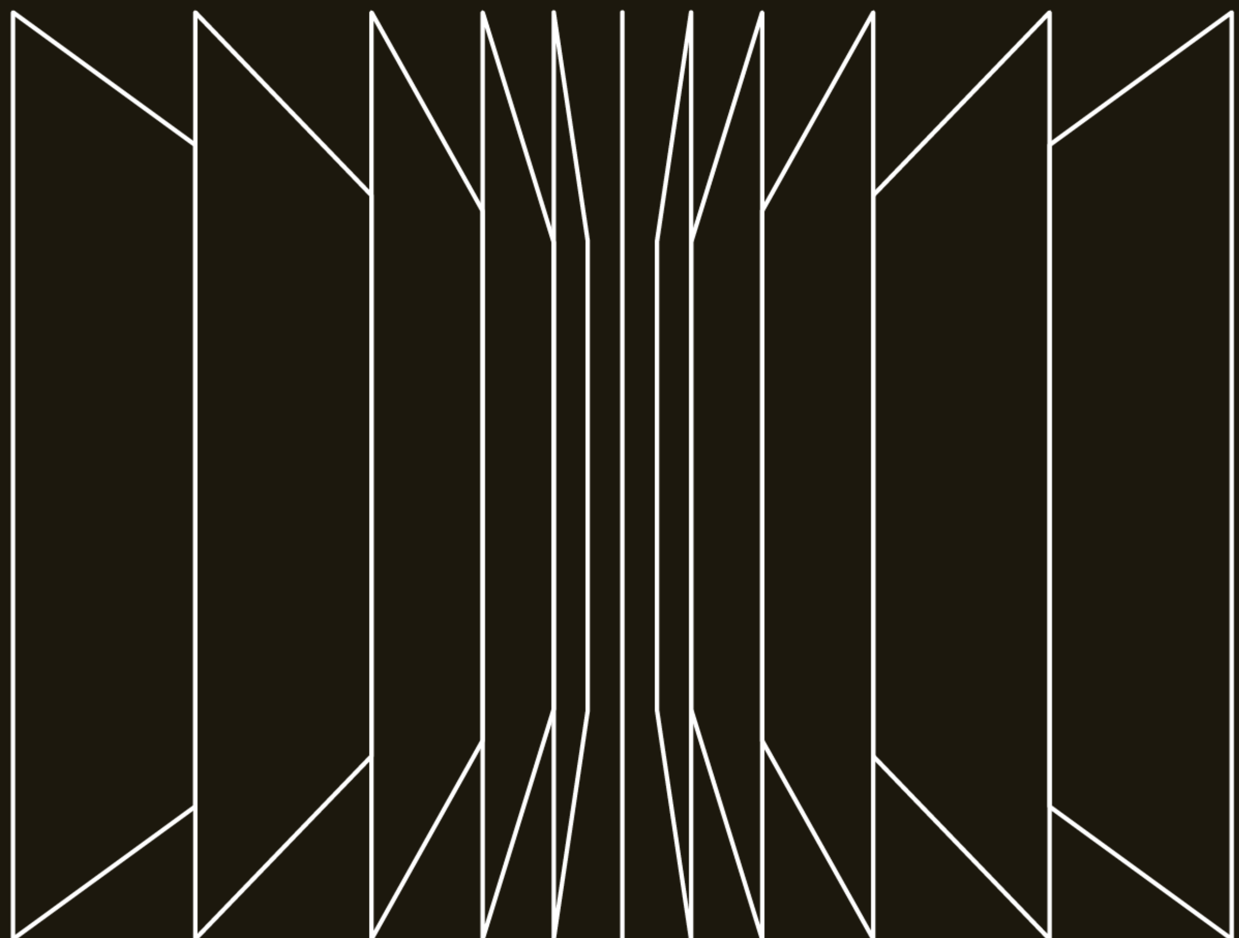
Code of Conduct



Robinhood

Our mission is to democratize finance for all.

Robinhood

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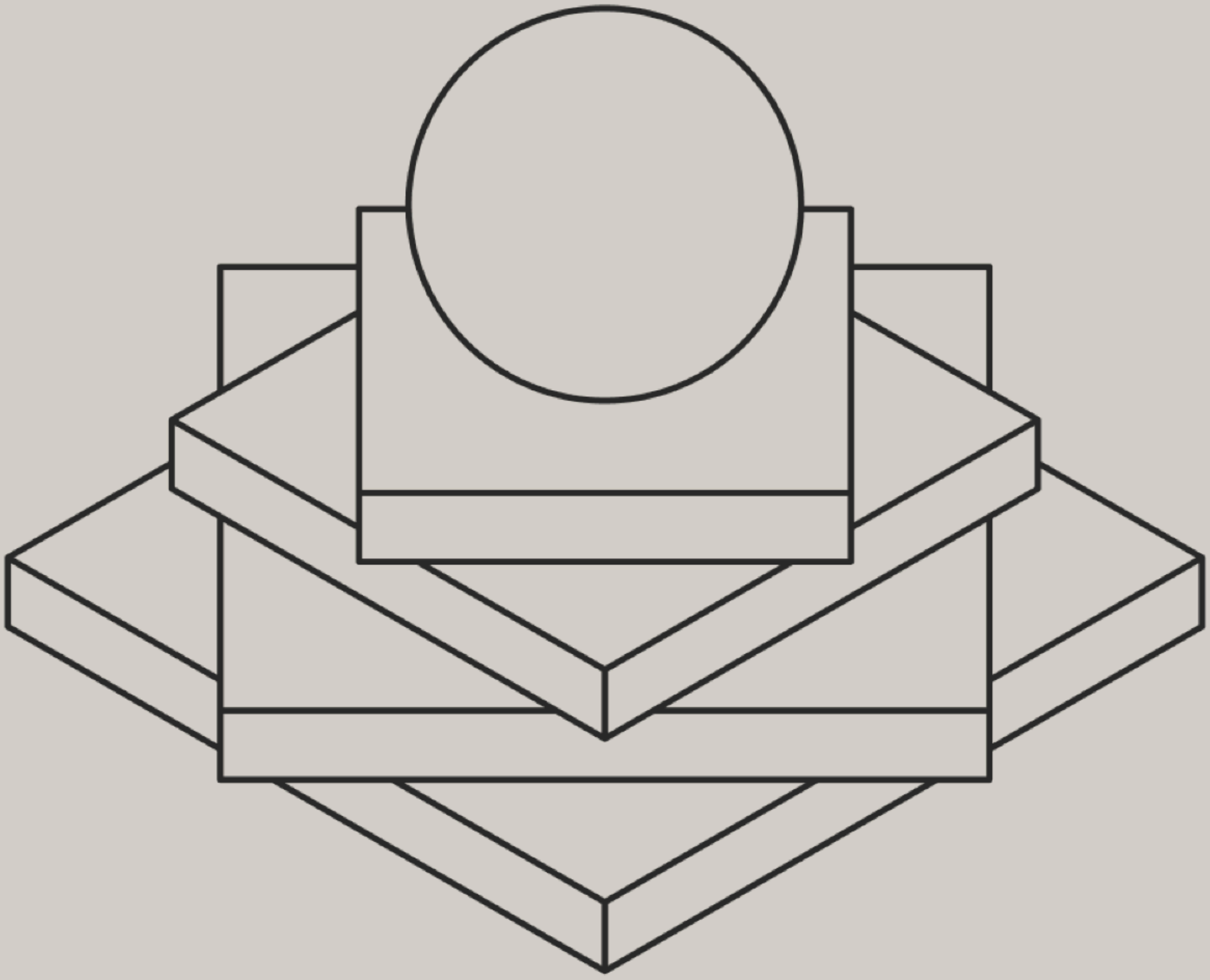


01

A Message From Our CEO

I’m excited to share with you our Code of Conduct. The Code of Conduct is core to our business and rooted in our company values.

This important document will guide you in making the right choices every day about how we treat each other, our customers, and our work. Our work contributes to customers’ long-term financial health, and with that comes deep responsibility. It is critical that customers can fully trust we’ll support them in that pursuit. It can take years to build a great reputation with customers, but it can be lost in a moment. Operating in this **Safety Always** way creates the foundation we need to innovate and build for customers.

To build and maintain customer trust, we must — as **One Robinhood** — act with honesty and integrity, even in the absence of a policy or a rule. We also welcome different perspectives, support our colleagues, and debate with conviction and respect.

Understanding our Code of Conduct is not a ‘check-the-box’ task — if both the letter and the spirit of the Code are not upheld, there are real consequences for our customers, the company, and us all. Our Code of Conduct is a resource for you in applying our values, and it provides a consistent roadmap for what’s expected. Please read and understand it thoroughly, hold one another accountable, and live these values each and every day. And as always, the ultimate goal is to use good judgment and do the right thing — **if you see something that doesn’t feel right, please say something**.

