



Square Code of Business Conduct and Ethics

(Adopted On November 4, 2015; Effective As Of November 18, 2015; As Last Amended on October 21, 2020)

At Square, 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 Square. This Code of Business Conduct and Ethics (“**Code**”) is your guide for such conduct, and the policies and procedures within show you how to uphold this Code in your day-to-day activities. For purposes of this Code, “we,” “our,” “Company,” and “Square” refer to Square, Inc. and its subsidiaries.

It is critical that all employees, officers, directors, agents, contractors, and any other individuals or party working on behalf of Square (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. If you have any questions or concerns, talk to your lead, your Human Resources Business Partner (**HRBP**) or the Legal Team (“**Legal**”) to ensure that you are following it with everything you do. You can find the name and contact information of their HRBP at [go/myhrbp](https://square.com/go/myhrbp) and reach Legal at [legal@](mailto:legal@square.com). These policies 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.

Beyond being responsible for following this Code, we must also hold each other accountable and report any violations. Individuals who violate this Code may be subject to disciplinary action, in accordance with applicable local law, up to and including termination of employment or the business relationship. If there is any conflict between this Code and applicable local law, you should comply with the most restrictive requirement.

Contingent workers and contractors can reach out to their agency-employer as appropriate. 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 Square.

Please also take the time to review the Employee Handbook via [go/handbook](https://square.com/go/handbook) or Employee Work Rules that are relevant to your locale, which covers in greater detail how we should conduct ourselves at work in compliance with local rules and laws. 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 Square 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 General Counsel. 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 General Counsel under this Code.

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OUR RESPONSIBILITIES

Maintain Confidentiality

Protecting Square’s Confidential Information is a critical responsibility for all individuals who perform work for Square, and violations of these obligations can have a serious impact on our business. While we are proud of significant milestones we have accomplished as a company, we need to protect Square’s Confidential Information and avoid communicating any material, non-public information (“**MNPI**”) about Square to anyone outside of Square who is not bound by a confidentiality obligation to us (“**Third Parties**”). Even if you have access to confidential information, you should not access, use, or share confidential information (or your opinions about such information) with people outside Square or people inside of Square 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 Square’s policies.

Only our Chief Executive Officer, 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 Square’s External Communications Policy, may speak on behalf of Square with Third Parties.

Unless you are a Spokesperson or Delegate, you are not authorized to speak with Third Parties on behalf of Square, including the media, investors, or analysts, and should not give the impression that you are speaking on behalf of Square in any communication. This includes any public speaking event and posts to online forums such as social media sites, blogs, chat rooms, 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

Square 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. Square is an equal opportunity employer and makes decisions based solely on individual merit and qualifications directly related to professional competence and objective business needs. Square 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 Report Potential Violations section ([described below](#)). Managers should immediately report any such concerns. The Employee Relations team will promptly investigate any concerns and take appropriate action. Please review Square's Equal Employment Opportunity Policy and Policy Prohibiting Harassment for further information.

Maintain a Safe Workplace

Square 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 Square offices, at any Square-sponsored event, or during any time you are acting on behalf of Square. If you have any concerns regarding safety in the workplace, you should immediately report it as described in the Report Potential Violations section ([described below](#)). You may also contact the Trust & Safety team at safety@square.com. Please review the workplace safety policies applicable to your locale.

Report Potential Violations

Employees are responsible for fostering a safe, respectful, and productive environment. This means that you should report any concerns you have regarding a violation of Square's policies, including: (1) reporting suspected legal violations; (2) providing truthful information in connection with an inquiry or investigation by the Employee Relations team, the Informational Security team, the Incident Response team, an external investigator, a court, law enforcement, or any other governmental body; and (3) identifying potential violations of the Code or the Employee Handbook relevant to your locale. Please refer to the Reporting and Speak Up Policy for details, including who to contact to report your concerns.

