

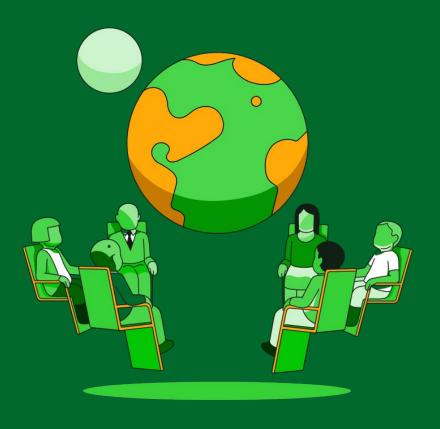
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<sup>&</sup>lt;sup>1</sup> "Robinhood" means Robinhood Markets, Inc. and its in-application and web experiences along with its family of wholly-owned subsidiaries.

### **About Robinhood**

This 2022 report provides an overview of Environmental, Social, and Governance (ESG) performance at Robinhood as well as related activities and progress undertaken in fiscal year 2022 (January 1, 2022 to December 31, 2022). All data is reflective of FY22, unless otherwise noted.



## Letter from our Chief Executive Officer



Our mission—to democratize finance for all—is fundamental to everything we do at Robinhood. It drives every step of our work and how we do business, from developing products that make investing more accessible to being transparent about how we show up in the world as a corporate citizen. Our values remain the bedrock of how we work to fulfill this mission everyday.

This year's ESG report, which is the third edition for Robinhood, comes on the heels of a tough market environment in 2022, with customers battling inflation, volatility in crypto markets, and rising interest rates in the U.S. These economic headwinds have had wide-ranging effects, not just on Wall Street but in people's everyday lives. This made it even more important for us to double down on our mission and help customers prepare for the future.

Amidst this economic backdrop, we responded by working harder than ever to deliver products tailored to meet the need of our customers, which continue to evolve and diversify. For example, in 2022 we launched Robinhood Retirement, which offers people a way to invest for the future with one percent matching and no employer necessary.

Our ESG strategy fosters an opportunity to advance our mission and drive positive impact for our business while providing our customers with more transparency on our priorities and how we operate. We're fiercely protective of our customers' safety and trust—we can't achieve our mission without these two principles. Transparency around our business operations is paramount to maintaining this trust.

In our latest ESG report, we build on our multiple years of disclosure and describe our ESG priorities, activities, and key metrics for fiscal year 2022. I'm especially proud of several highlights. For our work on the Environment, three years ago we took the first step in beginning to collect and track our greenhouse gas (GHG) emissions. This year, we've taken the next step toward high-quality measurement and reporting by completing a GHG data limited assurance process. This assurance helps us identify areas where emissions reductions can be achieved and allows us to continue to understand and implement strategies to mitigate climate change. As another highlight, we've continued to invest in providing easy-to-understand financial education resources, which is a cornerstone area for Robinhood. In 2022, we proudly partnered with community organizations in the U.S. to expand our financial education initiatives. Through our Money Drills Program, we partnered with universities across the U.S. to provide financial educational resources and support for student athletes so they feel empowered to take control of their financial futures. Participating universities included West Virginia University, Kansas State University, and the University of Memphis.

We're proud of the progress we've made on our ESG priorities in 2022, but we're still at the beginning of our journey and are committed to remaining open about how our programs are implemented and deliver outcomes. In the days ahead, I'm excited to see how our ESG strategies drive us forward on our road to democratizing finance for all.

Vladimir Tenev

Chairman, Chief Executive Officer, Co-Founder, and President Robinhood Markets, Inc.

### Our Mission and Values

#### **Our Mission**

Robinhood was founded in 2013 on the belief that everyone should be welcome to participate in the financial system. We are creating a modern financial services platform for everyone, regardless of their wealth, income, or background.

Our mission is to democratize finance for all. We use technology to provide access to the financial system in a way that is simple and convenient for our customers. We believe investing should be familiar and welcoming, with a simple design and an intuitive interface, so that customers are empowered to achieve their goals. We started with a revolutionary, bold brand and design in the Robinhood app which makes investing approachable for millions. We pioneered commission-free stock trading with no account minimums, which was adopted by the rest of the industry, and we continue to build relationships with our customers by introducing new products that further expand access to the financial system. Through these efforts, we believe we have made investing culturally relevant and understandable, and our platform is enabling our customers to become long-term investors and take greater control of their finances.

#### **Our Values**

At Robinhood, our values are in service of our customers. The following values describe the company that we aspire to become.



