### 

# **Empowering the** next generation

Access and protection for teens in the digital economy

### Introduction

Economic empowerment means that everyone should be able to participate and thrive in the economy.

In 2009, Block (formerly Square) started by enabling anyone with a mobile device to accept card payments, anywhere, anytime. For one flat, clear rate, anyone could accept credit cards. The ease, speed, and transparency of the process was revolutionary. And Block's differentiated approach to risk management enabled millions of sellers who had previously been unable to accept card payments to now participate in a rapidly changing economy.

While teens are active earners and spenders, the financial system has similarly been slow to build tools specially suited to them. The same features that drove so much of Square's adoption among its earliest sellers — simple setup, ease of use, sleek design, social cachet — made Cash App one of the most widely used financial platforms in the U.S. by younger consumers. Initially built to take the pain out of peer-to-peer (P2P) payments, Cash App expanded into spending, investing, and money management tools. Collectively, these services have helped teens experience many financial "firsts" and develop positive financial habits early. Of course, as teens spend more time online, the boundaries between social, private, and financial platforms have blurred, creating new opportunities for exploitation.

As Cash App has grown, Block has worked to identify and understand the risks associated with child safety, and invested in methods and mechanisms that promote safe, financial access for teens. While bad actors have become increasingly adept at identifying, engaging, and exploiting victims with sophisticated tactics, any effective response requires a multidimensional approach, including investment in technology, people, cross-industry partnerships, and relationships with public and private sector entities.

In this constantly evolving environment, staying ahead of these challenges is a critical priority.

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1.0

### The Case for Access

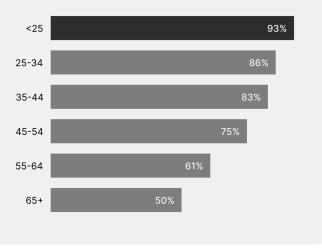
1.1

### A generation built for mobile money

For today's teens, technology isn't just a tool—it's seamlessly woven into their daily lives, and they're using it to reshape the future of money.

Nearly all U.S. teens (95%) now own a smartphone, up from 73% a decade ago. Digital tools are the native operating system they've grown up with, not a trend they've had to learn or adapt to. Unsurprisingly, 93% of Gen Zs under 25 already use at least one mobile payment app, accessing tools to earn, spend, and save significantly earlier than any prior generation.

### Adoption of Mobile Payments by Age

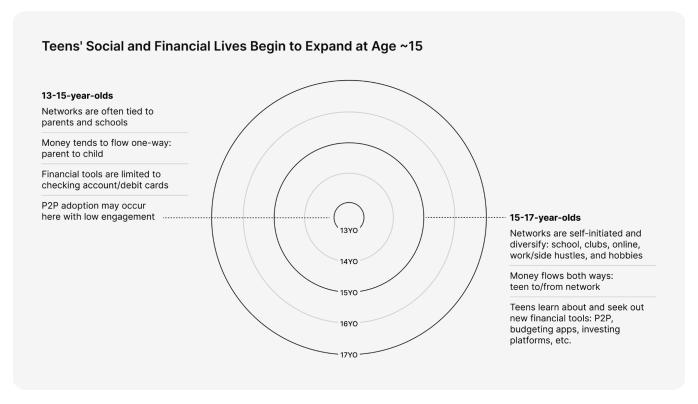


Source: "Consumer Payment Behavior by Income and Demographics," authors' calculations based on the 2023 Survey and Diary of Consumer Payment Choice

What's especially unique about this generation is how they earn. More than half (58%) of U.S. teens report earning money, often not from a single source but through a patchwork of income streams, including part-time jobs, neighborhood gigs, online businesses, and creative work.<sup>3</sup> Two in five teens (42%) earn through digital channels, more than the 38% who hold traditional jobs.<sup>4</sup> The number of teens holding multiple jobs has also increased more than 2x faster than the adult population (16+).<sup>5</sup>

This isn't just prep for adulthood. Teens today are already in the economy earning, spending, and making real financial decisions. They are simply learning by doing.

As they move through adolescence, teens' financial lives evolve from being guided only by parents to also being shaped by peers and personal choices. Around age 15, many teens begin earning in more consistent ways, whether through part-time jobs or ongoing paid gigs. This is a pivotal moment: As their social circles expand, teens begin spending their hard-earned money, and financial independence becomes top of mind. Teens begin to seek financial tools that match those expanding needs, often influenced by the people and platforms they trust, and start laying the foundation for lifelong financial habits.<sup>6</sup>



Source: Cash App internal data

Teens are seeking access to financial tools earlier because they "don't want to be gatekept from building their own future with their own money."<sup>7,8</sup> They're leaving home and spending time with friends, sharing dinner bills, collecting money for group activities, or helping out a friend who forgot their wallet. Yet most teens still navigate this transition without access to tools or technology that are purpose-built for them. Many rely on workarounds like using their parents' bank accounts, handling physical cash, or downloading multiple apps designed for all the different financial purposes they need.<sup>9</sup>

"What really geared me to Cash App was wanting a bit more financial freedom. With [other teen financial accounts] there's a couple things that you can't do. So for me when I got Cash App I felt a bit more independent and that's why I've been using Cash App as my main banking system rather anything else."

— 17-year-old Cash App sponsored teen

In an increasingly cashless society, this lack of access isn't just inconvenient, it's exclusionary. Teens may find themselves in situations where they simply can't pay, save, participate, or experience alongside their peers.

