

Affirm Holdings, Inc.
Amendments to the Code of Business Conduct and Ethics in the Last 12 Months

Effective January 14, 2026, Affirm Holdings, Inc. (“Affirm”) revised its Code of Ethics and Business Conduct (the “Code”) applicable to all directors, officers and employees. The revision of the Code maintains the essential principles and standards contained in the prior Code and is intended to reflect current best practices. A summary of the revisions reflected in the revised Code is as follows:

- All references to our whistleblower hotline throughout the Code were revised to reflect the transition to a new vendor, Speakfully;
- The "Drug & Alcohol Policy" (Section 4.6) was revised to clarify expectations around how this policy applies to Affirmers in different work settings (e.g., when working remote, traveling for business or attending events);
- The "Use of Company Equipment & Materials" section (Section 5.1) was revised to establish expectations related to personal use of Company laptops;
- The "Protecting Our Company" section (Section 5) was revised to incorporate and reference our AI Standards;
- The "Modern Slavery Prevention" section (Section 6.6) was revised to have general application with a global scope; and
- Additional non-substantive revisions designed to simplify messaging were made to the Code.

The revision of the Code did not relate to or result in any waiver, explicit or implicit, of any provision of the prior Code. The full text of the updates can be found at <https://investors.affirm.com/corporate-governance/governance-overview>.