#### **Safety First**

Robinhood is a Safety-First company. The reliability of our platform takes precedence over all else, so that we can be there for our customers when they need us the most. We relentlessly work toward protecting our customers' security and privacy, and we only share with our counterparties what they need to fulfill our customers' financial needs, nothing more. We build safeguards and provide education so that our customers are in the best position to succeed. We have high-quality timely customer support, and when things aren't right, we fix them. We work closely with regulators and lawmakers to protect our customers and the broader financial system. We speak simply, plainly, and truthfully, even if it's not what others want to hear. We hold ourselves and our colleagues to the highest ethical standards.

### Our Mission and Values



#### **Participation is Power**

At Robinhood, the rich don't get a better deal. We founded Robinhood in the wake of the financial crisis because we identified a gap—the more you had, the better deal you got. We aim to give everyone access to the financial system, regardless of their background or bank account balance. That's why we have no account minimums and a product that was designed from the ground up for small accounts. We would rather serve many small customers over a few large ones. We reflect the world around us, and we elevate and embrace all voices so everyone feels at home at Robinhood.



#### **Radical Customer Focus**

We exist to make our customers happy. From the early days of Robinhood, we have prioritized getting direct customer feedback on what we were building. Talking to our customers forms the kernel of the product development process we have today. We listen with empathy, ask questions, and critically evaluate our work by how valuable our customers find it. We never stop asking how we can make our product better, and we never settle for 'good enough'. We listen to our colleagues, and we start from a place of believing they are capable and well-intentioned. We delight our customers and take pride in our work.



#### **First-Principles Thinking**

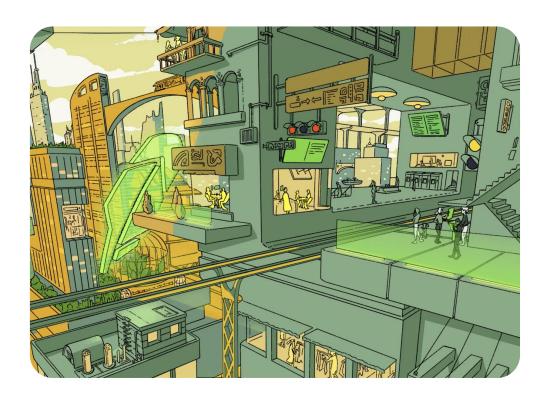
We make bold bets and challenge the status quo. Our foundation is in art, science, and pure mathematics, and we have a deep appreciation for the scientific process. We develop hypotheses and design experiments to test them. We reduce complex problems to their constituent bits. We debate vigorously and change our minds when confronted with the right evidence. We bravely do what's right, even when it hasn't been done before. We treat our company like a product and aim to get better, every single day.

#### **Our Business**

We understand that millions of our customers have used Robinhood to enter the financial markets for the first time, and we take our responsibility to them seriously. We are passionate about operating Robinhood in a way that aligns with customer interests, applicable regulations, and with our own mission to democratize finance for all. We plan to create an ecosystem of financial products and services that will enable people across the world to become investors.

We believe the products on our roadmap will go a long way toward making that a reality, and can transform the relationship people have with the financial system. We began by offering our customers the ability to buy and sell equities on a mobile-first platform and have since continued to expand our offerings to add products and features for our customers. Each capability we have added has been the result of a continuous focus on our customers' needs and feedback, which has guided our product development decisions throughout our history.

Each of our offerings are underpinned by our core tenet of expanding access to our financial system through products that empower people to learn, participate, and grow. We remain focused on building the best products and ultimately aim to serve all of our customers' financial needs.



#### **Our Business**

#### Our Brokerage subsidiary, Robinhood Financial LLC, offers:



- Equities Investing: We offer U.S. listed stocks and exchange-traded funds (ETFs), as well as related options and select American depositary receipts.
- Retirement: We are making it easy and accessible to start saving for retirement through a traditional or Roth IRA and expanding options for the growing population of freelance and gig workers without access to employer-based matching programs. Robinhood Retirement provides a 1% match (other fees and match limitations may apply) on every eligible contribution with no traditional employer necessary, and zero commissions and account minimums.
- Fractional Trading. Fractional trading allows customers
  to invest in fractions of a share of stock, rather than
  requiring them to buy and sell whole shares. This
  service enables customers to build a diversified portfolio
  regardless of their budget and removes a barrier to
  investing in higher-priced stocks, thereby providing
  access to a much greater selection of equities with as
  little as \$1.
- Robinhood Gold: Our monthly paid subscription (\$5/Mo) service provides customers with premium features, such as bigger instant deposits, margin investing at 7.75%, real-time market data, professional research, and a competitive 4.65% APY rate on uninvested cash (each rate as of May 4, 2023). All rates are variable.
- Advanced Charts: Robinhood launched advanced charts, giving all customers customizable, quick, simple, and in depth analysis right in the app. More advanced and active traders have a specific need for features that help them make quantitative, analytical decisions.

