

**THE CORPORATE GOVERNANCE GUIDELINES OF
AFFIRM HOLDINGS, INC.**

AS ADOPTED BY THE BOARD ON OCTOBER 18, 2023

The following Corporate Governance Guidelines have been adopted by the Board of Directors (the “*Board*”) of Affirm Holdings, Inc., a Delaware corporation (the “*Corporation*”), to assist the Board in the exercise of its responsibilities. These Corporate Governance Guidelines are not intended to change or interpret any Federal or state law or regulation, including the General Corporation Law of the State of Delaware, or the Certificate of Incorporation or the Bylaws of the Corporation. These Corporate Governance Guidelines are subject to modification from time to time by the Board.

I. THE BOARD’S ROLE AND RESPONSIBILITIES

The business and affairs of the Corporation shall be managed by or under the direction of the Board. In so doing, the primary responsibility of the Board is to exercise its powers in accordance with its fiduciary duties to the Corporation and in a manner it reasonably believes to be in the best interests of the Corporation and its stockholders. The principal ways that the Board fulfills its responsibilities are by providing oversight and strategic guidance to senior management; reviewing, approving, and monitoring fundamental financial and business strategies; assessing the Corporation’s major risks and considering ways to address them; selecting and overseeing management; and establishing and overseeing processes to maintain the Corporation’s integrity.

A director is expected to spend the time and effort necessary to properly discharge such director’s responsibilities. Accordingly, a director is expected to regularly attend meetings of the Board and committees on which such director sits, and to review prior to meetings material distributed in advance for such meetings. A director who is unable to attend a meeting (which it is understood will occur on occasion) is expected to notify the Chairperson of the Board (the “*Chairperson*”) or the chairperson of the appropriate committee in advance of such meeting. Directors are also encouraged to attend each annual meeting of stockholders.

II. BOARD LEADERSHIP

The Chairperson shall preside at all meetings of the Board and shall perform such other duties, and exercise such powers, as prescribed in the Bylaws of the Corporation or by the Board from time to time.

The Board annually reviews its leadership structure to evaluate whether the structure remains appropriate for the Corporation. The Board does not require the separation of the offices of the Chairperson and of the Corporation’s Chief Executive Officer (the “*Chief Executive Officer*”). The Board believes that whether to have the same person occupy the offices of Chairperson of the Board and Chief Executive Officer should be decided by the Board, from time to time, in its business judgment after considering relevant factors, including the specific needs of the business and what is in the best interests of the Corporation’s stockholders.

If the Chairperson chosen by the Board is not an Independent Director (as defined below), the Independent Directors may designate an Independent Director to serve as a Lead Independent Director (the “*Lead Independent Director*”). If designated, the Lead Independent Director shall preside over periodic meetings of the Independent Directors, serve as liaison between the Independent Directors and the Chairperson, shall have such other responsibilities as set forth in these Corporate Governance Guidelines or the Bylaws of the Corporation, and shall perform other functions and responsibilities as requested by the Board from time to time.

III. BOARD COMPOSITION

A. Size of the Board

The Board shall have no fewer than five directors with the exact number to be determined by the Board. The Board believes that it should generally have no more than nine directors. The size of the Board may, however, be increased above that number if determined to be appropriate by the Board.

B. Independence of the Board

The Board shall be composed of a majority of directors who qualify as independent directors (“*Independent Directors*”) under the listing standards of the Nasdaq Global Select Market (“*Nasdaq*”).

The Board shall review annually the relationships that each director has with the Corporation (either directly or as a partner, stockholder or officer of an organization that has a relationship with the Corporation). Following such annual review, only those directors who the Board affirmatively determines have no such relationship that would interfere with the exercise of independent judgment in carrying out the responsibilities of a director will be considered Independent Directors, subject to additional qualifications prescribed under the Nasdaq listing standards or under applicable law. In the event that a director becomes aware of any change in circumstances that may result in such director no longer being considered independent under the Nasdaq listing standards or under applicable law, the director shall promptly inform the chairperson of the Nominating and Governance Committee.

C. Selection of New Directors

The Board shall be responsible for nominating members for election to the Board and for filling vacancies on the Board that may occur between annual meetings of stockholders. The Nominating and Governance Committee is responsible for identifying, evaluating and recommending candidates to the Board for Board membership. When formulating its Board membership recommendations, the Nominating and Governance Committee may also consider advice and recommendations from others as it deems appropriate.

The Nominating and Governance Committee will consider candidates recommended by stockholders. In considering candidates submitted by stockholders, the Nominating and

Governance Committee will take into consideration the needs of the Board and the qualifications of the candidate.

