Robinhood UK Conflicts of Interest Policy Summary



This Conflicts of Interest Policy Summary document should be read along with the Customer Agreement between you, Robinhood U.K. Ltd ("**Robinhood UK**", "**we**", "**our**", "**us**"), and Robinhood Securities, LLC ("**RHS**"). You should read both carefully and ensure you understand them fully before placing an order. Please reach out to us if there is anything you do not understand. Robinhood UK is authorised and regulated by the Financial Conduct Authority (FRN: 823590).

Overview

Having taken into account the nature, scale, and complexity of our business and its structure, we have established and maintain a comprehensive Conflicts of Interest Policy. This policy, in summary, requires our employees and associated personnel to:

- 1. <u>Identify</u> any potential or actual conflicts of interest by following the reporting procedure in place; and
- 2. <u>Manage</u> the associated risks by avoidance, making use of additional controls, or making a disclosure to customers.

Identifying conflicts of interest

- Robinhood UK employees and associated personnel are required to report all potential and actual conflicts of interest as soon as they arise. This also applies to conflicts of interest arising between customers.
- Robinhood UK maintains a register of actual and potential conflicts of interest of which we have been notified.

Managing conflicts of interest

- Robinhood UK employees and associated personnel are required to act in the best interests of our customers and, in the context of a potential conflict of interest, may be required not to act.
 For example, where an individual has a personal interest that might cause a conflict of interest, Robinhood UK may require that the individual not have involvement in a decision-making process.
- Robinhood UK has implemented internal policies and frameworks, including but not limited to those addressing product approval, personal account dealing, remuneration, and gifts and entertainment. The internal policies and frameworks are designed to help manage potential and actual conflicts of interest as they arise. Robinhood UK undertakes to periodically review its control measures.
- Robinhood UK may deem it necessary to disclose some conflicts of interest to customers in writing. In the event we do so, we may make the disclosure by updating this document, the

Customer Agreement, or another disclosure document. We will describe the conflict clearly, identify residual risks that remain despite any mitigation efforts undertaken by us, and be sufficiently detailed to enable customers to make an informed decision.

Robinhood U.K. Ltd (Robinhood UK) is registered in England and Wales (09908051) and is authorised and regulated by the Financial Conduct Authority (FRN: 823590). Robinhood UK onboards UK customers and has the lead customer relationship with UK customers in relation to their use of the Robinhood UK app and website. Robinhood UK introduces UK customers to Robinhood Securities, LLC for order routing, execution, clearing, settlement, arranging custody services and margin lending to eligible UK customers with margin accounts. Robinhood Securities, LLC is regulated in the U.S. by the SEC and FINRA. Robinhood UK and Robinhood Securities, LLC are subsidiaries of Robinhood Markets, Inc.