



Block, Inc. | Global Code of Business Conduct and Ethics

(Adopted On November 4, 2015; effective as of November 18, 2015; As Last Amended on October 20, 2022 with changes effective as of January 1, 2023)

A Message From Jack Dorsey

Each year, we take innovative pathways to support a variety of customers – from sellers and consumers, to artists, developers, and internal teams across Block. Wherever you work within the ecosystem, our purpose of economic empowerment connects our contributions. As we move Block’s purpose forward together, the ethics we uphold come front and center. The Code is our framework for keeping our workplace inclusive, respectful, and compliant. Like our purpose, it helps us stay grounded as our ecosystem evolves, so be sure to follow it in your day to day. As always, if you have any questions or concerns, please don’t hesitate to speak up. – *Jack*

At Block, your work empowers individuals to participate and thrive in the economy. This is exciting, inspiring work, and we expect that you approach it lawfully, honestly, ethically, and in the best interest of Block, Inc. This Global Code of Business Conduct and Ethics (“**Code**”) is your guide for such conduct, and the information within shows you how to uphold this Code in your day-to-day activities. For purposes of this Code, “we,” “our,” “Company,” and “Block” refer to Block, Inc. and its subsidiaries.

It is critical that all employees, officers, directors of Block (all of whom we will refer to collectively as “you” or “employees” throughout this Code) read, understand, and abide by this Code – so please reference it frequently.

The Code is our foundation for how we work. It helps to empower everyone who works at Block to understand the responsibilities we have. It explains some of the rules we must abide by and the high standard we hold ourselves to.

The Code may not anticipate every situation, so it is important that you exercise good judgment in every decision you make and seek additional guidance when appropriate. If you’re navigating a gray area and you’re not finding answers in the Code or other policies, you can seek guidance or ask a question through Block’s Ethics site at

ethics.block.xyz, where you have the option to remain anonymous. In addition, some sections of the Code provide contact info for the appropriate team which can provide you guidance and support.

If there is any conflict between this Code and applicable local law, you should comply with the most restrictive requirement. Beyond being responsible for following this Code, we must also hold each other accountable and report any violations (find details on how below). As always, retaliation for raising concerns in good faith is strictly prohibited and will not be tolerated.

Please note this Code sets forth a minimum standard; It does not reduce or limit the other legal and contractual obligations you may have to Block. This Code supplements and does not replace the Employee Handbook, Employee Work Rules, or other policies and procedures implemented in your locale.

This Code does not form part of any contract of employment or give rise to any contractual rights. It constitutes a direction from Block with which you must comply.

The Board of Directors, in conjunction with the Audit and Risk Committee and the Nominating and Corporate Governance Committee, is ultimately responsible for administering this Code, and they have delegated day-to-day responsibility for administering and interpreting this Code to our Chief Legal Officer. The Nominating and Corporate Governance Committee is responsible for reviewing and monitoring compliance with this Code, including oversight over the establishment of procedures for the prompt internal reporting of violations of this Code. The Audit and Risk Committee will oversee the review of any complaints and submissions that have been brought to the Audit and Risk Committee by our Chief Legal Officer under this Code.

TABLE OF CONTENTS

OUR RESPONSIBILITIES

- Maintain Confidentiality
- Speaking on Behalf of Block
- Create a Respectful Workplace
- Maintain a Safe Workplace
- Financial Integrity and Accurate Records
- Drug and Alcohol Abuse Policy

SPEAK UP

- Good Faith Reporting and No Retaliation
- Investigations
- Lead Responsibility

COMPLY WITH APPLICABLE LAWS, REGULATIONS, AND POLICIES

- Insider Trading Policy
- Digital Currency Transaction Policy
- Antitrust and Fair Dealing
- Global Sanctions Policy

CONFLICTS OF INTEREST

- Outside Activities
- Investing in a company that has a business relationship with Block
- Engaging Friends or Family in employment or other business relationships
- Corporate Opportunities
- Political Affiliations and Charitable Contributions

