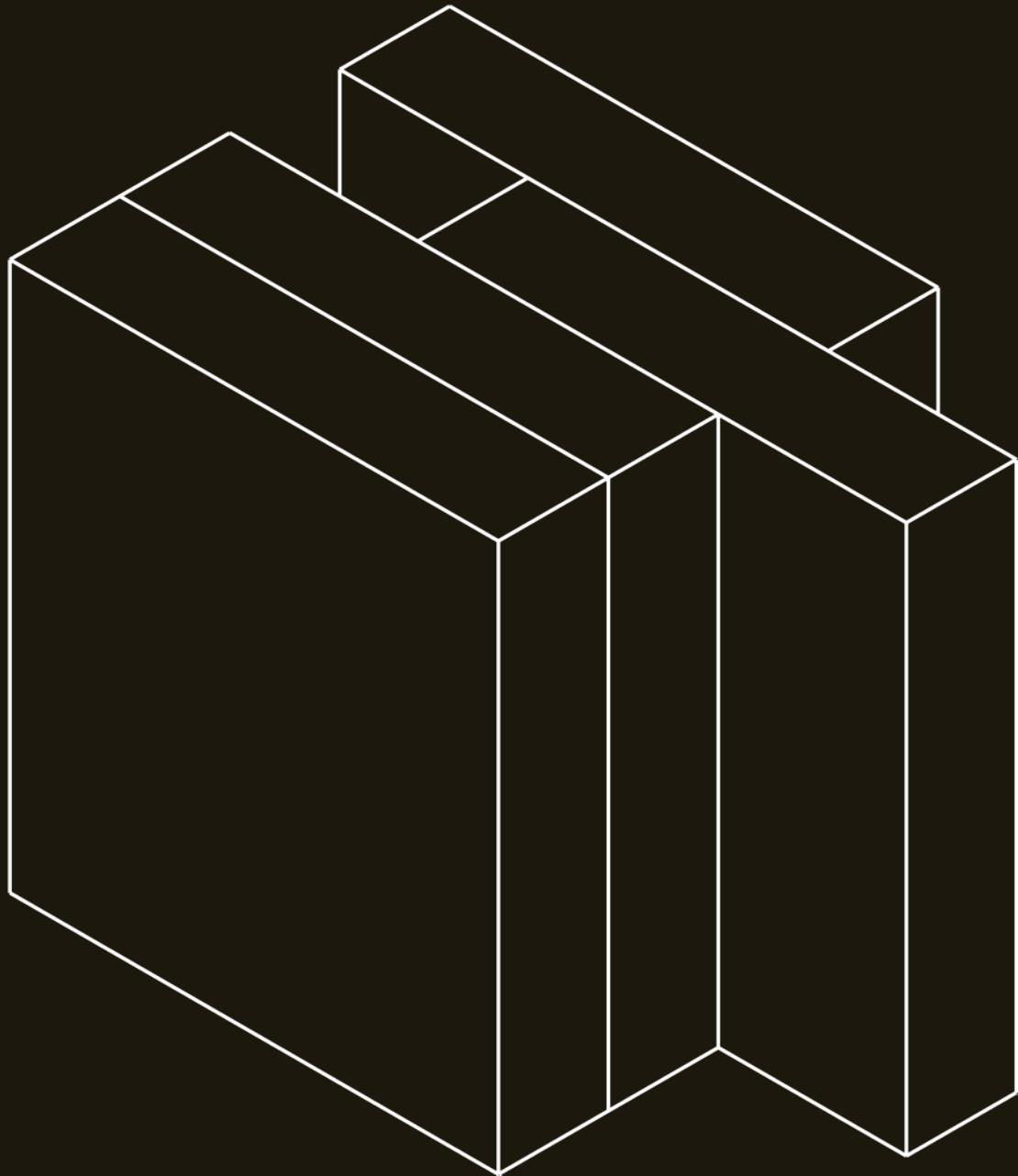




Code of Conduct

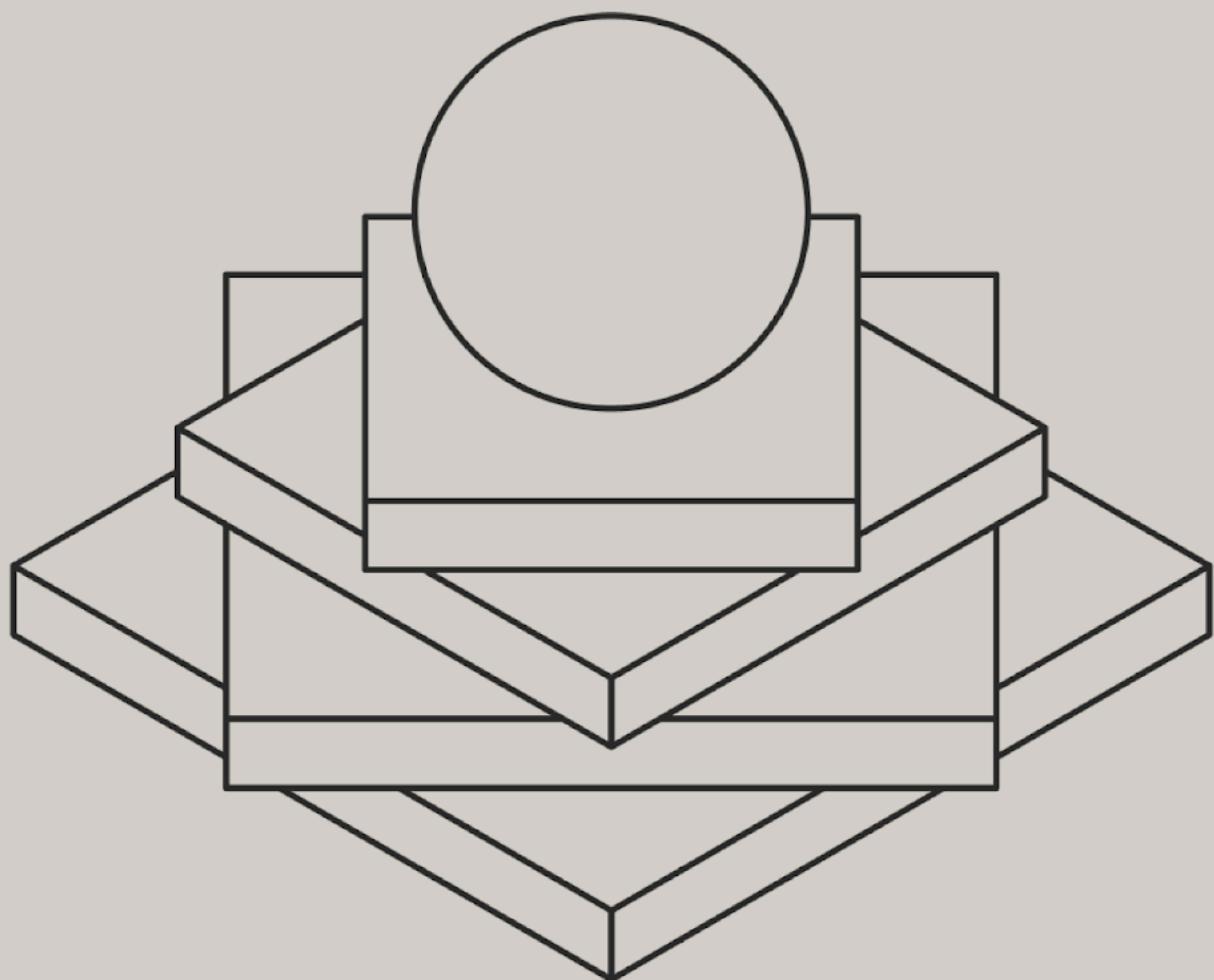


Robinhood

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A Message From Our CEO



01

A Message from Our CEO

Robinhoodies,

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 is here to 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.