#### Our crypto subsidiary, Robinhood Crypto, LLC, offers:



- Cryptocurrency Trading: 15 different crypto-currencies are available for trading as of June 9, 2023. We charge no commissions or fees for crypto trades.
- Recurring Crypto Investments: Customers can regularly buy cryptocurrency with as little as \$1, on a daily, weekly, biweekly, or monthly schedule of their choice.

#### **Our Business**

#### Robinhood Non-Custodial, Ltd. (Caymans) offers:



 Robinhood Wallets: This year Robinhood Wallet officially rolled out to all iOS users on the waitlist. It is now available globally, where it has been downloaded in 130+ countries.

#### Our spending account subsidiary, Robinhood Money, LLC, offers:



- Robinhood Cash Card and Spending Account:
   Customers can spend with a debit card and opt into
   rewards that were once reserved for credit card
   holders, like round-ups and bonuses.
- Early Access to Paychecks: Customers can set up direct deposit and apply to get access to their paycheck up to two days early.
- No Hidden Fees: Spending the Robinhood way with no monthly fees, no subscription fees, no in-network ATM fees, no overdraft fees, and no account minimum fees that cut into a customer's subsequent investing activity.

#### We generate substantially all of our revenue through:

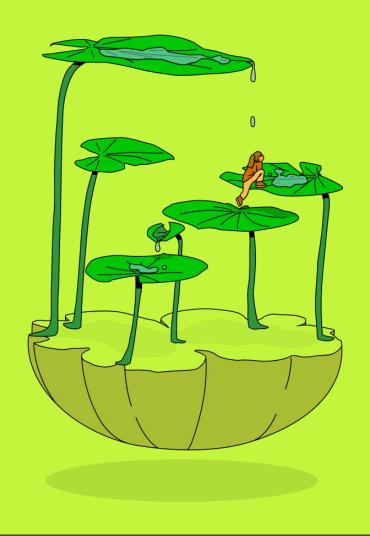


- Payment for order flow (PFOF) and Transaction Rebates: From market makers to which we route orders
- Interest income: Margin lending and cash deposits
- Securities lending: Income from lending securities to counterparties
- Robinhood Gold: Subscription fees

For important disclosures, please see pages 51 and 52.

### Environmental

Robinhood is committed to understanding and responsibly managing our environmental impact, including emissions that contribute to climate change. We understand that protecting our planet helps sustain long-term economic growth, and we seek to utilize our corporate capabilities to address environmental challenges.



#### SAFETY FIRST

### Environmental Footprint

#### **Environmental Footprint**

At Robinhood, we recognize that climate change impacts all businesses, and we're committed to understanding both our impact on the environment and the climate's impact on our business. We're committed to building a sustainability program anchored in transparency, where we openly share our current state and progress updates.

#### **Greenhouse Gas Inventory**

We are working to improve our environmental footprint through a measurement plan and sustainability programs. Since 2019, we've completed an annual greenhouse gas (GHG) inventory (sometimes termed a "carbon footprint"). We report Scope 1, 2, and 3 emissions across our value chain, including building operations, cloud usage and contracted co-located data centers (we do not own or operate data centers), employee work from home, purchased goods and services, marketing, and business travel. Our GHG inventory has expanded each year to include additional relevant categories. Robinhood's 2022 inventory maintains the same operational boundary as 2020 and 2021, but introduces some changes to calculation methodology to align with the latest science and emissions factors.

#### **2022 Carbon Footprint**

In 2022, Robinhood emitted 72,585 metric tons (see table on following page) of carbon dioxide equivalent (tCO2e). Our Scope 1 emissions increased y/y due to employees returning to offices. Through renewable energy purchases for all of our operations, we were able to fully offset our Scope 2 emissions associated with our rented or leased office space. Robinhood's inventory shows that Scope 3 emissions make up the majority of our footprint with the largest emissions categories being purchased goods and services (e.g., professional services and information technology), cloud usage, and marketing. Scope 3 emissions associated with purchased goods and services and cloud usage decreased in 2022 compared to the prior year because suppliers integrated more renewable energy into their operations. Business travel and employee commute emissions increased somewhat as we returned to in-person work.

What are greenhouse gas emissions?

Emissions are gasses that trap heat in earth's atmosphere and that contribute to the global greenhouse effect, causing climate change. GHG emissions are emitted from activities such as burning fossil fuels.

