

# Modern Slavery and Human Trafficking Statement

For the Financial Year Ended 31 December 2025



# Robinhood



## Introduction

Robinhood U.K. Ltd, Bitstamp UK Ltd, Bitstamp Limited and Chartr Limited (the “UK Entities”) are wholly owned subsidiaries of Robinhood Markets, Inc. (“RHM”). The UK Entities operate within a global governance framework established by RHM and rely on certain group-level policies, controls, and shared services described in this Statement. Many of the policies, programmes and controls described in this Statement are implemented at the Robinhood group-level and made available to the UK Entities through shared services and centralised functions.

We are committed to conducting business ethically, responsibly, and in a manner that respects and protects human rights worldwide. We consider human dignity paramount and do not tolerate modern slavery, forced labour, child labour, human trafficking, or any other form of exploitation in our operations or supply chains. We believe transparency and accountability promote healthy and resilient financial markets.

This Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 on behalf of Robinhood U.K. Ltd, Bitstamp UK Ltd, Bitstamp Limited and Chartr Limited.

This Statement sets out the steps we take, including through group-level governance frameworks, to help prevent modern slavery and human trafficking. It reflects our ongoing commitment to transparency and continuous improvement, consistent with applicable laws and regulations, including the UK Modern Slavery Act.

As technology, financial services, and media businesses, we seek to comply with applicable laws and regulations and focus on addressing modern slavery risks within our supply chains and, where relevant, in connection with our business activities, where such risks are most likely to arise. This Statement outlines the practices and policies we have in place to mitigate the risk of modern slavery occurring throughout our business operations.

## About Us

The UK Entities form part of the Robinhood group of companies. Robinhood Markets, Inc. (NASDAQ: HOOD) transformed financial services by introducing commission-free stock trading and democratising access to the markets for millions of investors. Today, Robinhood, through its subsidiaries, offers products in the United States, the United Kingdom, and across more than 30 countries in the European Union (EU) and European Economic Area (EEA) enabling customers to trade stocks, options, futures (including event contracts), and crypto, invest for retirement, earn with Robinhood Gold, and access expert-managed portfolios through Robinhood Strategies. Headquartered in Menlo Park, California, Robinhood puts customers in the driver's seat, delivering unprecedented value and products intentionally designed for a new generation of investors. Additional information about Robinhood can be found at [www.robinhood.com](http://www.robinhood.com).

## Our Business, Operations, and Supply Chains

As technology, financial services, and media businesses, we do not manufacture physical goods. Our global supply chain is primarily service-based and includes third-party technology providers, financial and professional services firms, and other vendors that enable the operation of our platform and services. These suppliers operate across multiple countries, and certain vendors, such as cloud service providers, rely on globally sourced hardware and infrastructure. Accordingly, the origins of our goods and services are international in nature, with limited direct visibility beyond our immediate suppliers.



## Policies and Governance

Our commitment to ethical conduct, responsible business practices, and respect for human rights is supported by governance frameworks and policies implemented across the Robinhood group, including the Robinhood Code of Conduct, which sets expectations for lawful conduct, integrity, and respect across the company's global operations. The Code applies to Robinhood's directors, officers, employees, and contingent workers and establishes common standards for how business is conducted, including expectations related to ethical decision-making, avoidance of conflicts of interest, protection of Robinhood's assets, and respectful workplace behaviour. The Code of Conduct is reviewed and acknowledged on a regular basis by all individuals subject to the Code. The full text of the Code of Conduct is publicly available on our [website](#).

Robinhood also maintains a Third-Party (Vendor) Code of Conduct, which sets expectations for third-parties regarding ethical behaviour, compliance with applicable laws, and responsible business conduct. These expectations include adherence to applicable labour standards and the prohibition of forced labour, child labour, and human trafficking or any other form of modern slavery. The Third-Party (Vendor) Code of Conduct is reviewed periodically to ensure continued alignment with evolving regulatory requirements and industry standards and is incorporated into relevant contractual arrangements. We expect our third-parties to act in accordance with these standards, and violations may result in remedial action, review, or termination of the business relationship where appropriate. The full text of the Third-Party (Vendor) Code of Conduct is publicly available on our [website](#).

## Risk Assessment and Due Diligence (Third-Parties)

We rely on Robinhood's group-level third-party risk management framework, which takes a risk-based approach to identifying and addressing potential modern slavery and human trafficking risks associated with third-party relationships across our supply chain and business operations. As part of our third-party due diligence, we consider factors such as the nature of services provided, geographic considerations, and other relevant risk indicators.