1.2

### A growing economic force

There are an estimated 22 million teens (ages 13-18), approximately one-third of all Gen Z in the U.S., and their economic power is accelerating. 10,11,12

In the next five years, Gen Z is expected to become the largest and wealthiest generation in history, amassing \$36 trillion in income, with expectations for that to double by 2040.<sup>13</sup> Their spending growth is already outpacing every other age group in both essential and discretionary categories.<sup>14</sup> As Gen Z continues to come of age, they're poised to disrupt economic and social systems — reshaping the role and expectations of the modern U.S. consumer. They also have entrepreneurial firepower, with today's young

adults (ages 18–24) starting businesses at the highest rate of any generation.<sup>15</sup>

In the next 5–10 years, teens will drive trillions in spending and generate unprecedented wealth. Their digital-native instincts and demand for instant, mobile-first experiences will redefine what "good" looks like in consumer finance. Financial providers that overlook under-18s today risk missing a once-in-a-generation opportunity to win the loyalty of increasingly high-value customers; Bankrate data shows Americans stick with the same checking account on average for 19 years. <sup>16</sup>

19

Average amount of years that Americans stick with the same checking account

13

### A system that wasn't built for them

While teens are active earners and spenders, the financial system has been slow to adapt. Most offerings either mimic traditional banks or cater exclusively to parents, not teens themselves, and many do not account for the multitude of ways today's teens are earning money. Those under 18 are typically restricted from accessing relevant financial products or are forced into systems that require in-person branch visits or outdated interfaces. These designs may work for younger or less independent teens, but they don't reflect how the emerging high-autonomy teen operates: independently, digitally, and socially.

Meanwhile, Gen Z is already shifting away from traditional banking. They are 29% more likely than average to have a digital-only bank account, and their expectations are radically different.<sup>17</sup> They want experiences that avoid traditional bank interactions, showing a preference for intuitive app interfaces that offer easy sign-up and

real-time access to their money along with clear visualizations that empower them to track, control, and grow their financial future. Surveys have indicated that Gen Z values the security of banks while wanting the modern and engaging customer experience that fintechs provide.<sup>18</sup>

When seeking a new financial institution, parents and teens are looking for tools that are accessible and support good money management, all while offering strong privacy and security protections. 19,20 For teens, access is about more than convenience — it's about confidence and control. They seek opportunities to invest and manage entrepreneurial activities.21 Parents and quardians are also interested in tools that allow them to actively partner with their teen in these spaces, teaching them how to effectively manage their finances and use apps that can help them prepare for a future of financial independence with responsible habits.<sup>22</sup> Providing access to these tools alone does not assure long-term success, but access combined with oversight and guidance are essential in helping young people "find their own way and learn from their choices."23

"[My daughter] uses her
Cash App card as her bank.\*
It was awesome that she could
have a bank card with her first
job. I feel that it gave her
opportunities to learn about
money on her own, which is
how she learns best."

Cash App Sponsor

\*Cash App is a financial services platform, not a bank. Banking services are provided by Cash App's bank partner(s). Debit cards are issued by Sutton Bank.

### Access as a gateway to long-term success

To build a more inclusive financial system, access to financial tools must begin earlier and be designed specifically for teen use. A growing body of research suggests that when young people have access to financial tools — paired with education and guidance — they develop positive financial habits that last into adulthood.<sup>24</sup> Early access, especially when supported by families or communities, fosters confidence, autonomy, and long-term economic capability.

Despite this, most financial inclusion efforts and regulatory frameworks focus on adults, leaving teens excluded by default. This lack of access is especially consequential for underserved communities, where traditional banking access is limited and financial education resources are often scarce. For teens, these platforms also serve as real-world financial education. Studies show that learning through hands-on experience, such as budgeting, saving, sending money, and tracking expenses, has a greater impact than traditional classroom-based instruction.<sup>25</sup>

Financial education gained early can also help mitigate risk. Research finds that even brief digital financial education sessions can reduce a teen's likelihood of falling victim to scams, fraud, or impulsive behaviors. In this context, access is not only about inclusion but also safety and resilience. Making access for teens the default — not the exception — can help foster a more financially capable generation.

1.4

# Cash App's approach to serving teens

With 57 million monthly actives — including 5 million monthly active sponsored teen accounts — Cash App is one of the most widely used financial platforms in the U.S., with deep penetration among young people and high brand affinity.<sup>27</sup> For many, it's the way they manage their money day-to-day. By enabling safe, controlled access to a wide breadth of financial products, Cash App is

helping shape a generation that's not just included in the economy but equipped to thrive in it.

Today, with the support of an eligible parent or quardian, Cash App allows teens 13 and up to have limited access to peer-to-peer (P2P) payments, Cash App Card (a Visa debit card), savings, direct deposit, paper money deposits, ATM withdrawals, Cash App Pay, and investing in stocks and bitcoin. Teens can safely save, manage, and grow their money in one place, gaining practical financial experience. Cash App also meets their social needs, allowing them to spot a friend for coffee, pool money for a birthday gift, or split a group dinner with ease. Cash App Card not only allows them access to their favorite brands, but it also provides a place to explore their creativity with a custom-designed Cash App Card they can show off to friends. The capabilities of a "Sponsor" (an eligible parent or quardian of the teen) extend beyond making funds instantly available to their teen; they can also monitor all their teen's activity, view their teen's balances, receive real-time notifications for transactions, and block certain payments at their discretion.<sup>28</sup> Sponsors also control access to features like P2P and investing in stocks and bitcoin, and may block and report other Cash App customers on behalf of their teen.

