

ROBINHOOD THIRD-PARTY (VENDOR) CODE OF CONDUCT

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 Vendors to demonstrate ethical business conduct and assure the privacy and security of our data, protect human rights, assure workforce safety, care for the environment, and ensure regulatory compliance, 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.

A. GOVERNANCE AND ETHICAL BUSINESS PRACTICES

At Robinhood, we have defined our approach to managing conduct across the company in our [Code of Conduct](#). Robinhood and our agents are to uphold the highest standards of ethics including:

1) Business Integrity

The highest standards of integrity are to be upheld in all business interactions. Robinhood has a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

A. Conflicts of Interest

We expect our Vendors to disclose any potential conflicts of interest prior to initiating their relationship with us, or as soon as a Vendor becomes aware of a conflict after initiating a relationship; and we expect fair, noncollusive competition among our potential Vendors, contractors and subcontractors.

B. Gifts and Political Contributions

Vendors are prohibited from making payments to our employees or representatives in an effort to influence actions or gain an advantage with the Robinhood. Vendors are also prohibited from providing or offering gifts or anything of value to employees, government officials, or other corporate representatives in an effort to obtain or retain business. Political contributions must not be made on behalf of, or as a representative of Robinhood, in an effort to influence a business relationship, or to request influence of a political figure in favor of Robinhood.

C. Anti-Bribery and Anti-Corruption

We take a zero tolerance approach to bribery and corruption. We expect our Vendors to act professionally, fairly and with integrity in all business dealings on behalf of Robinhood. Vendors

are prohibited from engaging in any activity that would constitute, or be perceived to constitute, bribery and/or corruption, including tolerating or facilitating bribery and/or corruption.

D. Anti-Money Laundering

Vendors must not engage in illicit activities, including doing business with those engaged in illicit activities, including, without limitation, money laundering, terrorism financing, human trafficking, slavery or the proliferation of weapons of mass destruction.

E. Anti-tax evasion and anti-facilitation of tax evasion

Robinhood will not tolerate unlawful tax evasion or the facilitation of unlawful tax evasion. Vendors 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.

2) Disclosure of Information

All business dealings should be transparently performed and accurately reflected on the Vendor's business books and records. Information regarding Vendor'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.

3) 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 Vendor information is to be safeguarded.

4) 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. Vendors should have a communicated process for their personnel to raise any concerns without fear of retaliation.

5) Grievance Mechanism

We expect our Vendors to have a grievance mechanism that is transparent and understandable to workers, and which ensures the protection of whistleblowers.

6) Insider Trading

Insider trading is prohibited. Under Federal Securities Laws, our Vendors 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.

B. PRIVACY AND DATA PROTECTION

We expect our Vendors to protect our confidential information as well as their own. Vendors must adopt and maintain processes to provide reasonable protections for personal, proprietary and confidential information, including information that they access, receive or process on

behalf of Robinhood. In addition, Vendors must comply with all applicable privacy / data protection and information security laws and regulations. Furthermore, we expect our Vendors to:

1) Business Continuity

Maintain a documented emergency response and disaster recovery plan to guarantee the protection of data and intellectual property and the business continuity of the services and/or goods being provided to Robinhood.

2) Security

Disclose and ensure any identified vulnerabilities are addressed immediately. Do not provide access to Robinhood information, or customer information, without a legitimate business need, and permission from the responsible owner. Do not bypass security controls, restrictions, or any other security measures. Do not repurpose or synchronize Robinhood credentials with accounts on third-party sites.

3) Retention of Corporate Records and Internal Business Information

Ensure that all business records created, managed, or used on Robinhood premises or with Robinhood equipment / tools are retained in full compliance with the Robinhood Data Retention Policy.

B. MANAGEMENT SYSTEMS

Vendor shall adopt or establish a management system with a scope that is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the Vendor'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 continual improvement. The management system should contain the following elements:

1) Company Commitment

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

2) Management Accountability and Responsibility

Clearly identify senior executive and company representative(s) of the Vendor 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.

3) 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.

4) Risk Assessment and Risk Management

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

5) Training Programs

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

6) 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.

7) Corrective Action Process

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

8) Documentation and Records

Create and maintain documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality measures to protect privacy.

C. 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:

1) Freedom of Association

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

2) Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover, and increased injury and illness. We expect Vendors to establish working hours that do not exceed the maximum set by local law, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Workers shall be allowed at least one day off every seven days.

3) Wages and Benefits

We expect our Vendors 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 Vendors to adopt policies and business practices that are consistent with our commitment to pay an economically viable wage and provide appropriate benefits.

4) Non-Discrimination / Non-Harassment

Our Vendors shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, neurodivergence, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Our Vendors shall provide their workers reasonable accommodation for religious practices. In addition, our Vendors shall not subject its 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 ILO Discrimination (Employment and Occupation) Convention (No.111).

5) No Child Labor

Our Vendors 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.

6) Human Trafficking

Vendors 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.

D. 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 Vendors 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.

E. ENVIRONMENTAL STEWARDSHIP

Robinhood recognizes that environmental responsibility is integral to producing world-class products. We expect our Vendors to refer to recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS), which were used as references in preparing the Code, as a useful source of additional information. The environmental standards we expect our Vendors to adhere to are:

1) 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.

2) Solid Waste

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

3) 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 Vendors shall conduct routine monitoring of the performance of its air emission control systems.

4) Water Management

Taking steps to conserve, reduce use of, and reuse water in their own operations. Vendors 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.

F. DIVERSITY & INCLUSION

Our commitment to diversity and inclusion is at the core of who we are as a company. We actively encourage a diverse workforce and an inclusive work environment that mirrors the clients and communities we serve - in terms of thought, style, sexual orientation, gender identity, race, ethnicity, disability, culture and experience. We invest in programs to attract, retain and develop diverse talent within our workforce and, as a result, have strong representation at all levels, including our management team and Board of Directors. We expect the same from our Vendors.

G. COMPLIANCE ASSURANCE

Vendors 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, Vendors 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.