### Environmental Footprint

#### 2022 Carbon Footprint Breakdown



#### **Greenhouse Gas Inventory Methodology**

Robinhood's 2022 footprint covers the following scopes and categories through market-based emissions measurement:

GHG Scopes	Emissions (tCO2e)	
Scope 1: Natural gas	421	
Scope 2: Purchased electricity (market-based)	0	
Scope 3.1: Purchased goods & services	60,111	
Scope 3.2: Capital goods	100	
Scope 3.3: Fuel and energy related activities	701	
Scope 3.5: Waste generated in operations	312	
Scope 3.6: Business travel	5,690	
Scope 3.7: Employee commuting	4,953	
Scope 3.8: Upstream leased assets	297	
Gross emissions	72,585	
Carbon removals (see details on page 15)	-1,235	
Net emissions	71,350	

For our 2022 GHG inventory, Robinhood continued to work with Watershed, a third-party climate software platform. Robinhood follows the guidelines from the GHG Protocol Corporate Accounting and Reporting Standard ("GHG Protocol") and the Corporate Value Chain (Scope 3) Accounting and Reporting Standard. Watershed determined which data inputs cover Robinhood's operational control and value chain and used this data to calculate our emissions inventory.

<sup>&</sup>lt;sup>2</sup> Scope 2 emissions are reported here as market-based due to Robinhood's renewable energy purchases.

### Environmental Footprint

#### **Inventory Boundary**

Reporting period: Fiscal year 2022 (January 1, 2022 to December 31, 2022)

Operational Control: As described in the GHG Protocol, under the operational control approach, companies account for 100% of emissions from operations over which it or one of its subsidiaries has operational control. For Robinhood, operational control is defined as any facility or operation in which employees were present and had the ability to influence operating policies that relate to resource consumption. Robinhood also considers emissions associated with our employees working from home within its inventory boundary.



#### How are GHG scopes defined?

Scope 1 — Direct emissions from sources owned or controlled by Robinhood (e.g., natural gas usage)

Scope 2 — Indirect emissions associated with the purchase of electricity, heat, or cooling by Robinhood

Scope 3 — Indirect emissions associated with Robinhood's value chain (e.g. business travel, capital goods)

# Efficiency and Emissions Reduction Strategies

#### **Efficiency and Emissions Reduction Strategies**

Robinhood is committed to reducing our carbon footprint through efficiency and reduction strategies. Our biggest opportunities to reduce our footprint are managing energy use more efficiently where we can control it and working with environmentally responsible third-party providers.

#### Office Emissions

We lease facilities located throughout the United States and other countries around the world, including United Kingdom, Netherlands, and India. Our leased locations include our corporate headquarters located in Menlo Park, California and offices in Denver, Colorado; Lake Mary, Florida; New York, New York; and Washington, D.C. Currently, all offices are open for employees to use. To support energy efficiency in our offices, all locations use LED and motion-sensored lighting in designated areas. At our headquarters location, all buildings are located within short walking distance to encourage travel by foot versus car.

#### **Cloud Providers**

Cloud services are one of our largest sources of Scope 3 emissions and fall within the Scope 3.1 category of purchased goods and services. Robinhood does not own or operate any data centers. As of 2022, all our cloud providers have either achieved zero GHG emissions or have a public commitment to do so. We do not currently account for emissions reductions already achieved by suppliers in our Scope 3 footprint.

#### **Employee Commuting**

We encourage employees at our headquarters location to reduce their emissions from commuting by providing paid public transportation passes, stipends for public transportation costs, and electric vehicle charging stations. At our other office locations, we also offer bike storage, lockers, and showers.

#### **Water and Waste**

We are committed to using natural resources judiciously. To reduce water usage in U.S. offices we installed low-flow faucets and toilets. We have also specified low water species of indoor plants and native species in external landscaping. To address waste management, we have been composting and recycling at our headquarters since 2017, following California ZeroWaste initiatives in Palo Alto and San Mateo Counties. Caterers at our corporate headquarters provide compostable utensils and serving ware. At our second largest location in Lake Mary, Florida, we have had a recycling program since 2018.

# Efficiency and Emissions Reduction Strategies

#### **Carbon Removal and Renewable Energy Purchases**

Building on our efficiency and emission reduction efforts, in 2022, Robinhood purchased a total of 1,288 (tCO2e) of carbon dioxide removal and procured 10,694 megawatt hours (MWh) of Renewable Energy Certificates (RECs) for 2022 and future footprints. We are proud to take these steps forward to reduce our impact on the environment, and we intend to continue building our clean energy and carbon removal strategies.

#### **Reforestation Carbon Removal**

In order to fully remove our Scope 1 and a portion of our Scope 3 emissions, Robinhood purchased 1,235 metric tonnes of (tCO2e) reforestation carbon removal from CommuniTrees, a reforestation project located in Nicaragua. These investments help build financial security for smallholder farmers and support reforestation of underused land.