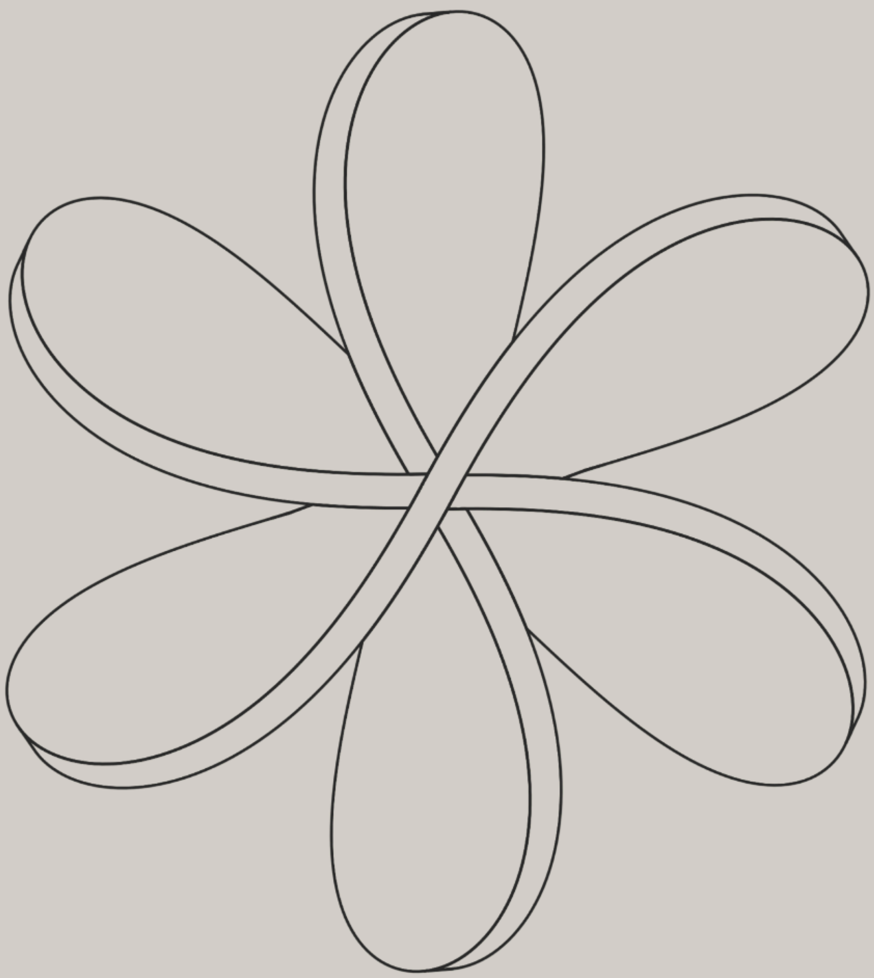
Thank you for keeping customers and one another safe.

Sincerely,

Vlad Tenev
Robinhood CEO

About Our Code Of Conduct

Our Code of Conduct (the “Code”) sets the bar for how we show up to operate at the highest level of performance. It reflects the culture we’re building at Robinhood: one that operates with extreme urgency, rewards outsized impact, and keeps ethics and compliance at the center of everything we do. Grounded in our values, the Code is a daily reminder to do the right thing — especially when it may be the tougher choice.



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About Our Code of Conduct

Our Code of Conduct

Looking after our customers' assets is both a privilege and a responsibility we take seriously. We design products and services to support our customers' interests, and put financial power in their hands. We work diligently to ensure that we adhere to applicable laws, rules, and regulations.

"Hard questions aren't a threat here — they're expected. Everyone's hands-on, and good ideas win over big egos."

GINA PASQUA-ABELES | Senior Director of Product Management

The financial system is highly regulated and imposes strict ethical standards on everyone in it. We are committed not only to meeting these standards, but also to exceeding them, making them part of our culture, how we treat one another, and how we conduct business. Our Code of Conduct and related policies set out these standards and explain how we expect everyone to uphold them.

About Our Code of Conduct

Why this is everyone's business

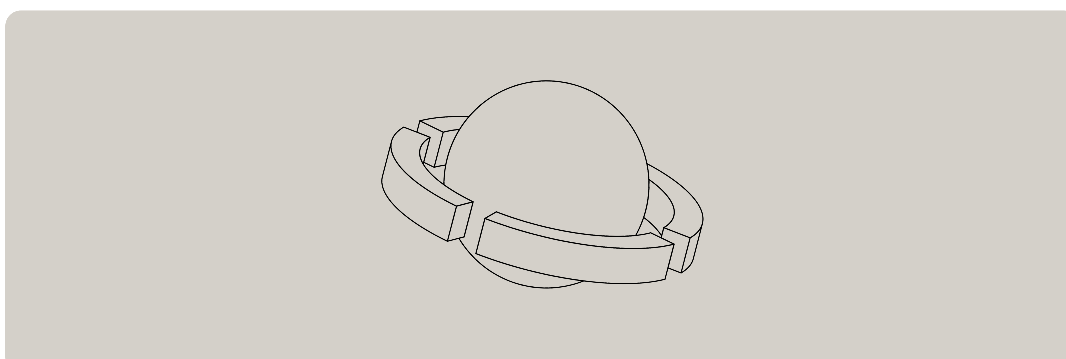
This Code of Conduct applies to every director, officer, employee, and contingent worker of Robinhood Markets, Inc. and its subsidiaries (together "Robinhood"). Adopted by the Robinhood Markets, Inc. Board of Directors (the "Board"), it sets the standards that must guide our actions.

The Code applies to conduct in the workplace as well as in work-related settings outside the office, including business travel, company-sponsored events, and interactions with colleagues, customers, or business partners.

While the Code of Conduct does not cover every situation you may face in your daily work, it should be one of your first stops when you face an unclear or difficult decision.

Violating laws, our Code, or our policies — or encouraging others to do so — could expose Robinhood to liability, put our reputation at risk, and may lead to disciplinary action, subject to applicable law. If an ethics, compliance, or regulatory concern arises, it's essential — and expected — that you report it so it can be addressed. Violations of laws or regulations may result in legal proceedings and penalties including, in some circumstances, criminal prosecution.

We require all directors, officers, employees, and contingent workers to comply with the Code regardless of their geographic location. Because of this universal standard, waivers are rarely, if ever, expected to be granted. Any waiver of this Code for a director or executive officer may be made only by the Board or a designated Board Committee, and will be publicly disclosed as required by law or applicable listing rules. Waivers for all employees or contingent workers require the prior written approval of the Chief Compliance Officer.



About Our Code of Conduct

Our Code applies to everyone at Robinhood

➔ **Our Leadership**

Our Board and Leadership Team strive to promote our culture of compliance, oversee our ethics program, and expect everyone at Robinhood to understand and adhere to the standards in this Code.

➔ **Our Managers**

Our managers support and coach their teams to perform their jobs in compliance with our policies, including the Code. It's our managers' responsibility to actively promote Robinhood's open door policy to ensure that all employees and contingent workers feel confident and comfortable speaking up about concerns or suspected violations of the Code, laws, regulations, or policies without fear of retaliation.

➔ **Our Employees and Contingent Workers**

We expect our employees and contingent workers to conduct business with integrity, exercise good judgment, treat colleagues and customers with respect, and raise concerns or violations of the Code in a timely manner.

Throughout this Code, "Robinhood," "we," and "our" refer to the company. The terms "you" and "your" refer to all directors, officers, employees, and contingent workers. Together, these terms reflect that adherence to the Code is both an individual and shared responsibility — extending to contingent workers, defined as individuals who provide services to Robinhood but are not directly employed by the company.

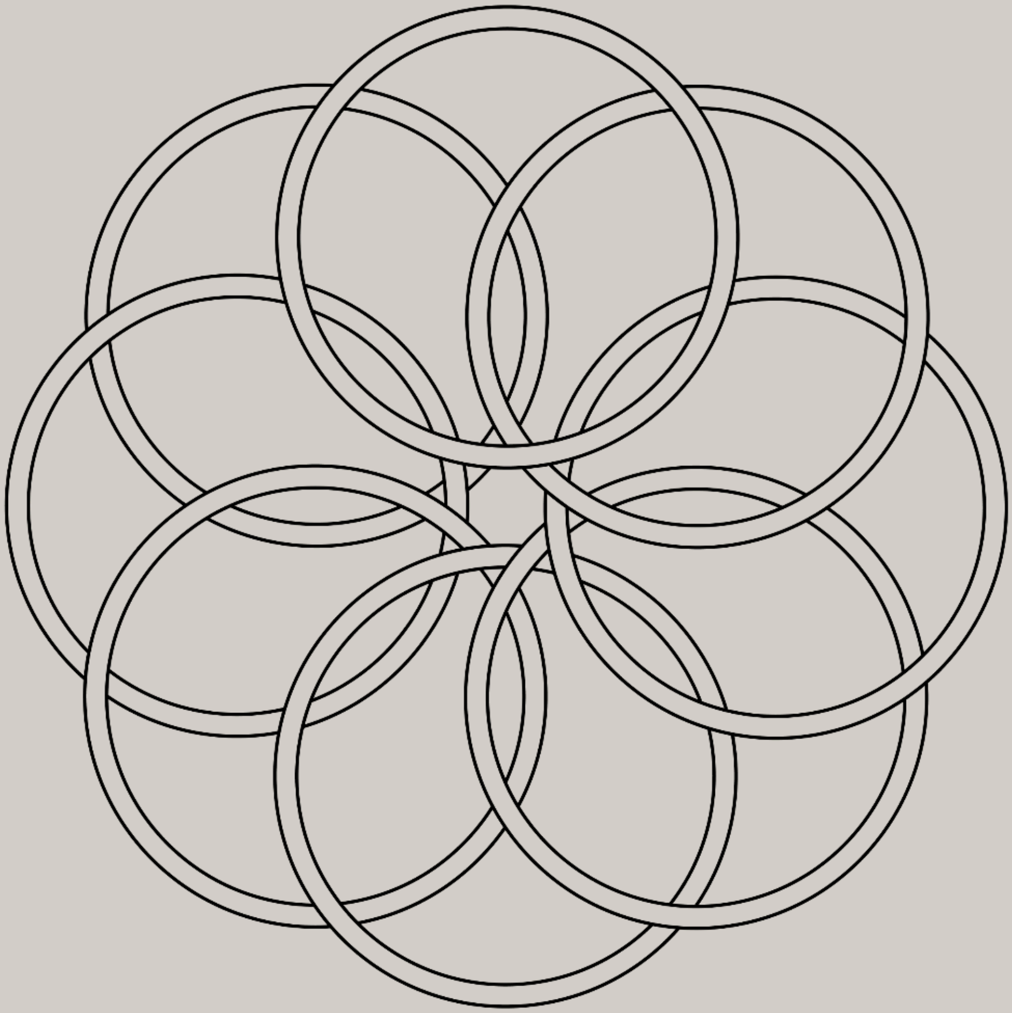
How this Code works with other policies and laws

Robinhood has various policies and procedures that complement the Code. These provide a framework that you must follow. We expect you to familiarize yourself with the policies and procedures applicable to your role, adhere to their requirements, and speak up with any questions.