To build and maintain customer trust, we must — as **One Robinhood** — feel safe and trust one another, and that means using good judgment, acting with integrity, and always doing the right thing, even in the absence of a policy or a rule. It also means we welcome diverse perspectives and support our colleagues. Operating in this **Safety Always** way ultimately creates such a strong foundation that we can innovate and build for customers.

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 of 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,

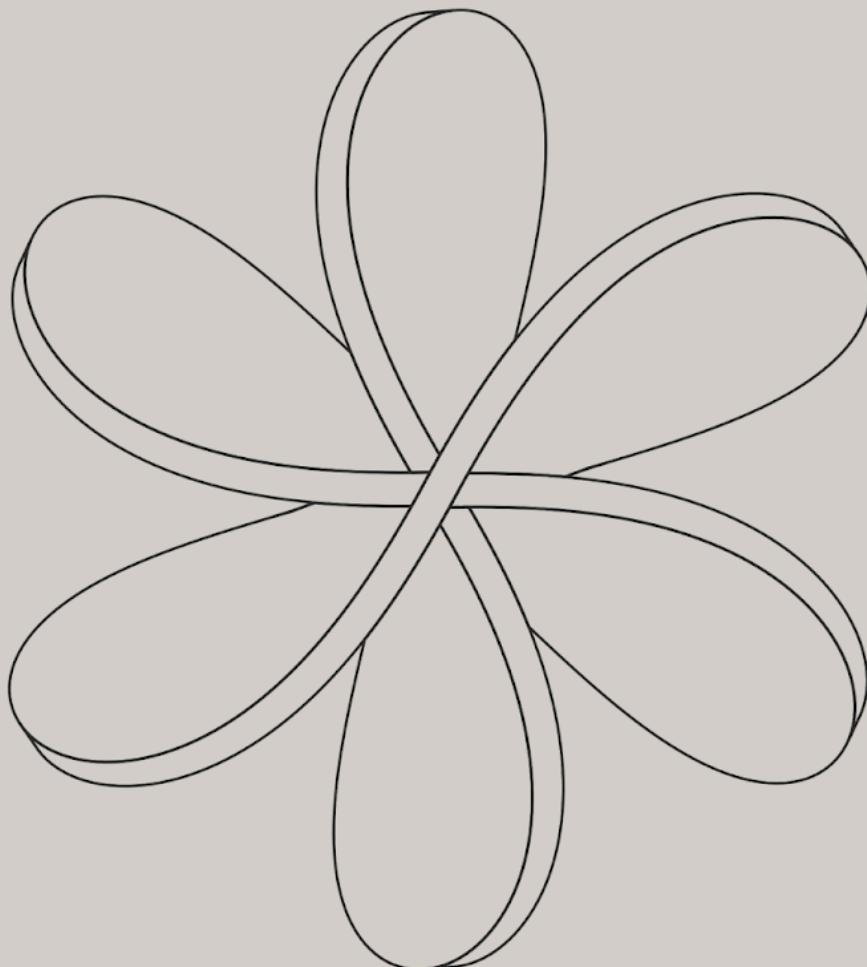


A handwritten signature in black ink that reads "Vlad Tenev".

Vlad Tenev
Robinhood CEO

About Our Code Of Conduct

Our Code of Conduct lays out our shared commitment to an ethical workplace. It supports our unique company culture – one that strives to foster innovation, reward hard work, value our colleagues and be grounded in the highest standards of integrity. It's founded on our values and centered on celebrating an open, transparent, inclusive, and socially responsible work environment. Our Code of Conduct reminds us to do the right thing every day to support our mission – even when people are not watching and especially when it may be the tougher choice.



02

About Our Code of Conduct

Our Code of Conduct

Looking after millions of people's money is a privilege that we take very seriously. We design products and services with the goal of protecting our customers' interests, and putting financial power in their hands, confident in the knowledge that everything we do aims to adhere to applicable laws, rules, and regulations.



"I love that we treat all of our customers with empathy and our goal is to help them invest no matter how much or how little they have to invest with."

Hanna Neisz

ACATs Team Lead, Market Ops

The financial system is highly regulated and imposes rigorous ethical standards on its participants. We aim not only to meet, but to exceed these standards and have built them into our culture, the way we treat each other, and the way we conduct business. Our Code of Conduct (the "Code") and related policies reflect these standards, demonstrate our commitment to meet or exceed these standards, and explain how we expect everyone to live by them.

About Our Code of Conduct

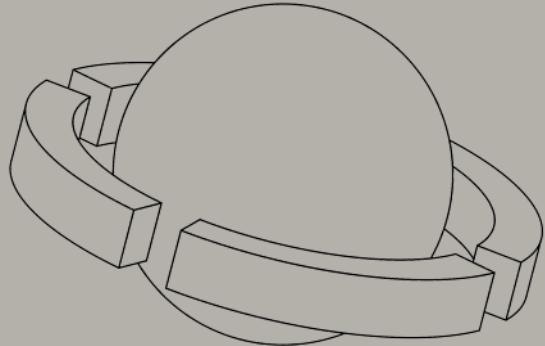
Why this is everyone's business

Our Code of Conduct, which applies to every director, officer, employee, and contingent worker of Robinhood Markets, Inc. and its subsidiaries (collectively referred to in this document as “Robinhood”), has been adopted by the Robinhood Markets, Inc. Board of Directors (the “Board”) and summarizes the standards that must guide our actions. We are all responsible for reading, understanding, and acting in accordance with this Code.

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 potentially 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 expect all directors, officers, employees, and contingent workers to comply with the Code regardless of their geographic location and, therefore, do not expect to grant waivers of its provisions.



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 integrity programming, and expect our people to understand and adhere to the standards in this Code.

→ Our Managers

Each manager supports and coaches their people to perform their jobs in compliance with Robinhood's policies, including the Code. It's each manager's 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

Our employees and contingent workers are expected 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.

The terms "Robinhoodie" and "you" used throughout this Code refer collectively to the Board as well as all Robinhood officers, employees, and contingent workers and are intended to indicate that adherence to the Code is both a personal and shared responsibility of everyone.

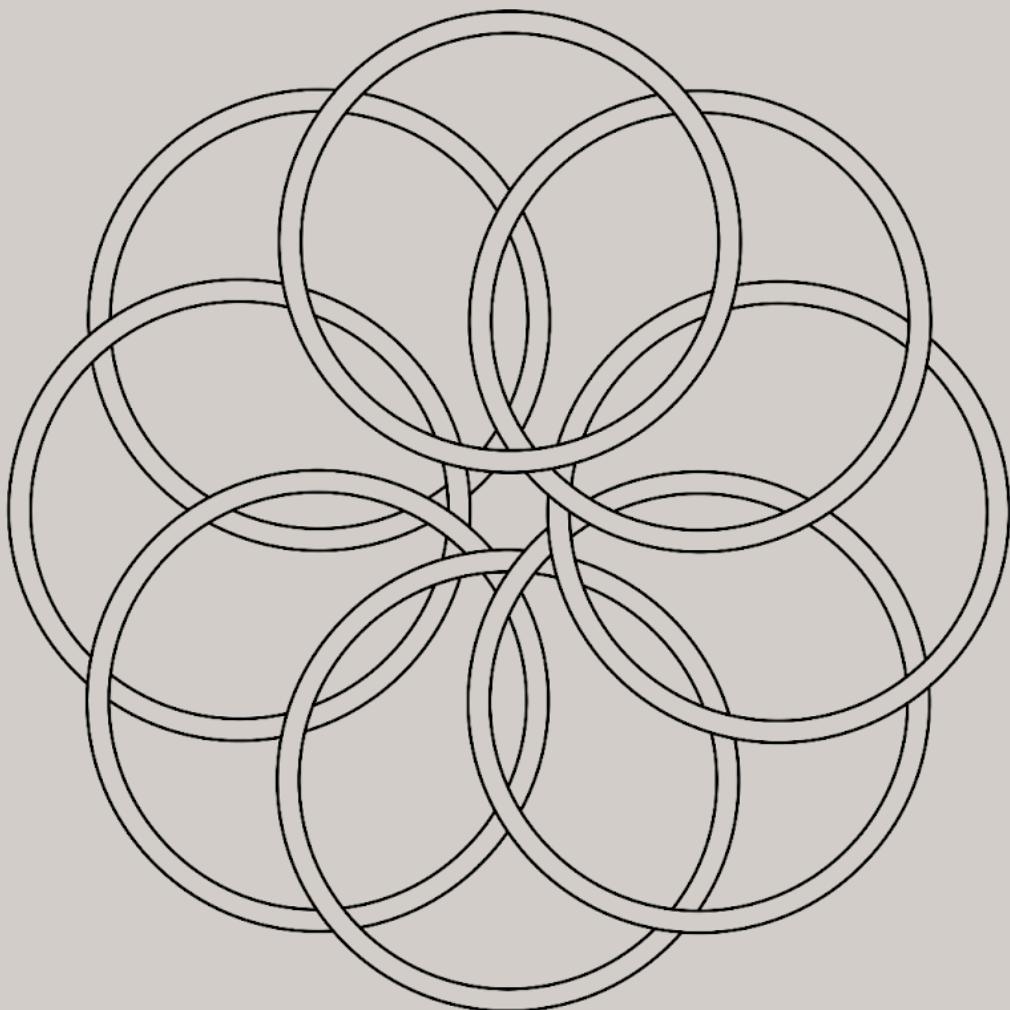
Also, the term "contingent worker" refers to individuals providing services on Robinhood's behalf who are not directly employed by Robinhood nor paid via Robinhood payroll. This includes independent contractors, workers engaged by an employer of record, and temporary workers through staffing agencies.

