

# ROBINHOOD THIRD-PARTY CODE OF CONDUCT

## PURPOSE

At Robinhood, we are guided by our mission to democratize finance for all. We deliver on our goals by operating a responsible and transparent business. Not only is this critical to our strength and stability as a company, it is also a core obligation to our customers, employees, and shareholders. We expect our Third-Parties to demonstrate ethical business conduct, assure the privacy and security of our data, protect human rights, assure workforce safety, care for the environment, ensure regulatory compliance, and promote diversity and inclusion. These principles are embedded in our lines of business and reflect how we build and maintain trust and credibility as a company that people want to work for, invest in, and do business with. The Robinhood Third-Party (Vendor) Code of Conduct (the “Code”) establishes standards that we expect our Vendors to meet.

## I. GOVERNANCE AND ETHICAL BUSINESS PRACTICES

Robinhood is committed to conducting business ethically and in compliance with all applicable laws, rules and regulations. Third-Parties who engage with Robinhood are expected to uphold the highest standards of integrity and ethics including, but not limited to:

### A. Conflicts of Interest

We expect Third-Parties to disclose all actual or potential conflicts of interest prior to initiating their relationship with us, or as soon as they become aware of an actual or potential conflict of interest after initiating a relationship. A conflict of interest can occur whenever the Third-Party has a competing interest that affects or could appear to affect their objectivity. We also expect fair, non-collusive competition among our potential Third-Parties and Fourth-Parties.

### B. Gifts and Entertainment

Third-Parties are prohibited from providing or offering lavish or otherwise inappropriate gifts or entertainment that are intended to influence, or may appear to influence, a business decision. Gifts and entertainment should be related to a legitimate business purpose, reasonable and proportionate in value and frequency, appropriate and customary for the circumstances, and transparent and compliant with local law.

### C. Political Activities and Lobbying

Third-Parties' participating in any political activities (including participation in Robinhood PAC events) is voluntary and must be on its own behalf, on its own time, at its own expense and subject to applicable laws. Third-Parties must not make political contributions with the intent to



influence the award or retention of any Robinhood business. Third-Parties must not lobby on behalf of Robinhood or use Robinhood resources for political activities without prior written approval from Robinhood.

#### D. Anti-Bribery and Corruption

Robinhood has a zero-tolerance policy towards bribery, corruption, kickbacks, extortion, and embezzlement in regards to all of its business interactions, including business dealings with Third-Parties. To that end, Robinhood requires that Third-Parties fully comply with requirements of all applicable laws and regulations designed to counter bribery and corruption, including the United States (“U.S.”) Foreign Corrupt Practices Act, the United Kingdom (“U.K.”) Bribery Act, the Anti-Kickback Statute, the False Claims Act, and any other applicable anti-bribery or anti-corruption laws.

Third-Parties are prohibited from bribing or corruptly offering, promising, authorizing, or paying anything of value, directly or indirectly, for the purpose of obtaining or retaining business, or securing some other improper business advantage. The act of conferring or offering to confer anything of value to influence a business decision is still considered a bribe, even if the desired outcome is not achieved.

For the avoidance of doubt, the term “anything of value” includes improper payments, such as cash bribes or kickbacks, other direct or indirect inducements, benefits, fees, commissions and advantages, including inappropriate gifts, meals, travel, entertainment, charitable and political contributions, and offers of employment or internships. Anything of value can also include corrupt payments disguised as legitimate payments for goods or services.

“Anything of value” also includes direct or indirect payments by Third-Parties to public officials for corrupt purposes such as, but not limited to, the following:

- Business opportunities, such as vendor contracts, to a company owned or controlled by the public official or their immediate family member(s).
- Offers of employment or other benefits to a friend or family member of a public official.

Robinhood prohibits Third-Parties from making facilitation payments, which are payments made to secure or speed up routine, non-discretionary government actions, such as processing paperwork, issuing visas, supplying utilities, or other ministerial functions by mid- or low-level government employees.



