

SOFI TECHNOLOGIES, INC.

Anti-Corruption Policy

Effective as of March 12, 2018¹

Purpose

It is the policy of SoFi Technologies, Inc., its affiliates and subsidiaries, (hereafter, “SoFi” or “the Company”) to prohibit any associate, officer, director, agent or attorney (“Insider”) working on behalf of SoFi from accepting anything of value for or in connection with any transaction that is unethical and a violation of the U.S. Foreign Corrupt Practices Act (“FCPA”), International Anti-Bribery and Fair Competition Act of 1998 (“IAB”), and similar anti-corruption laws and regulations (collectively, “Anti-Bribery and Corruption Laws”).

SoFi has established a Zero Tolerance policy regarding violations of Anti-Bribery and Corruption Laws and this Anti-Corruption Policy (the “AC Policy” or this “Policy”). This applies to all US and International Laws and Organizations of Ethical Standards. Insiders suspected to be involved with illegal or unethical activity will be held accountable. A violation of Anti-Bribery and Corruption Laws can lead to severe civil and criminal penalties and is cause for disciplinary action (up to and including termination of employment); therefore, it is vital that employees not only understand and appreciate the importance of these laws, policies and procedures but comply with them in daily work.

Scope

This Policy applies to all business lines and relevant support personnel at SoFi, as well as third-party service providers with whom SoFi has entered into business arrangements for ongoing operational activities. This Policy focuses on the processes that are specifically in the scope of all applicable Anti-Bribery and Corruption laws, including the FCPA, and the local laws in every jurisdiction in which we do business.

Policy Ownership and Administration

This Policy is owned and maintained by the Compliance Department (the “Policy Owner”), is made available to all staff members and becomes effective upon approval by the Compliance Committee. This Policy is reviewed on an annual basis, where required by any major changes in the organization and operational processes, or to reflect updates to a related policy or changes in applicable law. The Policy Owner or its delegate is charged with keeping a chronology of the updates to enable the reader to track all changes to this Policy.

Regulatory Background

¹ Previously the Social Finance, Inc. Anti-Corruption Policy. Adopted by SoFi Technologies, Inc. following the business combination with Social Capital Hedosophia Holdings Corp. V on May 28, 2021.

Foreign Corrupt Practices Act

The FCPA is considered to have greater jurisdictional reach than the Corruption of Foreign Public Officials Act (CFPOA), applying to issuers in the United States, domestic concerns and any person pursuing a bribery arrangement with a foreign official while within the territory of the United States.

The purpose of the FCPA is to make it illegal for companies and their supervisors to influence anyone with any personal payments or rewards. The FCPA applies to any person who has a certain degree of connection to the United States and engages in foreign corrupt practices. This application of the FCPA is generally delineated into a “nationality” principle and a “protective” principal. Under the nationality principle, the FCPA applies to any act by U.S. businesses, foreign corporations trading securities in the United States, American nationals, citizens, and residents acting in furtherance of a foreign corrupt practice whether or not they are physically present in the United States. Under the protective principle, the FCPA applies to any act by a foreign natural and legal person if they are in the United States at the time of the corrupt conduct. The important principle for SoFi employees to remember is that whenever businesses decide to follow an unethical road, the FCPA imposes consequences, including high financial penalties and potential criminal liability and prison time. It is unlawful for any SoFi employee or agent to make payments to foreign government officials to assist in obtaining or retaining business.

Further, under its “territoriality” principle, the FCPA governs not only payments to foreign officials, candidates, and parties, but any other recipient if any portion of the payment is ultimately attributable to a foreign official, candidate, or party. These payments are not restricted to just monetary forms and may include anything of value. When looking at the outcome of the FCPA on corrupt practices since its adoption, it appears to have had a positive effect, and the growth of American multinational companies in the last few years could be viewed as confirmation that bribes are not a requirement to building a successful business. That said, bribery and corruption are still prevalent in many countries, and while governments and companies have taken important steps, much more remains to be done.

International Anti-Bribery Act USA 15 U.S.C. 78

The IAB is a United States federal law that amends the FCPA by implementing the provisions of the Organization for Economic Cooperation and Development's Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

The IAB makes it illegal for a citizen or corporation of the United States or a person or corporation acting within the United States to influence, bribe or seek an advantage from a public official of another country.

Alternative Jurisdiction over Acts outside the United States – Alternative Jurisdiction

It shall also be unlawful for any issuer organized under the laws of the United States, or a State, territory, possession, or commonwealth of the United States or a political subdivision thereof and which has a class of securities registered pursuant to or which is required to file

reports under applicable sections of the Act, or for any United States person that is an officer, director, associate, or agent of such issuer or a stockholder thereof acting on behalf of such issuer, to corruptly do any act outside the United States in furtherance of an offer, payment, promise to pay, or authorization of the payment of any money, or offer, gift, promise to give, or authorization of the giving of anything of value to any of the persons or entities set forth in applicable paragraphs of the Act, irrespective of whether such issuer or such officer, director, associate, agent, or stockholder makes use of the mails or any means or instrumentality of interstate commerce in furtherance of such offer, gift, payment, promise, or authorization.