If there is a conflict between this Code and any other Robinhood policy or procedure, the most restrictive requirement applies. The Code is intended to be compliant with applicable legal requirements, but we recognize that these may change. Therefore, to the extent any provisions of the Code conflict with applicable laws, the provisions of the applicable laws apply.

Our Mission & Values

Our mission to democratize finance for all drives our actions every day and shapes how we interact with each other and our stakeholders — including our customers, regulators, business partners and our community.



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Our Mission & Values

Our Mission

To democratize finance for all.

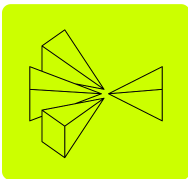
Our Vision

Our vision is to become the number one platform for active traders, number one in wallet share for the next generation, and the world's number one global financial ecosystem.

Our Values

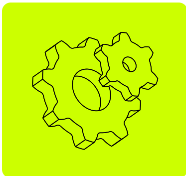
These are the most important values we live by to achieve our mission.

Insane Customer Focus



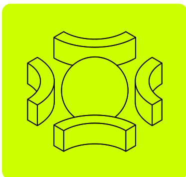
- **Our customers are why we exist.**
- We listen to them, design for their needs, and aim to make our user experience elegant and intuitive.
- We put what's best for customers at the center of decision-making, bringing them the best in technology coupled with real value.
- When there are customer pain points, we fix them quickly.

High Performance



- **We operate with extreme urgency.**
- We push for progress without compromising quality – and when something is broken, we fix it.
- We're driven by impact and pride ourselves in our ability to be nimble and quickly adjust our strategy when presented with new information.
- Friction and obstacles don't deter us from pursuing what's truly important.

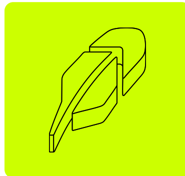
Safety Always



- **Trust is hard earned and easily lost.**
- We take our responsibility for our customers' finances seriously.
- We are compliant, approach risks thoughtfully and never compromise trust for speed.

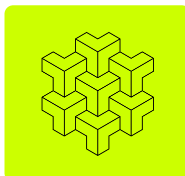
Our Mission & Values

One Robinhood



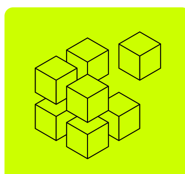
- ➔ **We're all invested in the same mission.**
- ➔ We earn each other's trust through honesty, inclusion, and respect – because finger-pointing never does the trick.
- ➔ We invite contrary perspectives, support each other, and debate with energy and kindness.
- ➔ Once decisions are made, we move in unison with ownership and accountability, powered by the thrill of building something great together.

Participation is Power



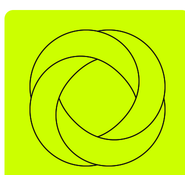
- ➔ **We level the playing field.**
- ➔ We started a movement, breaking barriers so everyone — not just the wealthy — can access the financial system.
- ➔ The elites always find a way to get nicer things, which means our job to "democratize finance for all" may never be complete — which is what makes it so fun.

First Principles Thinking



- ➔ **We only follow the crowd when they're right.**
- ➔ We're innovators and problem solvers.
- ➔ We use data, empirical truth, and experiments to inform decisions.
- ➔ Our bold bets often make us a first mover, and we do what's right for customers — even if it hasn't been done before.

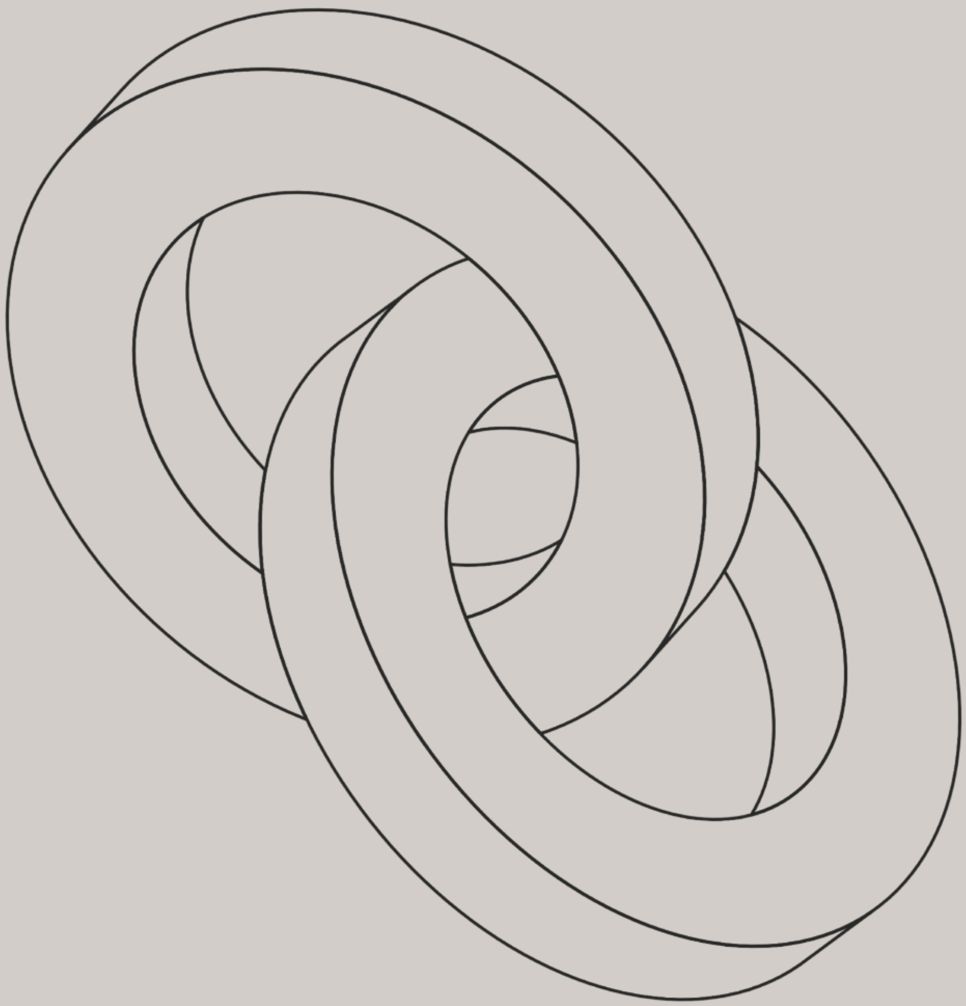
Lean & Disciplined



- ➔ **We do more with less.**
- ➔ Constraint drives us to innovate through scalable technology — not excess resources.
- ➔ We set ambitious goals, benchmark performance, and weigh trade offs before changing course.
- ➔ We respect each other's time by reducing toil and bureaucracy.
- ➔ And by keeping costs low and efficiency high, we deliver exceptional value customers can't find anywhere else.

Speaking Up Safely

When you see behaviors that are inconsistent with our mission, vision, values, Code of Conduct, or policies, we expect you to speak up. Everyone acting on behalf of Robinhood or providing services to Robinhood has a duty to report known or suspected violations of the Code or of any law, rule, regulation, or Robinhood policy. Speaking up helps Robinhood prevent unethical conduct from occurring, continuing, or escalating.



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Speaking Up Safely

Choose from the various reporting channels to seek guidance and raise concerns in a way that works best for you. Whichever method you choose, we aim to protect your confidentiality to the extent possible.

Ways to raise concerns or seek guidance

➔ **Your Manager**

Managers across Robinhood are available to discuss any ethics or compliance concerns and are required to promptly escalate any known or suspected violations of the Code, our policies, or legal requirements.

➔ **People Team**

Contact the People Team at saysomething@robinhood.com to seek guidance or raise concerns.

➔ **Ethics Office**

Contact the Ethics Office at ethics_office@robinhood.com to seek guidance or raise concerns.

➔ **Global Integrity Helpline**

If you prefer, you may report anonymously through our Global Integrity Helpline, which is available 24 hours a day, 7 days a week, supports multiple languages, and is operated by a third-party provider to help preserve anonymity where permitted by law.

You can submit a report online at speakup.robinhood.com or call 1-888-308-0166 (U.S. toll-free). If calling from outside of the U.S., click here.

Robinhood protects against retaliation

Robinhood works tirelessly to build trust with our customers and, likewise, we are determined to build that same level of protection and support for you. We prohibit retaliation against anyone for making a good faith complaint or bringing inappropriate conduct to our attention, for helping a colleague make a good faith report, or for cooperating in an investigation. Robinhood also prohibits retaliation against anyone who refuses to carry out an action that would violate this Code.

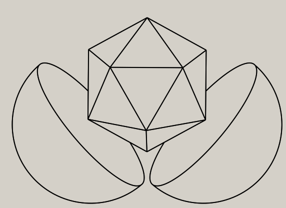
All reports will be thoroughly investigated

We are committed to taking reports seriously. Reports will be acknowledged promptly, and we aim to provide a response in a reasonable timeframe.

You must cooperate fully in internal investigations, including by providing truthful and complete information. You must not attempt to conceal any known or suspected violations of the Code, a Robinhood policy, or a legal requirement, including by interfering with someone else's report or cooperation.

Nothing in this Code or any other Robinhood policy prevents you from (a) communicating with the U.S. Securities and Exchange Commission, the U.S. Commodity Futures Trading Commission, the U.S. Financial Industry Regulatory Authority, or any other applicable regulatory or governmental agency; (b) exercising protected rights, including without limitation, as applicable, those rights granted under Section 7 of the U.S. National Labor Relations Act to engage in concerted activities for the purpose of collective bargaining or other mutual aid or protection, or otherwise disclosing information as permitted by applicable law, regulation, or order; or (c) discussing or disclosing information about unlawful acts in the workplace, such as harassment or discrimination or any other conduct that you have reason to believe is unlawful.

We do not require prior authorization to engage in activity protected by the above paragraph, and you do not need to notify us that you have engaged in such activity. We do not, through this Code, waive any applicable privileges or the right to continue to protect our privileged attorney-client information, attorney work product, and other privileged information.

