditor or advisor of a Marqeta competitor, supplier, customer, partner, contractor, or subcontractor, except when doing so at the request of Marqeta.

**I hold an unpaid position on the board of a non-profit. Does that need to be disclosed?**

Not necessarily. Generally, if you are serving as a board member for an outside entity, it needs to be disclosed. There are exceptions when such board service is:

- At the request of Marqeta;
- For an industry or professional association; or
- For a not-for-profit entity whose activities are unrelated to Marqeta's business or activities, and which does not seek or receive funding from Marqeta, a Marqeta-sponsored organization, or Marqeta Cares.

**I was offered an opportunity and I'm unsure if it will cause a conflict of interest, what do I do?**

Please email [conflicts@marqeta.com](mailto:conflicts@marqeta.com) for any questions or concerns related to conflicts of interest. You can also submit a Conflicts of Interest Disclosure Form to LRC with the details.

**I've read these FAQs, is that all I need to know?**

While these FAQs are designed to help guide you, you are required to read and understand the entire Conflicts of Interest Policy.

**I have some other questions related to conflicts that are not included in this FAQ, who can I contact?**

Please email [conflicts@marqeta.com](mailto:conflicts@marqeta.com) for any questions or concerns related to conflicts of interest.