Robinhood has various policies and procedures that complement the Code, and they provide a framework that Robinhoodies must follow. Robinhoodies are expected to familiarize themselves with the policies and procedures applicable to their roles, adhere to their requirements, and speak up with any questions.

To the extent there are any conflicts between the Code and any other Robinhood policies or procedures, the more restrictive requirement shall apply. The Code is intended to be compliant with applicable legal requirements, but the company recognizes that legal changes may occur. Therefore, to the extent any provisions of the Code conflict with applicable laws, the provisions of the applicable laws shall apply.

Our Mission & Values

The mission of democratizing finance for all drives our actions every day and how we interact with each other and our stakeholders – including our customers, regulators, business partners and our community.



03

Our Mission & Values

Our Mission

To democratize finance for all.



“Everyone should make their financial health a priority and we are here to help everyone achieve that.”

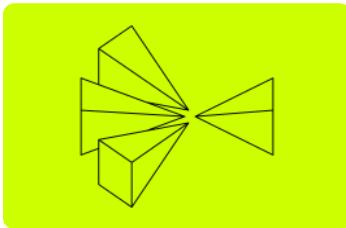
Melody Jackson Assistant General Counsel

Our Vision

Our vision is for Robinhood to be the most trusted, lowest cost, and most culturally-relevant money app worldwide.

Our Values

These are the most important values we strive to attain in order to achieve our mission.

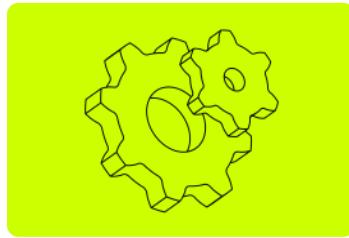


Insane Customer Focus

→ Our customers are why we exist.

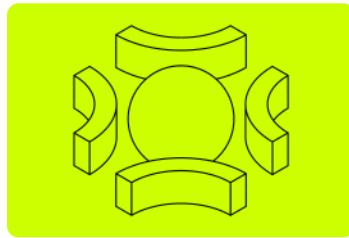
- We listen to them, design for their needs, and aim to make our user experience elegant and intuitive.
- We put what's best for customers at the center of decision-making, bringing them the best in technology coupled with real value.
- When there are customer pain points, we fix them quickly.

Our Mission & Values



High Performance

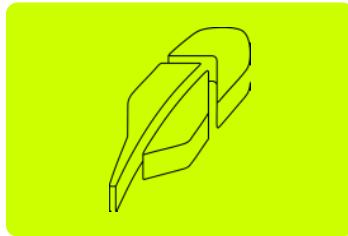
- **We operate with extreme urgency.**
- We push for progress without compromising quality – and when something is broken, we fix it.
- We're driven by impact and pride ourselves in our ability to be nimble and quickly adjust our strategy when presented with new information.
- Friction and obstacles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



Safety Always

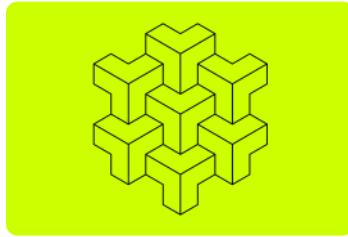
- **Trust is hard earned and easily lost.**
- We take our responsibility for our customers' finances seriously.
- We are compliant, approach risks thoughtfully and never compromise trust for speed.

Our Mission & Values



One Robinhood

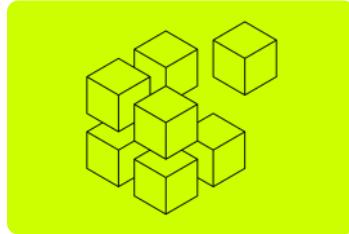
- **We're all invested in the same mission.**
- We earn each other's trust through honesty, inclusion, and respect – because finger-pointing never does the trick.
- We invite contrary perspectives, support each other, and debate with energy and kindness.
- Once decisions are made, we move in unison with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



Participation is Power

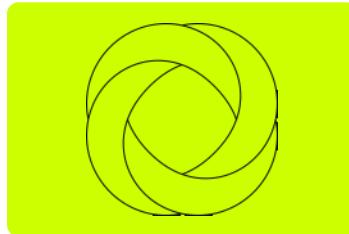
- **We level the playing field.**
- We started a movement, breaking barriers so everyone — not just the wealthy — can access the financial system.
- The elites always find a way to get nicer things, which means our job to “democratize finance for all” may never be complete — which is what makes it so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

Our Mission & Values



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.