"What I want to do the most with my money is saving — I'm not able to have an actual savings account — I only have a checking account, like, through my mom. So I just save in Cash App."

— 16-year-old with a sponsored Cash App account

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As teens grow and become more independent, their relationship with Cash App changes as well. Cash App stands out as one of few platforms that allows teens to seamlessly transition into their own account. When they turn 18 years old, teens that complete the identity verification (IDV) process can graduate into their own Cash App account, removing parental oversight and unlocking full access to Cash App. This includes the ability to send and receive money freely, invest, and use features like higher limits across products, Cash App Borrow, Afterpay, and mobile check deposits.<sup>29</sup> This process lets teens seamlessly continue using Cash App as they transition into adulthood, so they can keep earning, spending, and investing in one place without needing to switch apps or to a traditional bank to manage their money. As of the end of June 2025, 1.7 million teens have graduated into adult monthly active accounts on Cash App.<sup>30</sup>

#### Teen Products and Features on Cash App

	Teen Account*	Adult Account
P2P	~	~
Cash App Card	~	~
Cash App Pay	~	<b>✓</b>
Paper Money Deposit	~	~
Direct Deposit	~	~
Bitcoin Buy/Sell	~	~
Stocks	~	~
Savings	~	~
Bitcoin Deposits and Withdrawals (On- chain and Lightning)		~
Check Deposit		~
Cash App Borrow		~
Wires		~
BNPL		~
Cash App Taxes		~
Remittances		~

<sup>\*</sup>Features are subject to limits and Sponsor approvals.

Teens can graduate into an adult account when they turn
18 and go through the full identity verification process.

Cash App is not only where their friends are but also a place that provides teens access to the financial tools they've been looking for in an app that is sleek, easy to use, and part of the cultural conversation, just like they are. Parents find that Cash App has both the features and the oversight they are looking for.31 On Cash App, parents can receive instant spending notification, view their teen's balance, and top up their spending money instantly. The combination of access, social relevance, and oversight is what makes Cash App a natural entry point for this generation of earners. More importantly, Cash App reflects a broader evolution in how teens gain financial education. Rather than relying only on simulations or one-time instruction, teens are learning by doing — developing habits in real time, with real money, on a platform designed to support them. **Expanding access through Cash App creates a** path for earlier education, promoting a future of financial independence.

### How Cash App Protects Teens

For financial, social media, and technology companies, identifying and understanding the risks associated with child safety and implementing robust mitigating controls should be a top priority. Cash App's commitment is to provide a platform for teens to access the financial system that is designed around trust and safety first, including protecting teens from exploitation.

2.1

### The risk landscape

As teens spend more time online, the boundaries between social, private, and financial platforms have blurred, creating new opportunities for exploitation. Criminals have adapted quickly, employing more sophisticated tactics to target young people in these interconnected environments. Policymakers around the world are responding with heightened urgency, guided by both troubling data and the lived experiences of teens and their families.

2.1.1

# Child exploitation and Block's strategy for addressing the risks

Crimes involving children often ultimately involve a financial transaction, which means financial platforms play a key role in ensuring child safety. This criminal activity has been a core focus for child safety groups such as the National Center for Missing and Exploited Children (NCMEC). Based on the typologies tracked in NCMEC's CyberTipline reporting — a central reporting system for suspected online child exploitation in the U.S. — there are three primary reporting categories of exploitation risk that financial services platforms must account for, each of which Cash App has developed strategies for detecting and reporting:

- Child sexual abuse material (CSAM):
   Offenders may use financial platforms to facilitate payments for illegal content involving the abuse or exploitation of minors.
- Online enticement: This includes grooming as well as the crime of financially motivated sextortion, where minors are blackmailed after receiving money or gifts online.
- Child sex trafficking: In some cases, financial platforms may be used to directly or indirectly facilitate payments related to child trafficking.

These risks require sophisticated methods for detection and response mechanisms tailored for platforms that allow teen access. Block and its brands, including Cash App, have developed a multidimensional strategy to address the risks associated with human exploitation, including of children, both on and off their platforms.

The strategy involves: (1) maintaining a robust set of internal policies, processes, and controls and (2) building and maintaining strong external partnerships and engagements to further identify risks on Block's platform. Block's policies, process, controls, and external partnerships are symbiotic: External engagements support the advancement of new detection methods, product controls, and other risk mitigation strategies, while Block shares information externally to promote the identification of bad actors, help law enforcement, and ultimately stop crimes before they happen.

Block's internal policies and processes encompass product controls, detection models, and education and staffing:

 Cash App integrates compliance with laws, regulations, and internal risk policies into product development and ongoing risk management. This is achieved through regular business reviews, proactive threat analysis, external partnerships and collaboration, and a dedicated compliance team that collaborates with product teams. These mechanisms ensure products adhere

- to compliance obligations and mitigate risks effectively.
- From the moment a teen onboards and begins to use Cash App, dedicated monitoring continues throughout their account life cycle. This is done with several machine learning models that assess the risk of the customer as well as individual transactions in real time, helping to identify and disrupt suspicious activity. These models are designed to manage risk by either immediately restricting an account when suspected of specific activity, blocking transactions, and/or queueing for an investigator to review.
- Investigators receive specialized training for red flags, which complements anti-money laundering (AML) training and promotes compliance. Expert staffing includes dedicated teams with deep knowledge and experience in disrupting human exploitation activity. The compliance team is diverse, with backgrounds in financial services investigations, law enforcement, and data science.

