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

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Introduction

Block builds technology to increase access to the global economy. Each of our brands unlocks different aspects of the economy for more people. Square makes commerce and financial services accessible to sellers. Cash App is the easy way to spend, send, and store money. Afterpay is transforming the way customers manage their spending over time. TIDAL is a music platform that empowers artists to thrive as entrepreneurs. Bitkey is a simple self-custody wallet built for bitcoin. Proto is a suite of bitcoin mining products and services.

At Block, we are guided by our purpose of economic empowerment, which we seek to achieve through lawful, transparent and respectful business dealings. As a result, we expect that all suppliers of products and services to Block, including vendors, staffing agencies, temporary agency workers, independent contractors, and licensees ("Block Suppliers"), approach business lawfully, ethically, with integrity, good judgment, and fairness. The Block Supplier Code of Business Conduct and Ethics ("Code"), is based on the following guiding tenets: (a) operating business ethically and compliantly; (b) protecting the labor rights of all workers; (c) safeguarding the health and safety of all workers; and (d) stewardship of the environment. All Block Suppliers are expected to conduct business in accordance with this Code, including instituting appropriate policies and practices, and communicating and enforcing the provisions of this Code throughout their organization and across their supply chains and subcontractors.

This Code is not intended to provide an exhaustive list of Block's expectations, but rather highlights examples of the types of compliance obligations and business practices that should always be top of mind for Block Suppliers when conducting business.

For purposes of this Code, "we," "our," "Company," and "Block" refer to Block, Inc. and its subsidiaries.

Ethics and Compliance

Integrity

Block is committed to conducting business in accordance with the highest ethical standards and in compliance with all applicable laws, rules and regulations. We expect Block Suppliers to share our principles and enforce our standards, and where Block's standards conflict with local law, we expect Block Suppliers to honor the higher standard.

Anti-Bribery. Block believes business should be won on its merits, and not based on any form of bribery, extortion, kickback or other corrupt or unethical business practice. Block Suppliers must know and follow all applicable anti-corruption laws wherever they do business in the world. Block Suppliers must not offer or accept bribes to or from anyone. This prohibition covers the exchange of anything of value, including a payment, benefit, gift, gratuity, service, or other consideration—to secure or retain an improper advantage related to work for Block. This extends to any attempt to improperly influence Block representatives, officers, agents or employees in exchange for Block's business. Block Suppliers must implement and maintain internal controls including policies, recordkeeping, and enforcement sufficient to ensure compliance with applicable anti-bribery and corruption laws.

Fair Competition. Block Suppliers must comply with antitrust and competition laws and deal fairly and ethically in their business arrangements, including never taking advantage of another party through improper manipulation, concealment or misrepresentation of material facts, or any other unfair dealing practices.

No Conflicts of Interest. Block Suppliers must avoid any conflicts of interest, or appearance thereof. Any conflicts, or appearance thereof, that could potentially impact an engagement with Block shall be disclosed to Block immediately.

Intellectual Property, Data Protection and Privacy

Block Suppliers shall take all commercially reasonable steps to protect confidential information and respect intellectual property ("IP") rights. They are expected to design and continuously improve processes that provide commercially reasonable protection to personally identifiable information, confidential information, and IP.

Securities Laws Compliance

Block Suppliers may have access to material, non-public information about Block or other companies. Information is material if a reasonable investor would consider it important in deciding whether to buy, sell, or hold a company's securities. Block Suppliers are prohibited by law from transacting in securities of a company while in possession of material, non-public information of such company and/or communicating such information to others.

Raising Questions and Reporting Concerns

We expect Block Suppliers to have a process through which their employees, customers and clients can raise concerns without fear of retaliation. The reporting process should be transparent and ensure the protection of reporting persons.

In addition, Block is committed to maintaining a business environment in which Block Suppliers feel comfortable raising any good faith concern, free of retaliation. Accordingly, we do not tolerate any retaliation against any individual for reporting or participating in good faith in the investigation of any suspected fraudulent activity or violation of law or this Code whether conducted by the supplier or Block. This also means that Block Suppliers should communicate with us if they are unsure of what to do or have concerns regarding a potential violation of the Code. Block Suppliers (or their employees, agents or representatives) may report such a concern via our Ethics Line (at www.ethics.block.xyz), through which they may choose to identify themselves or remain anonymous.

Cooperation in Investigations

Should violations of this Code be reported, suspected, uncovered or otherwise arise, Block Suppliers are expected to cooperate in good faith and provide truthful information in connection with an inquiry or investigation by Block, an external investigator, a court, an arbitrator, law enforcement, or any other government agency or official.