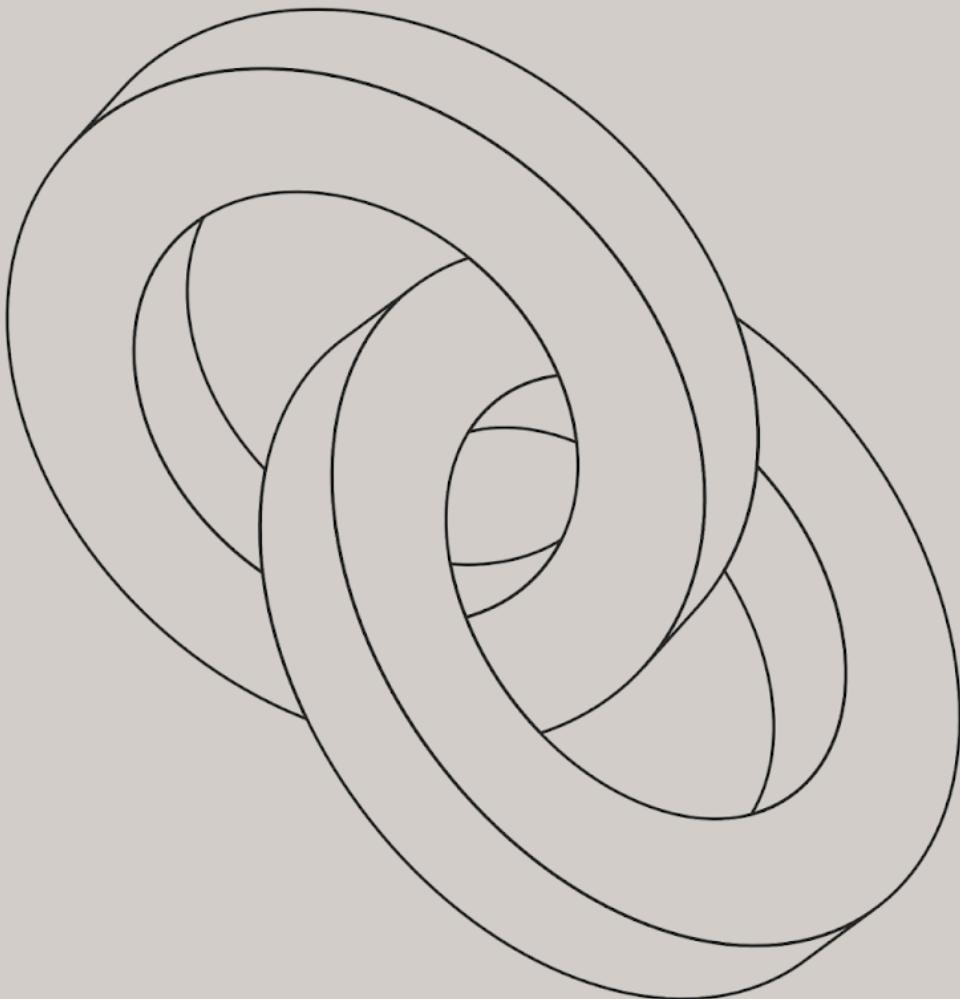


Lean & Disciplined

- **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 something that isn't right, you must speak up. 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 rendering 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.



04

Speaking Up Safely

Choose from the various reporting channels to seek guidance and raise concerns in a manner that is comfortable for you. You can report anonymously if preferred, unless prohibited by law. Whichever method you choose, we aim to protect your confidentiality to the extent permitted.

Talk to Your Manager

Management across Robinhood is available to discuss any compliance or ethics concerns. All managers must escalate any reports that they receive related to known or suspected violations of the Code, our policies, or legal requirements.

Talk to the People Team

Your People Team (saysomething@robinhood.com) is available to address any concerns.

Talk to the Ethics Office

You may contact the Ethics Office at ethics_office@robinhood.com to seek guidance and/or raise concerns.

Make a report through our Global Integrity Helpline

If you prefer, you may report through our Global Integrity Helpline. You may report anonymously, unless prohibited by law. The Global Integrity Helpline is available 24 hours a day, 7 days a week. The Helpline supports multiple languages and is run by a third-party provider as our goal is to ensure the preservation of anonymity to the extent possible.

You can file a report online at speakup.robinhood.com. You can also call the Global Integrity Helpline at 1-888-308-0166 (U.S. toll-free). If calling from outside of the U.S., please 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 our fellow Robinhoodies through our Speak Up and Non-Retaliation Policy. We prohibit retaliation or attempted 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 in good faith refuses to carry out a request or perform an action that would violate this Code.

Speaking Up Safely

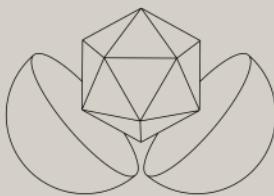
All reports will be thoroughly investigated

Robinhood is committed to taking reports seriously. Reports will be acknowledged promptly and we aim to provide a response in a reasonable time frame.

Robinhoodies must cooperate fully in internal investigations, including by providing truthful and complete information. Robinhoodies must not attempt to conceal or cover up any known or suspected violations of the Code, a Robinhood policy, or a legal requirement including by attempting to stop someone from reporting a known or suspected violation, or from cooperating in an investigation.

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 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 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.

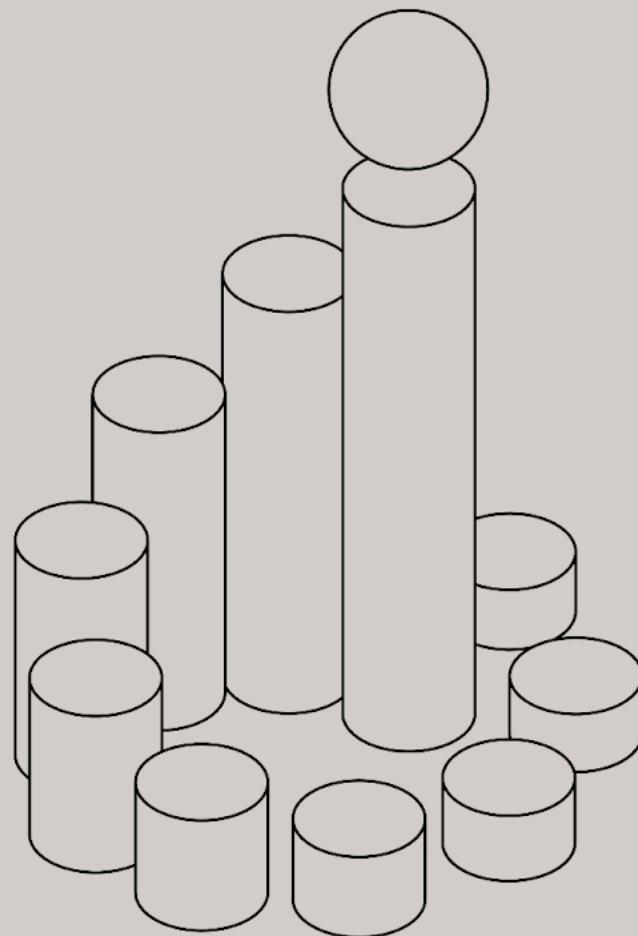


**Every Robinhoodie has a voice
and is encouraged to use it.
When in doubt, reach out.**

Following the Highest Ethical & Legal Standards

Robinhoodies must be straightforward and honest. We need to communicate openly, tell the truth, and follow through on our promises. Robinhoodies 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 potentially include termination.

The Code requires Robinhoodies to use 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.



05

Following the Highest Ethical & Legal Standards

Protecting market integrity and avoiding fraudulent behavior

It's a Robinhood imperative to promote ethical practices in the financial marketplace. We 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.

Selecting reputable business partners

Robinhood is committed to working with business partners that share our values and commitment to ethical conduct. We require due diligence on high-risk business partners before engagement and periodically monitor their activity after onboarding. No one may direct, authorize, condone, or ignore behavior by business partners that would violate the Code if directly engaged in by a Robinhoodie.

Keeping accurate records

The accuracy and completeness of our business records and accounts are essential to our business and legal compliance. Robinhood prohibits falsifying or altering company records of any kind. We must be accurate in everything we do, including when recording and reporting information, and strive to maintain such records in accordance with all legal requirements. Robinhoodies 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 governing legal requirements.

Abiding by our tax obligations

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



Following the Highest Ethical & Legal Standards

Promoting fair competition and trade

To fulfill Robinhood's mission to democratize finance for all, we promote fair competition and trade practice. Each Robinhoodie must deal fairly with Robinhood's customers, suppliers, partners, service providers, competitors, employees, and anyone else with whom they have contact in the course of performing their job. No Robinhoodie may 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, human resources, to name a few. Moreover, certain types of conduct or transactions are more likely to have potential antitrust implications. For example:

- 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.

Employees or management must seek guidance from their local Legal Team any time they are interacting with competitors regarding potentially commercially sensitive areas or contemplating entering into a contract or arrangement that might involve any of the above or any other situation that raises antitrust concerns.