#### 2.1.2

#### Scam-specific challenges for teens

As teens broaden their adoption and use of digital financial products, so too have scammers and bad actors become more sophisticated and changed tactics to take advantage of this younger generation. Even though the digitally native generation, particularly Gen Z, has grown up with social media, online marketplaces, and digital payment tools, the blending of these worlds can make it difficult to discern legitimate requests from scams. Teens are increasingly being targeted by fraudsters looking to exploit them — and scammers are becoming more and more sophisticated in their tactics with fake social profiles, phishing messages, or fraudulent ads.<sup>32</sup>

Cash App has built its own protections across the platform to detect and prevent scams, secure customer accounts, take action against scammers, and educate and protect customers

as new scam types emerge. Some examples of these actions include:

- Investing in scam prevention <u>awareness</u> <u>and education</u> through marketing and social media campaigns that highlight Cash App's security features, common scam scenarios, and how Cash App features thwart fraud attempts
- Surfacing useful contextual information on each customer's profile to help customers identify and avoid scams
- Using advanced technology such as AI to detect and block bad activity, including Payment Warnings, which leverage Block's machine learning systems to warn customers that their P2P transaction may be part of a scam and have blocked approximately \$2 billion in potential P2P scams since 2020
- Leveraging Cash App's internal team of experts to review customer accounts as well as customer-reported scams to remove bad actors from the platform
- Allowing customers to report potential scams through the in-app "Scam Report" feature, which Cash App leverages to improve automated scam detection methods

This has led to a <u>confirmed scam rate of less than 0.01%</u> of all transactions on Cash App, making significant progress towards combatting scams on the platform.

Many social media platforms lack the age-based controls or monitoring systems necessary to detect or intervene in harmful behavior early. As policymakers continue to prioritize teens' digital safety, there is a clear opportunity — and responsibility — for financial platforms to lead in building safer, more accountable systems.

Read more <u>here</u> about how Cash App is fighting scams.

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# Cash App's product and controls strategy

Today's teens are digital natives and expect modern tools that reflect their growing financial independence. Enabling that access also opens the door to potential risk. Cash App's teen product is designed to meet that moment and effectively balance providing access with preventing harm. When sponsored, teens can send, spend, and save safely on their own terms.

Through extensive research with teens and parents, Cash App has developed a number of features to enable teens to use the platform safely and responsibly, with Sponsor oversight built in from the start. Sponsors and teens receive educational safety content at sign-up, and Sponsors are equipped with a high degree of visibility and control, including the ability to monitor activity and set customizable parameters for how their teens use Cash App. Sponsors and teens can collaborate and ensure they make the best decisions for their family when setting up controls, with Cash App continuing to monitor and provide essential protections from harm when necessary.

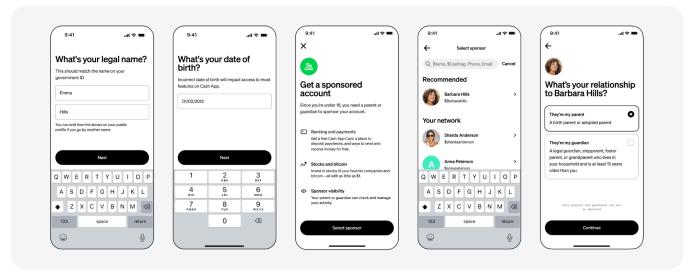
# 2.2.1 Onboarding and sponsorship

#### **Product construct**

Cash App's Families product is designed to foster financial education and freedom. Teens aged 13–17 are able to use a limited version of Cash App so long as they are sponsored by an eligible Sponsor. Cash App offers teens access to the most diverse set of financial products in the market across P2P payments, Cash App Card, paper money deposits, direct deposits, investing in bitcoin and stocks, and more. These are a critical value proposition to allow teens to learn and experience these features early in their financial lives.

### **Account onboarding**

When new customers sign up for Cash App, they are required to enter their date of birth. If a customer's entered date of birth indicates their age is 18 years or older, they are onboarded into a regular Cash App account. When a teen attempts to onboard and enters a date of birth that indicates their age is 13–17 years old, Cash App places the teen into a "Restricted Minor Account" (RMA), where they are unable to transact on Cash App until they are successfully sponsored by a parent or guardian. Cash App has invested heavily in advanced risk models and controls tailored to teen activity and the associated risks, and Sponsors have control and oversight of their teen's activity.



Teen onboarding flow that prompts them to send a sponsor request

#### Detection of teens using restricted accounts

A critical part of protecting minors on Cash App is ensuring that all individuals between the ages of 13 and 17 are onboarded into a sponsored teen account. However, there are cases where teens may share an incorrect date of birth during onboarding to gain access to features without requiring sponsorship first.

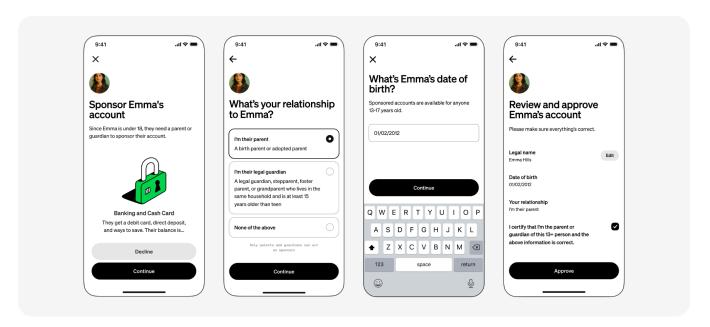
To address this issue, Cash App has invested significantly in real-time machine learning and AI models trained to proactively detect teens attempting to use non-teen accounts. These models use thousands of signals derived from customer attributes, device information, and transaction activity to understand the profile and usage patterns of teens on Cash App. The models evaluate all Cash App accounts that have not gone through the identity verification (IDV) process, beginning with their first attempted payment, and predict whether the customers may actually be between the ages of 13 and 17. When a potential teen is detected, Cash App requires the account to pass IDV in order to continue using Cash App. If the customer enters a date of birth that indicates an age between 13 and 17 during IDV, they are immediately placed in an RMA state

and require sponsorship to continue using Cash App.

