To: National Institute for Standards and Technology

From:
Mastercard

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Subject: Proposed Changes to the CSF v2.0 Core

To Whom It May Concern:

We greatly appreciate the opportunity to comment and collaborate on the National Institute for Standards and Technology's (NIST) Discussion Draft of the Cybersecurity Framework (CSF) Core 2.0.

In its current form, the NIST CSF has proven not only its value in building and maintaining effective cybersecurity and risk management programs, but also adaptability to address current and future compliance and regulatory requirements. Through the Core 2.0 journey, we share NIST's commitment to update the CSF consistent with the needs of security and risk practitioners, while also helping to inform and bridge technology and business stakeholders.

Mastercard (NYSE: MA) is a global technology company in the payments industry. Our mission is to connect and power an inclusive, digital economy that benefits everyone, everywhere by making transactions safe, simple, smart and accessible. Using secure data and networks, partnerships and passion, our innovations and solutions help individuals, financial institutions, governments and businesses realize their greatest potential. With connections across more than 210 countries and territories, we are building a sustainable world that unlocks priceless possibilities for all.

Our focus on delivering safe, smart and accessible payments for consumers globally informs our endorsement of "**Govern**" as a function in the next version of the NIST CSF. Mastercard recognizes strong governance around security programs is essential for cyber risk management, enabling organizations to more effectively implement and oversee critical functions and associated controls.

Beyond the addition of supply chain risk management in the CSF 2.0 Core, we further recommend formalizing a Supply Chain or "**Extend**" function, reflecting the growing importance of third-party dependencies and risk management to cybersecurity overall. Mastercard holds that this separate function covering dependencies supports future implementation as cyber threats adapt and technologies advance.

We support the addition of both Govern and Extend functions to NIST CSF Core 2.0 and with the Cyber Risk Institute, remain committed to championing NIST CSF as industry benchmark and best-practice.