

**CHARTER FOR THE AUDIT AND RISK MANAGEMENT COMMITTEE
OF THE BOARD OF DIRECTORS OF
FIGURE TECHNOLOGY SOLUTIONS, INC.**

Adopted and effective as of August 28, 2025

PURPOSE

The purpose of the Audit and Risk Management Committee (the “**Committee**”) of the Board of Directors (the “**Board**”) of Figure Technology Solutions, Inc., a Delaware corporation (the “**Company**”), shall be to:

- Oversee the Company’s (i) accounting and financial reporting processes, (ii) audits of the financial statements, and (iii) design and implementation of the internal audit function;
- Assist the Board in its oversight and monitoring of (i) the integrity of the Company’s financial statements, (ii) the Company’s compliance with legal and regulatory requirements, (iii) the independent auditor’s qualifications, independence and performance, and (iv) the Company’s internal accounting and financial controls;
- Oversee the Company’s risk management framework and related activities, including risks relating to the blockchain technologies utilized by the Company and its affiliated entities; and
- Provide to the Board such additional information and materials as it may deem necessary to make the Board aware of significant financial and risk matters that require the attention of the Board.

In addition, the Committee will undertake those specific duties and responsibilities listed below and such other duties as the Board may from time to time prescribe.

COMPOSITION

The Committee shall consist of at least three members, comprised solely of directors deemed by the Board to be experienced and able to understand the Company’s financial statements. Members of the Committee shall be appointed by the Board and may be removed by the Board in its discretion. The Board may designate a chairperson of the Committee.

RESPONSIBILITIES

Committee members shall exercise their business judgment to act in what they reasonably believe to be in the best interests of the Company and its shareholders. In discharging such obligation, members may rely on the honesty and integrity of the Company’s senior executives and its outside advisors and auditors, to the fullest extent permitted by law. The Committee’s responsibilities include the following matters, along with any other duties assigned by the Board:

Audit/Financial Related Matters

- Appoint, compensate and oversee the work of any accounting firm engaged for the purpose of preparing or issuing an audit report or performing other audit; each such accounting firm shall report directly to the Committee.
- Pre-approve audit and non-audit services (including fees) to be provided by the independent auditor pursuant to Committee policies. The Committee may delegate pre-approval authority to a

designated member(s), provided such approvals are presented at the next Committee meeting.

- Discuss with the independent auditor its responsibilities under generally accepted auditing standards, review and approve the planned scope and timing of audit plan(s), and discuss significant findings, including any restrictions on scope, access to information, or significant disagreements with management.
- Evaluate the independent auditor's qualifications, performance and independence annually, reporting conclusions to the Board. This evaluation shall include:
 - Obtaining reports from the independent auditor describing:
 - internal quality-control procedures;
 - material issues raised by governmental or professional authorities within five years regarding the firm's independent audits, and steps taken to address them; and
 - all relationships between the independent auditor and the Company.
 - Reviewing the lead audit partner and other senior team members;
 - Confirming required audit partner rotation; and
 - Obtaining management's and internal audit personnel's assessment of the auditor's performance.
- Establish hiring policies for current or former independent auditor employees.

Internal Auditors

- Review management's plans with respect to the responsibilities of the internal audit function, including a discussion of those plans with the independent auditors.

Financial Statements

- Review and discuss with management and the independent auditor the annual audited and unaudited quarterly financial statements.
- Meet separately as needed with management, internal audit personnel, and the independent auditor to review:
 - Management and/or auditor analyses of significant financial reporting issues and judgments made in preparing financial statements, including analyses of the effects of alternative Generally Accepted Accounting Principles methods on the financial statements;
 - The Company's critical accounting policies and practices;
 - Any "second" opinions sought by management regarding accounting treatment;

- Effects of regulatory and accounting initiatives and off-balance sheet structures on financial statements; and
- any major issues regarding accounting principles and financial statement presentations, including significant changes in accounting principle selection or application.
- Review current accounting trends and developments with the independent auditor and management, taking appropriate action as needed.
- Review audit problems or difficulties and management's response, including matters required for auditor discussion under established auditing standards.
- Resolve disagreements between management and the auditor regarding financial reporting.
- Review, in conjunction with counsel, any legal matters that could have a significant impact on the Company's financial statements.