Definitions

Bribery

The act or practice of giving or accepting a bribe: money or any other consideration given or promised with a view to corrupting the behavior of a person, especially in that person's performance, decisions, or providing a return of money or thing of value;

Corruption

The act of corrupting or state of being corrupt: guilty of dishonest practices, as bribery; lacking integrity; crooked;

Coercion

The act of coercing: use of force or intimidation to obtain compliance, gain of money, power, thing of value;

Domestic concerns

Refers to any individual who is a citizen, national, or resident of the United States and any corporation and other business entity organized under the laws of the United States or of any individual US State, or having its principal place of business in the United States Any person covers both enterprises and individuals.

Facilitation Payments

A financial payment that may constitute a bribe and that is made with the intention of expediting an administrative process;

Foreign Official

Means any officer or associate of a foreign government or any department, agency, or instrumentality thereof, or of a public international organization, or any person acting in an official capacity for or on behalf of any such government or department, agency, or instrumentality, or for or on behalf of any such public international organization.

Issuers

Includes any U.S. or foreign corporation that has a class of securities registered, or that is required to file reports under the Securities and Exchange Act of 1934.

Kickbacks

A percentage of income given to a person in a position of power or influence as payment for having made the income possible; usually considered improper or unethical;

Public International Organization

Means an organization that is designated by Executive order pursuant to section 1 of the International Organizations Immunities Act; or any other international organization that is designated by the President by Executive Order for the purposes of this section, effective as of the date of publication of such order in the Federal Register;

Self-Dealing

A financial transaction conducted on a personal, nonbusiness like basis, as lending or borrowing corporate money by a director, or gaining personal money or thing of value from corporate assets without approval by the corporation;

United States Person

Means a national of the United States or any corporation, partnership, association, joint-stock company, business trust, unincorporated organization, or sole proprietorship organized under the laws of the United States or any State, territory, possession, or commonwealth of the United States, or any political subdivision thereof.

Policy Requirements

Fair Dealing, Gifts, and Business Gratuities

SoFi does not encourage giving or receiving gifts, even where the gift is otherwise perceived to be in the company's interest. Insiders must behave honestly and ethically at all times and with all people. They shall act in good faith, with due care, and shall engage only in fair and open competition, by treating ethically competitors, suppliers, customers, investors, and colleagues. Stealing proprietary or privileged information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited. No Insider should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practice.

The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain unfair advantage with customers. No gift or entertainment should ever be offered or accepted by an Insider or any family member of an Insider unless it:

- is consistent with customary business practices;
- is not excessive in value;
- cannot be construed as a bribe or payoff; and
- does not violate any laws or regulations.

The offer or acceptance of cash gifts, including gift cards, by any Insider is prohibited. The limitation on gifts and gratuities does not apply to usual business entertainment such as dinners or events, including sporting events, hosted for business purposes, however such expenses must be reasonable and the party paying for the dinner or event must be present at the dinner or event. Insiders should discuss with the Enterprise Chief Compliance Officer any questions regarding the appropriate nature or reasonableness of proposed business entertainment or gifts.

Prohibited Conduct

- Influencing any act or decision of such foreign official in his/her official capacity inducing such foreign official to do or omit to do any act in violation of the lawful duty of such official, or (iii) securing any improper advantage; or;
- Influencing any act or decision of such party, official, or candidate in its or his/her official capacity, (ii) inducing such party, official, or candidate to do or omit to do an act in violation of the lawful duty of such party, official, or candidate, or (iii) securing any improper advantage; or
- Influencing any act or decision of such foreign official, political party, party official, or candidate in his/her or its official capacity, (ii) inducing such foreign official, political party, party official, or candidate to do or omit to do any act in violation of the lawful duty of such foreign official, political party, party official, or candidate, or (iii) securing any improper advantage.

Foreign Recipients

When contemplating giving a gift to a foreign individual or entity, Insiders must review this policy, and must discuss their intentions with the Enterprise Chief Compliance Officer (“ECCO”). The ECCO must approve all such offerings in advance, following a review of the purpose of the gift and the identity of the intended recipient, for the sake of ruling out an FCPA violation. Certain payments may be made to foreign officials, etc., but only if permitted by SoFi and in accordance with the exceptions outlined in the FCPA.

Penalties

- Any officer, director, associate, or agent of an issuer, or stockholder acting on behalf of such issuer, who willfully violates applicable subsections of the Act shall be fined not more than \$100,000, or imprisoned not more than 5 years, or both;
- Any officer, director, associate, or agent of an issuer, or stockholder acting on behalf of such issuer, who violates applicable subsections of the Act shall be subject to a civil penalty of not more than \$10,000.

Exceptions

The ECCO/Policy Owner reviews and approves exceptions to this Policy. At least

quarterly, the Policy Owner summarizes and reports policy exceptions to the Compliance Committee, including the frequency and reasons for exceptions. The Compliance Department will maintain a record of any exceptions granted under this Policy and will review these exceptions annually as part of the Policy review and update process.

Training

SoFi provides training on these Policy requirements in the effort to prevent, detect and respond to corrupt practices, bribery, and other conflicts of interest.

Record Retention

Should SoFi have Insiders or any other agents/employees working in foreign locations or working with foreign persons in the conduct of their business, all expenses reimbursement or other payments made to or by such persons will be scrutinized regularly to detect improper payments.

Records may consist of originals, copies, or microfilm copies. Records made in the ordinary course of business may be used to meet these requirements. Required records will be retained at minimum for the required amount of time set forth by any applicable law or regulation.