Following the Highest Ethical & Legal Standards

Combating money laundering

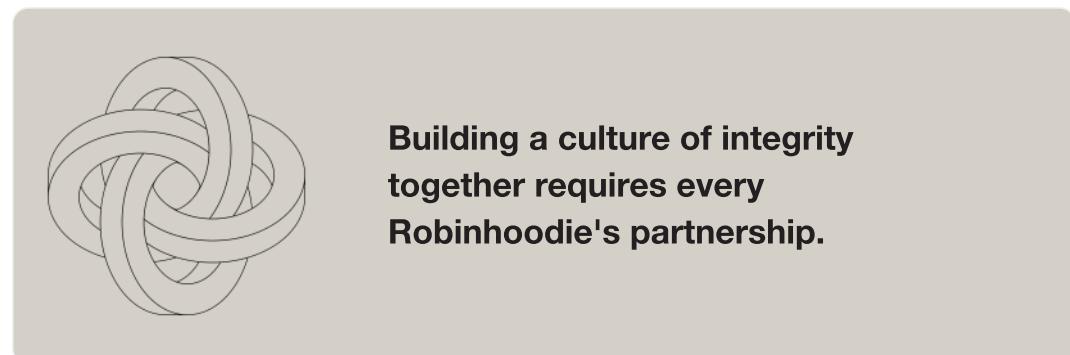
Robinhood is committed to complying with all applicable anti-money laundering and counter-terrorism legal requirements and will only accept funds received from legitimate sources. To this end, we perform various activities, including due diligence on potential new and existing customers, monitor customer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

Avoiding bribery and corruption

At Robinhood, we strictly prohibit bribery and corruption in all forms. Robinhood prohibits seeking any improper advantage in business dealings and is committed to avoiding even the appearance of impropriety in interactions with government officials, competitors, customers, suppliers, business partners, and other third parties. Robinhoodies 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, Robinhoodies may not offer, promise, provide, or authorize giving anything of value, directly or indirectly, to anyone in exchange for an improper business advantage. Similarly, Robinhoodies may not request or accept anything of value in exchange for improperly obtaining or maintaining a business relationship or granting business or a business advantage.

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



**Building a culture of integrity
together requires every
Robinhoodie's partnership.**

Following the Highest Ethical & Legal Standards

Abiding by economic and trade sanctions

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

Robinhoodies involved in exports, imports, or technology transfers 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, Robinhoodies must be sensitive to prohibitions on most activities associated with locations that are embargoed.

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 is 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.

Robinhoodies must never use material non-public information to trade in securities, derivatives or the equivalent, or for other personal gain during or after their employment at Robinhood, or pass it along to others for that purpose.

Being honest and transparent in public statements

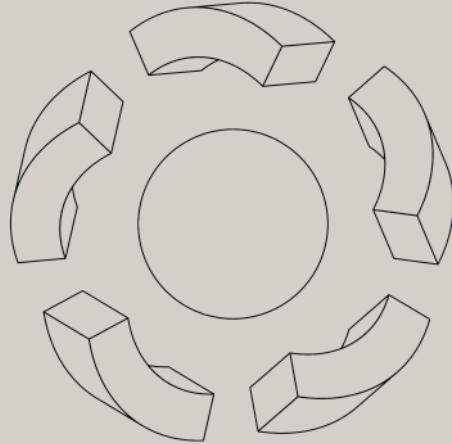
Robinhoodies are required to ensure that public disclosures and disclosures to regulatory agencies and other government entities are full, fair, accurate, timely, and understandable. This obligation applies to all Robinhoodies with any responsibility for such communications, including, but not limited to, drafting, reviewing, signing, or certifying to the information.

Each Robinhoodie who contributes in any way to the preparation or verification of Robinhood's financial statements and other financial information must do their part to ensure that Robinhood's books, records and accounts are accurately maintained. Each Robinhoodie must cooperate fully with Robinhood's accounting and internal audit departments, as well as Robinhood's independent public accountants and counsel. Each Robinhoodie who is involved in Robinhood's disclosure process must be familiar with and comply with Robinhood's disclosure controls and procedures and its internal controls over financial reporting.

Following the Highest Ethical & Legal Standards

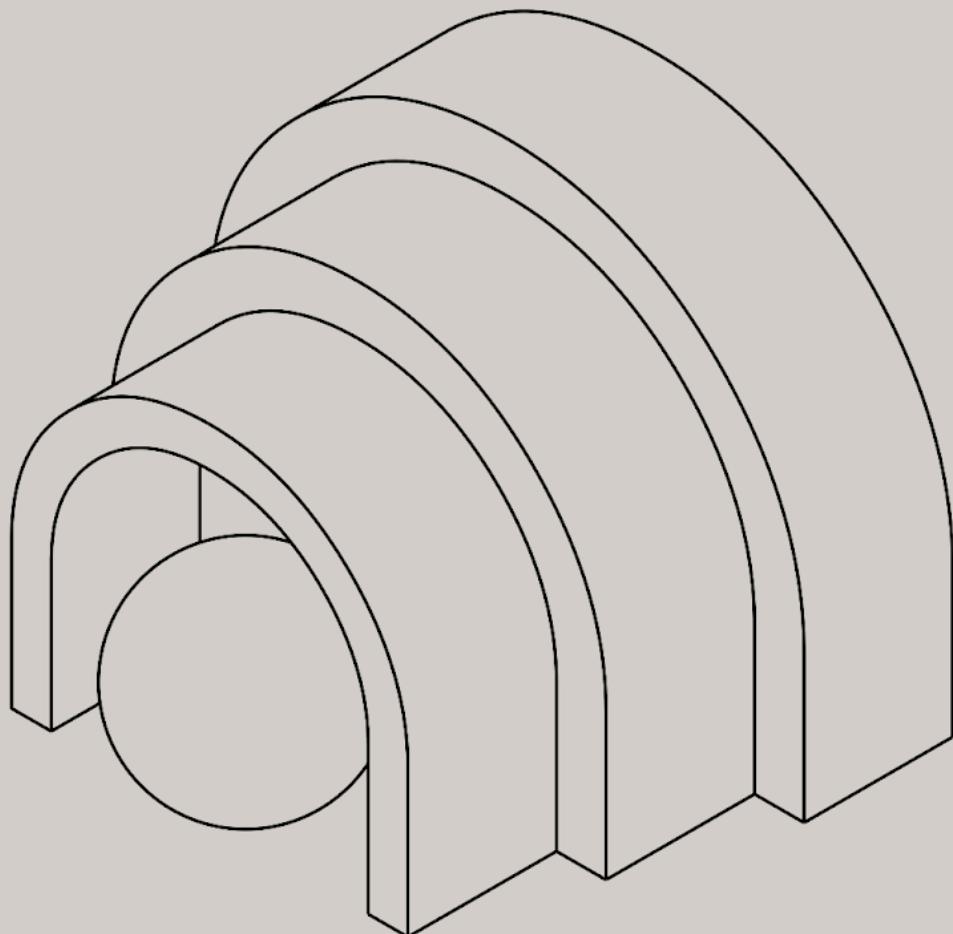
Cooperating in good faith with government or regulatory inquiries

From time to time, Robinhood may be contacted by, or receive requests for information from, government or regulatory agency examiners or investigators. Robinhood is committed to cooperating in good faith with government and regulatory requests and investigations. Robinhoodies must not destroy or alter documents relevant to, provide inaccurate or misleading information about, or otherwise obstruct a government or regulatory agency examination or investigation. Robinhoodies must immediately notify a Robinhood manager and their local Compliance and/or Legal Teams if they are contacted by or receive a request for information from government or regulatory agency personnel that is directed to Robinhood.



Committing to Our People

Robinhood has been widely recognized as a workplace where people feel safe, respect is genuine, and diverse perspectives are embraced and admired as true superpowers for connecting with our customers – who are incredibly diverse, dynamic and creative. We value and want to preserve this important part of our culture.



06

Committing to Our People

Promoting inclusion

We're building a collaborative, inclusive, and high performance culture where employees can connect, different perspectives can be heard, and everyone can do their best work. Inclusion isn't a standalone initiative — it's how we work every day to create a workplace where great ideas can come from anyone, and everyone can make an impact.