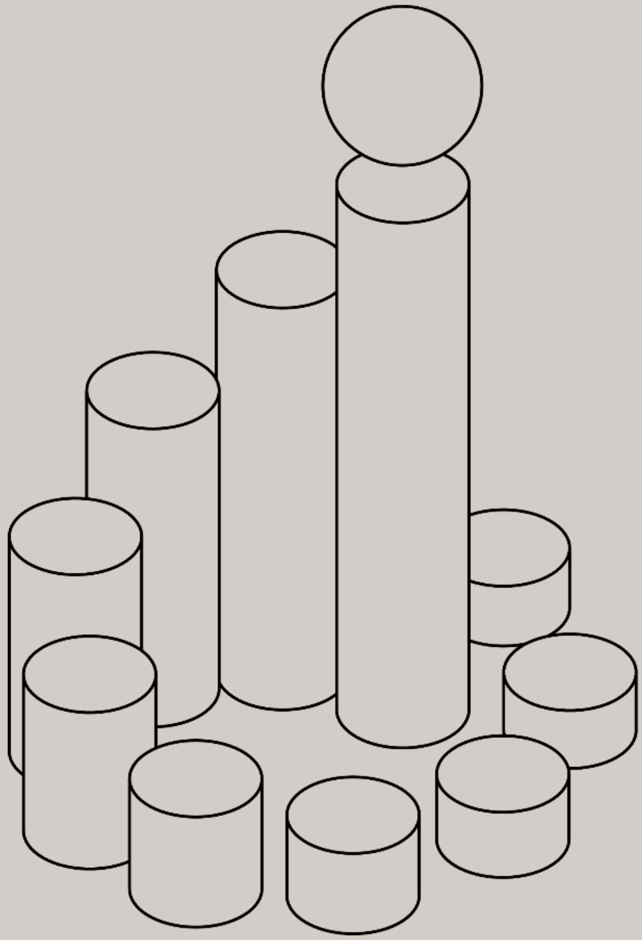


You have a voice and
are encouraged to use it.
When in doubt, reach out.

Following the Highest Ethical & Legal Standards

We hold ourselves to the highest standards — and we ask the same of you. Be honest, communicate openly, and keep your promises. You must comply with all applicable legal requirements. Beyond that, this Code may establish standards of conduct that exceed legal requirements. Failure to adhere to these standards can lead to disciplinary action, which may include termination.

The Code relies on your good judgment. When you have a question about the Code, including whether an activity is permitted, please ask. You may contact your local Compliance Team or use any of the avenues in the Speaking Up Safely section of the Code.



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Following the Highest Ethical & Legal Standards

Protecting market integrity and avoiding fraudulent behavior

We are committed to ethical practices in the financial marketplace and prohibit any activity that violates applicable laws, regulations, rules, policies, or procedures. We also prohibit misleading, fraudulent, or unethical behavior, and strive to do our part to protect the integrity of the financial markets.

Keeping accurate records

The accuracy and completeness of our business and accounting records are essential to our operations and legal compliance. Robinhood prohibits falsifying or altering company records of any kind. You must be accurate in everything you do, including when recording and reporting information, and strive to maintain such records in accordance with legal requirements. You must document transactions in a timely manner. Agreements with customers, suppliers, business partners, and other third parties must be transparent and documented in written agreements, accurately reflect the terms and date of the arrangement, and not include “side deals” or other off-the-books arrangements.

Following these practices helps support responsible business decisions and compliance with legal requirements. You must also retain, preserve, and dispose of company records in accordance with applicable record-retention requirements, and you must comply with all legal hold obligations (i.e., in the event of a regulatory investigation or litigation).

Using artificial intelligence responsibly

Robinhood is committed to the ethical, transparent, and responsible use of artificial intelligence (“AI”) to enhance Robinhood products, services, and your experience while safeguarding customer trust. We prioritize safety, accuracy, transparency, fairness, and accountability in AI-driven decisions, seeking to ensure compliance with applicable legal and regulatory requirements and protecting the privacy, security, and rights of our customers.

To support the responsible use of AI, and in accordance with the company’s AI and technology use policies, you must use only company-approved AI tools, systems, and accounts for work-related purposes. Records created or impacted by AI must comply with applicable regulatory and company requirements, and you must handle customer and workforce data securely. Improper or unapproved use of AI tools is prohibited and may introduce significant legal, regulatory, or operational risk.

Selecting reputable business partners

Robinhood is committed to working with business partners that share our values and commitment to ethical conduct. We require risk-based due diligence on our business partners before engagement and periodically monitor their activity after onboarding. Do not direct, authorize, or ignore improper or unethical behavior by a business partner.

Following the Highest Ethical & Legal Standards

Abiding by our tax obligations

We work diligently toward our commitment to satisfy the tax obligations of each jurisdiction where we conduct business.

Promoting fair competition and trade

To fulfill our mission to democratize finance for all, we promote fair competition and trade practice. We must deal fairly with our customers, suppliers, partners, service providers, competitors, employees, and anyone else with whom we have contact in the course of performing our jobs. We may not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts, or any other related practice.

We require compliance with antitrust and other trade regulation laws to prohibit agreements or actions that eliminate or discourage competition, establish or create the intention of a monopoly, artificially maintain prices, or otherwise illegally impact commerce.

Anyone making decisions for the company should be aware that antitrust and competition legal requirements can apply to almost all aspects of Robinhood's activities: marketing, procurement, contracting, selling, mergers and acquisitions, and human resources, to name a few. Certain conduct or transactions are more likely to raise antitrust implications including, but not limited to the following examples:

- ➔ Agreements with competitors to fix or control prices;
- ➔ Bid rigging;
- ➔ Boycotts of certain suppliers or competitors;
- ➔ Coordinating with competitors to divide up customers and/or geographic areas;
- ➔ Agreements to limit production or sale of products;
- ➔ Tying arrangements;
- ➔ Exclusive dealing contracts or arrangements;
- ➔ Agreements not to poach employees or to fix wages and/or benefits; and
- ➔ Restrictive agreements with suppliers and customers.

You must seek guidance from your local Legal Team any time you are dealing with competitors on commercially sensitive topics or considering any arrangement that may raise antitrust concerns.

Following the Highest Ethical & Legal Standards

Combating money laundering

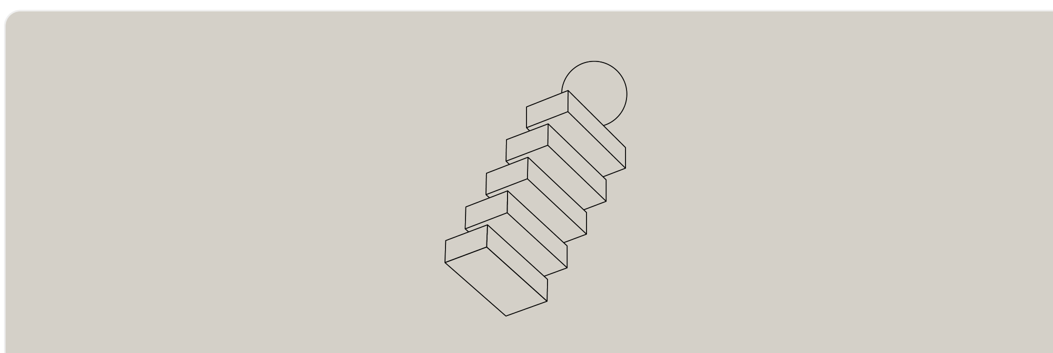
Robinhood is committed to complying with all applicable anti-money laundering and counter-terrorism legal requirements and we will only accept funds received from legitimate sources. To this end, we perform various activities, including conducting due diligence on potential new and existing customers, monitoring customer activity, and reporting suspicious activities to appropriate authorities.

Avoiding bribery and corruption

At Robinhood, we strictly prohibit bribery and corruption in all forms. We prohibit seeking any improper advantage in business dealings and are committed to avoiding even the appearance of impropriety when dealing with government officials, competitors, customers, suppliers, business partners, and other third parties. You must comply with the applicable provisions of the U.S. Foreign Corrupt Practices Act and all other applicable anti-corruption, anti-bribery, and anti-kickback laws.

Robinhood prohibits improper payments and benefits. Specifically, you may not offer, promise, provide, or authorize giving anything of value, directly or indirectly, to anyone in exchange for an improper business advantage. Similarly, you may not request or accept anything of value in exchange for improperly obtaining or maintaining a business relationship or granting a business advantage.

You may not use your own funds to engage in any activity that is otherwise directly prohibited by this Code, nor may you make, authorize, or condone improper payments through anyone else, including family members, customers, suppliers, business partners, or other third parties.



Abiding by economic sanctions and other international trade controls

We prohibit conducting unauthorized business with sanctioned parties. Robinhood has implemented measures designed to comply with economic sanctions overseen by the U.S. Department of the Treasury's Office of Foreign Assets Control and other similar bodies.

If your work involves exports, imports, or technology transfers, you must be aware that, in certain instances, governmental licenses or approvals may be required for the cross-national transmission of goods, services, software, and technical data, and sometimes even for oral or written disclosure to a foreign person within the same country. In addition, stay alert to prohibitions on activities associated with embargoed locations, persons, entities, and governments.

