



Affirm U.K. Limited Supplier Code of Conduct

Effective Date: June 1, 2026

Last Updated: June 1, 2026

Our Commitment

Affirm's mission is to deliver honest financial products that improve lives. In furtherance of our mission, we view integrity, transparency, and responsibility as foundational to our operations.

Affirm U.K. Limited ("Affirm"), an indirect wholly-owned subsidiary of Affirm Holdings, Inc., values third parties that align their business practices with the Affirm Holdings, Inc. Code of Ethics and Business Conduct. Specifically, we expect certain suppliers, vendors, contractors, consultants, and other third parties that are significant to our business ("Suppliers") to uphold standards consistent with our values and applicable legal and regulatory requirements.

This Supplier Code of Conduct (the "Code") outlines the minimum standards we require of our Suppliers in the United Kingdom. The Code is informed by internationally recognized standards, including the International Labour Organization Fundamental Conventions, the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and applicable modern slavery legislation.

Suppliers are expected to comply with the Code, applicable laws and regulations, and the terms of their agreements with Affirm. Where the Code and local law address the same subject, Suppliers should apply the higher standard.

1. Compliance with Laws and Regulations

Affirm expects Suppliers to comply with all applicable laws and regulations in the jurisdictions in which they operate and where they provide services to Affirm. This includes, but is not limited to:

- financial services and consumer protection laws;
- anti-money laundering (AML) and economic sanctions laws;
- anti-bribery and anti-corruption laws;
- data protection and privacy laws;
- labor and employment laws;
- environmental laws; and
- trade compliance and export control laws.

Suppliers must not engage in or knowingly support illicit and/or illegal activities, including money laundering, terrorist financing, human trafficking, slavery, sanctions evasion, or the proliferation of weapons. Suppliers must maintain effective policies, procedures, and internal controls to support ongoing compliance.

Suppliers shall maintain and, upon request, provide a modern slavery statement approved by senior leadership.

2. Business Integrity and Ethical Conduct

Anti-Bribery and Anti-Corruption

- Suppliers must not engage in bribery, corruption, extortion, or embezzlement. Suppliers must not offer, promise, give, request, or accept anything of value—including gifts, hospitality, entertainment, charitable contributions, or political donations—for the purpose of improperly influencing a business decision.
- Suppliers must not make political contributions or charitable donations on behalf of, or in a manner perceived as representing, Affirm.
- Accurate books, records, and appropriate internal controls must be maintained at all times.
- Suppliers must not provide gifts exceeding USD \$200 per year (on a 12-month trailing basis) to Affirm employees without prior written approval through Affirm's Ethics team.
- Suppliers must avoid actual, potential, or perceived conflicts of interest and must comply with antitrust and competition laws.

Conflicts of Interest

Suppliers must avoid actual, potential, or perceived conflicts of interest in their relationship with Affirm. Any situation that could reasonably create a conflict must be disclosed promptly to Affirm.

Fair Competition

Suppliers must compete fairly and comply with applicable antitrust and competition laws. Anti-competitive conduct, including price fixing, bid rigging, or market allocation, is prohibited.

3. Consumer Protection and Responsible Practices

Affirm is committed to fairness, transparency, and responsible innovation. Suppliers that support Affirm's products, operations, or consumers must:

- avoid deceptive, misleading, or unfair practices;
- ensure that communications are clear, accurate, and transparent;
- support Affirm's commitment to treating consumers fairly; and
- promptly escalate any issues that could negatively impact consumers.

Suppliers interacting directly with consumers on Affirm's behalf must comply with all applicable consumer protection laws and adhere to Affirm's standards of conduct.

Suppliers shall maintain documented controls to ensure compliance with consumer protection laws and notify Affirm of regulatory inquiries that may impact Affirm or its consumers.

4. Data Protection, Privacy, and Information Security

Affirm entrusts Suppliers with sensitive and confidential information. Suppliers must:

- protect Affirm's confidential information and the information of its consumers, partners, and employees;
- implement appropriate administrative, technical, and physical safeguards;
- comply with applicable data protection and privacy laws;
- use Affirm data only for authorized and contractually permitted purposes;
- prohibit unauthorized sharing of Affirm data with third parties;
- promptly notify Affirm of any actual or suspected data breach or security incident; and
- return or delete Affirm data upon termination of an engagement, as required by applicable law, the applicable Supplier agreement, or Affirm's reasonable instructions.

Suppliers must maintain documented cybersecurity programs that include risk assessments, vulnerability management, access controls (including multi-factor authentication where appropriate), encryption, and incident response procedures.

Suppliers must restrict access to Affirm data to personnel with a legitimate business need to meet confidentiality obligations.