Conflict Minerals

Block supports the humanitarian goal of ending the violence and human rights abuses in minerals sourcing. Block strives to have a conflict-free supply chain and is committed to avoiding the use of conflict minerals. Block Suppliers are expected to conduct the necessary due diligence and provide proper verification of the country of origin and source of the materials used in the products supplied to Block. Block Suppliers are expected to have a policy to reasonably assure that the use of minerals in the products, parts, components, and materials they manufacture does not directly or indirectly finance or benefit armed groups or contribute to serious human rights abuses.

Labor and Human Rights

Fair Treatment

Block is committed to inclusion and diversity and conducting business with Block Suppliers who share this commitment. Harassment, abuse, corporal punishment, degrading or inhumane treatment is not authorized or tolerated. Block Suppliers represent that they are equal-opportunity employers and that they shall not discriminate based upon race, color, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, relationship status, ethnicity, national origin, caste, physical or mental disability, genetic information, medical condition, pregnancy, religion, political affiliation,

veteran status and/or any other trait protected by applicable law. Harassment based on these protected characteristics is also not tolerated.

Working Hours

Block Suppliers are expected to comply with any applicable legal limits with respect to hours worked (including overtime hours) and working days.

Wages

Block Suppliers are expected to provide and pay all wages and any legally-mandated benefits, and make any wage withholdings, in accordance with applicable laws. In addition, Block Suppliers are expected to comply with any applicable wage reduction laws. Block has the expectation that wage deduction as a disciplinary measure is unacceptable.

Forced Labor

Block Suppliers are expected 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 lawful notice provisions or other laws that may apply. Block Suppliers must know and act in accordance with relevant international principles and frameworks such as the United Nations Guiding Principles on Business and Human Rights and International Labor Organization (ILO) conventions, and ensure that all recruitment and labor practices are free from exploitation and abuse. Block Suppliers must not impose unreasonable restrictions on personnel's freedom of movement, and must not withhold, destroy, or confiscate personnel's identity or travel documents except where required by law and where personnel retain access upon request. Block Suppliers must never require personnel to pay recruitment fees or similar fees or debt to obtain employment. Slavery, forced labor, indentured work, and human trafficking of any kind is strictly prohibited under any circumstances.

Child Labor

Block Suppliers must not employ anyone below the minimum age for employment in their respective country or locale or below the age of completion of compulsory education, whichever is higher. In no circumstance shall they employ anyone under the age of 15. Block Suppliers should implement all necessary and effective practices and processes to ensure that they do not employ anyone who is underage.

Freedom of Association

Block Suppliers are expected to permit and respect their workers' right to bargain collectively and associate freely.

Health and Safety

Block firmly believes in the protection of the health and safety of all workers and expects our Block Suppliers to provide its workers with a safe and healthy work environment. Our Block Suppliers are expected to comply with applicable laws regarding working conditions and meet the standards below.

Occupational Safety

It is expected that Block Suppliers provide a safe and healthy work environment to their workers, and either meet or exceed all applicable health and safety regulations and/or legal requirements.

Emergency Preparedness

Block Suppliers are expected to take all commercially reasonable measures to identify, plan for, and implement appropriate action plans and procedures to ensure their workers' safety during emergencies.

Shelter, Sanitation, and Food

Block Suppliers are expected to provide their workers with ready to use potable water and clean toilet facilities. If accommodations or residential facilities are provided to workers, it is expected that they are well maintained, clean, safe, include emergency egresses, hot water for showering, and adequate ventilation and heat.

Stewardship of the Environment

Block is committed to minimizing and reducing the environmental impacts of our business. All Block Suppliers are expected to develop, implement, and maintain environmentally responsible business practices.

Compliance with Environmental Laws

Block Suppliers are expected to comply with all applicable environmental policies, laws, rules, and regulations, including adhering to environmental permits and approval for regulated activities.

Energy Use Consumption

Block Suppliers are expected to track, monitor and, where possible, reduce their energy use consumption, utilizing renewable energy to the fullest extent possible, so as to be better stewards of the environment in their communities.

Hazardous Materials

Block Suppliers are expected to implement a system to identify, manage, reduce, and eliminate hazardous substances and other materials posing a hazard if released into the environment and to ensure their safe handling, movement, storage, use, and recycling. Block Suppliers are expected to properly dispose of any hazardous waste in accordance with applicable standards.

Pollution Prevention and Resource Reduction

Block Suppliers should strive to reduce or eliminate waste of all types, including air, water and energy, at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, recycling, and reusing materials. Block Suppliers are expected to reduce the consumption of energy, water, and natural resources by implementing conservation and substitution measures and to conduct routine monitoring of the performance of their waste treatment and containment systems as applicable to ensure compliance with laws and regulations.

AMENDMENTS

We are committed to continuously reviewing and updating our policies and procedures. Any changes to this Code must be approved by the Chief Legal Officer (or equivalent thereof) of Block.