The integrity of our business practices and financial information is paramount. Our financial information guides the decisions of our management team and Board of Directors. In parallel, our stockholders and the financial markets rely on our financial information as well. For these reasons, we must maintain a workplace where individuals can raise concerns free of any retaliation, discrimination, or harassment when they reasonably believe that they are aware of questionable accounting, internal accounting controls, or other financial matters, or the reporting of fraudulent financial information (collectively, "**Fraudulent Activities**").

Reporting and Investigation

If you have a good faith concern regarding conduct that you believe to be a violation of law or Company policy (“**Violation**”), or a belief that any Violation or Fraudulent Activity has occurred or is occurring, you should:

- Discuss the situation with your lead or your HRBP or your agency-employer (if applicable); or
- If your lead is involved in the situation or you are uncomfortable speaking with your lead, contact your HRBP (and agency-employer if applicable), the People Lead, General Counsel, or Chief Financial Officer; or
- If you do not believe your concern is being adequately addressed, you are not comfortable speaking with one of the above-noted contacts, or you prefer to remain anonymous, you may report your concern via our reporting hotline via our Reporting Hotline at www.intouchwebsite.com/square (available to all individuals performing services for Square) or (855)-339-2828 if you are in the U.S. or Canada, 0800-919-8509 if you are in Japan, 1-300-926-132 if you are in Australia, 900-999-334 if you are in Spain, 1-800-903-232 if you are in Ireland and 0800-098-8471 if you are in the United Kingdom, through which you may choose to identify yourself or remain anonymous. Concerns submitted through the reporting hotline that are financial or accounting related will be reviewed by a member of the Audit and Risk Committee and General Counsel or their delegates, as appropriate.

No Retaliation

Square 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**”). Accordingly, we will not tolerate any Retaliation against any individual for reporting or participating in good faith in the investigation of any suspected Violation or Fraudulent Activity.

Nothing in this Code prevents you from reporting information to federal/national, state/provincial, or local law enforcement agencies when you have reasonable cause to believe that a violation of law has occurred.

Cooperate in Investigations

You are expected to cooperate in good faith in any investigations, and provide complete and truthful information. All information disclosed during the course of the

investigation will remain confidential, except as reasonably necessary to conduct the investigation, to allow Square to take any remedial action and/or to comply with applicable regulations.

Comply with Applicable Laws, Regulations, and Policies

Insider Trading Policy

You may not trade or enable others to trade Square stock or stock of another company, such as a customer, supplier, competitor, potential acquisition 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 Square's Insider Trading Policy, which explains the risks of insider trading and trading windows when you may not trade Square stock.

Digital Currency Transaction Policy

You may not engage in transactions and activities involving digital currency if you are in possession of MNPI about digital currency initiatives or during a special blackout period. Please refer to Square'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 Square'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 legal@.

Global Sanctions Policy

While performing work on behalf of Square, 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 (ie., Cuba, Iran, North Korea, Syria, Crimea Region of Ukraine, subject to OFAC amendments) without 14 days advance notice and approval received from globalsanctions@.

CONFLICTS OF INTEREST AND OUTSIDE ACTIVITIES

Avoid Conflicts of Interest

When faced with a situation in which you have competing loyalties between Square’s interests and your personal interests that could benefit you, your friends, or family members, your decisions and actions should be based on Square’s interests. You should avoid any situation that may create an actual or perceived conflict of interest. When faced with a potential conflict of interest, ask yourself:

- Could this situation create an actual or perceived benefit for me, my friends, or my family at Square’s expense?
- Could this activity impact or hinder my ability to work at Square?

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

- *Investing in a company that has a business relationship with Square:* You should seek approval before making any significant personal investments or other financial interests in any company that has a business relationship with Square, or that competes with Square’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.
- *Accepting or giving gifts, entertainment, or favors:* You may not accept gifts, entertainment, or other favors from a third party where doing so creates an appearance that such action was intended to influence a business decision, did influence a business decision, or created a reciprocal obligation. Business courtesies such as meals and tickets to entertainment events are permitted if they are reasonable in cost and the purpose is to hold bona fide business discussions or to foster better business relations. The nature and purpose of business courtesies must always be sufficiently documented, and business courtesies exceeding \$500 must be disclosed to your lead and your HRBP in advance.