### Sponsorship authenticity

While it is important that Cash App correctly identify individuals aged 13–17 so they can be onboarded into a teen account, it is also important to validate the relationship between the teen and their prospective Sponsor to help ensure the Sponsor is their parent or guardian. To achieve this, Cash App has implemented a set of restrictions and criteria, including machine learning models, to substantiate the relationship between the teen and the Sponsor.

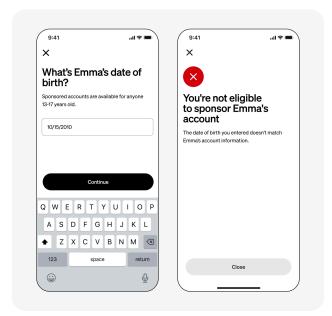
Currently, Sponsors must meet defined eligibility requirements and complete all verification steps in the sponsorship flow. These checks validate identity, assess account health, confirm age requirements, and verify the Sponsor-teen relationship. This process helps validate that sponsorships are properly established between teens and their parent or guardian. Requests that do not meet this standard are evaluated in real time at the acceptance stage and blocked from proceeding. Together, these measures help ensure that only qualified Sponsors can advance.



Sponsors are required to attest to their relationship to the teen and validate the birthdate input by the teen before they can approve a teen account

**##** 

Furthermore, Cash App has also trained machine learning and Al models to predict — in real time — when a sponsorship attempt may not be between a teen and their parent or guardian. Like the model previously described, these models are also trained using thousands of signals derived from customer attributes, device information, and transaction activity for both the teen and prospective Sponsor to help detect invalid sponsorship attempts. These models, similar to others across Block, are continuously retrained and tuned to incorporate the latest data.

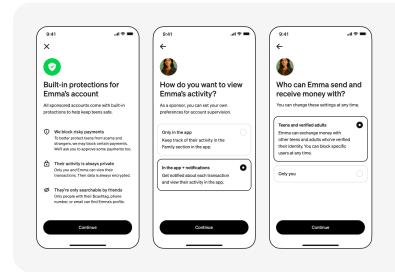


If a sponsor indicates a birthdate that is different than what the teen input, he or she will not be able to sponsor the teen account

### **Education for Sponsors and teens**

Having access to Cash App and the financial system may be new for some customers. For that reason, as a Sponsor onboards, it is essential they become familiar with the controls available to manage oversight of their teen's account. Upon onboarding, all Sponsor and teen accounts are presented with an in-app education module that provides an overview of the controls and other information about how to keep their teen's account safe. As part of this flow, Sponsors can toggle certain features on or off, such as when they'd like to receive notifications about their teen's activity, and who is able to transact with

their teen. Teens also receive education and information as they onboard to highlight controls and safety measures available to them.



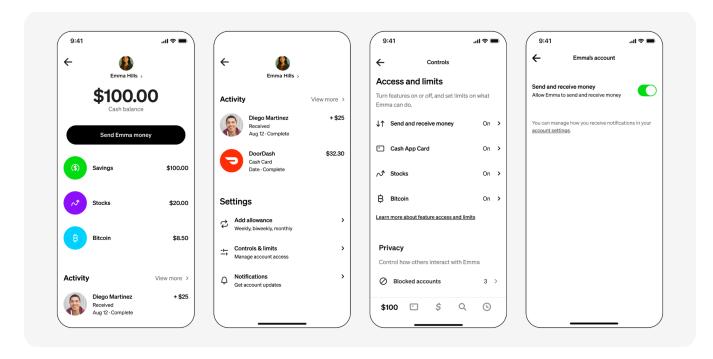
Sponsors have built-in protections and the flexibility to choose how they want to view the teen's activity

#### 2.2.2

### Account oversight and controls

# Sponsors can choose which features their teen has access to

Different families have different needs, and Sponsors may want to allow varying levels of access and oversight depending on their teen's age, especially as older teens gain more financial independence. Cash App's features for Sponsors are designed to be flexible, allowing them to tailor controls to best suit their preferences and their teen's maturity. Sponsors may choose to only allow their teen to send and receive money with a select group of peers, such as family and close friends, by setting up a list of approved contacts. They can also enable or disable their teen's ability to use a Cash App Card as needed. For teens to access investing features such as buying stocks or bitcoin, Sponsors must provide explicit approval. Additionally, Sponsors can set and adjust monthly limits on stock and bitcoin purchases, giving teens the opportunity to learn responsible investing under guided supervision.



Sponsors are able to view their teen's activity and adjust their product access and limits

### Account security and privacy

Teens are also given control over their privacy on Cash App. Unlike regular accounts, teen accounts are not discoverable through search unless a customer has their direct account details or an existing relationship with them on Cash App. The intent is to ensure that only customers who know the teen are able to find them on Cash App. If a teen prefers to not be searchable at all by certain attributes, they may update their privacy settings at any time within the app.

"It definitely gives me peace of mind in knowing I would have more of a presence in determining how she uses Cash App."

