

Anti-Bribery & Anti-Corruption Policy

Introduction

At Affirm, our [Code of Ethics & Business Conduct](#) (the “Code”) reflects our commitment to upholding high ethical and legal standards. To implement that commitment, we will win business only through fair and honest practices, we will obey all applicable anti-bribery and anti-corruption laws of the countries in which we operate, and we will support Affirmers who say no to doing something that could violate our ethical standards or compromise our reputation and trust, regardless of financial impact. Our integrity is more important than any one transaction, no matter how important that transaction might seem in the moment. The Audit Committee of our Board of Directors oversees the enforcement of this Policy through regular compliance updates provided by the Chief Legal Officer.

Affirm has put in place this Anti-Bribery & Anti-Corruption Policy (the “Policy”) to provide information and guidance for complying with both the letter and the spirit of applicable anti-corruption laws, including the Foreign Corrupt Practices Act (“FCPA”). This Policy sets forth our policy against bribery and corruption in our business and our minimum anti-corruption and anti-bribery standards. The fundamental points of this Policy are: you should never participate in bribery and, if you are ever unsure about the right thing to do or need some guidance, we want you to ask before you act.

For purposes of this Policy, “we,” “our,” “Affirm” and the “Company” refer collectively to Affirm Holdings, Inc. and each of its direct and indirect subsidiaries (including Affirm, Inc.) as they may exist from time to time.

Scope

This Policy applies to all directors, officers, and employees (all of whom we will refer to collectively as “you” or “Affirmers” throughout this Policy) upon the commencement of their relationship with Affirm and for so long as they are providing services to Affirm in that capacity. For more information on prohibited activities and company standards, please see Affirm’s Financial Crimes Global Anti-Bribery and Corruption Policy.

Background

Bribery goes against our commitment to winning business only through fair and honest competition in the marketplace. Unethical, dishonest, and corrupt business is contrary to our values. In addition, bribery is a crime. Affirm is subject to the FCPA, as well as the anti-bribery and corruption laws of other countries in which we operate. The consequences for violating these laws can be severe, not just for Affirm, but also for any individuals involved. Criminal and civil enforcement actions for violating these laws often carry harsh prison sentences and large monetary fines and penalties. This is serious business, and Affirmers must treat it as such.

It’s on all of us to follow this Policy and the law in our daily work. As you read this Policy, keep in mind the questions from our Code that should guide all of our actions:

- Does it follow our policies?
- Does it comply with the law?
- Will it help us maintain the trust people place in Affirm?
- Would we feel comfortable if it were on the news or made public?

If the answer to any of these questions is “no,” or if there is pause, evaluate the situation and ask for help. In particular, prior to taking any action that commits Affirm, you should raise with the Ethics Team any questions or concerns you have about the appropriateness of a proposed payment, request for payment, gift, expense, transaction, or a proposed or ongoing third-party relationship.

Policy

1. We don't bribe

Affirm prohibits bribery. This means you may not, whether directly or indirectly using a third party, offer, provide, promise, or authorize the provision of a **"bribe"** to anyone—regardless of amount, regardless of whether it involves a public official, and regardless of whether it involves Affirm funds or assets. Bribery in small amounts is prohibited. Bribery involving non-governmental parties is prohibited. Bribery through third parties is prohibited.

A bribe involves giving a **"thing of value"** to obtain an improper advantage (like influencing official action or a business decision), to encourage someone to do something improper, or to reward someone for doing something improper. There is no minimum amount exception for bribes. A thing of value includes money, but is much broader than that. It includes anything the recipient would find beneficial or useful—such as (but not limited to) gift cards, donations, gifts and entertainment, trips, discounts, and employment offers or internships for relatives.

2. We don't bribe public or foreign officials and adhere to the FCPA

Be particularly careful when interacting with public and **"foreign officials,"** including employees of state-owned enterprises. We prohibit bribes to anyone, but the laws are particularly harsh where public and foreign officials are involved. You may never offer, provide, promise, or authorize the provision of a thing of value as a bribe to a public or foreign official. Because many jurisdictions have limits and restrictions on what things of value can be offered to these parties, we require Affirmers to contact the Ethics Team and receive approval before offering anything of value to a public or foreign official.

Under the Foreign Corrupt Practices Act, ("FCPA") the term foreign official is broad. They can include employees, officers, or persons acting in an official capacity for a local or national government; a government department or agency; a state-owned or state-controlled commercial enterprise; or a public international organization, like the United Nations. Non-U.S. political parties, their employees and officials, and even candidates for foreign political office also are considered foreign officials. When in doubt, it is better to contact the Ethics Team about whether someone qualifies as a public or foreign official. Of course, even if that person is not a public or foreign official, we don't bribe them.

3. We don't bribe indirectly

Affirmers may not use others to do something indirectly that they cannot do directly under this Policy. This means that you cannot use a third party to make an improper payment or otherwise to violate this Policy. Do not offer, provide, promise, or authorize the provision of a thing of value to any third party if you know, believe, or suspect that any part of it will be provided to someone for an improper purpose.

4. We don't request or accept improper benefits

Affirmers may not request, agree to accept, or accept a thing of value from an external party as a reward or in exchange for doing something improper related to Affirm's business, or if doing so compromises your ability to act in the Company's best interest. Our rules for gifts and entertainment include that Affirmers should not solicit such items from third parties.