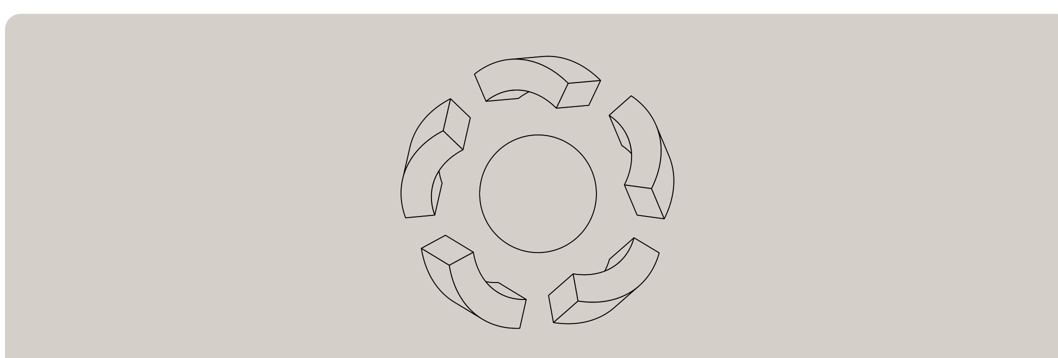
Robinhood is also committed to complying with applicable anti-boycott laws and not participating in or supporting unsanctioned or unlawful foreign boycotts. You must not agree to, facilitate, or respond to requests, whether from customers, suppliers, business partners, or others, that could violate anti-boycott or trade laws, and you must promptly report any such request to your local Compliance or Legal Team.

Avoiding insider trading

The United States and other countries have laws that prohibit buying or selling securities based on material non-public information about a company. Insider trading laws also prohibit relaying material non-public information to others to enable them to trade on it. Material non-public information is information about a company that has not been broadly disseminated or made widely available to the public and that a reasonable person would consider important in making investment decisions.

Examples of material information may include, but are not limited to, information about significant contracts or proposed contracts with customers or suppliers, proposed acquisitions or divestitures, cybersecurity events, financial results, or new product lines.

You must never use material non-public information to trade in securities, cryptocurrency assets, or derivatives (including, but not limited to, event contracts, which are commonly called "prediction markets") or otherwise use or share such information for personal gain, during or after your association with the company.



Following the Highest Ethical & Legal Standards

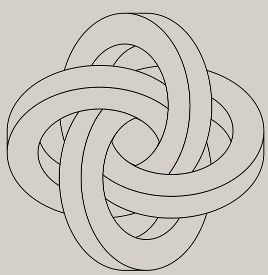
Being honest and transparent in public statements

Our reputation depends on what we say publicly being true. Public statements, disclosures, and communications with regulators and government entities must be complete, fair, accurate, timely, and understandable. This obligation applies to anyone involved with such communications, including, but not limited to, compiling data, drafting, reviewing, signing, certifying, or releasing the information.

If you contribute in any way to the preparation or verification of Robinhood's financial statements and other financial information, you must ensure Robinhood's books, records, and accounts are accurately maintained. You must cooperate fully with Robinhood’s accounting and internal audit departments, as well as Robinhood's independent public accountants and counsel. If you are involved in Robinhood’s disclosure process, you must comply with Robinhood’s disclosure controls and procedures and its internal controls over financial reporting.

Cooperating in good faith with government or regulatory inquiries

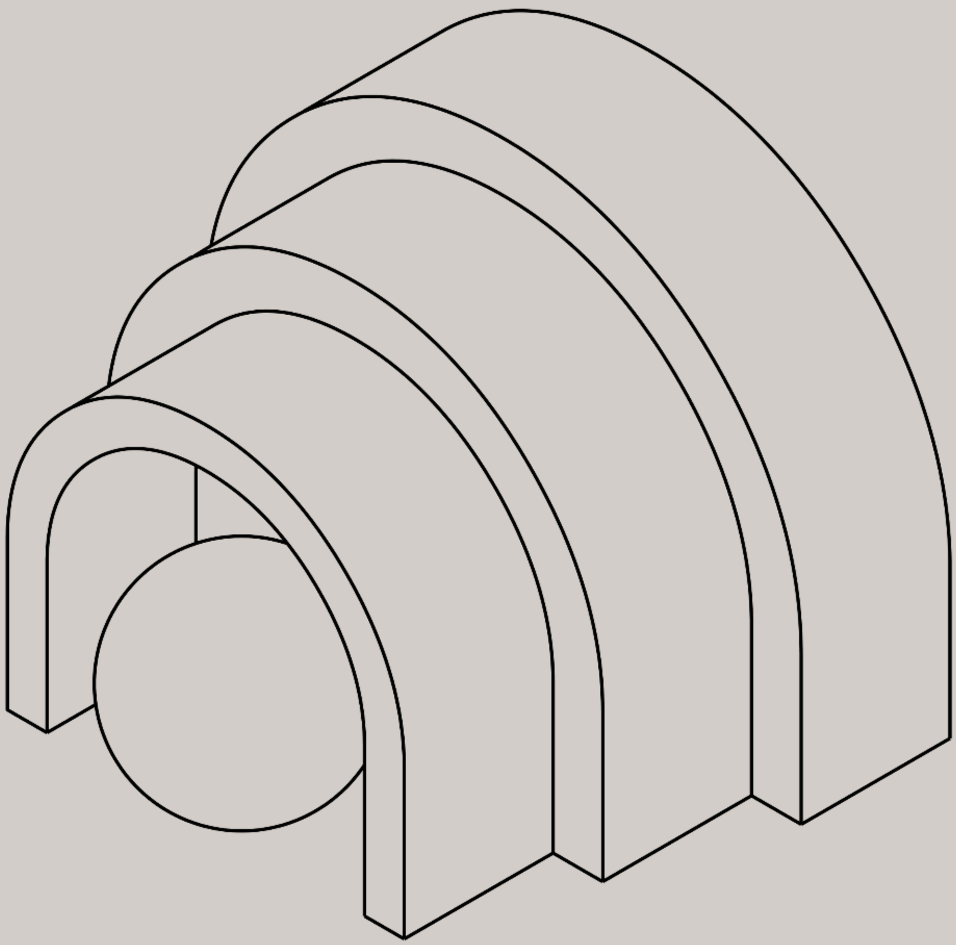
From time to time, we may be contacted by, or receive requests from government or regulatory agencies. Robinhood is committed to cooperating in good faith with government and regulatory requests and investigations. You must not destroy or alter documents relevant to an inquiry, provide false or misleading information, or otherwise obstruct a government or regulatory agency examination or investigation. You must immediately notify your manager and your local Compliance or Legal Team if you are contacted by or receive a request from a government or regulatory agency related to Robinhood.



Building and sustaining a culture of integrity is a shared responsibility.

Committing to Our People

Robinhood has been widely recognized as a workplace where people feel safe, respect is genuine, and different perspectives are valued. As a global company, we are committed to respecting different backgrounds, cultures, and lived experiences across all the regions where we operate. We value and want to preserve this important part of our culture.



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Committing to Our People

Providing equal opportunity and a respectful workplace

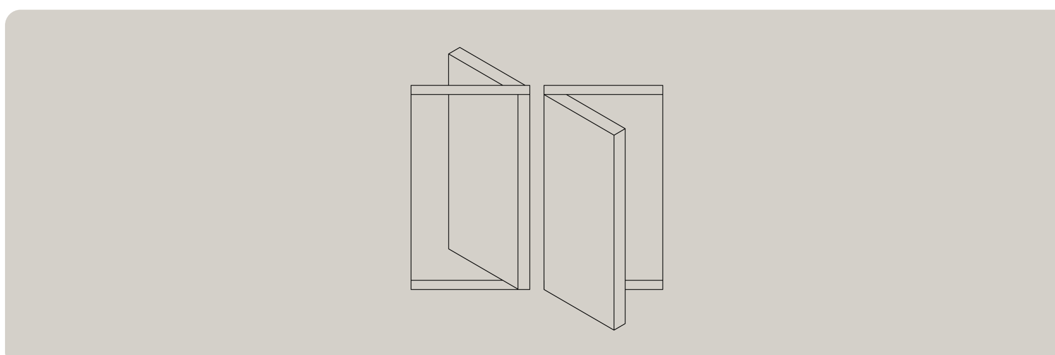
Robinhood is committed to providing equal opportunity for all applicants and employees and to maintaining a work environment free from discrimination, harassment, bullying, or retaliation. This commitment applies to all employees, anyone doing business with or for Robinhood, and anyone providing services to Robinhood under a contract.

We are dedicated to fostering an environment where people are treated with respect and where individuals of all backgrounds feel safe. Discrimination, harassment, bullying, retaliation, or bias of any kind based on any protected characteristic or other attribute protected by applicable legal requirements is unacceptable.

We can achieve a safe workplace through active participation and support. You are responsible for protecting and promoting a respectful work environment — through your own conduct and by raising concerns about potential Code violations promptly.

Managing solicitation and distribution

To maintain a respectful and productive workplace, you must avoid solicitation or distribution activities that disrupt work, interfere with business operations, or create pressure or discomfort for others. Any solicitation or distribution must be conducted responsibly and in accordance with applicable laws, local policies, and workplace guidelines.



Committing to Our People

Safeguarding our shared workplace

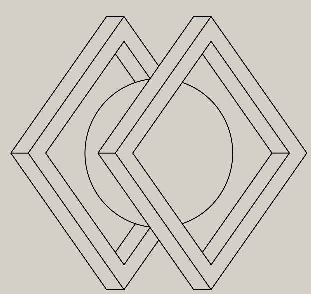
We are committed to maintaining a safe and healthy workplace for everyone and to complying with applicable workplace health and safety laws. Each of us has a role in acting responsibly, following safety guidance, and helping keep our shared spaces safe.

To accomplish this, we work diligently to support positive and secure communal spaces for all our people, including enforcing strict access requirements to our buildings and systems. You must not share your login credentials or access badge with others, and you should never allow anyone to enter Robinhood premises without properly badging in. If you observe unsafe or hazardous conditions, or feel unsafe at work, you should speak up so the issue can be addressed.

➔ Robinhood is committed to protecting you and our workspaces from workplace violence. If there is ever a situation where you feel unsafe emotionally or physically, please speak up.

➔ Robinhood strictly prohibits the use or possession of illegal drugs and other controlled substances (e.g., alcohol and marijuana in some locations) that could compromise performance or endanger others while on company premises or performing company business. Firearms and weapons are not permitted in any Robinhood location (except where local law permits firearms stored in locked vehicles in parking areas). Moderate consumption of alcohol is permitted during company-sponsored events.