ANTI-BRIBERY AND ANTI-CORRUPTION

GIFTS AND ENTERTAINMENT

ETHICAL BUSINESS PRACTICES AND SELLING

INFORMATION AND TECHNOLOGY POLICIES

- Security and Privacy

LABOR AND HUMAN RIGHTS

- Working Hours
- Wages
- Forced Labor
- Child Labor

AMENDMENTS, MODIFICATIONS AND WAIVERS

OUR RESPONSIBILITIES

Maintain Confidentiality

Protecting Block's Confidential Information is a critical responsibility for all individuals who perform work for Block, and violations of these obligations can have a serious impact on our business. Confidential Information is broadly defined in the Confidential Information and Invention Assignment Agreement that you signed in connection with your work at Block and consists of all information and physical material not generally known or available outside the Company and information and physical material entrusted to the Company in confidence by third parties. It includes, but is not limited to, all technical data, trade secrets, know-how, research, product or service ideas or plans, information about employees and consultants, and other business information.

While we are proud of all of Block's accomplishments, you must not communicate any

of Block's Confidential Information, including any material nonpublic information ("MNPI") about Block, to anyone outside of Block who is not bound by a confidentiality obligation to us ("Third Parties"). Find an overview of MNPI here. Even if you have access to Confidential Information, you must not access, use, or share confidential information (or your opinions about such information) with people outside Block or people inside of Block who do not have a business need to know this information, and only do so in compliance with our [Data Policy](#).

If you are uncertain about whether information is confidential, reach out to your Lead and you can work together to ensure your actions comply with Block's policies. For clarity, this policy does not restrict you from (i) discussing your wages, hours, working conditions, or other terms and conditions of employment with other employees or Third Parties, including labor organizations or (ii) reporting information to any law enforcement agencies when you have reasonable cause to believe that a violation of law has occurred. See Block's Protected Communications Policy for more information.

Speaking on Behalf of Block

Only our Block Head (our version of CEO), Chief Financial Officer, and Communications Leads (collectively, "**Spokespersons**"), and individuals explicitly authorized by a Spokesperson to speak on a particular topic or occasion ("**Delegates**"), as designated in Block's External Communications Policy, may speak on behalf of Block with Third Parties.

Unless you are a Spokesperson or Delegate, you are not authorized to speak with Third Parties on behalf of Block, including the media, investors, or analysts, and should not give the impression that you are speaking on behalf of Block in any communication. This includes any public speaking event and posts to online forums such as social media sites, blogs, text or audio/visual chat rooms, podcasts and bulletin boards. This Code also applies to public comments about specific matters that relate to our businesses, as well as letters to the editor and endorsements of products or services. Please refer to our External Communications Policy for more information.

Create a Respectful Workplace

Block encourages a creative, culturally diverse, and supportive work environment. Employees are expected to create and promote a respectful workplace culture that is free of harassment, intimidation, unlawful bias, and discrimination. Block is an equal opportunity employer and makes decisions based solely on individual merit and qualifications directly related to professional competence and objective business needs. Block strictly prohibits discrimination or harassment of any kind on the basis of race, color, religion, veteran status, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical

condition, sexual orientation or any other characteristics protected by law.

If you have any concerns regarding discrimination, harassment, or bullying, we strongly encourage you to report it as described in the Speak Up section. Leads should immediately report any such concerns to their HRBP or as provided for in the Speak Up Section , below. The Employee Relations team will promptly investigate any concerns and take appropriate action.

Please review Block's Equal Employment Opportunity Policy and Policy Prohibiting Harassment for further information. Respectful workplace expectations also apply to digital communications, such as those on Slack. See Rules of Engagement for Slack for more information.

Maintain a Safe Workplace

Block is committed to a safe and healthy work environment, free from violent, threatening, or intimidating behavior. Violent or threatening behavior of any kind is unacceptable at Block offices, while working remotely, at any Block-sponsored event, at off-site work-related events, or during any time you are acting on behalf of Block.

If you have any concerns regarding safety in the workplace, please review the workplace safety policies applicable to your locale. You may also contact the Trust & Safety team at safety@.

Financial Integrity and Accurate Records

The integrity of our business practices and financial information is paramount. Accurate, clear and complete records are essential to making the best business decisions, preserving our reputation for financial integrity and meeting our obligations as a public company. In parallel, our shareholders and the financial markets rely on our full, fair, truthful, timely and understandable disclosures and financial information as well.

