UK Merchant Partner Marketing Guidelines

MARCH 2026

affirm

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Affirm in the UK

Introduction

Affirm’s UK Merchant Partner Marketing Guidelines are for Affirm’s regulated merchant partners who are: credit brokers, appointed representatives and introductory appointed representatives. The Guidelines provide an overview of the requirements for compliant marketing of Affirm’s credit products to retail customers.

- The Financial Conduct Authority (FCA) overseas entities who can carry on with regulated permitted activities in the United Kingdom, and ensures fair practices in consumer credit through its Financial Promotions regime.
- As a financial services firm and lender of consumer credit products, Affirm is subject to UK consumer credit regulations
- Merchant partners like you are introducers of Affirm’s regulated consumer credit products to consumers (i.e., credit brokering) – a regulated permitted activity
- Your financial promotions and disclosures regarding the availability of consumer credit with Affirm are also subject to these regulations.

Merchant Partner Marketing

How to use these Guidelines

Your use of these Guidelines should align with your regulatory status (credit broker, appointed representative or introductory appointed representative).

Affirm provides marketing templates, tailored to a variety of channels, on our Business Resource Hub.

For Credit Brokers:

- Affirm's marketing templates can include the addition of your logo.
- Any proposed marketing template updates or custom marketing (including banners, landing pages, emails, social media posts, and other consumer messaging) must be sent to Affirm for review and approval prior to deployment.

For Appointed Representatives & Introducer Appointed Representatives:

- Affirm's marketing templates must be used with only the addition of your logo, and no other changes.
- Appointed Representatives and Introducer Appointed Representatives for Affirm are not authorised to do in-store/ real-time promotions.

Note: These guidelines do not address all types of marketing channels. If you have questions regarding marketing channels you do not see listed, questions about these guidelines, or are uncertain of your merchant partner category, please contact Affirm at compliance.uk@affirm.com.

Who we are

Honest, transparent financing

Affirm was founded in 2012 with a mission to deliver honest financial products that improve lives. Affirm empowers consumers by offering a transparent and flexible way to pay over time, and helps merchant partners of all sizes drive growth and better serve their customers. Affirm has over 17 million active customers and works with 245,000+ businesses in North America.

Affirm's approach to consumer protection and regulatory compliance strives to be best-in-class. We have actively engaged with regulators and policymakers as part of our mission to improve lives and meet the needs of consumers and merchant partners. We value our relationships with our merchant partners, and look forward to introducing your UK customers to our product.

01 UK Financial Promotions

What is a Financial Promotion?

A financial promotion is an invitation or inducement to engage in investment activity that is communicated in the course of business. What constitutes an invitation or inducement is highly context- and purpose-specific. **Each financial promotion should be considered as a standalone asset.**

Engaging in investment activity refers to the purpose of the financial promotion—that the consumer enter into an agreement with Affirm for one of our credit products (whether regulated or unregulated).

Some examples include:

- An ad that contains a link directing a consumer to apply for Affirm
- A website banner that offers Affirm or that may contain a link, directing a consumer to apply for one of the Affirm's products
- A social media post mentioning APR percentages that may be available with Affirm when purchasing from your company
- Ads in newspapers and magazines, posters, out-of-home (e.g., billboards, transit shelters, airport displays), radio/TV ads, and websites

Legal requirements

Points of law

Financial Promotion must-dos

1 Be fair, clear, and not misleading

All financial promotions must:

- Be clearly identifiable as a financial promotion
- Use plain language
- Be easily legible
- Be accurate
- Avoid unsubstantiated claims
- Be balanced in emphasizing both benefits and relevant risks of a product/service
- Be presented in a way that is likely to be understood by the average consumer
- Not mislead customers as to the availability of a product
- Not disguise, omit, diminish or obscure important information, statements, or warnings.

2 Make balanced comparisons

Any comparison to another product or service must be presented in a fair and balanced way.