#### **Engineered Carbon Removal via Kelp Sequestration**

Robinhood also purchased 53 tCO2e of kelp sequestration carbon removal units from Running Tide. Based in Maine, this startup is working to develop a scalable ocean carbon dioxide removal technology to restore ocean alkalinity and combat ocean acidification. We expect that the credits will be delivered to Robinhood in 2024, and by purchasing in advance, Robinhood sends an important demand signal for greater investment in new carbon removal approaches.

#### **Renewable Energy Certificates**

In 2022, we procured 10,694 MWh of wind RECs from a project in Oklahoma to reduce indirect emissions, and a portion of future emissions in 2023. The RECs cover 100% of Robinhood's total office electricity usage and support clean energy projects.

#### **Future Sustainability**

Based on these initial assessments and efforts we are in the early stages of understanding how best to reduce and mitigate our environmental impact. Our goal is to assess ways to minimize our impact across different areas, efficiently handle our business travel, and actively choose third-party providers who prioritize sustainability. It is our intention to create targets, develop an emissions reduction strategy, and continue reporting our progress.

#### What is Carbon Removal?

Carbon Removal is a process by which carbon dioxide (CO2) is extracted from the atmosphere and sequestered (stored). Carbon Removal credits help companies to offset part or all of their carbon impact.

### Social

Since our founding in 2013, we've committed to breaking down barriers that have historically prevented millions of investors of all backgrounds and socioeconomic status from participating in the financial markets.



#### **Access and Inclusion**

### Access and Inclusion

23M

Robinhood Net Cumulative Funded Accounts (as of December 31, 2022).

~50%

Percentage of Robinhood customers who started investing on Robinhood in 2022 and self-identified as first-time investors.

~1/3

Customers on the platform that self-identify as women.\*

Robinhood is helping to create a diverse new generation of investors. We understand the barriers that have prevented millions of people from participating in financial markets. And, we're committed to helping our customers overcome those barriers. Through targeted educational resources, product enhancements, and community partnerships, we continue to make investing and wealth generation more accessible for millions of diverse investors.

Women Investors on Robinhood\*



<sup>\*</sup>This data comes from a Robinhood survey, powered by Dynata, based on a sample of approximately 7,200 Americans who have a brokerage account. The sample is representative of the U.S. population across age, gender, and income. Data was collected between January 1, 2023, and March 31, 2023. Incumbent firms include: Charles Schwab, E\*Trade, Fidelity, TD Ameritrade, Vanguard.

#### Education

#### **Education**

Offering educational resources is critical to advancing our mission. The more financial education people receive, the better equipped, and thus more empowered they will be to make personal investment decisions that support their long-term goals. We've been expanding financial educational resources on the Robinhood Learn <u>website</u> for anyone to access as well as in-app education for our customers.

We offer a variety of ways for investors to grow their financial knowledge:

 Robinhood Learn. Robinhood Learn is an online collection of beginners' guides, feature tutorials, and an extensive financial dictionary available to anyone. It is designed to provide people with a breadth of financial education and is regularly updated in order to provide timely and relevant information for anyone to learn and grow.



Number of web page views for educational articles on learn.robinhood.com in 2022.



Launched in April 2021, our in-app education modules put learning the basics of investing at your fingertips.

- In-App Education. Our first in-app education resources cover investing fundamentals including why people invest, a stock market overview, and tips on how to define investing goals. This allows customers to understand the basics of investing before their first trade. We plan to continue to release additional Learn modules to provide customers access to information that can help build financial confidence.
- Newsfeeds. Our newsfeeds give customers access to free, premium news from sites such as Barron's, Reuters, and Dow Jones.

**RADICAL CUSTOMER FOCUS** 

#### Education

Sherwood Media, LLC. Robinhood Markets, Inc.'s <u>newly formed subsidiary</u>, Sherwood Media, LLC, will build on the success of Snacks—a daily markets and business newsletter—which has one of the largest audiences in the country among financial publications. Sherwood Media will be home for news and information about the markets, economics, business, technology, and the culture of money.

#### ~40M

Snacks newsletter subscribers as of December 2022. Snacks provides easily digestible financial news.

 Crypto Learn and Earn. Exclusive in-app educational module available to all Robinhood Crypto customers via Robinhood Learn to teach customers the basics about cryptocurrency. Customers who complete the free courses will be eligible to receive rewards, which will be paid out in cryptocurrency.

Robinhood's array of financial education tools is providing on-demand learning opportunities designed to serve a diverse audience. By bringing greater transparency to the function of the market and the factors shaping investment opportunities each day, we continue to make the financial markets more accessible and inclusive for millions of people.



### Community Engagement

#### **Community Engagement**

At Robinhood, the External Affairs and Community team embodies our commitment to democratizing finance for all through meaningful community engagement aligned with our business and mission and innovative social impact. To do this, we work with a diverse spectrum of mission-aligned people and organizations.