Drug and Alcohol Abuse Policy

Block prohibits individuals from being impaired under the influence of alcohol, as well as the unlawful use, possession, distribution, sale, or manufacture of any illegal drug or controlled substance on Block premises; while conducting or performing Block business regardless of location; while operating or responsible for the operation, custody, or care of Block equipment or other property; or while responsible for the safety of Block employees or clients. See more information at Drug and Alcohol Abuse Policy.

SPEAK UP

If you have a good faith concern regarding conduct that you believe to be a violation of Company policy including this Code, a violation of law, or questionable accounting practices, internal accounting controls, or other financial matters, or the reporting of fraudulent financial information you should speak up. No matter how small the issue is, Block wants to hear from you. You have several options to speak up:

- Discuss the situation with your Lead or your HRBP;
- Reach out to Block's employment counsel team at employment-legal@; or
- Report your concern via Block's Ethics Line at ethics.block.xyz which provides options for you to make a report online or by local phone numbers with a representative. If utilizing the Ethics Line, you have the option to report your concern while remaining anonymous.

Good Faith Reporting and No Retaliation

Block is committed to maintaining a work environment in which you feel free to raise any good faith concern, free of retaliation, discrimination, or harassment ("**Retaliation**"). Good faith means that all reports of possible violations of this Code, Company policy, or the law are made sincerely and honestly.

Accordingly, Block is committed to non-retaliation. Retaliating against someone who has made a report or participated in an investigation in good faith is not tolerated.

Raising concerns within Block does not prevent you from reporting the same concerns to law enforcement or other relevant government agencies if there is a suspected or potential violation of law.

Investigations

When Block learns about a potential violation of law, this Code or any of Block's policies, the Company will take action. This often includes conducting a fair, objective and thorough investigation. When investigating, Block will make every reasonable effort to get all sides of the story in a timely, impartial way and maintain confidentiality to the greatest extent possible and in compliance with applicable laws and regulations. Note: Block requires all employees to cooperate with investigations and provide complete, accurate, and truthful information whenever asked to do so.

If we determine that a violation occurred or someone was untruthful in the course of an investigation, we will take appropriate action, including disciplinary action up to termination and, if necessary, referral to law enforcement.

Lead Responsibility

While the Code applies to everyone at Block, leads (our term for managers) have a deeper level of responsibility and must lead with integrity and reinforce Block's ethical culture. Leads are often the first resource for employees who have questions on ethical issues or potential violations of Block policy. If unsure of the best course of action, Leads are responsible for directing their employees to the correct resource. Also, Leads are required to promptly report any violation or suspected violation of company policy or law. Leads may be held responsible if they don't report misconduct. Leads must create an environment where others feel comfortable sharing concerns and uphold the principle that an employee reporting their concerns is protected from retaliation.

COMPLY WITH APPLICABLE LAWS, REGULATIONS, AND POLICIES

Insider Trading Policy

You may not trade or enable others to trade Block stock or stock of another company, such as a customer, supplier, competitor, potential acquisition target or alliance, while in possession of MNPI about that company. Insider trading not only violates this Code, it also violates the law and can result in criminal consequences. Any questions as to whether information is material or has been adequately disclosed should be directed to insider@. Please review Block's Insider Trading Policy, which explains the risks of insider trading and trading windows when you may not trade Block stock.

Digital Currency Transaction Policy

You may not engage in transactions and activities involving digital currency if you are in possession of MNPI about that digital currency or during a special blackout period related to that digital currency. Please refer to Block's Digital Currency Transaction Policy or direct questions to digitalcurrencypolicy@ for additional information.

Antitrust and Fair Dealing

Competing vigorously, yet lawfully, with competitors and establishing advantageous, but fair, business relationships with customers and suppliers is a part of the foundation for long-term success. That being said, unlawful and unethical conduct, which may lead to short-term gains, would damage Block's reputation and long-term business prospects. Accordingly, you must comply with antitrust and competition laws and deal ethically and lawfully with our customers, suppliers, competitors, employees, and contractors in all business dealings on our behalf. You should not take unfair advantage of another person in business dealings on our behalf through the abuse of privileged or confidential information or through improper manipulation, concealment or misrepresentation of material facts, or any other unfair dealing practices. Antitrust laws

■

apply in locations throughout the world, and can be complicated. If you have any questions about the applicability of any antitrust law or regulation, please reach out to Legal at ma-legal@.