Legal requirements (continued)

Points of law

3 Representative example

Where a regulated financial promotion contains:

1. An interest rate that is not 0% APR (i.e., 22% Representative APR)

   or

2. a specific amount of money relating to the cost of credit (i.e., From £60/month)

The financial promotion **must also include a representative example** which includes all of the following:

- Fixed or variable annual interest rate;
- The total amount of credit;
- The representative APR shown as "Representative example: ___% Representative APR";
- In the case of credit in the form of a deferred payment credit for specific goods or services, the cash price and any advance payment amount;
- Agreement duration/term length;
- The total amount payable
- The amount of each credit repayment; and
- Affirm's postal address

The representative example must be:

- Clear and prominent
- Presented accompanied by the words "Representative example"
- Together with each item, given equal prominence

When it applies, use the Financial Promotion with Representative Example.

Note:

- "From 0% APR" financial promotions must still include a representative example.
- Where there are no space constraints (e.g. website or landing page), the Representative Example line should have a space before it to allow ideal placement and prominence.

Legal requirements (continued)

Points of Law

4 X% Representative APR

A financial promotion must include a representative APR percentage if the advertising includes any of the following:

- States or implies that credit is available to consumers who might consider their access to credit restricted
  - Example: where the consumer has a poor credit rating, there is a high debt-to-income ratio, their income is too low generally, bankruptcy/insolvency, and/or they are unemployed
- Includes an incentive (like an offer, special discount or prize) to apply for or use Affirm's loan product
- Makes a favourable comparison (i.e., a comparative or superiority claim) relating to the credit offered by Affirm, whether express or implied, with another person, product, or service
- Induces the consumer to apply for or use an Affirm loan product.

- Some examples of when X% Representative APR is required:
  - "Get a real-time decision" or "Quick eligibility check"

Tips:

- X% Representative APR is different from a Representative Example
  - A Representative Example will always include an X% Representative APR.
- Some asset copy that does not require a Representative Example will still require a X% Representative APR
- When used, X% Representative APR should be in close proximity and equally prominent to the financial promotion.

Legal requirements (continued)

Points of law

Financial promotions must not include

1. "Interest-free" or any similar expression indicating that a customer is liable to pay no greater amount for a transaction financed by credit than he would be liable to pay as a cash purchaser for the same transaction.

   "Interest-free" may be used for 0% APR promotions; it cannot be used for "From 0% APR" promotions.

2. "No deposit" or any similar expression, except where no advance payments are to be made.

3. "Gift," "present," or any similar expression, except where there are no conditions which would require the customer to repay the credit or to return the item that is the subject of the claim.

   This does not apply to an informal use of "gift" (i.e., "Get all the gifts on your list this holiday").

4. The expression "weekly equivalent" or any expression of any other periodical equivalent, unless weekly repayments or the other periodical payments are provided for under the agreement.

Including Affirm's disclosures in these Guidelines will help your financial promotion meet these requirements.

01 Consumer Duty

What is Consumer Duty?

Standards of conduct

The FCA's Consumer Duty rules require Affirm to act to deliver good outcomes for our customers through our product design, pricing, communication, and consumer support.

We expect merchant partners to consider and be aware of the Consumer Duty regime, and to be clear, fair, and not misleading when communicating about Affirm and providing support to consumers about Affirm's products—especially to vulnerable consumers.

The marketing templates Affirm will provide to merchant partners account for Consumer Duty as well as regulatory requirements from the FCA. Any proposed changes to the marketing templates must meet these requirements, and be approved by Affirm.

03 Financial Promotion Disclosures

Disclosure requirements for promoting Affirm

General disclosure guidance

Disclosures are necessary to ensure that ads are not hiding important information from consumers. They cannot, however, contradict the main messaging or undo a potentially misleading or deceptive message.

Disclosures must:

- Be clear, conspicuous, and legible (no one should have to squint to read them)
- Contrast text with background
- be on, next to, or under the factual advertising or financial promotion copy or image

The following pages contain information on:

- which disclosures apply to your financial promotion
- the appropriate disclosure for various marketing channels
- Affirm's approved disclosure language.