Third-party due diligence includes consideration of environmental, social, and governance factors, including labour standards, which inform overall risk assessment and oversight processes. We also rely on the Robinhood group to establish contractual expectations with third-parties, including requirements to comply with applicable laws and Robinhood's Third-Party (Vendor) Code of Conduct and, where appropriate, to flow down these expectations to subcontractors (fourth-parties).

Where higher-risk third-party relationships or concerns related to modern slavery are identified, additional review or monitoring may be conducted proportionate to the level of risk, and we seek to address those concerns appropriately, including engagement with relevant third-parties and, where necessary, escalation or remediation measures. We recognise that managing modern slavery risk is an ongoing process and we continue to evolve our approach in line with regulatory developments and industry practices.

## Compliance Assurance

Third-parties are contractually required to comply with applicable laws and regulations and are expected to self-monitor their compliance with Robinhood's Third-Party (Vendor) Code of Conduct while conducting business with or on behalf of the UK Entities or the wider Robinhood group, and to inform us in a timely manner of any non-compliance. We reserve the right to monitor compliance with the Third-Party (Vendor) Code of Conduct using a reasonable and risk-based approach. This may include verification through self-assessment/questionnaires, on-site audits, and/or other means of due diligence. If requested, third-parties are expected to provide written information, including policies, procedures, and data regarding the topics included in the Third-Party (Vendor) Code of Conduct. Failure to agree upon a remediation plan, or failure to implement it, could adversely affect a third-party's ability to be awarded additional work and/or result in termination.



## Training

We provide mandatory training to employees and contingent workers to support ethical conduct and responsible business practices. This training includes annual online modules covering topics such as ethics, anti-corruption, workplace conduct, business continuity, insider trading prevention, privacy, information security, and compliance with applicable laws, including harassment and discrimination. These training programs are developed and administered through Robinhood's centralised compliance and learning functions. Where relevant to their role, employees and contingent workers also receive additional training related to Robinhood's products and services and applicable compliance programs. These online modules generally include attestations confirming review of and commitment to comply with applicable policies. Through these training and attestation efforts, we seek to promote awareness of ethical standards and reinforce expectations for lawful and responsible conduct across our business.

## Reporting and Speak-Up

We encourage concerns to be raised without fear of retaliation, including concerns related to modern slavery or human trafficking, through appropriate internal channels or through Robinhood's [Global Integrity Hotline](#).

The Global Integrity Hotline is operated by an independent third-party and is available 24 hours a day, seven days a week, in multiple languages. Reports may be made confidentially and, where permitted by law, anonymously. Reports are handled discreetly and investigated promptly and appropriately. We prohibit retaliation against anyone who raises concerns in good faith.

## Effectiveness and Continuous Improvement

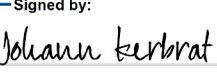
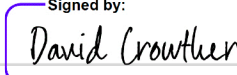
We recognise that addressing modern slavery and human trafficking risks is an ongoing effort. We are committed to periodically reviewing and enhancing our policies, processes, and controls, informed by changing global circumstances, regulatory developments, emerging best practices, and the outcomes of our risk assessments. As our business grows and evolves, we will continue to evaluate and manage potential modern slavery risks and to refine our policies and practices where necessary.



# Approval

This Statement has been approved by the Board of Directors (or equivalent governing body) of each of the UK Entities. This Statement relates to the financial year ended 31 December 2025. During this reporting period, we continued to operate existing policies and controls and did not introduce material new actions beyond those previously disclosed to address modern slavery risks. We remain committed to reviewing our approach on an ongoing basis and will update this Statement annually in line with applicable legal requirements and business developments.

For and on behalf of <b>Robinhood U.K. Ltd</b>		For and on behalf of <b>Bitstamp UK Ltd</b>	
Signed:	 Signed by: Bert van Delft F20AB833BE0F427...	Signed:	 Signed by: Nicola White 5461DB08BAB94E2...
Name:	Bert Van Delft	Name:	Nicola White
Title:	Robinhood U.K. Ltd Chief Compliance Officer & Director	Title:	Vice President Institutional Crypto and GM of Bitstamp & Director
Date:	21-05-2026	Date:	20/05/2026

For and on behalf of <b>Bitstamp Limited</b>		For and on behalf of <b>Chartr Limited</b>	
Signed:	 Signed by: Johann Kerbrat 5E73E8653598410...	Signed:	 Signed by: David Crowther 6B0A85B35FF54D8...
Name:	Johann Kerbrat	Name:	David Crowther
Title:	SVP and GM, International and Crypto & Director	Title:	Managing Editor & Director
Date:	20/05/2026	Date:	27/05/2026