Providing equal opportunity

We are committed to providing equal opportunity for all applicants and employees. We are also committed to providing a work environment that is free of unlawful discrimination and harassment for all Robinhoodies as well as those doing business with or for, or otherwise engaging with, Robinhood, and those providing services to Robinhood pursuant to a contract. In keeping with this policy, Robinhood strictly prohibits discrimination and harassment based on any protected characteristic or any attribute protected by applicable legal requirements.

Safeguarding our shared workplace

We want Robinhoodies to feel comfortable and safe when they come to work. To accomplish this, we must work diligently to enable positive and secure communal spaces for all our people. This includes enforcing strict access requirements to our buildings and systems. You must not share your login credentials or access badge with others, and never allow people to enter Robinhood premises without badging in.

→ We must protect against workplace violence and substance abuse. Robinhood is committed to protecting Robinhoodies and our workspaces. 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 the safety of others while on company premises or performing company business. Moderate consumption of alcohol is permitted during company-sponsored events.

→ We must protect our property. Theft, misusing, removing or destroying company property, or the property of another on company premises, is prohibited. Company assets, including Robinhood laptops and systems, are only to be used for Robinhood-related work.

Committing to Our People

Avoiding discrimination, bullying, harassment, or retaliation

We are dedicated to fostering an environment where people are treated with respect and grace. Robinhood should be a safe space for people of all backgrounds, where every employee and contingent worker understands that racism, sexism, ageism, or any other bias, discrimination, or harassment based on a protected characteristic in any form is unacceptable.

We can achieve our goal of a safe and healthy workplace through active participation and support. It is the responsibility of every Robinhoodie to protect and promote a safe and respectful work environment supportive of Robinhood's commitments to inclusion — not only through their own conduct, but also by raising concerns of Code violations in a timely manner.



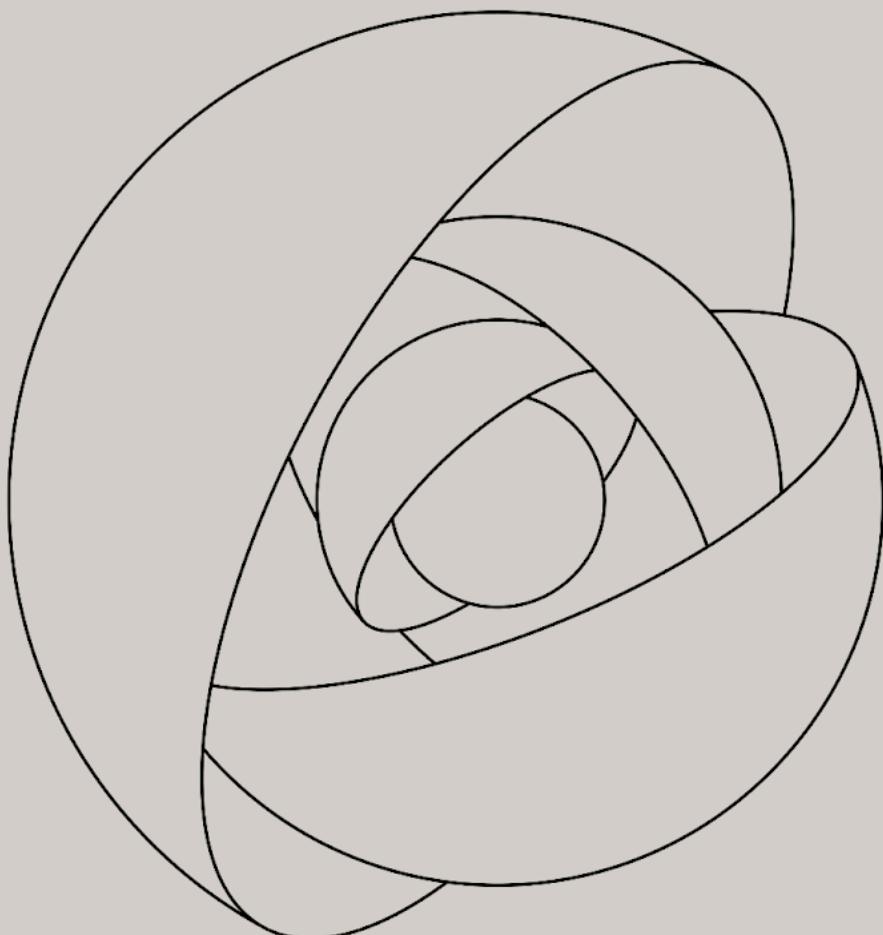
"I have never had more fun or personal gratification out of a job than I have from Robinhood. We heavily promote and encourage inclusion for all types of people and that's made very clear with Rainbowhood."

Jesse Patterson

CX Representative

Maintaining Confidentiality at Work

Robinhood strives to closely safeguard the confidential information it collects, uses, discloses and processes in connection with its business. Confidential information refers collectively to non-public information received or created by Robinhood, including material non-public information, proprietary information and customer information.



07

Maintaining Confidentiality at Work

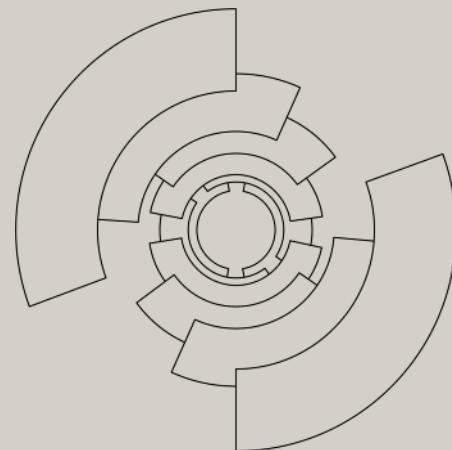
Safeguarding our confidential information

Your duty to protect confidential information includes taking precautions before sharing it with anyone. Access to confidential information should only be provided to those with appropriate authorizations and information should only be shared, even internally, with those who have a valid business reason for receiving it. The loss or unauthorized disclosure of confidential information may harm Robinhood and its customers.

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 to your family and friends. If there is any doubt about the confidential nature of the information you are considering sharing, ask your manager or the Security Team 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 Robinhoodies understand how we should be processing and protecting personal information, including that of our customers. Regardless of location or state of residency, we aim to protect the personal information we have in our care.

Every Robinhoodie is required to comply with applicable data protection laws and Robinhood’s privacy policies. Every Robinhoodie is also required to keep personal information secure and escalate 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. Keeping our products, technologies, and trade secrets secure is essential to maintaining our competitive edge. Robinhoodies are not permitted to draw on proprietary, non-public information or intellectual property used by or related to Robinhood and its businesses for their personal gain or in competition with Robinhood. This includes proprietary work developed by Robinhoodies while employed at, or otherwise engaged with, Robinhood or using company property, information, platforms, or positions. Proprietary trade secrets may include, among other items, Robinhood business, scientific, technical, economic, or engineering information, including plans, compilations, designs, methods, techniques, processes, procedures or programs. Unauthorized use or distribution of this information or intellectual property is prohibited and could also be illegal and result in civil or criminal penalties.

Maintaining Confidentiality at Work

Securing our secrets

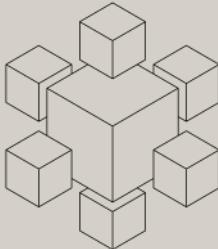
Be mindful of how you store and view confidential information. Think of this information as anything that would be valuable to a competitor. Use screen protectors when working in public. Lock your computer when you leave your desk. Safely secure and conceal any confidential papers or information when you are away from your work area. Please 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, Robinhoodies' online postings must not suggest that they are speaking on behalf of the company, violate any company policies, identify customers or suppliers by name, or unlawfully use company logos, trademarks or other intellectual property. Employees and contingent workers must not post any content that is vulgar, obscene, threatening, intimidating, or that would violate Robinhood's workplace policies against discrimination or harassment.