Financial Promotion Disclosures

General disclosure guidance

1) **Financial Promotion Disclosures must include the following statements:**
    - Affirm is a form of credit
    - All products and approvals are subject to eligibility
    - Terms and conditions apply
        - *Tip: If you're promoting an offer of any kind, there are specific terms that will apply to that financial promotion that must also be included. (See "Financial Promotion with an Offer" for an example)*
    - Risks of the use of Affirm as form of credit (i.e., impact to credit scores from missed payments), indicated in text at least as prominent as the financial promotion copy

2) **Disclosures for financial promotions should be placed on, next to, or under the financial promotion copy or image**

3) **Financial promotions should not be advertised in channels where there are space constraints which do not allow for the required disclosures**

4) **If an APR other than 0% APR or "From 0% APR" or "£ ____/per month") is stated in the copy ~~mentioned~~, you must include a representative example**

5) **For a Financial Promotion with Representative Example, the "Representative example" text should be on a separate line for prominence where there are no space constraints.**

Including the Affirm disclosures in these Guidelines will help your financial promotion meet these requirements.

Affirm's Financial Promotion Disclosures

All marketing channels

Updated March 2026

Financial Promotion Disclosure

(where *X% APR* or *£ X/month* is not included, or it is *0% APR*)

Affirm is a form of credit, subject to credit check and a minimum spend. Terms apply. U.K. residents, 18+ with a bank account or debit card. Missed payments may affect your financial status.

Financial Promotion Disclosure with Representative Example*

(where *X% APR* or *£ X/month* or "From 0% APR" is included)

Affirm is a form of credit, subject to credit check and a minimum spend. Terms apply. U.K. residents, 18+ with a bank account or debit card. Missed payments may affect your financial status.
Representative example: A £900 purchase might cost £75.00/mo over 12 months at 22% Representative APR. A down payment may be required. Affirm UK Limited, 1 Angel Court, 13th Floor, London, EC2R 7HJ is the Lender.

Note for Financial Promotion Disclosure and Financial Promotion Disclosure with Representative Example:

For ***space-constrained digital assets*** (i.e., website banners), the only required disclosure is "Affirm is a form of credit."

- However, the full financial promotion disclosure must be linked one-click away (i.e., on a pop-up or a separate page)

****Exception for Financial Promotion Disclosure with Representative Example:***

- A General Footer Disclosure is required for email, website footer, out-of-home (OOH), digital display, and website banner assets (without space constraints).
- Where these assets also require a Financial Promotion Disclosure with Representative Example, you may remove Affirm's address "Affirm UK Limited, 1 Angel Court, 13th Floor, London, EC2R 7HJ is the Lender" from the Representative Example.

See example asset.

General Footer Disclosure: Purpose & Use

Marketing channels: Email, website, out-of-home (OOH), digital display, website banner

As a Credit Broker, Authorised Representative, or Introducer Authorised Representative of Affirm, you will need to disclose your regulatory status to the customer. The FCA prescribes the content of these disclosures and they must be used **as is**, with no changes.

- **If your email, out-of-home (OOH), digital display, or website banner* asset contains an Affirm financial promotion, the appropriate "General Footer Disclosure" for your company must be at the bottom of the asset (clearly, legibly, and identifiably).**
- **Your website must contain the appropriate General Footer Disclosure as a fixed part of your footer.**

***Exception for Space-Constrained Digital Assets**

- **For space-constrained digital assets (i.e., website banners), the only required disclosure is "Affirm is a form of credit."**
- **However, the full financial promotion disclosure must be linked one-click away (i.e., on a pop-up or a separate page)**

General Footer Disclosure: Text

Marketing channels: All except Social Media .

Don't forget to include your Firm Reference Number.

Credit Broker

[Merchant partner's legal entity name (as it appears on the FCA register)] is authorised and regulated by the Financial Conduct Authority (Firm Reference Number: XXX) and acts as a credit broker and is not a lender, offering regulated credit products provided exclusively by Affirm U.K. Limited. Credit subject to credit check. Terms apply. U.K. residents only, 18 and over.

[insert postal address of merchant partner].

Affirm U.K. Limited provides consumer credit products and is authorised and regulated by the Financial Conduct Authority ("FCA") for carrying out regulated consumer credit activities (firm reference number 756087). Company number 10199101, with its registered Office at C/O TMF Group, 1 Angel Court, 13th Floor, London, EC2R 7HJ . Affirm is the trading name of Affirm U.K. Limited.

Appointed Representative

[Merchant partner's legal entity name (as it appears on the FCA register)] is an Appointed Representative of Affirm U.K. Limited which is authorised and regulated by the Financial Conduct Authority (Firm Reference Number: XXXX).