— Cash App Sponsor

### Sponsor visibility and notifications

By default, Sponsors have full visibility into all their teen's account activity and can further increase oversight by enabling real-time notifications for every transaction their teen makes — a feature now adopted by half of Sponsors during onboarding.<sup>33</sup> Even for Sponsors that prefer not to receive notifications for every transaction, Cash App provides <u>proactive</u>

notifications whenever their teen transacts with a new counterparty for the first time — this helps ensure Sponsors remain aware of new interactions their teen has on the platform. If a Sponsor observes concerning activity or behavior, they have the ability to block and/or report other Cash App customers on behalf of their teen.



Sponsor visibility into teen payment activity

### Customer reporting and blocking

Customer reports are a critical signal in identifying, investigating, and preventing child exploitation on the platform. Cash App empowers teens and Sponsors to report concerning behavior directly through the app. When reporting another customer, they can select from a set of reasons including "scam," "inappropriate behavior," or "spam." If "inappropriate behavior" is selected, customers can further select if the inappropriate behavior was due to "nudity or sexual activity," "bullying or harassment," or "something else" and provide a written description of what happened. Cash App worked closely with child safety experts to ensure these terms are understandable for younger individuals while still yielding actionable signals for internal teams. Once a report is submitted, the Sponsor or teen is prompted with additional resources as well as the option to block the reported customer from transacting with them or their entire family in the future. Any customer blocked by a Sponsor cannot be unblocked by the teen, and Sponsors are immediately notified when their teen blocks/unblocks customers.

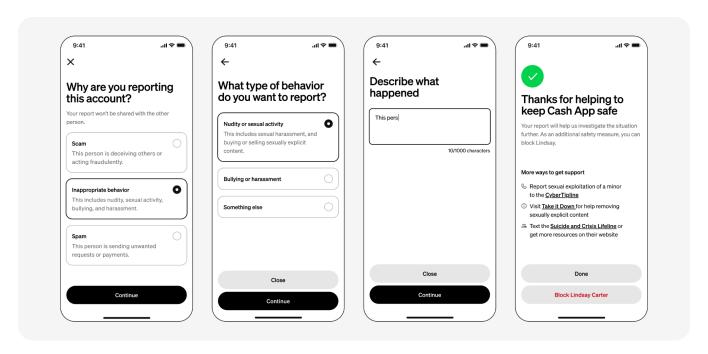
These reports play a critical role in creating feedback loops that help keep the platform safe.

For example, all reports of nudity or sexual activity are investigated expeditiously. When bad activity is confirmed, Cash App immediately restricts the bad actor's account as well as certain attributes (e.g., their SSN) so they cannot return to the platform in the future.

By investigating all of these reports, Cash App is able to measure the occurrence of inappropriate nudity or sexual activity over time and use this data to inform and improve additional controls, including training and retraining machine learning models designed to detect and prevent child sexual exploitation (CSE) activity directly. Cash App estimates that confirmed instances of CSE occur less than five times per million teen P2P payments — a rate it is committed to lowering even further through ongoing investment.<sup>34</sup>

<0.0005%

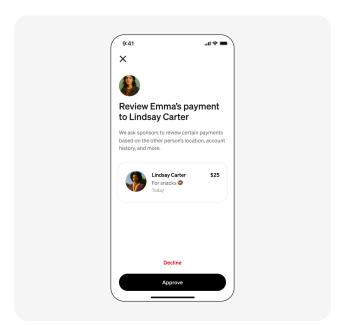
Percentage of confirmed instances of CSE activity on teen P2P payment



Customer reporting flow for teens and Sponsors to indicate any inappropriate behavior

### **Sponsor approvals**

Additionally, Cash App has developed several heuristic risk rules and machine learning and Al models trained to detect high-risk and potential CSE activity within teen P2P payments. These rules and models evaluate all attempted teen P2P payments in real time; when a high-risk payment is detected, the Sponsor is immediately notified and must approve the payment for it to proceed. They are also given additional information about the other customer and the option to cancel the payment, as well as guidance to have a conversation with their teen if they believe potentially concerning activity is taking place, which helps foster trust and dialogue between Sponsors and teens. When a Sponsor declines the payment, they are given the option to report and block the customer that was attempting to transact with their teen. In an effort to keep teens safe, Cash App may still block high-risk payments in some cases, even when the Sponsor approves.



Sponsor approval notification for P2P payment

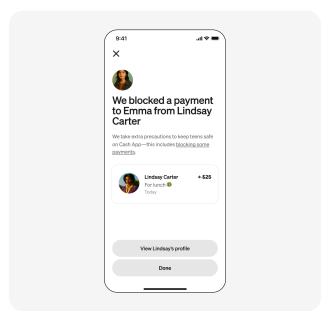
### 2.2.3

### Real-time risk systems and detection

### Cash App's child protection system

While Sponsors and teens have a comprehensive suite of in-app tools — such as privacy settings, blocking, and reporting — to help manage their

safety, Cash App's commitment to protecting minors goes beyond these tools. A real-time risk system fuses advanced AI models with carefully engineered heuristic rules to detect and prevent risky transactions, with a particular focus on those involving CSE, including CSAM, and the threat of financial sextortion. These systems and models not only evaluate all attempted P2P payments in real time but also intervene in real time by pausing payments for Sponsor review and approval, automatically blocking payments, or escalating accounts for investigation.