5. We don't make facilitation payments

Facilitation payments are usually small, unofficial payments to a foreign official to expedite or secure the performance of non-discretionary, routine governmental duties. For example, making a small cash payment to a government clerk to process a business license to which the payor is already entitled. Although permitted by the FCPA under certain circumstances, facilitation payments may violate other anti-corruption laws. Therefore, Affirm prohibits facilitation payments.

In rare situations, a payment prohibited by this Policy may be made in response to an imminent threat to someone's physical health or safety. If you think you need to make such a payment, you should contact the Ethics Team to obtain advance approval unless this is not possible under the circumstances, in which case you should report the payment to the Ethics Team as soon as possible.

6. We allow reasonable gifts & entertainment

We always demonstrate sound judgment and moderation when exchanging business courtesies, even if you use your own funds and do not seek reimbursement for the expense. Giving and receiving socially acceptable gifts and hospitality can build strong working relationships between Affirm and those we do business with. However, gifts or hospitality that are extravagant or lack transparency or a legitimate purpose may be viewed as bribes, call into question our business decisions, or simply be inappropriate, erode trust, and harm our business. Therefore, we must take care to avoid any possible appearance that business decisions or governmental action could be or have been influenced as a result. Before offering or receiving any kind of gift or entertainment to or from an external party, follow the rules from our Code:

Whether offered or received, gifts and entertainment must always be:

- Reasonable and appropriate under the circumstances, for a legitimate business purpose (such as to promote or provide an opportunity to discuss the business of the Company), and properly documented and supported per our Expense and Travel Policies;
- Valued at USD\$200 or less per gift or entertainment expense;
- Infrequent;
- Provided and received transparently; and
- If involving a public or foreign official, approved in advance by the Ethics Team.

Gifts and entertainment must never be:

- For the purpose of obtaining new business, retaining existing business, expediting government action, or obtaining any improper advantage;
- In cash or a cash equivalent;
- Extravagant in appearance;
- Solicited by Affirmers from third parties;
- Provided by a representative, like a merchant, partner, or vendor, on our behalf without first obtaining approval from the Ethics Team; or
- Offered to or received from a public or foreign official without first obtaining approval from the Ethics Team.

Always contact the Ethics Team if you are unsure what to do, or to obtain an exception to the above requirements based on business justification. And remember, Affirmers must contact the Ethics Team for approval before offering or receiving any gift or hospitality, even a cup of coffee, to or from a public or foreign official.

7. Political and charitable contributions must be pre-approved

Political and charitable donations cannot be used as a pretense to pay bribes. You cannot offer, make, promise, or authorize any political or charitable donation in connection with your work for Affirm without first obtaining approval from the Ethics Team.

8. We hold our business partners to our ethical standards

Our commitment to high ethical and legal standards extends to external parties that work on our behalf, such as contractors, vendors, agents, and representatives. We expect these business partners to comply with the principles set forth in our Code and all applicable anti-bribery and corruption laws of the countries in which we operate.

In some circumstances, a third party's misconduct could create liability for Affirm or Affirmers, particularly if you participate in or approve a third party's misconduct or even if you are aware only of a high risk that the third party is violating anti-corruption laws in its work for us. Therefore, we should always have a valid business purpose for engaging any third party and we should take appropriate steps to ensure that we form business relationships only with trustworthy and qualified third parties.

Before engaging a third party, we are expected to perform appropriate risk-based due diligence into the party's background, reputation, and integrity, which will vary depending on the circumstances. Before engaging any non-U.S. third party that will interact, or is likely to interact, with a foreign official or government entity on our behalf, Affirmers must consult with the Ethics Team, which will advise on the steps to be taken, including, as required, performing appropriate due diligence into the reputation and qualifications of the third party and ensuring that the third party will agree to our compliance expectations.

9. We are accurate in our record keeping

Accurate financial books and records are important to prevent the misuse of Company funds and are required by the FCPA. Even a payment that does not constitute a violation of the

FCPA's anti-bribery provisions can lead to enforcement under the FCPA's accounting provisions if inaccurately recorded or attributable to an internal controls deficiency. Records and accounting entries must be accurate, properly supported by documentation, and not hide or disguise the true nature of any transaction. Consistent with the requirements of our Code, Affirmers should never falsify, forge, or improperly alter Company records, and misleading documents or undisclosed or unrecorded payments, assets, funds, or accounts should not be used.

Guidance and Inquiries

For guidance or any questions about the requirements of this Policy, please reach out to the Ethics Team.

Submitting Complaints

Affirmers have a responsibility to speak up immediately in the event they become aware of anything that potentially violates the Code, this Policy, or anti-corruption laws. There are multiple ways to submit complaints to Affirm, you can:

- Report it to your People Business Partner;
- Report it to Employee Relations;
- Report it to the Ethics team; or
- Submit a report, either identifiably or anonymously, to our reporting hotline www.affirmethics.com by web, SMS or phone.

Affirm has a strict non-retaliation policy, meaning that Affirmers will not be disciplined for submitting a complaint in good faith, participating in an investigation related to a complaint, or opposing a practice that is believed in good faith to be unlawful or in violation of our policies.