Affirm U.K. Limited provides consumer credit products and is authorised and regulated by the Financial Conduct Authority ("FCA") for carrying out regulated consumer credit activities (firm reference number 756087). Company number 10199101, with its registered Office at C/O TMF Group, 1 Angel Court, 13th Floor, London, EC2R 7HJ. Affirm is the trading name of Affirm U.K. Limited.

Introducer Appointed Representative

[Merchant partner's legal entity name (as it appears on the FCA register)] is an Introducer Appointed Representative of Affirm U.K. Limited which is authorised and regulated by the Financial Conduct Authority (Firm Reference Number: XXXX).

Affirm U.K. Limited provides consumer credit products and is authorised and regulated by the Financial Conduct Authority ("FCA") for carrying out regulated consumer credit activities (firm reference number 756087). Company number 10199101, with its registered Office at C/O TMF Group, 1 Angel Court, 13th Floor, London, EC2R 7HJ. Affirm is the trading name of Affirm U.K. Limited.

Placement: The General Footer Disclosure should be [static] in the footer of your asset.

General Footer & Financial Promotion Disclosures

Marketing channels: Email, website, out-of-home (OOH), digital display, website banner

All financial promotions marketing of Affirm credit products require disclosures.

General Footer Disclosure

- Email
- website/ landing page
- out-of-home (OOH)
- digital display and website banners

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If *X% APR* or *£X/month* is **not** included, or it is 0% APR:
Affirm's Financial Promotion Disclosure

OR

If *X% APR* or *£X/month* or *"From 0% APR"* **is** included:
Affirm's Financial Promotion Disclosure with Representative Example

OR

If there are specific offer terms that will apply to a financial promotion
Financial Promotion with an Offer
AND
Affirm's Financial Promotion Disclosure **OR** **Affirm's Financial Promotion Disclosure with Representative Example**

***Exception for Space-Constrained Digital Assets**

For space-constrained digital assets (i.e., website banners), the only required disclosure is "Affirm is a form of credit."
However, the full financial promotion disclosure must be linked one-click away (i.e., on a pop-up or a separate page)

04 Best Practices

- Email
- Websites

Emails with financial promotions

Best practices

Emails you send introducing Affirm to your customers are also a type of financial promotion and must follow the following guidance.

1. The subject line of any email containing an Affirm financial promotion must be accurate and not misleading
2. Avoid claims that could be considered false or misleading
3. Inform customers of actually available offers with Affirm (i.e., if 0% APR is not available on items you offer, do not mention it)
4. If you are advertising an offer by email, please also refer to the Offers section of these guidelines
5. Emails must include all required Financial Promotions Disclosures in the email itself + A General Footer Disclosure in the footer.
6. Marketing emails must include an opt-out mechanism, and cannot be sent to customers who have "opted-out" of marketing emails

   Opt-out requests must be honored within ten (10) days and a "do not email list" should be kept of all consumers who have opted out

Disclosure placement examples

Merchant Partner Websites

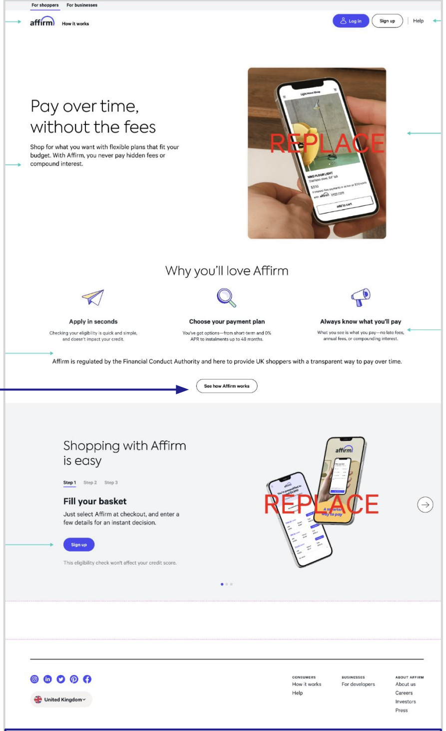
- Financial promotions where:
    - *X% APR* or *£ XX/ month* is not included,

    or
    - it is 0% APR.
- Representative example not required.
- Financial Promotion Disclosure must be in the same asset, in close proximity to the financial promotion.
    - Note: If an asset contains multiple financial promotions, you only need to include one Financial Promotion Disclosure. It must be positioned prominently (i.e., where the consumer does not have to scroll to see it).