In 2022, we increased our stakeholder partnerships by 150%, launched new mission-driven programs, and supported organizations working to advance financial access and inclusion. Highlights include:

- Florida Council on Economic Education: To reinforce
  Robinhood's value of Participation is Power, Robinhood built a
  partnership with the Florida Council on Economic Education to
  provide free trainings for public teachers to educate their students
  on personal finance. In the first year, we empowered educators
  across the state, from Jacksonville and Pensacola to Orlando,
  Tallahassee, and beyond.
- Robinhood Money Drills: With access to scholarships, sponsorships, stipends, and now, in some cases, to earnings because of the recent Name, Image, and Likeness (NIL) legislation, student athletes are in a unique financial position during college. It is more important than ever that student athletes are empowered to manage their personal finances. Robinhood Money Drills is a financial education program for student athletes that aims to close the knowledge gap for this community. By providing resources and support to universities, Robinhood Money Drills empowers athletes to develop the skills and confidence to manage their financial futures. The pilot launched in April 2022 with West Virginia University, and Robinhood announced additional partnerships with Kansas State University and the University of Memphis in the fall.

"Every student has a different path and financial variables to navigate, and we are building out new opportunities to engage everyone on that journey in new ways. We are so grateful for the new partnership with Robinhood as we embark on a big goal of equipping every K-State student with financial competencies and life skills — whether it's support when creating a college budget plan, making decisions about loans and repayments, or understanding compensation and benefits with job offers."

**KATHLEEN HATCH** 

Morrison Family Associate Vice President Student Well-being at Kansas State University

### Community Engagement



- Thought Leadership: We convened thought leaders in the financial empowerment space by hosting roundtables with National Bankers Association Foundation, National Association of Securities Professionals (NASP), Operation HOPE, and the World Economic Forum. We promoted financial access and inclusion in key discussions at the National Bankers Association's Annual Conference, the Memorial Foundation's signature event on Martin Luther King, Jr. Day, and a FitMoney convening with NFL player and financial educator Brandon Copeland.
- Opportunity Crypto: Aligned with our value of Safety First,
  Robinhood launched a new program offering free, in-person crypto
  education workshops designed to present a holistic introduction to
  this asset class that helps people better understand the power of
  cryptocurrency and determine if it is right for them. Some of our
  2022 partners for this program included Amplify Latinx, Durham
  Chamber of Commerce, and the National Black Empowerment
  Council

"The market is stronger when it's more inclusive to retail investors and individuals of all backgrounds... It's no surprise that I'm so impressed by Robinhood's courage to challenge the status quo. Their leadership will have an impact on generations of families who simply were unable to access wealth building tools."

Ronald C. Parker

President and CEO of NASP

#### Attracting Talent

#### **Attracting Talent**

Our employees—Robinhoodies—are mission driven. We seek to hire curious thinkers who are looking to co-author the next chapter of our story and play a key role as we continue forward with our ambitious plans.

We want our employees to be able to fulfill their roles, experience meaningful career growth, and reach their goals. We champion our people to work on challenging projects and drive their development. They're encouraged to raise their hand for opportunities that align with their individual career plans. Recognizing great talent and fostering their success is key to continuing to build a strong culture at Robinhood.

We're proud of what we've built. In 2022, Robinhood was recognized by several leading organizations as a top place to work:

- Fortune Best Workplace in Financial Services & Insurance™
- Fortune Best Workplaces for Millennials™
- Built In Best Places to Work in San Francisco
- Built In Best Large Companies to Work For in San Francisco
- Built In Best Places to Work in Colorado
- Built In Best Large Companies to Work For in Colorado
- Built In Best Paying Companies to Work For in Colorado



#### Growth, Motivation, and Retention

#### **Growth, Motivation, and Retention**

As we continue innovating for our customers, we will also strive to continue building a culture of belonging for Robinhoodies and an inclusive and equitable working environment for every single team member.



#### **University Program**

Robinhood is working to diversify our talent pool and increase access to finance and technology careers. This is an important strategy to drive innovation and excellence in our products and customer service. To drive results and support the demands of our business, we've built strong relationships with universities, professional associations, and industry groups to proactively engage and attract talent from underrepresented groups. Our dedicated university program attracts and retains exceptional interns and new graduates to fuel the growth of our most strategic business areas. We host a paid intern program each summer across multiple functions. We also lean into our partnerships with Historically Black Colleges and Universities (HBCUs), Hispanic-Serving Institutions (HSIs), boot camps, and groups for underrepresented students to identify talent.