Cash App may block high-risk payments in some cases

#### Al-powered detection

At the core of this system are Cash App's proprietary machine learning and Al models, trained using large amounts of data, alongside carefully designed heuristic rules to detect exploitative or prohibited activity. These models and rules are continuously refined and improved as they collect more customer data, instances of reported inappropriate behavior, and outcomes from investigations. This iterative development process helps ensure the systems adapt quickly to evolving threats, enhancing both accuracy and responsiveness over time.

### Adult-to-adult CSAM sales detection

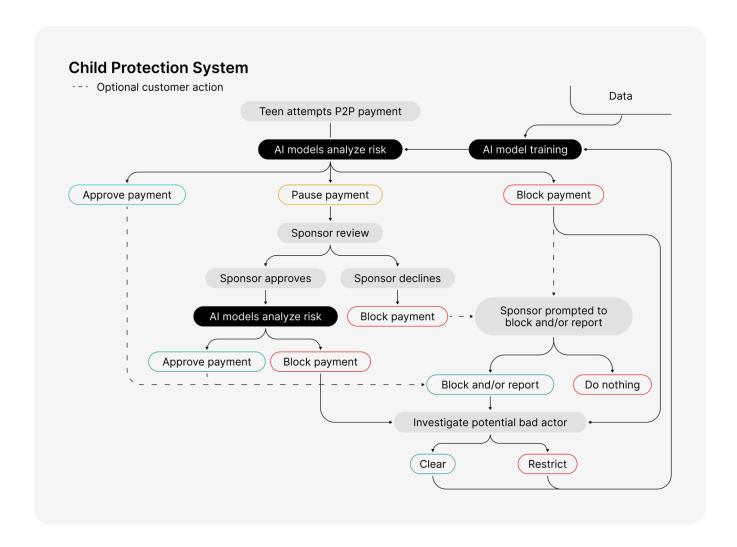
Cash App's child protection solutions go beyond

protecting teens that use the platform. These same systems are used to monitor all payments on the platform to detect instances where adults may be transacting with one another for the exchange of CSAM across third-party messaging platforms, filesharing applications, and/or social media platforms. Similar to the models described above, Cash App has trained machine learning and Al models to detect this pattern of activity directly, including leveraging a third-party partner's CSAM signals to provide CSAM coverage for on-chain activity. Cash App uses these models to block high-risk payments in real time and route accounts for further investigation.

### **Escalations and investigations**

As described above, payments and customers that are flagged as high risk by the CSE and CSAM detection systems, as well as customer

accounts that are reported for "inappropriate behavior" by a Sponsor or teen, create alerts for Cash App's Financial Crimes team. This team of experts utilizes customer histories, transactional context, device associations, and network connections to thoroughly investigate flagged accounts and activity. If the investigation confirms prohibited activity related to CSE, CSAM, or sextortion, the agent will restrict the offending account, any identified associated accounts, and unique assets associated with the bad actor (such as SSNs and devices) to prevent them from returning to the platform in the future. Where appropriate, investigators may also file a Suspicious Activity Report in accordance with federal regulations and/or refer the incident to external partners, including non-governmental organizations such as the National Center for Missing and Exploited Children (NCMEC).



# External engagement with third-party organizations and law enforcement

Block's strategy to combat human trafficking and exploitation has centered on building relationships with public and private sector entities that aid teams in countering industry-wide and cross-sector issues.

Identifying illicit activity on its platform, in isolation, can be challenging, and while Cash App's policies, processes, and controls have helped reduce unwanted activity, external partnerships are critical to help get the full picture to most effectively detect activity, disrupt the illicit financial gain, and continue to make Cash App a safe destination for financial services.

As such, external engagements have been an area of focus and investment for Block.

Cash App regularly receives external referrals from law enforcement (LE) and non-governmental organizations to investigate. To support this continued engagement, Block has established an Intelligence Program that operates a dedicated email for intelligence leads, which is used to collect incoming information and is key for LE to leverage. The collected information is used to assess and mitigate exposure, in addition to informing broader investigative internal educational bulletins. As a targeted piece of Cash App's overall child exploitation and human trafficking strategy, Block holds quarterly <u>Law</u> **Enforcement Summits in strategic locations** around the U.S. This initiative focuses on building connections with key law enforcement agencies and third-party organizations, providing education about Block and its brands, sharing overviews of Block's Financial Crimes and Operations programs, and providing training and awareness of the subpoena process in an effort to generate more effective leads for internal investigations. In turn, Block teams have the opportunity to learn from local LE experts on case trends and localized and emerging issues, and to ensure that their practices are continuing to meet the needs



Block <u>hosted</u> its third quarterly Law Enforcement Summit in Oakland and convened more than 80 law enforcement representatives with Block's legal and compliance leaders to discuss how to best tackle financial crimes together.

of LE. This creates an opportunity to highlight and share Block's strategies and overall innovation to demonstrate the focus and sophistication of the company's efforts to combat illicit activity on its platform.

Cash App values the subject matter expertise of those with lived experience and engages with survivor leaders to ensure work is informed by those with lived experience, including partnering with survivors to conduct internal training for employees.

## National Center for Missing and Exploited Children (NCMEC)

Cash App regularly reports suspected instances of payments related to CSAM, online enticement (including financial sextortion), and child sex trafficking to NCMEC's CyberTipline.

Direct reporting through the CyberTipline streamlines communication and allows law enforcement to respond more quickly to potential threats, ultimately aiding in the recovery of missing and exploited children and the prosecution of offenders. Such coordination strengthens overall efforts to combat child exploitation and enhance community safety.