This example is for illustration purposes only, as an example for disclosure placement on merchant partners' websites. *This is not a representation of a compliant financial promotion.*

Financial promotions where **X% APR or £ X/month is not included, or it is 0% APR**

"Affirm is a form of credit, subject to credit check and a minimum spend. Terms apply. U.K. residents, 18+ with a bank account or debit card. Missed payments may affect your financial status."



General Footer Disclosure
(example for Introducer Appointed Representatives)

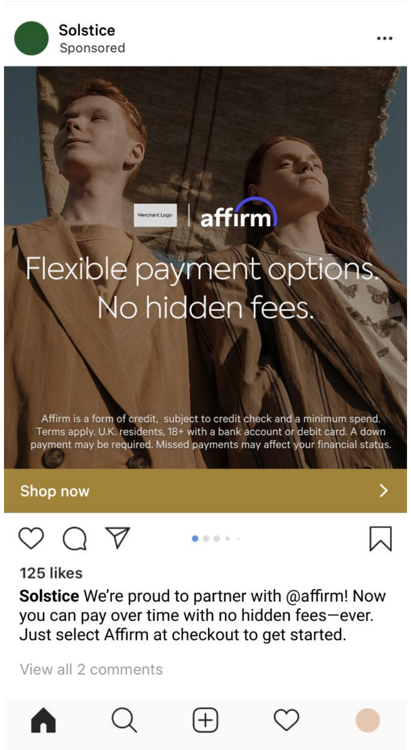
[Merchant Partner's legal entity name (as it appears on the FCA register)] is an Introducer Appointed Representative of Affirm U.K. Limited which is authorised and regulated by the Financial Conduct Authority (Firm Reference Number: XXXXX).

Affirm U.K. Limited provides consumer credit products and is authorised and regulated by the Financial Conduct Authority ("FCA") for carrying out regulated consumer credit activities (firm reference number 756087). Affirm is the trading name of Affirm U.K. Limited.

05 Social Media

Financial Promotion Disclosures for Social Media

Social Media



- Financial promotion disclosures must be placed on the social media image. **They cannot be hyperlinked**.
- No asterisk is required
- Social media advertisements that contain influencer endorsements must have
  - ***#Ad*** at the beginning of the caption, or superimposed in-frame on all images/videos; and
  - the appropriate Financial Promotion Disclosure overlaid on the image or video.

Is your advertisement a financial promotion? Inducing? Inviting?

Do a quick check of the requirements here

Social Media Disclosures

All social media channels

Social media marketing about Affirm requires disclosures. You should **always include them on the image or video**:

If *X% APR* or *£X/month* is **not** included, or is it 0% APR:
Affirm's Financial Promotion Disclosure

OR

If *X% APR* or *£X/month* or *From 0% APR* **is** included:
Affirm's Financial Promotion Disclosure with Representative Example

OR

If there are specific terms that will apply to a financial promotion
Affirm's Financial Promotion Offer Disclosure
AND
Affirm's Financial Promotion Disclosure **OR** **Affirm's Financial Promotion Disclosure with Representative Example**

OR

If it is an Affirm-approved factual advertising message only
Affirm is a form of credit.

Important: Publishing Financial Promotions on behalf of Affirm where the social media marketing channel has space constraints that do not allow for the required disclosures is prohibited.