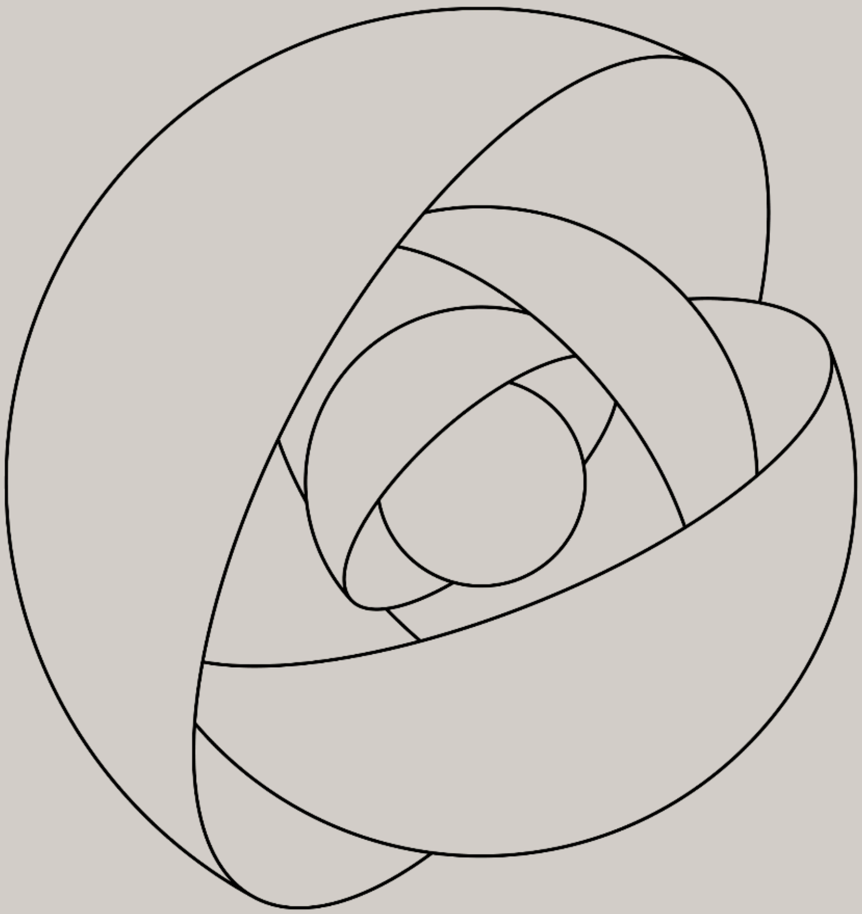
➔ We must protect our property. Stealing, misusing, removing, or destroying company property, or the property of another on company premises, is prohibited. Company assets, including Robinhood laptops, phones, systems, and other equipment, must only be used for Robinhood-related work.



Maintaining Confidentiality at Work

Robinhood strives to safeguard the confidential information it collects, uses, processes, creates, and discloses in connection with its business. Confidential information includes all non-public information received or created by Robinhood, including material non-public information, proprietary information and personal information.

Robinhood protects its intellectual property and innovation, including company-owned inventions, software, data, trade secrets, brands, and other proprietary or non-public information. You must safeguard these assets and promptly report any suspected misuse. You must also respect the intellectual property rights of others, during and after your employment or engagement with Robinhood.



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Maintaining Confidentiality at Work

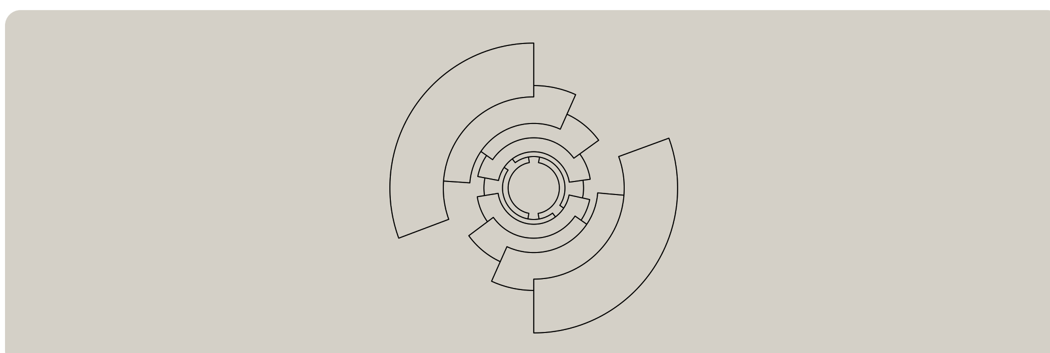
Safeguarding our confidential information

Your duty to protect confidential information includes being careful about who you share it with. Access to confidential information should be limited to those with appropriate authorizations, and information should only be shared, even internally, with those who have a valid business reason for receiving it. Confidential information should not be shared outside Robinhood unless approved. The loss, misuse, or unauthorized disclosure of confidential information may cause significant harm to Robinhood, its customers, and its business partners.

Before sharing information that may be confidential, ask yourself:

- Does the intended recipient legitimately need to know this information?
- Is the intended recipient authorized to access, view, use, or otherwise process this information?
- Is this information valuable to the business because it is non-public, sensitive, or legally privileged?
- Can this information negatively impact a customer or Robinhood or weaken a customer's security or business standing if known by others?

When you are uncertain about whether information is confidential, assume it is and do not share it outside of Robinhood. And remember, protecting information includes not disclosing it to your family and friends. Ask your manager or visit go/security-help for guidance.



Maintaining Confidentiality at Work

Respecting individual privacy

Robinhood is subject to various privacy laws in the jurisdictions in which it operates. The definition of “personal information” can vary widely, but generally includes information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual. Examples of personal information include an individual’s name, mailing address, account username and password, government issued identifier, payment card number, credit history, internet browsing history, geolocation data, IP address, or other online identifier (such as a device ID).

Respecting individual privacy and protecting the personal information that we collect, use, disclose, and otherwise process in connection with our business is an important element of how we continue to grow and succeed. We have established a privacy program to help you understand how we should be processing and protecting personal information, including that of our customers. Regardless of region, country, or state of residency, we aim to protect the personal information we have in our care.

You are required to comply with applicable data protection laws and Robinhood’s privacy policies. Keep personal information secure and report incidents involving the potential misuse of personal information.

Keeping our competitive edge

Innovation is in our DNA and part of our commitment to First Principles Thinking. Protecting intellectual property and keeping our trade secrets secure is essential to maintaining our competitive edge. Intellectual property includes, but is not limited to, inventions, software, source code, object code, algorithms, models, designs, documentation, data, databases, content, trademarks, service marks, logos, trade secrets, know-how processes, methods, and any other proprietary or non-public information or materials developed, used, or maintained by or on behalf of Robinhood.

You are expected to protect Robinhood’s intellectual property, use it only for legitimate business purposes, and never exploit or disclose it for personal gain or in any way that competes with or harms Robinhood.

> “We’re not dragging outdated legacy systems into the future — we’re built on a modern stack, using the best technology.”
>
> **TAM BAIN** | Senior Staff Software Engineer

Maintaining Confidentiality at Work

Securing our secrets

Be mindful of how you store and view confidential information. Think of this information as anything that would be valuable to a competitor. Use screen protectors when working in public. Lock your computer when you leave your desk. Secure any confidential papers or information when you are away from your work area. Dispose of confidential papers in the specially marked shredding bins or personally shred them when working remotely.

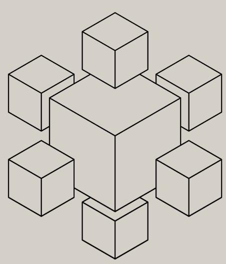
Being smart with social media

Unless authorized by Robinhood, your online posts must not suggest that you are speaking on behalf of the company. Your posts must also follow company policies and avoid naming customers or suppliers, or unlawfully using company logos, trademarks, or other intellectual property. To the extent permitted by applicable law, you must not post any content that is vulgar, obscene, threatening, intimidating, or that would violate Robinhood's workplace policies against discrimination or harassment.

Nothing in this section is intended to restrict lawful off-duty conduct or personal expression unrelated to Robinhood, except where such conduct creates a legitimate business or workplace concern.

Cybersecurity

As a financial services and technology company, cybersecurity vigilance is essential. While the company has implemented policies, procedures, and systems designed to reduce security risks, you are our first line of defense. If you see something unusual, don't ignore it. Contact [go/security-help]() or [phishing@robinhood.com]() immediately for guidance.



Robinhood has been entrusted with sensitive information of others. Protect it like it's yours.

Maintaining Confidentiality at Work

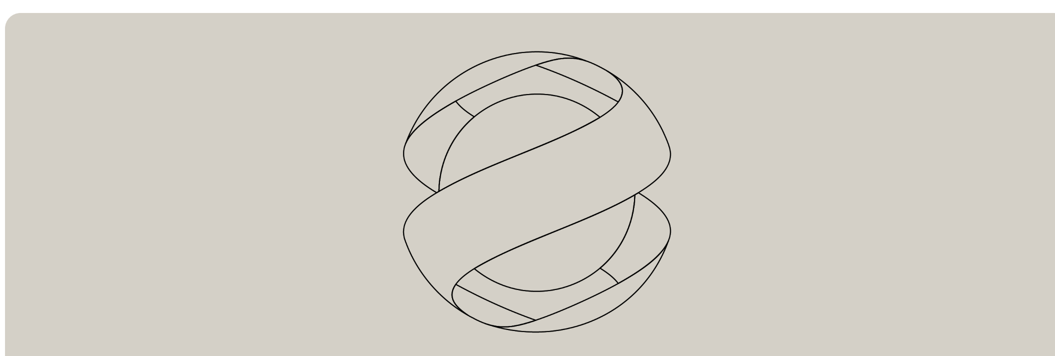
Protecting our information

We must be alert to people who appear to take an interest in our company, but may not have our interests at heart. Know who you're talking to, and think carefully about what you share. All media requests relating to Robinhood business must be approved or handled by the Communications Team (comms@robinhood.com). If you are contacted by a reporter, whether in person or through any communication channel (including email or social media), refrain from comment and refer the reporter to press@robinhood.com. If you are contacted by someone asking you to be an advisor or consultant on any subject related to Robinhood's business (or the industry or market in general), you should treat this as a request from the media and refrain from any engagement.