#### Growth, Motivation, and Retention

#### **Compensation and Benefits**

We offer highly competitive compensation packages and flexible benefits to hire and develop great talent. In addition to competitive base pay, full time employees are eligible for variable incentive pay (cash and/or equity) linked to company and individual performance. We also offer benefits for employees and their families, including domestic partners and their children, as applicable. Benefits include:

- A robust offering of medical, dental, and vision insurance; for U.S. employees, Robinhood pays 100% of monthly premiums for employees and covers 90% for any dependents on select plans.
- Employer-paid life and disability plans
- Retirement savings plans with competitive employer match
- Parental leave, including 16 weeks of fully paid, flexible parental leave following birth or adoption in the U.S.
- Fertility lifetime benefits up to \$25,000
- \$2,500 lifestyle spending account credit per year
- On-demand emotional health support and 12 free therapy sessions a year for employees and dependents
- Employee Assistance Program for employees to receive confidential 24/7 support about emotional well-being and financial or legal matters
- Paid time off, sick leave, company holidays, and volunteering time off
- Tax advantaged accounts like Flexible Spending Account (FSA),
   Dependent Care FSA, Health Savings Account, and commuter benefits

#### Growth, Motivation, and Retention

#### **Learning and Development**

To achieve our mission to democratize finance, we need to attract, develop, and retain world class talent. We strive to create the programs, tools, and resources that enable Robinhoodies to do incredible work, lead exceptional teams, and realize their full potential. We also design programs that nurture, sustain, and embed our unique culture across the entire employee lifecycle.

Last year was a foundational moment for our learning and development programs. We introduced a new career framework to help employees understand the expectations of their role and enable them to drive their own career growth and development. This framework facilitates consistent expectations for our employees across teams and functions.

We also invested in leadership development. We believe a great employee experience requires equally great managers and leaders who know how to set direction, unlock potential, and build high performing teams. We developed an inaugural leadership development program and enrolled the first cohort of over 175 managers. This program encourages managers to review current methods, explore content on best practices, reflect on key behaviors, and apply new skills in their roles. Using a third-party coaching platform, we provided professional 1:1 coaching services for over 500 managers, Employee Resource Group (ERG) leaders, newly promoted employees, and individual contributors to support their development.

Lastly, we invested in Lattice, a performance and growth platform that enables employees and managers to more effectively create long-term career goals, seek developmental feedback, and track progress along the way. We introduced individual growth plans to create the structure for employees to receive more frequent feedback on performance and career development throughout the year. We also doubled down on creating a culture of internal mobility, improving and clarifying our internal transfer processes in order to create the pathways and opportunities for employees to grow their careers here at Robinhood. Additionally, employees have access to an ongoing education stipend as part of our lifestyle wallet benefit, to access upskilling resources outside of the company.

#### Growth, Motivation, and Retention

#### **Employee Engagement**

Our Participation is Power value extends to how we approach our customers and employees alike. We seek to create an environment where employees reflect the world around us, and a culture that elevates and embraces all voices so everyone feels at home at Robinhood.

We want Robinhoodies to speak up and share their voices. During our weekly all-hands meetings, every employee has the opportunity to ask questions of our senior leadership. Our quarterly engagement survey measures organizational culture, inclusion, and engagement and gives employees an opportunity to share feedback and comments directly with our leaders. Each quarter, we report aggregate results of the survey and encourage all managers to discuss findings with their teams to help ensure we are constantly improving the employee experience. We launched several new initiatives as an outcome of employee feedback, including a spot bonus recognition program, greater transparency of compensation programs, and a flexible lifestyle wallet for wellness benefits. We use the survey results as critical inputs to inform our ongoing people programs and focus on what matters most for our employees. We also have an Anonymous Integrity hotline and Speak Up and Non-Retaliation policy to support Q&A. We encourage all employees to speak up about their confidential and anonymous concerns or questions through other channels.



We believe creating a strong culture requires intentionally bringing employees together to connect, collaborate, learn, and build community. All office locations, including remote-first workers, have a site leader to support events like happy hours, game nights, and family-style lunches to create informal opportunities for connection. We also enable leaders to bring teams together for in-person offsite meetings, where teams can engage in long-term planning, workshops, and team-building activities.

#### Growth, Motivation, and Retention

#### **Reduction and Restructuring**

One of the most cherished aspects of Robinhood is the teamwork and camaraderie in working toward our mission together. We are incredibly privileged and fortunate to work with many talented colleagues, and when necessary, parting ways with those colleagues has been a difficult task.

On April 26, 2022, Robinhood announced we would reduce 9% of full time employees. Throughout 2020 and the first half of 2021, we experienced a period of hyper growth accelerated by pandemic lockdowns, low interest rates, and fiscal stimulus. To meet customer and market demands, headcount grew almost 6X from 700 to nearly 3,800 people in that time period. This rapid growth resulted in some duplicated roles and functions and more layers and complexity than are optimal. After careful consideration of all factors, Robinhood determined that reducing and reorganizing staff was the right decision to improve efficiency, increase velocity, and promote responsiveness to our customers' changing needs.