5. Human Rights and Labor Standards

Affirm is committed to respecting internationally recognized human rights and expects the same of its Suppliers.

Forced and Child Labor

Suppliers must not use forced, bonded, indentured, or involuntary labor. Child labor is strictly prohibited except as permitted by law and consistent with international standards.

Suppliers must implement risk-based due diligence to identify and mitigate forced labor risks across operations and supply chains.

Suppliers shall not retain workers' original identity documents or require deposits as a condition of employment.

Workers must be free to terminate employment upon reasonable notice and leave the workplace without restriction.

Fair Wages, Working Hours and Labor Standards

Suppliers must comply with applicable wage and hour laws, including minimum wage, overtime requirements, and legally mandated benefits.

Workers must enter employment voluntarily and Suppliers must provide, where required by applicable law, workers with written terms of employment in a language they understand prior to starting work, including wages, hours, benefits, and conditions.

Non-Discrimination and Harassment

Suppliers must provide a workplace free from discrimination, harassment, abuse, and retaliation. Employment decisions must be based on merit, qualifications, and performance.

Freedom of Association

Suppliers must respect employees' rights to freedom of association and collective bargaining in accordance with applicable law.

6. Diversity, Equity, and Inclusion

Affirm values an inclusive work environment and encourages Suppliers to:

- promote inclusive hiring and employment practices;
- foster respectful workplace cultures; and
- support diverse-owned businesses within their own supply chains.

7. Health and Safety

Suppliers must provide a working environment that complies with applicable health and safety laws and regulations, which includes (as applicable):

- implementing appropriate workplace safety programs;
- providing required safety training and protective equipment; and
- maintaining emergency preparedness and response procedures.

Suppliers should promptly notify Affirm of significant health, safety, or public health incidents that could materially affect services provided to Affirm or otherwise impact Affirm's business relationship with the Supplier.

8. Environmental Responsibility

Suppliers are expected to operate responsibly and in an environmentally sustainable manner, which includes:

- complying with applicable environmental laws and regulations;
- minimizing waste, emissions, and environmental impact;
- promoting efficient use of energy and natural resources;
- measuring and reporting material Scope 1, Scope 2, and, where practicable, Scope 3 emissions by using recognized standards such as the GHG Protocol;
- seeking opportunities to reduce environmental impact across operations and supply chains; and
- generally supporting Affirm's environmental and climate-related objectives.

Suppliers are encouraged to demonstrate continuous improvement of their overall environmental impact, including establishing measurable emission reduction targets where relevant.

9. Conflict Minerals

Where applicable to the nature of the Supplier's operations, the use of conflict minerals is prohibited, and such Suppliers shall conduct due diligence on the source and chain of custody of minerals in their supply chains in alignment with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals.

Where applicable, Suppliers must:

- maintain policies and procedures to identify and mitigate conflict mineral risks; and
- provide reasonable supporting documentation (e.g., Conflict Minerals Reporting Template) upon request.

10. Responsible Use of Technology and Artificial Intelligence

Suppliers providing technology, data, analytics, or artificial intelligence solutions must:

- use technology responsibly and ethically;
- take reasonable steps to prevent bias, discrimination, and unfair outcomes;
- maintain appropriate transparency and documentation;
- protect data privacy and security; and
- comply with applicable laws governing automated decision-making.

Suppliers may not use Affirm data to train or improve models or systems without explicit authorization.

11. Confidentiality and Intellectual Property

Suppliers must:

- protect Affirm's confidential and proprietary information;
- respect intellectual property rights;
- use Affirm intellectual property only as authorized; and
- prevent unauthorized disclosure of confidential information.

These obligations continue after the termination of the Supplier relationship.

12. Subcontractors and Supply Chain Responsibility

Suppliers are responsible for ensuring that their subcontractors and agents comply with this Code and applicable laws. Suppliers must conduct appropriate due diligence and remain accountable for subcontractor performance.

13. Monitoring and Compliance

Affirm reserves the right, as permitted under Supplier agreements, to assess Supplier compliance with this Code through reasonable means, including questionnaires, documentation reviews, or audits.

Suppliers must cooperate with such assessments and promptly remediate any identified issues.

Failure to comply with this Code may result in corrective action, including termination of the business relationship.

14. Reporting Concerns

Suppliers are expected to promptly report suspected violations of this Code, applicable laws, or contractual obligations related to Affirm. Reports may be made to an Affirm business contact or through Affirm's designated reporting channels, as outlined in Supplier agreements.

Suppliers should also maintain their own confidential reporting mechanisms accessible to employees and third parties, investigate concerns, and take appropriate corrective action.

15. Acknowledgment

By doing business with Affirm, Suppliers agree to uphold the standards set forth in this Code and may be required to formally acknowledge and certify their compliance with the provisions included herein.