Risk Management Related Matters

- Review with management, including any chief risk officer of the Company, as appropriate:
 - Categories of risk facing the Company, such as operational, credit, market, interest rate, reputational, liquidity, counterparty, information technology and security, fiduciary, business continuity/resiliency, and other Board-delegated risk areas. This includes evaluating risk concentrations and risk interrelationships, as well as the likelihood of occurrence, the potential impact of those risks and mitigating measures; and
 - The Company's risk management and risk assessment guidelines and policies regarding such risks against established risk measurement methodologies.
- Receive and review periodic reports from management on regulatory matters, including regulatory treatment and technological developments relating to cryptographic tokens and blockchain technology, and material correspondence with regulatory agencies.
- Review, and, as applicable, approve the Company's risk appetite and supporting risk tolerance levels, the ways in which risk is measured on an aggregate, company-wide basis, the setting of aggregate and individual risk limits (quantitative and qualitative, as appropriate), the actions taken if those limits are exceeded, and the guidelines, policies and processes for monitoring and mitigating such risks.
- Review periodic reports from management on metrics used to measure, monitor, and manage risks, including management's views on acceptable and appropriate levels of exposure.
- Review reports from management, independent auditors, and internal auditors, legal counsel, regulators, and outside experts regarding the Company's risks, risk management function, and results of risk management reviews and assessments, including reports of instances where the Company has exceeded or is forecasted to exceed risk tolerances.

Additional Matters

- Establish procedures for:
 - Receiving, retaining and treating complaints about accounting, internal controls or auditing matters, and
 - Confidential, anonymous employee submission of concerns regarding questionable accounting or auditing matters.
- Provide oversight of the Company's investment policies.
- Review the Committee charter, structure, processes and membership requirements.
- Perform any other activities consistent with this charter, the Company's Bylaws and governing laws that the Board or Committee determines are necessary or appropriate.

MEETINGS

The Committee will set its own schedule of meetings and will meet at such times as it deems necessary or appropriate. The chairperson shall preside at meetings; in their absence, attending members may designate an acting chair. The Committee may act by unanimous written or electronic consent in lieu of a meeting, provided each member executes and dates the consent in accordance with Company Bylaws.

The Committee may invite to its meetings any director, officer or employee of the Company and such other persons as it deems appropriate in order to carry out its responsibilities. The Committee may also exclude from its meetings any persons it deems appropriate in order to carry out its responsibilities, including non-management directors who are not members of the Committee.

MINUTES

The Committee will maintain written minutes of its proceedings, which will be filed with the minutes of the proceedings of the Board. Any written consent will be effective on the date of the last signature or electronic consent, as the case may be, and will be filed with the minutes of the proceedings of the Board.

REPORTS

The Committee will summarize its findings and recommendations to the Board as may be appropriate, consistent with the Committee's charter. Such summary may take the form of an oral report by the chairperson or any other member of the Committee designated by the Committee.

COMPENSATION

Members of the Committee shall receive such compensation, if any, for their service as Committee members as may be determined by the Board in its sole discretion. Such compensation may include retainers or per meeting fees. Compensation may be paid in such form of consideration as is determined by the Board.

AUTHORITY TO RETAIN ADVISORS

Subject to Company approval, the Committee may obtain and engage advisors or consultants, including

independent counsel, to assist in fulfilling its responsibilities. Unless otherwise determined by the Board, any such advisors and consultants must be independent of the Company pursuant to applicable laws, rules and regulations, if any.

The Company shall approve the fees of any advisor or consultant and other retention terms, and shall provide appropriate funding, as determined by the Committee, for payment of reasonable compensation and any Committee administrative expenses necessary for its activities. The Committee shall be directly responsible for the appointment, compensation and oversight of the work of any advisor or consultant (including legal counsel) retained by the Committee, which shall include periodic evaluation of any such advisor or consultant's performance and independence. Nothing in this charter shall be construed to (i) require the Committee to implement or act consistently with advisor or consultant recommendations; or (ii) affect the ability or obligation of the Committee to exercise its own judgment in fulfilling its duties.

COMMITTEE CHARTER REVIEW

The Committee shall review and reassess the adequacy of this charter from time to time and shall submit any recommended changes to the charter to the Board for approval.

PERFORMANCE REVIEW

The Committee shall review and assess the performance of the Committee on a regular basis.

LIMITATIONS INHERENT IN THE COMMITTEE'S ROLE

It is recognized that members of the Committee are not full-time employees of the Company, and it is not the duty or responsibility of the Committee or its members to conduct "field work" and that each member of the Committee shall be entitled to rely on (i) the integrity of those persons and organizations within and outside the Company from which the Committee receives information and (ii) the accuracy of the financial and other information provided to the Committee, in either instance absent actual knowledge to the contrary.