Throughout the first six months of 2025, Block submitted 3,107 reports to NCMEC's CyberTipline, showing its commitment to detecting and reporting this activity, and keeping children safe on and offline.<sup>35</sup> Block is dedicated to ensuring its CyberTipline reports are comprehensive and actionable to support law enforcement investigations. It proactively communicates with officers handling these cases nationwide, creating a feedback loop to improve the quality and utility of reports.

#### **Tech Coalition**

Block is also a member of the <u>Tech Coalition</u>, an alliance of more than 80 leading tech companies who are working together to drive critical technological advances and adoption of best practices for keeping children safe online. Cash App is also an active participant in the Tech Coalition's Project Lantern, which is a child safety cross-platform signal sharing program. As one of the <u>first financial technology companies</u> to join this program, Block uses these signals as intelligence within its investigations team to help assess compliance detection rules and identify opportunities to enhance product and risk controls to prevent this type of activity on its platforms.

## International Centre for Missing and Exploited Children (ICMEC)

Cash App is also regularly involved with the U.S. Financial Coalition Against Child Sexual Exploitation, an effort led by ICMEC to ensure timely global intelligence to combat exploitation, fostering cooperation across technology and financial sectors and engagement with bi-lateral law enforcement partners.

To ensure a holistic, cross-sector approach to child exploitation, Cash App dedicates resources to the work of partners at child exploitation—focused organizations including <u>INHOPE</u>, the <u>International Centre for Missing & Exploited Children</u>, the <u>International Centre for Missing & Exploited Children - Australia</u>, <u>ChildFund International</u>, and <u>Raven</u>.

#### **Aspen Institute**

Cash App participates in Aspen Institute Financial Security Program's National Task Force on Fraud and Scam Prevention, developing a national strategy to safeguard against fraud and scams. This task force brings together government agencies and companies across industries ranging from retail to telecommunications to technology to effectively reduce the public threat posed by fraud and scams to people of all ages, with an emphasis on the protection of vulnerable populations like elders and youth. This work is informed by stakeholders in the regulatory and consumer advocacy sectors who are able to share real-time data about impacts and resources for victims.

### Commitment to ongoing education

Cash App regularly attends key stakeholder events to ensure it is constantly learning and keeping ahead of any emerging trends, as well as to give presentations about its unique perspective on child safety, including:

- Industry-leading conferences such as the Dallas Crimes Against Children Conference and <u>TrustCon</u>
- Specialized law enforcement trainings such as regionalized Internet Crimes Against Children (ICAC) Task Force Program and trafficking conferences
- Collaborative industry think tanks focused on online safety efforts

Cash App engages with the child safety sector in addition to law enforcement to create a feedback loop with stakeholders to absorb their latest insights and leading expertise, which helps ensure its products are safe and intelligence products are actionable and ultimately preventing misuse, not just detecting it. Block's presence at conferences and events allows it to stand shoulder-to-shoulder with strategic stakeholders who inform its continued efforts to combat child exploitation.

### The Path Forward

Block believes that providing access and protection to teens requires examination of the whole ecosystem, especially the role financial services providers and technology can play in promoting online child safety. To meaningfully address growing gaps in the breadth of industries that touch on this topic, Block recommends:

(1) Enhancing coordination among all industries,
(2) modernizing frameworks for law enforcement, and (3) expanding on resources and support for law enforcement.

### **Enhancing coordination**

A broad range of industries are deeply focused on serving younger consumers — including social media companies and financial services providers — but they face varying regulatory requirements and have different expertise at tackling safety issues as they arise. Establishing a method by which industries can share experiences and expertise across their platforms is an important first step. Additionally, U.S.-based law enforcement agencies investigating child exploitation often lack access to intelligence from the financial services industry and instead engage with the industry at the point in which fraud or money laundering has occurred. Closing these systemic gaps between online platforms, financial services providers, regulators, and law enforcement will enable efficient resource allocation and coordinated action against child exploitation.

### Modernizing frameworks

To strengthen protections for youth and their families, law enforcement needs modernized frameworks across regulatory, compliance, and supervisory domains. One opportunity to modernize would include expanding access to FinCEN's Bank Secrecy Act (BSA) database. Access to this database would allow local CSAM and trafficking investigators direct access to the intelligence that financial institutions are working diligently to report, and would establish vital

feedback loops between law enforcement, FinCEN, and financial institutions. This improved public-private information sharing channel would help prioritize high-value suspicious activity reports and deliver timely intelligence to all institutions, including smaller banks and regulated fintechs. As a result, investigators could expedite cases and create stronger deterrents against financial crimes targeting families and youth.

### **Expanding resources**

More key investments include resources and support for expert agencies that focus on protecting children, such as Internet Crimes Against Children (ICAC) Task Forces. ICAC's 61 coordinated task forces represent over 5,400 federal, state, and local law enforcement professionals, dedicated to investigating, prosecuting, and developing effective responses to internet crimes against children. Increasing investment in training for law enforcement on technology, how to interpret data from multiple sources, and the online crimes the industry is seeing is vital to combatting this crime.

Younger generations deserve access to financial services, and it is paramount that there is a safe environment for them to do so. Block is focused on helping future earners through its voluntary commitment to child safety principles, education, and integration of protections into its products, policies, and practices. Unfortunately, this is not something Block can solve alone. This work can only be done in collaboration with established leaders across all industries, including in the nonprofit and public service sectors.

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The customer experience screenshots included in this paper are provided for illustrative purposes only. They may not accurately represent the exact customer experience within the App and are subject to change in the normal course of updates and improvements.

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