## E. Anti-Money Laundering/Sanctions

Third-Parties are expected to comply with all applicable anti-money laundering, sanctions, and export control laws, rules, and regulations. To that end, Third-Parties must not knowingly engage or conduct business with any individual or entity who is potentially involved in illicit activities such as, but not limited to, money laundering, terrorist financing, drug or human trafficking, slavery, or the proliferation of weapons of mass destruction. Additionally, Third-Parties must not knowingly engage or conduct business with any individual or entity who appears on sanctions lists maintained by the U.S. Office of Foreign Assets Control (OFAC), the U.K., the European Union, or the United Nations, unless authorized by an applicable general or specific license, exception, or exemption. Further, Third-Parties are expected to comply with the U.S. Export Administration Regulations.

## F. Anti-tax evasion and anti-facilitation of tax evasion

Robinhood will not tolerate unlawful tax evasion or the facilitation of unlawful tax evasion. Third-Parties must not directly or indirectly engage in, or facilitate the engagement by others in, the deliberate and fraudulent diversion of funds from a tax authority.

## G. Disclosure of Information

All business dealings should be transparently performed and accurately reflected on the Third-Party's business books and records. Information regarding Third-Party's labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

## H. Intellectual Property

Intellectual property rights are to be respected, transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and Robinhood customer and Third-Party information is to be safeguarded.

## I. Protection of Identity and Non-Retaliation

Programs that ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers are to be maintained, unless prohibited by law. Third-Parties should have a communicated process for their personnel to raise any concerns without fear of retaliation.

## J. Grievance Mechanism

Third-Parties are expected to operate a grievance mechanism that is transparent and understandable to employees, government officials, or other corporate representatives, and ensures the protection of whistleblowers.



## K. Insider Trading

Insider trading is prohibited. Under Federal Securities Laws, our Third-Parties cannot buy or sell Robinhood or another company's securities when in possession of information about Robinhood or another company that is (1) not available to the investing public, and (2) could influence an investor's decision to buy or sell the security.

## II. PRIVACY AND DATA PROTECTION

We expect our Third-Parties to protect our confidential information as well as they protect their own. Third-Parties must adopt and maintain processes and technical controls to provide reasonable protections for Personal Information, Sensitive Personal Information, Restricted Data and Company Confidential Information including information that they access, receive or process on behalf of Robinhood. In addition, Third-Parties must comply with all applicable privacy / data protection and information security laws and regulations. Furthermore, we expect our Third-Parties to have the following in place:

### A. Business Continuity and Disaster Recovery

Third-Parties are expected to manage business continuity risk and ensure the availability and continuity of critical services during an event which disrupts normal business. Depending on the nature of their business, Third-Parties should have plans in place for their business and services to continue with minimal interruption in the event of an emergency, crisis situation, weather-related or other natural disaster, pandemic or epidemic, terrorist/security related event, strikes, labor or other resource constraints, system and/or facilities outage or unavailability, power outage, and/or telecommunication outage or unavailability, so as to ensure that there will be no significant disruption to Robinhood's business, operations, and reputation. Business Continuity / Disaster Recovery plans should be tested at least annually. Third-Parties will share these plans as requested by Robinhood.

### B. Security

Third-Parties are expected to maintain an appropriate Information Security Plan, consisting of, at a minimum, sub-plans addressing Incident Response, Vulnerability Management, System Access Management, Security Operations, Security Testing, Employee Onboarding, and ongoing Employee Security Training. Third-Parties should disclose any data breaches and notify Robinhood promptly without undue delay to [vendor-security-notifications-group@robinhood.com](mailto:vendor-security-notifications-group@robinhood.com), and ensure any identified vulnerabilities are addressed within a reasonable timeframe respective to the vulnerabilities' severity level, but no later than 15 days for critical and high severity vulnerabilities. Third-Parties should not provide access to Robinhood's Personal Information, Sensitive Personal Information, Restricted Data and Company Confidential Information, without a legitimate business need and permission from Robinhood. Third-Parties should implement (and not bypass) security controls, restrictions,



or any other security measures. Third-Parties should not repurpose or synchronize Robinhood credentials with accounts on Third-party sites.

### C. Retention of Corporate Records

Third-Parties should ensure that all business records created, managed, or used are retained in full compliance with contractual and regulatory requirements.

## III. MANAGEMENT SYSTEMS

Third-Parties shall adopt or establish a management system with a scope that is related to the contents of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the Third-Party's operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continuous improvement. The management system should contain the following elements:

### A. Company Commitment

Corporate social and environmental responsibility policy statements affirming Third-Party's commitment to compliance and continual improvement, endorsed by executive management, and posted in the Third-Party's facilities in the local language.