Cybersecurity

As a financial services and technology company, cybersecurity vigilance is essential. While the company has implemented policies, procedures, and systems designed to mitigate the risk of security compromise, Robinhoodies are our first line of defense. If you see something unusual, please stop what you are doing and contact #ask-security 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 need to be vigilant of people who appear to take an interest in our company, but may not have our interests at heart. We should know who we are talking to and take care with what information we share. All media requests relating to Robinhood business must be approved or handled by the Communications Team (comms@robinhood.com). If you are approached by a reporter, refrain from comment and refer the reporter to press@robinhood.com. If you are approached 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 or comments.

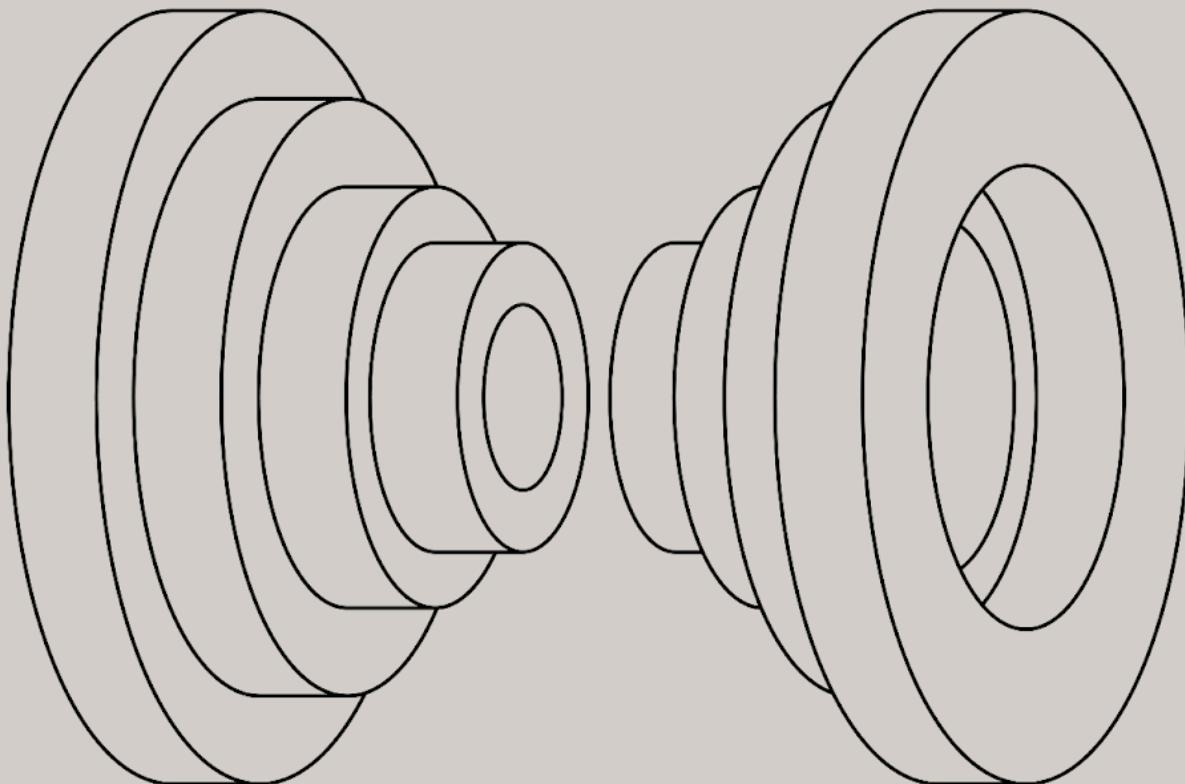
All requests from government entities and regulators, and other third parties, that are directed to Robinhood, including, but not limited to, requests made in connection with legal or regulatory proceedings, must be directed to your local Compliance and/or Legal Teams and approved prior to offering or providing any responsive information. If you are approached by an employee of a government entity or regulator, please contact your local Compliance or Legal Team.

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 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.

Avoiding Conflicts of Interest

Conflicts of interest can occur in numerous scenarios, including between different parties and customers. Robinhoodies are expected to place Robinhood's and its customers' interests above their own in business matters. A conflict of interest – or even the appearance of a conflict of interest – 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

All Robinhoodies 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. As such, Robinhoodies must immediately disclose any transactions, relationships, or activities that may constitute an actual or perceived conflict of interest as described below and not engage in them without receiving approval.

Disclosing outside business activities

Robinhoodies may at times wish to have additional jobs or activities outside their work at Robinhood. These jobs or activities may be paid or unpaid, including volunteer work or sitting on a private or public advisory board. They may be approved as long as they do not conflict with their responsibilities for Robinhood. Serving as a consultant or advisor and/or developing any products or services raises concerns if there is a perception that Robinhoodies could leverage specific knowledge about Robinhood's business or general knowledge of the financial markets for these activities. An actual, or perceived, conflict of interest can arise when accepting or performing such outside activities or consulting roles. Robinhoodies hoping to engage in such activities must disclose them via MyComplianceOffice, and as applicable, obtain prior approval, before beginning such a role.

Disclosing external interests

We require Robinhoodies to seek prior written approval from the Ethics Office or their local Compliance Team before they or an immediate family member engage in an external activity or accept a position that may pose a conflict, so that any necessary mitigation measures can be taken. A conflict of interest can also occur if a Robinhoodie or their immediate family member has a significant ownership or other financial interest in a business partner, supplier, institutional customer, or potential competitor.

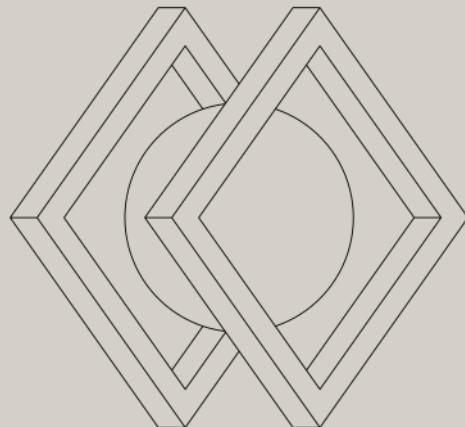
Providing notice of personal relationships

If a Robinhoodie enters into a personal relationship with someone in their reporting line or with an employee of a competitor or supplier, a conflict of interest may exist. If you are or become involved in a personal relationship that could cause even the perception of a conflict of interest or favoritism, you must contact the People Team or Ethics Office and disclose the relationship in writing.

Avoiding Conflicts of Interest

Avoiding personal advantage of business opportunities

All Robinhoodies owe a duty to the company to advance its interests when the opportunity arises. Robinhoodies may not take personal advantage of business opportunities that Robinhood might want to pursue. Robinhoodies must not take for themselves personally (or for the benefit of family members or other close personal relationships) opportunities that are discovered through the use of Robinhood property, information, or position. Even opportunities that are acquired through independent sources may be questionable if they are related to Robinhood's existing or proposed lines of business. Significant participation in an investment or outside business activity that is directly related to Robinhood's existing or proposed lines of business 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

We expect Robinhoodies to be smart with respect to offering and accepting business gifts and entertainment. A modest gift representing a thoughtful “thank you,” a reasonable meal, or entertainment event may be an appropriate setting for a business discussion. If not handled carefully, the exchange of gifts and entertainment may appear to create a conflict of interest or trigger anti-corruption law.

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

- Offered in connection with legitimate business activities (i.e., 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 inducement or give rise to a conflict of interest with duties owed to Robinhood or its customers.
- Giving or receiving cash or cash equivalents, such as gift cards or gift certificates in any amount is generally prohibited unless otherwise approved by the Ethics Office or your local Compliance Team.
- Do not give or accept gifts or entertainment while in negotiations with another party.

Robinhoodies must be particularly cautious when providing anything of value to government officials. Before offering or providing a gift or entertainment to a government official, Robinhoodies must obtain prior approval via MyComplianceOffice.

