

Extended Workforce and Third-Party Travel Policy

Robinhood Markets, Inc. (“Robinhood” or “RHM”) Extended Workforce and Third-Party Travel Policy (the “Policy”) applies to all Extended Workforce at RHM and its subsidiaries / affiliates as well as Third-Parties in which Robinhood has a business relationship.

Note: Robinhood’s Extended Workforce (“XWF”) comprises workers who provide services to Robinhood, but are not employees of Robinhood (e.g. contingent workers, independent contractors, consultants, vendor workers, Employer of Record workers). Robinhood Third-Parties include vendors, counterparties, partners, outside legal counsel, liquidity providers and business processing outsourcing providers.

Policy Requirements

1. **Pre-approval:** All travel for authorized Robinhood business must be pre-approved in writing (email, Slack, letter, contract, etc.) by a Robinhood Director or above, who is also the project budget owner [Note: Pre-approval is deemed to have been granted where travel (and related expenses) are detailed in the relevant contract]. In the case of a legal-specific Third-Party (including outside counsel), approval by the relevant Robinhood attorney or legal operations contact is sufficient.
2. **Reasonable and necessary business expenses:** Provided written pre-approval has been obtained, Robinhood will reimburse reasonable and necessary business expenses incurred in accordance with the contract and this Policy. Robinhood reserves the right to not reimburse travel or expenses that were not incurred in accordance with this Policy. Robinhood also reserves the right to modify this Policy at any time.



Roles / Responsibilities

Role	Responsibilities
Third-Party and Extended Workforce	<ul style="list-style-type: none"> • Use discretion and sound business judgment regarding the nature of travel and expenses incurred. Minimize travel expenses by using the least expensive option that does not compromise safety and/or does not result in inefficiency. • Submit an invoice including itineraries and receipts within 30 days of incurring the expense. • Pay with your own credit card. • All travel-related insurance is the responsibility of the Extended Workforce or Third-Party's employer.
Robinhood (Person(s) responsible for the Third-Party)	<ul style="list-style-type: none"> • Approve Extended Workforce and Third-Party travel expenses that are eligible and deemed necessary for Robinhood's business.

Guidelines by Expense Type

Expense Type	Guidelines
Airfare	<ul style="list-style-type: none"> • Approved airfare class is Economy for domestic and international travel. • Must purchase non-refundable airfare. • Airfare should be purchased as early as possible, and at a minimum, fourteen (14) days in advance of the travel departure date. • Any airfare upgrades or excessive bag fees will not be reimbursed. • Must not book a higher priced airfare for the purposes of gaining frequent flier points / miles.
Hotel	<ul style="list-style-type: none"> • Must book hotels only. AirBnB or similar accommodations are not permitted. • Hotel accommodation should be purchased as early as possible, and at a



	<p>minimum, fourteen (14) days in advance of the travel date.</p> <ul style="list-style-type: none"> ● Weekend stay must be approved in advance in writing by a Robinhood Director or above. In the case of a legal-specific Third Party (including outside counsel), approval by the applicable Robinhood attorney or legal operations contact is sufficient. ● Reimbursement for lodging is limited to the single standard room rate. <u>No</u> upgraded room will be reimbursed. ● Expenses for staying in a private home (e.g. family, friends, or at a Third Party’s personal residence) in lieu of hotel costs are <u>not</u> reimbursable. ● Room rates cannot exceed rate caps for each city: <ul style="list-style-type: none"> ○ London, New York City, Menlo Park: Up to \$400/night excluding tax and fees; ○ Seattle, Washington DC, Chicago, Toronto: Up to \$300/night excluding taxes and fees; or ○ All other U.S. or International cities: Up to \$250/night excluding tax and fees.
<p>Ground Transportation (Car rental, Rideshare, Taxi, Public Transportation and Parking)</p>	<p>Reimbursement for transportation is limited to the duration of travel for Robinhood business.</p> <ul style="list-style-type: none"> ● Must choose the least expensive transportation option. Luxury black car services / limousines are <u>not</u> eligible for reimbursement. ● Personal transportation (car or other transportation owned by the individual) costs are <u>not</u> reimbursable.
<p>Meals</p>	<p>Meals while traveling for Robinhood business are not covered by Robinhood, unless approved in writing by a Robinhood Director or above. In the case of a legal-specific Third-Party (including outside counsel), approval by the applicable Robinhood attorney or legal operations contact is sufficient.</p>
<p>Incidentals</p>	<p>Incidentals are not covered by Robinhood.</p>



Examples of Reimbursable versus Non-Reimbursable Expenses

Reimbursable	Non-Reimbursable
<ul style="list-style-type: none"> ● Commercial airfare <ul style="list-style-type: none"> ○ Economy/Coach Class ● Ground transportation <ul style="list-style-type: none"> ○ Car rental, Rideshare, Taxi, Public Transportation and Parking ● Hotel ● Hotel Internet 	<ul style="list-style-type: none"> ● Any personal expenses ● Any airfare upgrades ● Airline upgrade certificates ● Airfare excessive bag fees ● Airline lounge fees or memberships ● Airline mileage ● Loss of luggage and tickets ● Any hotel room greater than single occupancy room rate ● Hotel in-room entertainment ● Hotel room service ● Hotel mini bar ● Traffic violations ● Parking violations ● Any incidentals ● Any meals ● Luxury black car services/limousines ● Purchase of travel accessories ● Travel insurance ● Repair and/or damage to vehicles ● Telephone costs associated with international travel
<p>For questions on any items not listed above, reach out to your Robinhood contact.</p>	