Global Sanctions Policy

While performing work on behalf of Block, you must adhere to the Office of Foreign Assets Control (“**OFAC**”) Global Policy (go/sanctionspolicy), which restricts you from providing services in violation of local sanction law and prohibits any travel (personal or business) to a comprehensively sanctioned area (e.g., Cuba, Iran, North Korea, Syria, Crimea, Luhansk, and Donetsk Regions of Ukraine, subject to OFAC amendments) without 14 days advance notice and approval received from globalsanctions@.

CONFLICTS OF INTEREST

A conflict of interest occurs when your role and work at Block is in potential conflict with your personal interests. You must avoid conflicts of interest, and if there is a situation that could present a potential conflict, or the appearance of conflict, you must disclose it to Block through the available channels below, so that it can be evaluated. Avoid making a conflict-of-interest determination on your own.

Block’s business is broad in scope and continues to evolve, which means the factors considered in evaluating a conflict of interest may change.

Details on how to disclose a Conflict of Interest can be found on the Conflicts of Interest page. Once the potential conflict has been disclosed, no action should be taken until the disclosure has been reviewed and approval is provided.

You must promptly take action to eliminate a conflict of interest if Block asks you to do so. When necessary, we will take appropriate action to manage the conflict based on the circumstances. In cases where there is an actual or perceived conflict, even if there is no line of authority or reporting involved, Block may, in its sole discretion, make alternative reporting or decision-making arrangements, or may take appropriate action to resolve the conflict, to the extent permitted by applicable local law.

Situations that commonly create conflicts of interest include (but are not limited to):

Outside Activities

You must obtain pre-approval before engaging in any outside activities that could interfere with your work at Block, or if they could result in an actual or perceived conflict of interest. Outside activities include (but are not limited to) other employment, consulting, serving on a board or in another advisory capacity, and volunteer activities.

- If you are interested in pursuing an outside activity, your next step is to submit a

request at [go/outsideactivities](#). For more details, please refer to the Outside Activities Policy.

Investing in a company that has a business relationship with Block

You must seek approval before making any significant personal investments or having any other significant financial interests in any company that has a business relationship with Block, or that competes with Block's current or anticipated business. Significant personal investments or financial interests include those where you have the ability to control or influence the management or operating policies of the company.

Engaging friends or family in employment or other business relationships

To the extent permitted under local law, you must disclose any personal, familial, or romantic relationships with a competitor, supplier, potential supplier, subordinate employee of Block, anyone whom you refer to Block as a candidate for employment or engagement, or individual performing services for Block that create a perceived or actual conflict of interest.

You should not allow any of your personal connections or family members to receive a personal benefit from your position at Block or to improperly influence, or give the appearance of improperly influencing, your decision-making.

Corporate Opportunities

- Diverting opportunities (either to yourself or others) that are discovered through your work at Block;
- Using Block's property or information or your position for personal gain; or
- Competing with Block.

Political Affiliations and Charitable Contributions

If you contribute time or money to any political or charitable activity, you must comply with all laws, regulations, and Block policies regarding gifts to, and entertainment of, governmental officials, charitable organizations and political organizations. You may not use Block's stationery, the Block name or logo, work titles with Block, or subordinates to express personal political opinions, promote candidates, or seek political contributions.

All donations to charitable organizations and political organizations on behalf of Block must be reviewed and approved by the Policy team via [communitygiving@](#). In addition, if you become involved with a political group, you must make it clear that your activities are being conducted purely in a personal capacity and not on behalf of or in connection with Block.

If you are unsure about whether a conflict exists, you should share the relevant

■

circumstances with the Ethics team (askcompliance@) for guidance, which is managed by members of the Compliance team. For questions on outside activities or reporting relationships, please contact your HRBP.

ANTI-BRIBERY AND ANTI-CORRUPTION

Block's policy on bribery and corruption is simple: Don't offer any bribe to anybody, anytime, for any reason. Bribes and kickbacks – offering or accepting anything of value to obtain new business, retain existing business, expedite government actions, or secure any improper advantage – are strictly prohibited. More details on this are available in our Anti-Bribery and Anti-Corruption Policy and Guidelines.