D. Board Membership Criteria

Board membership criteria shall be established by the Board from time to time taking into account any applicable law, regulation or rule, and that criteria shall be considered by the Nominating and Governance Committee when identifying, evaluating and recommending candidates to the Board for Board membership. Qualifications considered by the Nominating and Governance Committee in identifying, evaluating and recommending candidates may include, among others: experience, skills, expertise, diversity, personal and professional integrity, character, business judgment, time availability in light of other commitments, dedication, conflicts of interest and such other relevant factors that the Committee considers appropriate in the context of the needs of the Board. As part of the search process for new directors, the Nominating and Governance Committee shall actively seek to identify candidates who reflect diverse backgrounds, including diversity of race, ethnicity and gender. Specifically, in any formal search for Board candidates where an initial candidate pool is assembled, the Nominating and Governance Committee shall include, and shall request that any search firm that it engages for such a search include, qualified candidates with a diversity of race, ethnicity and gender in that initial candidate pool.

E. Other Public Company Directorships

The Corporation does not have a policy limiting the number of other public company boards of directors upon which a director may sit, in general. However, the Nominating and Governance Committee shall consider the number of other public company boards and other boards (or comparable governing bodies) on which a prospective nominee or a director is a member. Directors shall provide prior written notice to the chairperson of the Nominating and Governance Committee of any proposed service on the board of directors of a public or private company.

Although the Corporation does not impose a limit on outside directorships, it does recognize the substantial time commitments attendant to Board membership and expects that the members of its Board be fully committed to devoting all such time as is necessary to fulfill their Board responsibilities, both in terms of preparation for, and attendance and participation at, meetings.

F. Directors Who Change Their Primary Job Responsibility

Non-employee directors shall notify the chairperson of the Nominating and Governance Committee in the event of any significant change in their primary job responsibilities. The Nominating and Governance Committee shall review the director's continuation on the Board in light of all the circumstances and recommend to the Board whether the director should continue to serve on the Board.

G. Director Tenure

The Board does not limit the number of terms that an individual may serve as a director,

nor has the Board established a mandatory retirement age for directors. In connection with each director nomination recommendation, the Nominating and Governance Committee shall consider the issue of continuing director tenure and take steps as may be appropriate so that the Board has a balance of fresh perspectives and continuity of service. The Nominating and Governance Committee shall consider each director's performance and suitability in connection with each director nomination recommendation.

H. Majority Voting; Director Resignation Policy

The Corporation has adopted majority voting in the uncontested election of directors and plurality voting in contested elections. In uncontested elections, directors are elected by a majority of the votes cast, which means that the number of shares voted "for" a director must exceed the number of shares voted "against" that director. Any director who is not elected by a majority of the votes cast is expected to tender his or her resignation to the Nominating and Governance Committee. The Nominating and Governance Committee will recommend to the Board whether to accept or reject the resignation offer, or whether other action should be taken. In determining whether to recommend that the Board accept any resignation offer, the Nominating and Governance Committee may consider all factors that the Committee's members believe are relevant.

The Board will act on the Nominating and Governance Committee's recommendation within 90 days following certification of the election results. In deciding whether to accept the resignation offer, the Board will consider the factors considered by the Nominating and Governance Committee and any additional information and factors that the Board believes to be relevant. If the Board accepts a director's resignation offer pursuant to this process, the Nominating and Governance Committee will recommend to the Board and the Board will thereafter determine whether to fill the vacancy or reduce the size of the Board. Any director who tenders his or her resignation pursuant to this provision will not participate in the proceedings of either the Nominating and Governance Committee or the Board with respect to his or her own resignation offer.

IV. BOARD MEETINGS

A. Frequency of Meetings and Attendance

The Board expects to have at least four regularly scheduled meetings each fiscal year.

B. Selection of Agenda Items for Board Meetings

The Chairperson shall prepare the agenda for each Board meeting with input from the Lead Independent Director, as appropriate. Board members are encouraged to suggest inclusion of items on the agenda or raise at any Board meeting topics that are not specifically on the agenda for that meeting.

C. Board Materials Distributed in Advance

Information and materials that are important to the Board's understanding of the agenda items and other topics to be considered at a Board meeting should, to the extent practicable, be

distributed sufficiently in advance of the meeting to permit prior review by the directors. In the event of a pressing need for the Board to meet on short notice or if such materials would otherwise contain highly confidential or sensitive information, it is recognized that written materials may not be available in advance of the meeting.

D. Separate Sessions of Independent Directors

In general, the Independent Directors shall meet in executive session without management at each regularly scheduled board meeting and at such other times as the Lead Independent Director shall designate. The Chairperson, or if the Chairperson is not an Independent Director, the Lead Independent Director, shall preside at such executive sessions or meetings of the Independent Directors.

V. BOARD COMPENSATION

A director who is also an officer of the Corporation shall not receive additional compensation for such service as a director.