If you are contacted by, or receive a request from, a government entity, regulator, or other third party directed to Robinhood — including legal or regulatory proceedings — promptly refer it to your local Compliance or Legal Team. You must obtain approval before providing any responsive information.

Nothing in this Code or any other Robinhood policy prevents you from (a) communicating with the U.S. Securities and Exchange Commission, the U.S. Commodity Futures Trading Commission, the U.S. Financial Industry Regulatory Authority, or any other applicable regulatory or governmental agency; (b) exercising protected rights, including without limitation, as applicable, those rights granted under Section 7 of the U.S. National Labor Relations Act to engage in concerted activities for the purpose of collective bargaining or other mutual aid or protection, or otherwise disclosing information as permitted by applicable law, regulation, or order; or (c) discussing or disclosing information about unlawful acts in the workplace, such as harassment or discrimination or any other conduct that you have reason to believe is unlawful.

Robinhood does not require you to receive prior authorization to engage in activity protected by the above paragraph, and you do not need to notify Robinhood that you have engaged in such activity. Robinhood does not, through this Code, waive any applicable privileges or the right to continue to protect its privileged attorney-client information, attorney work product, and other privileged information.



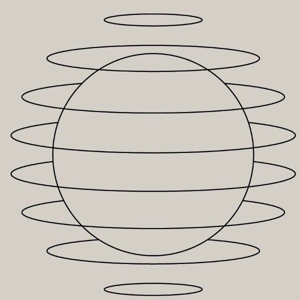
Respecting third-party intellectual property

Robinhood is committed to respecting the intellectual property rights of others. You must not improperly use, disclose, or incorporate intellectual property belonging to customers, business partners, competitors, vendors, prior employers, or any other third parties.

You must use third-party intellectual property only as licensed or authorized, and in accordance with applicable agreements and policies. You also must not bring or use confidential or proprietary information from a prior employer or third party without authorization. If you are unsure whether materials may be used, copied, modified, or incorporated into Robinhood products or services, consult IP Legal before proceeding.

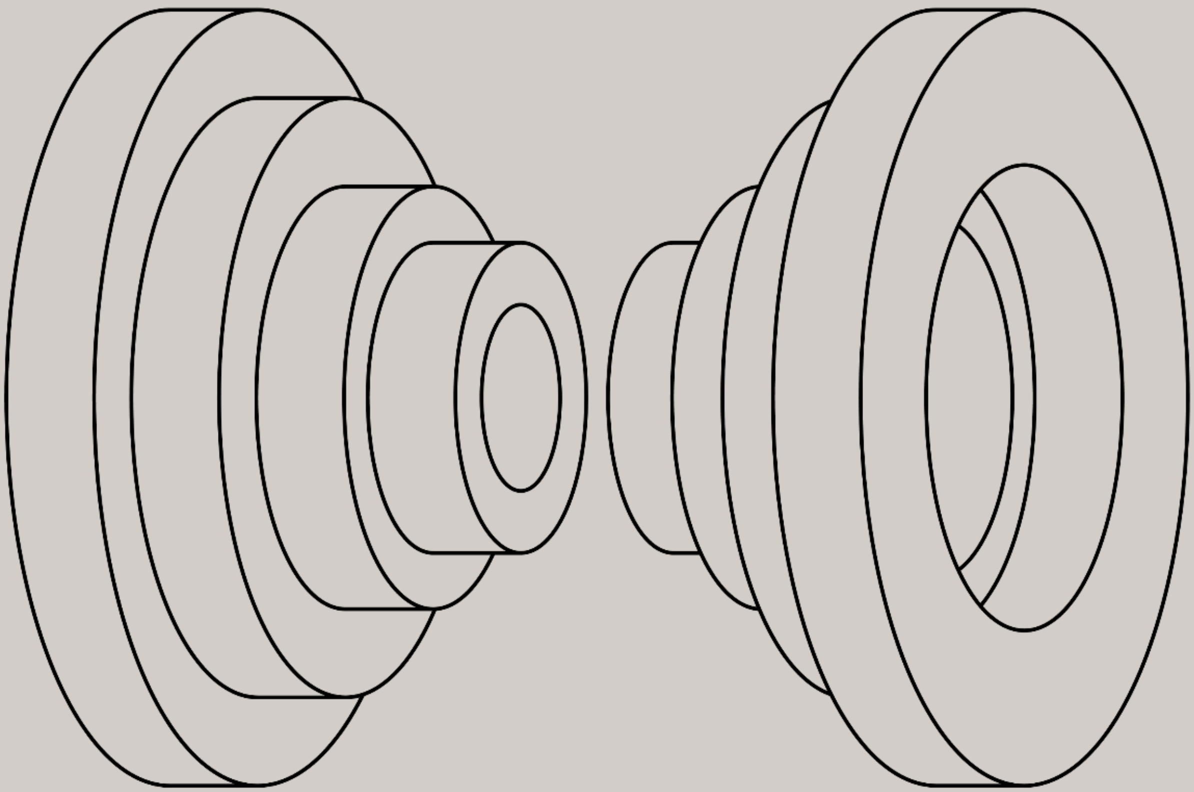
Your duty to protect Robinhood's confidential information and intellectual property continues after your employment or engagement with Robinhood ends.

Suspected theft, misuse, unauthorized disclosure, or infringement of intellectual property must be reported promptly to IP Legal or through the reporting channels described in the Speaking Up Safely section in this Code.



Avoiding Conflicts of Interest

Conflicts of interest can occur in numerous scenarios. You are expected to place Robinhood's and its customers' interests above your own in business matters. A conflict of interest – or even the appearance of one – can occur whenever you have a competing interest that could interfere with your ability to make an objective decision on behalf of Robinhood.



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Avoiding Conflicts of Interest

You are expected to use good judgment and avoid any action, position, or interest that conflicts with the interests of Robinhood or gives the appearance of a conflict. Conflicts of interest can undermine the trust others place in us. You must immediately disclose any transactions, relationships, or activities that may constitute an actual or perceived conflict of interest as described below, and you must not engage in them without approval.

Disclosing outside business activities and interests

You may at times wish to have additional jobs or activities outside of your work at Robinhood. These jobs or activities may be paid or unpaid, including volunteer work or service on a private or public advisory board. Such activities are allowed provided they do not conflict with your responsibilities to Robinhood or create an actual or perceived conflict of interest. Serving as a consultant or advisor or developing any products or services raises concerns if there is a perception that you could leverage specific knowledge about Robinhood's business or general knowledge of the financial markets. If you wish to engage in such activities, you must disclose them via MyComplianceOffice, and where required, obtain prior approval, before beginning such activities.

Conflicts of interest may also arise from significant financial or ownership interests held by you, directly or indirectly, in a Robinhood business partner, supplier, institutional customer, or potential competitor, or where your immediate family member engages in external activities or holds interests that may pose a conflict. In such cases, you must seek guidance or approval from the Ethics Office or your local Compliance Team so that appropriate mitigation measures can be evaluated.

Providing notice of personal relationships

If you start a personal relationship with someone in your reporting line or with an employee of a competitor or supplier, a conflict of interest may exist. This also applies if you have a personal relationship that could cause a perceived conflict of interest or favoritism. In either situation, you must contact the People Team or the Ethics Office and disclose the relationship in writing.

Avoiding personal advantage of business opportunities

You owe a duty to the company to advance its interests when business opportunities arise. You must not take personal advantage of business opportunities that the company could reasonably pursue. You must not take for yourself (or for the benefit of your family members or other close personal relationships) opportunities discovered through the use of Robinhood property, information, or position. Even opportunities acquired through independent sources may raise concerns if they are related to Robinhood's existing or proposed lines of business. Significant participation in an investment or outside business activity must be pre-approved via MyComplianceOffice by the Ethics Office or local Compliance Team.

Avoiding Conflicts of Interest

Using good judgment around gifts and entertainment

Gifts and entertainment must never be offered or accepted with the intention to influence business decisions. Modest gifts as well as reasonable meals and entertainment may be appropriate in connection with business discussions. However, these exchanges may create a conflict of interest or violate anti-corruption laws if not handled carefully.

Occasional business gifts and entertainment may generally be provided only if they are:

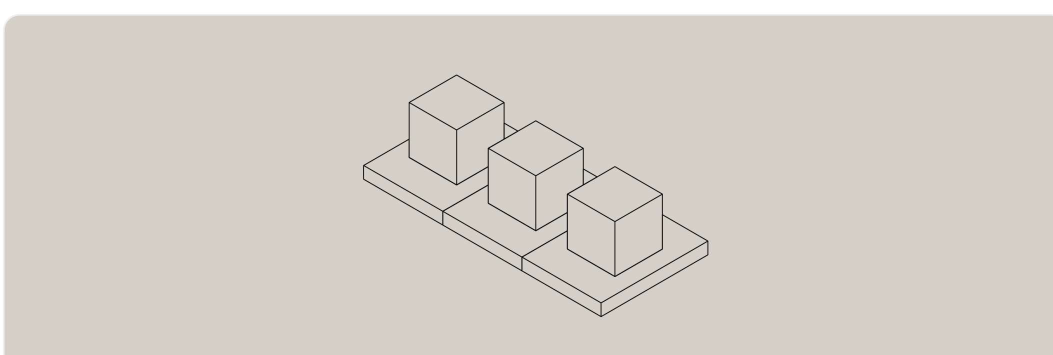
- ➔ Offered in connection with legitimate business activities (such as the promotion or demonstration of Robinhood's products or services, the execution or performance of a contract, or other sound business justification);
- ➔ Given openly and transparently;
- ➔ Reasonable in value and frequency; and
- ➔ Permitted under local law.