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

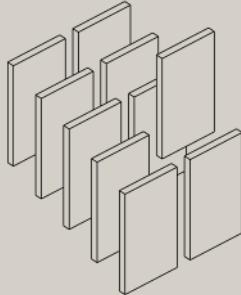
Avoiding Conflicts of Interest

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. Employees and contingent workers should also ensure any actions follow applicable legal requirements.

Robinhoodies may not, in a personal or professional capacity:

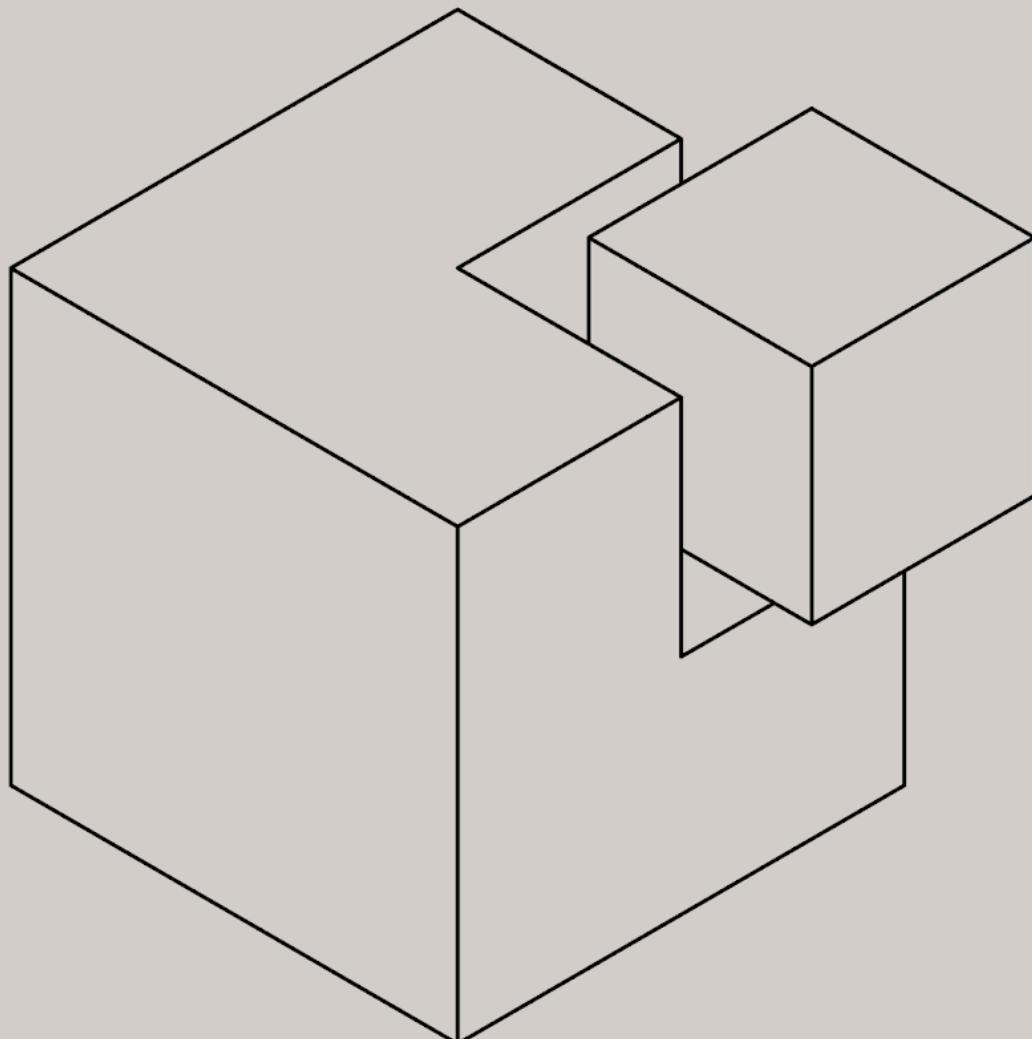
- Provide political contributions in anticipation of, in recognition of, or in return for an official act, to improperly obtain or retain business, or to improperly gain a financial or other advantage for Robinhood.
- Use company funds or resources for political activities unless pre-approved by Robinhood's General Counsel or to administer Robinhood's U.S. Political Action Committee.
- Use coercive solicitation to pressure other Robinhoodies to make political contributions to, or to support or oppose, any political activities or to engage in political activities.



Robinhoodies have a responsibility to use good judgment and be upfront and proactive about 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. Learn more about all of our ESG (environment, social, governance) work at esg.robinhood.com.



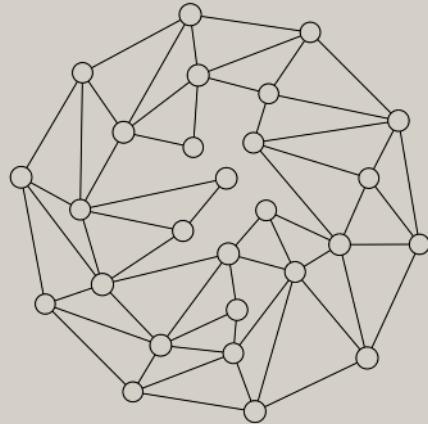
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Contributing to Society

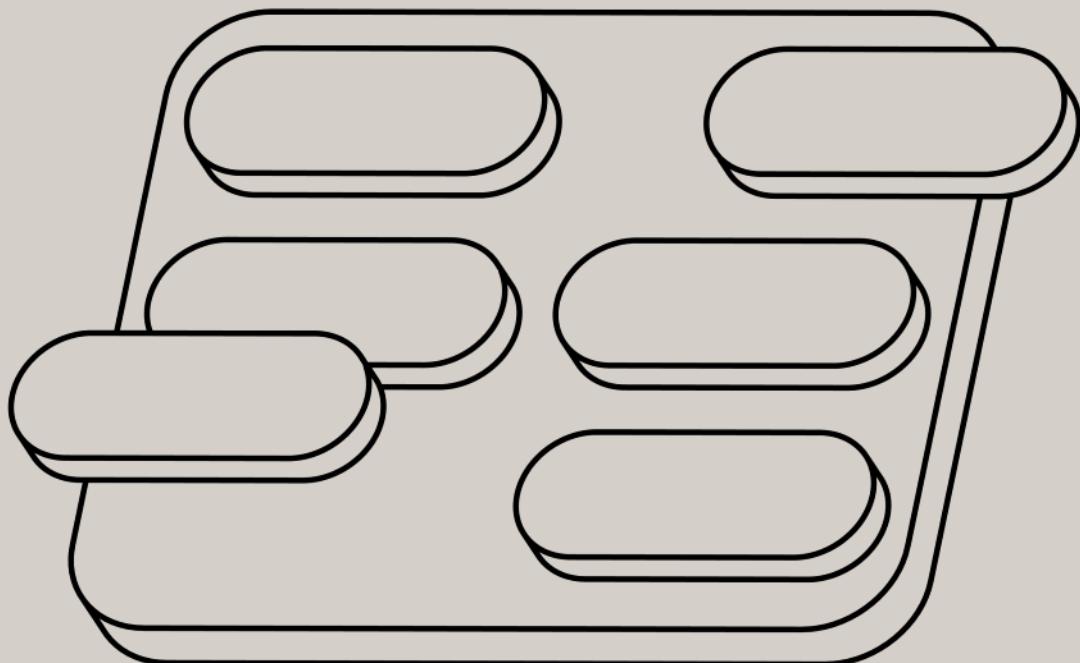
Serving the communities around us

We encourage all Robinhoodies to engage in community initiatives and to do their part in creating a better, more equitable, and more innovative world. To support this work, employees are provided volunteer time to give back to the community.

If a customer asks for Robinhood to make a corporate donation, or if you would like Robinhood to consider a donation to an organization or cause, please contact esg@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: #ask-security
phishing@robinhood.com
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