Cancellations

Extended Workforce or Third-Party shall not seek reimbursement for expenses where the Robinhood business travel was canceled by the Extended Workforce or Third-Party. When Robinhood business travel is canceled *by Robinhood* after a ticket / invoice has been issued, the Extended Workforce or Third-Party shall inquire about using the same ticket for future Robinhood business travel or obtain a refund that will be applied to a request for reimbursement. Extended Workforce or Third-Party is responsible for canceling hotel rooms and must secure a cancellation number. Robinhood will not reimburse hotel expenses that could have been avoided by prompt and proper cancellation.



Additional Requirements for International Travel

In order to mitigate risk to Robinhood and its customers, geopolitical factors must be considered when utilizing Robinhood technology or accessing Robinhood data and systems. “Technology” in this Policy refers to all devices utilized for Robinhood business, irrespective of device ownership.

Restricted Locations

The term “Restricted Locations” refers to Belarus, China (PRC), Taiwan, Hong Kong, Macau, Russia, and locations subject to comprehensive sanctions programs: Crimea, Cuba, Iran, North Korea, Syria, and/or any country sanctioned by Office of Foreign Assets Control (“OFAC”).

- Due to heightened security risk, the transport or use of Robinhood-issued or Robinhood-managed computer devices to or within these locations is prohibited. This includes traveling through a restricted location in order to reach a non-restricted location (such as flying from the United States to Thailand by changing planes in China (PRC)) as well as logical access, such as using a VPN service that terminates in a restricted location.
- The transport or use of personally owned, Robinhood-managed mobile devices to, within, or through these locations is permissible only under certain circumstances. All Robinhood data and management software must be removed from these devices prior to entering the location. Upon return, the device must be reset to factory settings prior to re-enrolling in Robinhood’s management system and accessing any Robinhood data and systems.
- Any Robinhood-managed device and associated accounts detected in restricted locations will be disabled automatically.

Other Sanctioned Locations

Robinhood is required to comply with all sanctions laws and guidance administered by OFAC. All activities by Robinhood, its Extended Workforce and its Third Parties must at all times comply with OFAC sanctions prohibitions, including the potential to restrict the transport or use of Robinhood technology within sanctioned locations. Due to the dynamic nature of OFAC’s requirements, Extended Workforce and Third Parties are encouraged to review OFAC’s Sanctions Programs and Country Information whenever travel is considered. Requests to transport or use Robinhood technology in any actively sanctioned location, or any location in which sanctions status is unclear, must be evaluated on a case-by-case basis and pre-cleared by the appropriate Robinhood teams. Such travel would likely be subject to at least the same controls as the locations specifically called out in the section above.

<https://ofac.treasury.gov/sanctions-programs-and-country-information>



Locations with Special Considerations

Unless otherwise permitted by applicable law or regulation, any Robinhood device assigned to Extended Workforce and Third Parties permanently located in Germany may not be monitored if such device is permitted to be utilized for personal use. Therefore, Extended Workforce and Third Parties based in Germany are not permitted to use managed devices or any Robinhood systems for any personal use. This includes any personally owned mobile devices.

All Other Locations

Extended Workforce and Third Parties should keep in mind that many of the typical civil rights protections that apply within a location may not apply in the same ways internationally. For instance, officers patrolling borders may be allowed to demand access to computing equipment (including passwords and credentials to log into such equipment) when transiting a border. For that reason, for all other locations free of restrictions, Extended Workforce and Third Parties are advised to take the following actions:

- Maintain physical control of Robinhood-issued and Robinhood-managed laptops while traveling (e.g. when traveling via plane, pack your laptop in the carry-on bag, not in checked luggage.);
- Review the U.S. Government Travel Advisory;
- Log out of all Robinhood accounts before transiting borders;
- Remove YubiKey from the laptop before traveling;
- Remove any Robinhood data and documents that are stored locally such as in documents, desktop, or downloads folders;
- Store / move all Robinhood data and documents on cloud servers;
- Use VPN on your laptop for all access while in country;
- Secure a privacy screen for devices;
- Disable AirDrop; and
- Never use a public kiosk (e.g. a computer at a hotel, library, or Internet cafe, etc. that anyone in the facility can use) to access any Robinhood data or systems. This is strictly prohibited. These computers are frequently infected with malware and pose a serious risk to Robinhood and its customers.

Questions? Email vendormanagement@robinhood.com.

Version	Description	Date	Department
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1.0	Policy Creation	02/2019	
1.1	Added additional hotel rate caps and international travel guidelines	05/2022	Procurement
2.0	Added hotel rate in London, added restricted locations and special considerations for to international travel and changed the format	11/2023	Procurement