A few things to keep in mind when offering or accepting business gifts or entertainment:

- ➔ Do not give or accept any gift or entertainment that may amount to a personal benefit or conflict with your duties to Robinhood or its customers.
- ➔ Giving or receiving cash or cash equivalents, such as gift cards or gift certificates, in any amount is prohibited unless otherwise approved by the Ethics Office or your local Compliance Team.
- ➔ Do not give or accept gifts or entertainment during active negotiations related to a contract, transaction, or other business decision.

Gifts and entertainment must comply with company policy, including applicable limits and reporting requirements in MyComplianceOffice. Government officials require extra care — before offering or providing anything of value to a government official, you must obtain prior approval through MyComplianceOffice.

Conflicts of interest may be actual, potential, or even just a matter of perception. Since these situations are not always clear-cut, disclose them to the Ethics Office or your local Compliance Team so they can help evaluate and manage them.



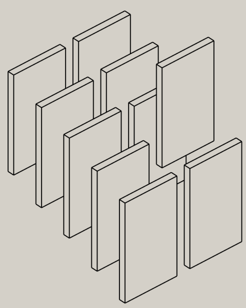
Avoiding Conflicts of Interest

Taking a Safety Always mindset towards political involvement

Robinhood encourages and respects your right to engage in personal political activity. Your participation in any political activities is voluntary and must be on your own behalf, on your own time, and at your own expense. You are responsible for ensuring your actions comply with all applicable laws.

You may not, in a personal or professional capacity:

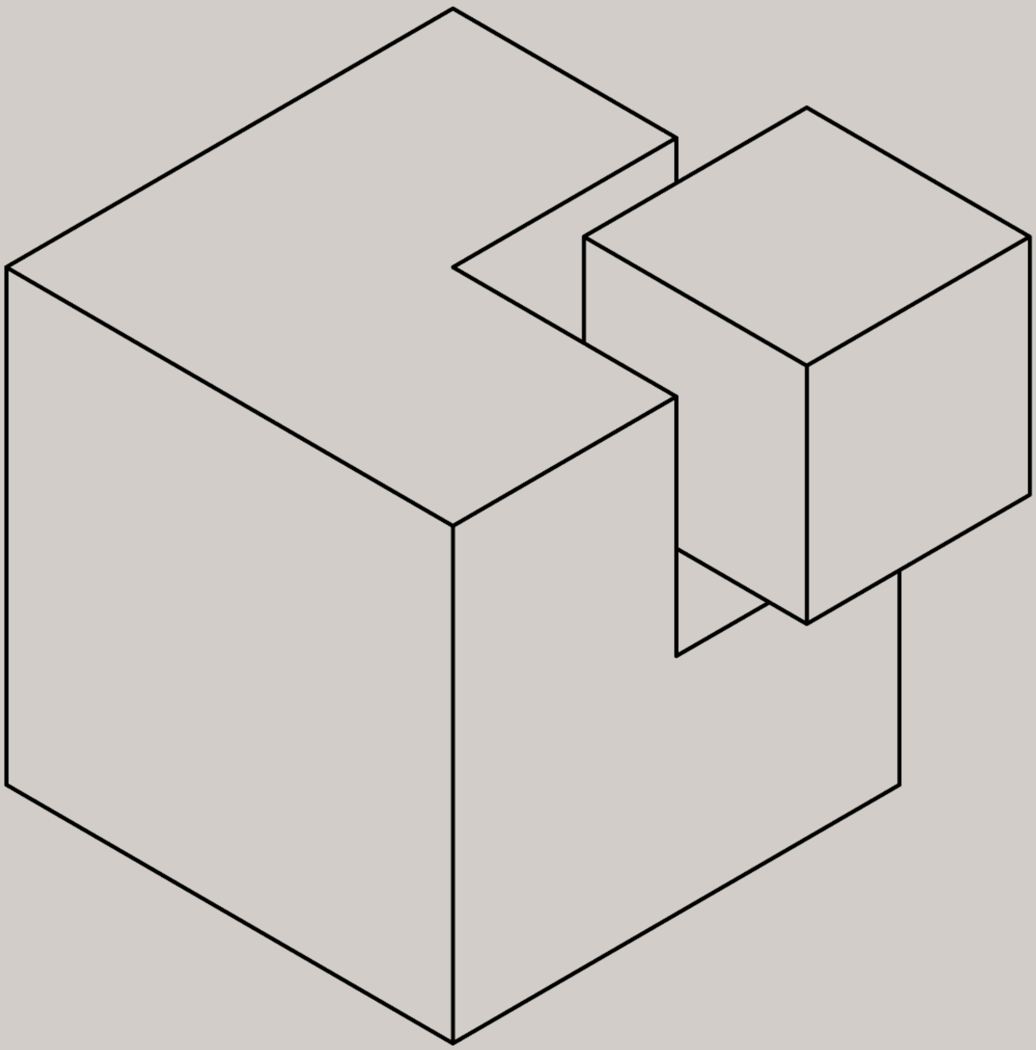
- ➔ Provide political contributions in anticipation of, in recognition of, or in return for an official act, to improperly obtain or retain business, or to improperly gain a financial or other advantage for Robinhood.
- ➔ Use company funds or resources for political activities unless pre-approved by Robinhood's General Counsel or to administer Robinhood's U.S. Political Action Committee.
- ➔ Pressure others to make political contributions to, or to support or oppose, any political activities or to engage in political activities. If someone declines a solicitation to make a political contribution, you may not engage in any retaliatory behavior toward that person for not contributing.



You are expected to exercise good judgment and promptly disclose any actual or potential conflicts of interest.

Contributing to Society

In line with our mission, Robinhood works to break down barriers that prevent millions of investors of all backgrounds from participating in financial markets. Supported by our Participation is Power value, we drive meaningful community engagement to advance financial education aligned with our business. Information about these programs is available on Robinhood's website.



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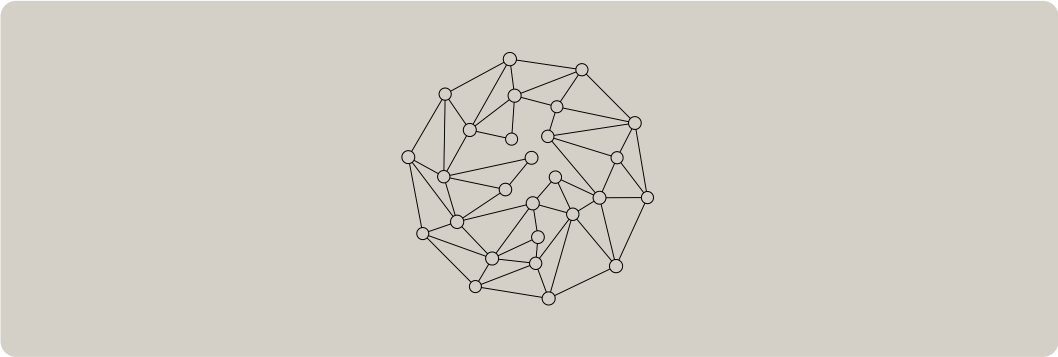
Contributing to Society

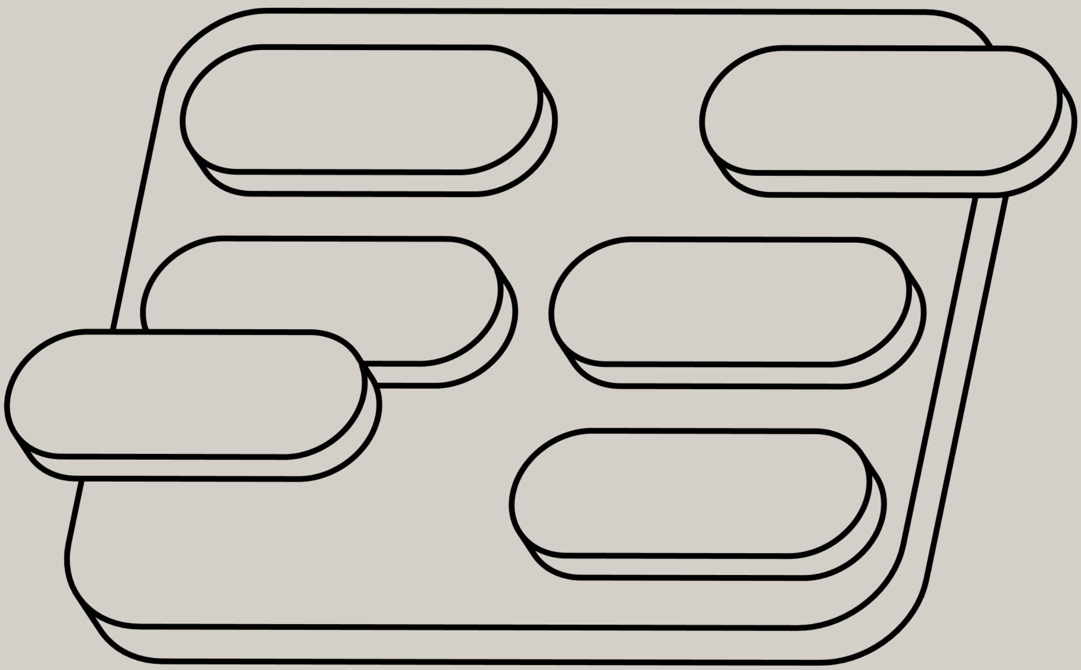
Serving the communities around us

We encourage you to engage in community initiatives and to do your part in creating a better and more innovative world. To support this work, we provide employees with volunteer time to give back to the community.

If a customer asks Robinhood to make a corporate donation, or if you would like Robinhood to consider a donation to an organization or cause, contact community@robinhood.com.



Supporting Resources



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Supporting Resources

People Team:	saysomething@robinhood.com
Ethics Office:	ethics_office@robinhood.com
Call the Global Integrity Helpline:	U.S. toll-free 1-888-308-0166. Outside U.S.
Global Integrity Helpline Online:	http://speakup.robinhood.com
Cybersecurity Concerns:	go/security-help
	phishing@robinhood.com
Physical Security Concerns:	gsoc@robinhood.com
	U.S. toll-free 1-800-497-4174