Best Practices

Social media financial promotions

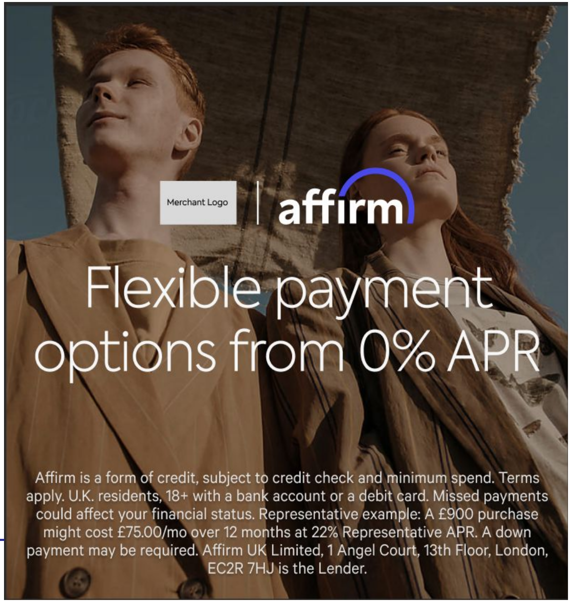
	Compliant disclosures with FCA regulations	**Disclosures non-compliant with FCA regulations**
Image & video format (e.g. stories & reels)	• Clear and prominent • Disclosure on every slide of the content that contains a financial promotion • Consumers should see it as soon as they view the financial promotion	• Illegible or unreadable • Placed in the caption (where it would be cut off)
Posts & carousel posts (e.g. posts with multiple images)	• Clear and prominent • Disclosure on every slide of the content that contains a financial promotion • Consumers should see it as soon as they view the financial promotion	• Illegible or unreadable • Found in the last slide of the financial promotion • Placed in the caption (where it would be cut off)
Character-limited media (e.g. X - fka Twitter)	We **do not recommend** this medium for financial promotions.	Disclosure has been truncated so that it ceases to comply with applicable rules.
Short-form & long-form video content (e.g. TikTok and YouTube)	Clearly and prominently displayed on the screen throughout the entire video communicating the financial promotion.	• Cut off in the caption of the video • The benefits are given disproportionate prominence (e.g. through use of flashing text or the dialogue in the video) • Displayed at the end of the video rather than throughout the entire video communicating the financial promotion

TIP: Look at prominence in the context of the promotion as a whole and consider the positioning of text, background, colour, and font size of all copy.

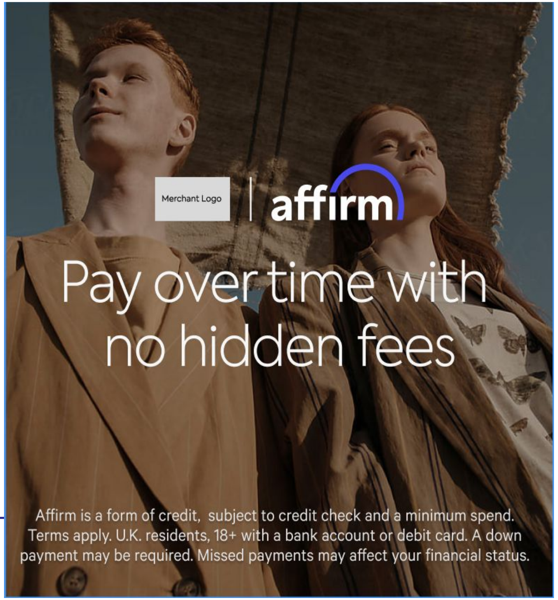
Financial Promotion Examples

Social media

- Financial promotion where *where X% APR or £ XX/month or From 0% APR is included*
- Financial Promotion Disclosure with Representative Example included in the same asset



- Financial promotion where X% APR or £ XX /month is not included, or it is 0% APR
- Financial Promotion Disclosure is included in the asset.



06 Factual Advertising

Factual Advertising

Non-Financial Promotion Advertising

- Factual advertising messaging does not encourage or have the specific intent that the consumer engage in investment activity (i.e., *enter into an* agreement *with Affirm for one of our credit products)*.

- These statements are:
  - not financial promotions, nor subject to the financial promotions regime
  - still regulated by the ASA under CAP/BCAP rules.

Examples:

  - *"Pay over time with [Affirm logo]"*
  - *"[Affirm logo] Available at checkout."*

What is considered "factual advertising" and not a "financial promotion" will be asset and copy specific.

Only use factual advertising copy in Affirm templates from our Business Resource Hub.