### B. Management Accountability and Responsibility

Clearly identify senior executive and company representative(s) of the Third-Party responsible for ensuring implementation of the management systems and associated programs. Senior management must review the status of the management systems on a regular basis.

### C. Legal and Customer Requirements

Have an established process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.

### D. Risk Assessment and Risk Management

Have a process to identify the legal, compliance, environmental, health and safety and labor practice and ethics risks associated with the Third-Party's operations. Determine the relative significance for each risk and implement appropriate controls to manage the identified risks and ensure regulatory compliance.



## E. Training Programs

Have established Training Programs for training managers and workers to implement Third-Party's policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.

## F. Audits and Assessments

Engage in periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements related to social and environmental responsibility.

## G. Corrective Action Process

Have established a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.

# IV. LABOR & HUMAN RIGHTS

Robinhood is committed to uphold the human rights of workers, and to treat them with dignity and respect, as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. The recognized labor standards are:

## A. Freedom of Association

We expect our Third-Parties to respect workers' rights to freedom of association by meeting or exceeding the relevant requirements of local law.

## B. Working Hours

We expect Third-Parties to establish working hours that do not exceed the maximum set by local law, including overtime. All overtime must be consistent with local law. Workers shall be allowed at least one day off every seven days, or more as may be legally required.

## C. Wages and Benefits

We expect our Third-Parties to provide fair and competitive compensation and benefits that – at a minimum – meet or exceed the requirements of applicable law or, where statutory provisions (or their equivalent) do not exist, provide for an adequate standard of living for all employees. We encourage our Third-Parties to adopt policies and business practices that are consistent with our commitment to pay an economically viable wage and provide appropriate benefits.

## D. Non-Discrimination / Non-Harassment

Our Third-Parties shall commit to providing a work environment free of unlawful discrimination,



harassment and retaliation, prohibit unlawful harassment based on sex (including breastfeeding status, pregnancy, childbirth, or related medical conditions), as well as harassment based on other protected characteristics, including race (including traits historically associated with race, including, but not limited to hair texture, and protective hair styles), color, religion, or religious creed (including all aspects of religious beliefs, observance or practice, including religious dress or grooming practices), national origin (including language use restrictions), ancestry, citizenship, age, physical disability, mental disability, medical condition, marital status, domestic partner status, sexual orientation, gender identity, gender expression, genetic information, family care or medical leave status, military or veteran status, status as a victim of domestic violence, assault or stalking, or any other basis protected by applicable local, state or federal laws (“Protected Characteristics”). Our Third-Parties shall strongly disapprove of and shall not tolerate harassment of employees by managers, supervisors, or co-workers. Similarly, Third-Parties shall not tolerate harassment by its employees of non-employees with whom the Third-Party has a business, service, or professional relationship or harassment of its employees by non-employees with whom employees come into contact in connection with their employment at the Third-Party. In addition, except as mandated by law (for example to meet local health and safety requirements), our Third-Parties shall not subject their workers or potential workers to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way, in consideration of International Labour Organisation (ILO) Discrimination (Employment and Occupation) Convention (No.111).

## E. No Child Labor

Our Third-Parties must take all necessary steps to ensure that there is no child labor within their organizations or supply chains. A “child” is any person under the age of 15 (or 14 where the law of the country permits), or under the local legal minimum age for work or mandatory schooling, whichever is greatest. ILO Conventions 138 and 182 provide further detail.

## F. Human Trafficking

Our Third-Parties will not participate in human trafficking or exploitation, or procure or supply goods tainted by human trafficking; use any form of involuntary, slave, forced, bonded or indentured labor, regardless of local business customs, or purchase products or services from companies using involuntary, slave, forced, bonded or indentured labor.

## G. Philanthropy

We expect our Third-Parties to prohibit philanthropic support (financial, in-kind, or employee matching donations) to any non-religious organizations that have a written policy of discrimination against any legally protected class including sex, race, color, religion, national origin, age, sexual orientation, and physical or mental disability (e.g. organizations that actively discriminate on the basis of sexual orientation and gender identity).



## V. HEALTH AND SAFETY

Robinhood recognizes that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Robinhood also recognizes that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace. We expect our Third-Parties to refer to recognized management systems such as [ISO 45001](#) and [ILO Guidelines on Occupational Safety and Health](#), which were used as references in preparing the Code, as useful sources of additional information.