GIFTS AND ENTERTAINMENT

Gifts and entertainment can help build and maintain relationships. However, when excessive, they may create unnecessary risk. You may never allow gift or entertainment offers to affect your ability to make objective business decisions, or create the appearance that your objectivity has been compromised. Any gift or entertainment offer given or received over \$250 USD must be disclosed using the Disclosure Tool.

In general it is ok to exchange reasonable, moderately priced business gift and entertainment offers, such as:

- Clothing or objects with a corporate logo.
- Gift baskets of food to be shared with others.
- Tickets to a local sporting event.
- Gifts for significant events, such as births or weddings.

Some gift and entertainment exchanges are never allowed, including:

- Cash or cash equivalents, such as gift cards or cash vouchers.
- Expensive tickets to major cultural or sporting events.
- Travel or accommodations.
- Extravagant gifts, such as jewelry or other luxury items.
- Anything of significant value.
- Gifts or entertainment involving government officials or their family

Additional information and guidance can be found on the Gifts and Entertainment Page which you should review prior to any activity related to gifts or entertainment occurring.

ETHICAL BUSINESS PRACTICES AND SELLING

Our customers must always take precedence over your personal or team performance incentives. This means you must clearly and truthfully communicate with our customers

about our products and services. If you have concerns about potential misconduct related to performance incentives or sales practices, report your concerns to your Lead, HRBP, or the Block Ethics Line.

INFORMATION AND TECHNOLOGY

Security and Privacy

You have a shared duty to protect Block's intellectual property, MNPI, personally identifiable information, other data described in [go/datapolicy](#) (collectively, "**Block Data**") and other business assets. We take our intellectual property, Block Data, business systems, and network security very seriously. Good security, working practices, and procedures for Block property, in all its forms, are critical in protecting Block Data and intellectual property development that fuels Block's growth, the livelihood of employees, and our collective investment in Block. Block's files, networks, software, internet access, internet browser programs, email, voice mail, and other business equipment and resources are provided for business use, and they are the exclusive property of Block. Misuse of such property is not tolerated. We reserve the right to monitor your use of Block systems (including email and Slack communications) and access to Block data to secure our systems, monitor compliance with this Code and other Block policies, and protect our rights and the rights of our customers. For more information, refer to our Data Policy , [go/infosec-policy](#), or send questions to [infosec@](#).

In addition, you should make every reasonable attempt to prevent your Block-issued equipment from becoming damaged or a security vulnerability for Block (see [go/update](#)) and report lost or stolen equipment immediately to [theft@](#).

LABOR AND HUMAN RIGHTS

Working Hours

We comply with any applicable legal limits with respect to hours worked (including overtime hours) and working days.

Wages

We provide all wages and any legally-mandated benefits, and make any wage withholdings, in accordance with applicable laws. We also comply with any applicable wage reduction laws.

Forced Labor

Block seeks to ensure that all personnel performing services for Block are doing so on a

voluntary basis, with the freedom to terminate their employment status at their own discretion, subject to any applicable notice provisions to the extent permitted by law. Slavery, forced labor, indentured work, and human trafficking of any kind will not be permitted under any circumstances.

Child Labor

Block will not employ anyone below the minimum legal age for employment in their respective country or locale, and in no circumstance shall employ anyone under the age of 15. We expect all Block employees to implement all necessary and effective practices and processes to ensure that we do not employ anyone who is underage.

You should report any labor and human rights compliance concerns to your HRBP or as set out in the Speak Up section of this Code.

AMENDMENTS, MODIFICATIONS, AND WAIVERS

Block is committed to continuously reviewing and updating our policies, and therefore reserves the right to amend this Code at any time, for any reason, subject to applicable law. Any amendment or modification of this Code must be approved by our Board of Directors and promptly disclosed in accordance with applicable laws and regulations.

Any waiver of any provision of this Code for an executive officer or director of the Company (or its direct or indirect subsidiaries) must be approved by our Board of Directors, or a committee authorized by our Board of Directors, and promptly disclosed pursuant to applicable laws and regulations. Any waiver of any provision of this Code for any other employees must be approved by the Chief Legal Officer.