Factual Advertising Disclosures

Exceptions for Social Media & Space-Constrained Digital Assets

- For certain types of assets with *only* Factual Advertising (i.e., messaging that does not contain a Financial Promotion), you are not required to include a General Footer Disclosure.
  - This exception applies to the following marketing channels:
    1. Social media
    2. Space-Constrained Digital Assets

- For factual advertising on these marketing channels, only the following disclosure is needed:

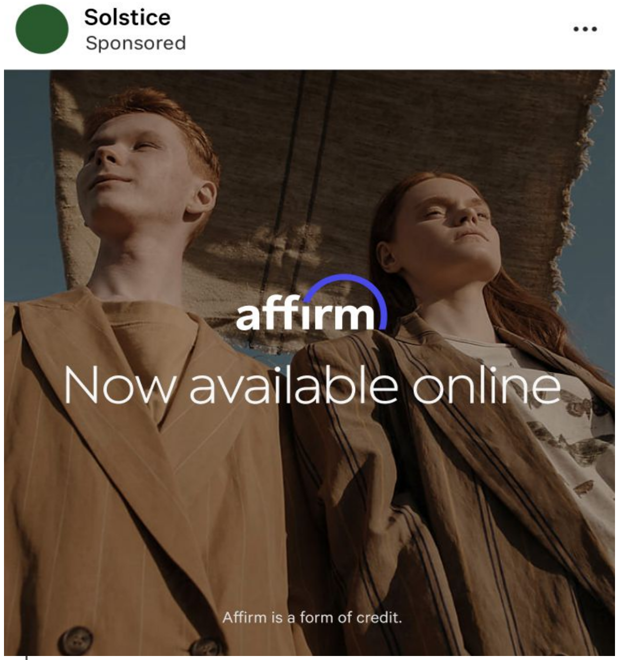
"Affirm is a form of credit."

Only use factual advertising copy in Affirm templates from our Business Resource Hub.

Factual Advertising Example

Social Media

- Factual advertising copy that is not a financial promotion*
- Factual Advertising disclosure “Affirm is a form of credit” on the image.
- Note: What is considered “factual advertising” and not a “financial promotion” will be asset and copy specific.



Only use factual advertising copy in Affirm templates from our Business Resource Hub.

06 Offers

All Marketing Channels

Financial Promotion with an Offer

All marketing channels

Required Offer Details and Financial Promotion Disclosure

If you are promoting an offer of any kind, there are material details that will apply and which *must be added to the appropriate financial promotion disclosure*. These include, but are not limited to:

- The offer start and end date
- Any cart minimum or maximum purchase requirement (including taxes or shipping)
- Any exclusions related to the offer.
- The X% Representative APR (*if it is not already included in the financial promotion disclosure*)

Example text:
[X% Representative APR]. Offer valid from ______ to _______. To qualify for credit, minimum purchase value of cart must be £____ before taxes and shipping. Excludes _____.

+

Appropriate **Financial Promotion Disclosure** for the offer.

- If your offer is in an **email, website, out-of-home (OOH), digital display, or website banner asset** (without space constraints), you will also need the correct General Footer Disclosure in the footer/bottom of the asset.
- Disclosures for financial promotions should be placed on, next to or directly under the financial promotion copy/image.
- The term “Gift,” “present,” or any similar expression (except where there are no conditions which would require the customer to repay the credit or to return the item that is the subject of the claim) is *prohibited*.

Disclosure Placement Example

Emails with Financial Promotions & Offers

- Financial promotion where *X% APR* or *£ XX/month* **is** included.
- Financial Promotion Disclosure with Representative Example included in the same asset in close proximity to the financial promotion.
- Representative example is required.
- General Footer Disclosure included.
    - *Exception: Because Affirm's address is already in the General Footer Disclosure, it does not need to be in this asset's representative example.*
        - *Reminder: this applies to email, website, out-of-home (OOH), digital display and website banners (without space constraints) only.*

Financial Promotion with an Offer

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Financial promotions where *X% APR* or *£ XX/month* is included

Offer valid from 3/1 to 3/15. To qualify for credit, minimum purchase value of cart must be £1.000 before taxes and shipping. Affirm is a form of credit, subject to credit check and a minimum spend. Terms apply. U.K. residents, 18+ with a bank account or debit card. Missed payments may affect your financial status. Representative example: A £900 purchase might cost £75.00/mo over 12 months at 22% Representative APR. A down payment may be required. ~~Affirm U.K. Limited, 1 Angel Court, 13th Floor, London, EC2R 7HJ is the Lender.~~

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General Footer Disclosure in the Email footer

(example for Introducer Appointed Representatives)

This example is for illustration purposes only.

Thank you

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