## VI. ENVIRONMENTAL STEWARDSHIP

Robinhood recognizes that environmental responsibility is integral to producing world-class products. We expect our Third-Parties to comply with all local, state and federal environmental regulations. We encourage our Third-Parties to work to reduce their environmental impacts associated with their operations. The environmental standards we expect our Third-Parties to adhere to are:

### A. Hazardous Substances

Chemicals, waste, and other materials posing a hazard to humans or the environment are to be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

### B. Solid Waste

A systematic approach to identify, manage, reduce, and responsibly dispose of, compost, or recycle solid waste (non-hazardous) shall be implemented.

### C. Greenhouse Gas Emissions (GHG)

We expect our Third-Parties to measure and report their emissions in line with the GHG protocol.

### D. Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations are to be characterized, routinely monitored, controlled, and treated as required prior to discharge. Ozone depleting substances are to be effectively managed in accordance with the Montreal Protocol and applicable regulations. Each of our Third-Parties shall conduct routine monitoring of the performance of its air emission control systems.



## E. Water Management

Third-Parties shall take steps to conserve, reduce use of, and reuse water in their own operations. Third-Parties are also expected to manage water resources to ensure their operations do not prevent access to sufficient safe water for all users in surrounding communities, including those both up and downstream from their facilities.

## VII. INCLUSION, EQUITY and BELONGING

Our commitment to inclusion, equity and belonging is at the core of who we are as a company. We actively work to foster a diverse workforce and an inclusive work environment that reflects the clients and communities we serve - in terms of sexual orientation, gender identity, race, ethnicity, neurodiversity, disability, veteran status, age, culture, skills, experience, thought and style. We invest in programs to attract, retain and develop diverse talent within our workforce and, as a result, have representation at all levels, including Board of Directors. We expect the same from our Third-Parties.

## VIII. COMPLIANCE ASSURANCE

Third-Parties are expected to self-monitor their compliance with the Code while conducting business with or on behalf of Robinhood, and to inform us in a timely manner of any non-compliance. We reserve the right to monitor compliance with the Code using a reasonable and risk-based approach and framework. 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 this code. Failure to agree upon a remediation plan, or failure to implement it, could adversely affect ability to be awarded additional work and/or result in termination.

## IX. GLOBAL INTEGRITY HELPLINE

If the Third-Party wishes to report possible illegal, unethical, or improper conduct, it may report through their own company's internal channels or the Third-Party can email Robinhood's Ethics Office Team at [ethics\\_office@robinhood.com](mailto:ethics_office@robinhood.com).

If that is not possible or appropriate, Robinhood maintains a Global Integrity Helpline for its employees, customers, Third-Parties and various other interested parties. The Integrity Helpline is run by a third-party provider and is accessible globally 24 hours a day, 7 days a week by website <http://speakup.robinhood.com> or phone through the U.S. toll-free number 1-888-308-0166. Robinhood will not tolerate unlawful retaliation against any individual for making a good faith complaint, reporting potentially inappropriate conduct or cooperating in an investigation. All voices are important and will be taken seriously by Robinhood.



## X. DEFINITIONS

- A. Robinhood - Robinhood Markets, Inc. and its subsidiaries.
- B. Third-Party - Business entities or individuals that provide products, services or resources directly to Robinhood, or to Robinhood's customers on its behalf.
- C. Fourth-Party - Business entities or individuals, including contingent workers of the Third-Parties that Robinhood purchases products and services from .
- D. Personal Information (PI) - Any data that identifies, relates to, describes, or is capable of being associated with a particular individual. Unless otherwise noted, all PI is treated the same regardless of whether it belongs to employees, customers or Third-Parties.
- E. Sensitive Personal Information (SPI) - PI within the Restricted Data classification which is subject to heightened controls due to its nature. Unless otherwise noted, all PI/SPI is treated the same regardless of whether it belongs to customers or staff.
- F. Restricted Data - data that if lost or exposed could cause significant harm to individuals or the business. Failure to protect this data would put the business prospects of the company at risk.
- G. Company Confidential Information - Internal data that provides useful information to staff. Loss or leak of this data may cause minor damage to the company or individuals.