You may only provide gifts, entertainment, or other favors to third parties if they are of nominal value. Gifts, entertainment, or other favors may never be provided to

government officials, including officers and employees of government agencies and state-owned or state-controlled entities, on behalf of Square without Legal approval. Bribes and kickbacks – offering 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 in the Employee Handbook.

Engaging friends or family in employment or other business relationships: To the extent permitted under local law, you should disclose any personal, familial, or romantic relationships with a competitor, supplier, subordinate employee of Square, or individual performing services for Square that create a potential or actual conflict of interest. If you are unsure about whether a conflict exists, you should share the relevant circumstances with your lead (or agency employer) or your HRBP for guidance. When necessary, we will take appropriate action to manage the conflict based on the circumstances. In cases where there is an actual or potential conflict, even if there is no line of authority or reporting involved, Square 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.

Outside Activities: Obtain pre-approval before engaging in any outside activities that could interfere with your work at Square, 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, you should submit a Jira request at [go/outsideactivities](#). For more details, please refer to the Outside Activities Policy in the Employee Handbook.

Corporate Opportunities: Obtain pre-approval before:

- diverting to yourself or to others any opportunities that are discovered through your work at Square;
- using Square's property or information or your position for personal gain; or
- competing with Square

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 Square policies regarding gifts to, and entertainment of, governmental officials, charitable organizations and political organizations. You may not use Square's stationery, the

Square name or logo, work titles with Square, or subordinates to express personal political opinions, promote candidates, or seek political contributions.

All donations to charitable organizations and political organizations on behalf of Square must be reviewed and approved by the Policy team via [communitygiving@](mailto:communitygiving@square.com). 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 Square.

Disclose Potential Conflicts and Report Concerns: You must disclose any actual or potential conflict of interest (or even the appearance of an actual or potential conflict of interest), including but not limited to the above situations, to your HRBP and Legal at [legal@](mailto:legal@square.com). You must promptly take action to eliminate a conflict of interest if Square asks you to do so. If you become aware of any actual or potential conflict of interest, bribe/kickback, or other ethical concern at Square, immediately report your concern to your lead, your HRBP, the People Lead, or the General Counsel, even if you are not sure whether the conduct violates this Code or any other Square policy. Contingent workers and contractors can reach out to their agency-employer (as applicable). Square does not permit Retaliation of any kind for reports of misconduct made in good faith or cooperation in any investigation of such reports. Please refer to the Report Potential Violations section ([described above](#)) for additional information.

INFORMATION AND TECHNOLOGY

Protection and Use of Square Technology

Square provides you with a range of technology, equipment, and data access to do your job effectively. Please read our Acceptable Use Policy to understand the appropriate conduct and use of these resources.

You are expected to operate your Square-issued equipment in a reasonably safe manner. You should make every reasonable attempt to prevent your equipment from becoming damaged or a security vulnerability for Square. Lost or stolen equipment should be reported to the IT team immediately. Instructions will be provided to help with recovery of the issued equipment, or instructions for replacement equipment will be offered.

Security and Privacy

You have a shared duty to protect Square's intellectual property, MNPI, personally identifiable information, other data described in [go/datapolicy](#) (collectively, "Square

Data”) and other business assets. We take our intellectual property, Square Data, business systems, and network security very seriously. Good security, working practices, and procedures for Square property, in all its forms, are critical in protecting Square Data and intellectual property development that fuels Square’s growth, the livelihood of employees, and our collective investment in Square. Square’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 Square. Misuse of such property is not tolerated. We reserve the right to monitor your use of Square systems (including email and Slack communications) and access to Square data to secure our systems, monitor compliance with this Code and other Square policies, and protect our rights and the rights of our customers. For more information, refer to our Data Policy or send questions to infosec@.

AMENDMENTS, MODIFICATIONS, AND WAIVERS

Square is committed to continuously reviewing and updating our policies, and therefore reserve 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 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, officers, agents, contractors, individuals performing services for Square and parties working on behalf of the Company or any of its direct and indirect subsidiaries must be approved by the General Counsel.