

Human Rights Policy

INTRODUCTION

Our relationships with our employees, suppliers, vendors, merchant partners, consumers, and the communities in which we operate, are intended to reflect the principles set forth and referred to in this Human Rights Policy (the “Policy”). The Audit Committee of our Board of Directors of Affirm Holdings, Inc. receives updates regarding compliance with this Policy, which are provided regularly by the Chief Legal Officer.

Human rights are basic rights for individuals. We recognize our responsibility to respect and protect human rights by providing fair and equitable working conditions and prohibit the use of any forced, compulsory, child labor, or human trafficking related activities by or for Affirm, Inc. or its affiliates (collectively “Affirm”). Our respect for the protection and preservation of human rights is guided by the principles outlined in the United Nations Universal Declaration of Human Rights and the International Labor Organization. We acknowledge the United Nations Guiding Principles on Business and Human Rights as the recognized framework for corporations to protect and respect human rights, and we work to align our efforts with these principles and other international standards. Our commitment to adhering to these principles applies to all Affirmers, and we encourage our merchant partners, vendors, and suppliers to adhere to these principles as well.

EXPECTATIONS & COMMITMENTS

Affirm’s expectations and commitments relating to human rights include, but are not limited to, the following:

- **Ethical Business Practices:** Affirm recognizes the importance of conducting business ethically and in compliance with the law everywhere we operate. Affirmers receive training on a variety of human rights related issues.
- **Community Engagement:** Affirm is committed to having a positive impact on our communities and consumers that use our products. We use a variety of engagement mechanisms to interact with relevant stakeholders to enhance and expand our relationship with them. In 2019, Affirm, Inc. launched its own employee-led 501(c)(3) Foundation, Affirm Cares. The mission of Affirm Cares is to support non-profit organizations in the U.S. that provide services in the financial literacy and inclusion space, build technology education and training programs, and help sustain vibrant communities.
- **DEI:** Diversity, equity, and inclusion are critical to our mission. We value the individual differences, experiences, and capabilities of each Affirmer, and we are dedicated to creating a workplace that respects and values all employees and maintains an environment of open and direct communication. To further our commitment to DEI, unconscious bias training is conducted to raise awareness and drive conversations to create more effective leaders, more productive teams, and a more inclusive

organizational culture. Affirm’s latest DEI report can be found on the Investor Relations section of our website under the “Corporate Governance” tab.

- ***Protection of Rights and Economic Inclusion:*** We believe that the protection of women's rights, minority rights, the rights of the underrepresented and economic inclusion for all are priorities for long-term success. Affirm strives and continually reviews compensation to ensure its employees are compensated in alignment with the market and pays U.S. employees at least 2x the average minimum wage in the United States.¹
- ***Equal Employment Opportunity and Non-discrimination:*** Affirm is an equal opportunity employer and makes employment decisions on the basis of merit and business needs. Our commitment to non-discrimination and equal employment applies to all aspects of our employment processes, including hiring, transfers, promotions, compensation, benefits, and disciplinary action. We seek to comply with all applicable employment-related laws and regulations. We do not tolerate discrimination against anyone based on characteristics protected by law, such as age, race, ethnicity, religion, gender (including identity and expression), color, national origin, veteran status, disability, and sexual orientation.
- ***Right to Water:*** Although Affirm does not use a significant amount of water resources in its business activities, we acknowledge the Human Right to Water, as defined by the United Nations, and that everyone is entitled to sufficient, safe, acceptable, physically accessible, and affordable water.

In addition to the standards set forth in this Policy, Affirm has a [Code of Ethics & Business Conduct](#) (the “Code”) that reflects our commitment to upholding high ethical and legal standards.

¹ This is applicable to full-time and part-time U.S. employees and excludes our CEO (whose base salary is set to align with the applicable minimum wage in San Francisco) and independent contractors.