The Corporation believes that compensation for non-employee directors should be competitive and should encourage increased ownership of the Corporation's stock through the payment of a portion of director compensation in Corporation stock, restricted stock units, options to purchase Corporation stock or similar compensation. The Board will determine the form and amount of non-employee director compensation upon the recommendation of the Compensation Committee, which will periodically review the level and form of the Corporation's director compensation, including how such compensation relates to director compensation of companies of comparable size, industry and complexity.

VI. SELF-EVALUATION BY THE BOARD

The Nominating and Governance Committee will coordinate an annual self-assessment of the Board's performance, as well as the performance of each committee of the Board, the results of which will be discussed with the full Board and each committee. The Nominating and Governance Committee may utilize the results of this self-evaluation process in assessing and determining the characteristics and critical skills required of prospective candidates for election to the Board and making recommendations to the Board with respect to assignments of Board members to various committees.

VII. BOARD ACCESS

A. Board Access to Management

Board members shall have reasonable access to the Corporation's management and, as appropriate, to the Corporation's outside advisors, subject to reasonable efforts to avoid disruption to the Corporation's business and operations. Board members shall coordinate such access through the Chief Executive Officer or the Chief Legal Officer.

B. Attendance of Management Personnel at Board Meetings

The Chief Executive Officer may bring members of management from time to time into Board meetings or other Board functions to (i) provide insight into items being discussed by the Board that involve management; (ii) make presentations to the Board on matters that involve management; and (iii) bring managers into contact with the Board. Attendance of such management personnel at Board meetings is at the discretion of the Chief Executive Officer.

VIII. OTHER BOARD TOPICS

A. Board Orientation and Continuing Education

The Corporation shall provide new directors with a director orientation program to familiarize such directors with, among other things, the Corporation's business, strategic plans, significant financial, accounting and risk management issues, compliance programs, conflicts policies, code of business conduct and ethics, corporate governance guidelines, principal officers and independent auditors. Each director is encouraged to participate in continuing educational programs in order to enhance his or her ability to perform his or her responsibilities as a director. The Corporation shall pay all reasonable pre-approved expenses relating to continuing director education.

B. Board Interaction with Institutional Investors, Analysts, Press and Customers

It is the policy of the Corporation that, as a general matter, management speaks for the Corporation and, accordingly, directors should refer all inquiries from investors, analysts, the press or others to the Chief Executive Officer, the Chief Financial Officer, the Chief Legal Officer or their designees. Nevertheless, directors may from time to time meet or otherwise communicate with external constituencies, including stockholders. It is expected that those meetings or communications will be coordinated with management.

IX. COMMITTEE MATTERS

A. Standing Board Committees

The Corporation shall have three standing committees: the Audit Committee, the Compensation Committee and the Nominating and Governance Committee. The purpose and responsibilities for each of these committees are outlined in committee charters adopted by the Board. The Board may want, from time to time, to form a new committee or dissolve a current committee depending on circumstances. In addition, the Board may determine to form ad hoc committees from time to time and establish the composition and areas of competence of such committees.

B. Independence of Board Committees

Each of the Audit Committee, the Compensation Committee and the Nominating and Governance Committee shall be composed entirely of Independent Directors satisfying applicable legal, regulatory and stock exchange requirements necessary for an assignment to any such committee.

C. Assignment of Committee Members

The Nominating and Governance Committee shall be responsible, after consultation with the Chairperson and the Lead Independent Director, for making recommendations to the Board with respect to the assignment of Board members to various committees and filling any vacancy that might occur on a committee. After reviewing the Nominating and Governance Committee's recommendations, the Board shall be responsible for appointing the chairperson (if any) and members to the committees.

The Nominating and Governance Committee shall annually review the committee assignments and, after consultation with the Chairperson and the Lead Independent Director, report any recommendations to the Board.

X. EXECUTIVE DEVELOPMENT

A. Selection of the Chief Executive Officer

The Board is responsible for identifying potential candidates for, and selecting, the Chief Executive Officer. The Board shall consider, among other things, a candidate's experience, understanding of the Corporation's business environment, leadership qualities, knowledge, skills, expertise, diversity, integrity, and reputation in the business community.

B. Evaluation of Chief Executive Officer

The formal evaluation of the Chief Executive Officer shall be made in the context of the annual compensation review of the Compensation Committee, with input from the other Independent Directors. The evaluation shall be based on such criteria as the Compensation Committee, with input from the other Independent Directors, shall determine, including performance of the business and accomplishment of long-term strategic objectives.

C. Other Duties and Responsibilities

The Board, led by the Compensation Committee (in collaboration with the Nominating and Governance Committee), is responsible for planning for succession to the position of Chief Executive Officer, as well as certain other senior management positions. To assist the Board, the Chief Executive Officer shall periodically provide the Compensation Committee with an assessment of persons considered potential successors to certain senior management positions and annually provide the Compensation Committee with an assessment of other senior managers and their potential to succeed to the Chief Executive Officer position.