As part of Robinhood's broader reorganization into a General Manager structure ,we announced a further reduction of headcount by approximately 23% on August 2, 2022. It was determined that the earlier reduction did not go far enough. There was additional deterioration of the macro environment, with inflation at 40-year highs and a broad crypto market crash. This further reduced customer trading activity and assets under custody. In this new environment, Robinhood was operating with more staffing than appropriate. To drive greater cost discipline and accountability, we changed organizational structures to flatten hierarchies, reduce cross functional dependencies, and remove redundancies. In both reductions, Robinhood offered severance packages to impacted individuals.

While the decisions to undertake these actions weren't easy, it was a deliberate step to support our efforts to continue delivering on our strategic goals and furthering our mission to democratize finance.

### Inclusion, Equity and Belonging

#### Inclusion, Equity, and Belonging (IEB)

At Robinhood, we strive to create a community where everyone feels valued, and embrace the differences that enable us to foster a high performance culture that serves the needs of our diverse customer base. We believe a more diverse and inclusive culture helps us achieve that outcome. We also recognize that there are systemic barriers that have led to lower representation and limited growth for underrepresented groups in the finance and tech industries, so we're committed to finding ways to disrupt bias and increase access in all that we do.

We have an IEB team dedicated to making progress on Robinhood's IEB work. This team partners with department leaders to build IEB action plans to empower ownership and accountability across our company.

Our senior leadership team and employees recognize and understand that IEB work takes time. It starts by creating an inclusive environment from the top and extends down to every employee. We continue to identify and act on areas that allow Robinhood to have a meaningful impact and serve as a model for inclusion, equity, and belonging.



What is Inclusion, Equity and Belonging (IEB)?

Inclusion, Equity, and Belonging (IEB) is the concept of creating a culture and community that values and embraces everyone's differences. Inclusion aims to increase access to opportunities and resources so that all groups can fully participate. Equity is the focus on fair and just processes and practices to eliminate partiality.

### Inclusion, Equity and Belonging

As we partner internally to build a more inclusive environment, we are seeking to drive change with the following actions:

- Modeling purposeful leadership: Leaders connect IEB to strategic business principles and outcomes in order to model the behavior expected when communicating, leading, and engaging in self-reflection
- **Guiding transformational change:** Delivering IEB programs and initiatives, and partnering with leaders to help manage implementation, track progress, and celebrate impactful milestones
- Building inclusion capabilities and shifting behavior: Designing programs that drive IEB capabilities within the company and encouraging employees to apply new learnings while adopting inclusive behavior

As we embarked on our journey to become a more inclusive company for our employees and customers, we continued to build out the infrastructure needed for IEB. We implemented new systems, updated processes, and launched several pilot programs.

We continue to explore how data collection and analysis can inform our hiring, advancement, inclusion, and retention strategies.



### Inclusion, Equity and Belonging

#### **Culture of Belonging**

Robinhood is committed to fostering a more inclusive, equitable, and welcoming environment for our employees that enables their success, supports their well being, and strengthens their sense of belonging. Our Employee Resource Groups (ERGs) are key to achieving this vision.

ERGs are voluntary, employee-led groups that aim to foster a more inclusive culture by building support and awareness of the experiences of Underrepresented Groups (URGs) and creating a sense of belonging. ERG members have the opportunity to develop professionally, expand their networks, drive awareness around important social issues, and amplify the needs and voices of URGs communities in pursuit of fostering a more inclusive culture at Robinhood. As of December 31, 2022, about 60% of our employees were members of at least one of the following ERGs: Asianhood, Black Excellence (BEX), Divergent, Latinhood, Parenthood, Rainbowhood, Sisterhood, Women in Tech, and Veterans at Robinhood. Our ERGs design annual strategies to build community, embed a culture of equity and inclusion, scale inclusive hiring, and support career growth of URGs. Members also provide invaluable perspective about our internal programs, talent management, external marketing, and inclusive product development.

Building a culture of belonging also means being supportive of and welcoming to people of different abilities. We engaged in the following robust set of strategies to ensure accessibility:

- Amplified our reasonable accommodations process during hiring and provided more accessible resources during onboarding such as a sign language interpreter, extended time for a technical exam, and improved accessibility in a work area
- Created a resource for leaders on how to lead more accessible meetings
- Included a checkpoint for accessibility in evaluating new technology vendors for hiring and learning

#### What is an ERG?

Employee Resource Groups (ERGs) are identity or experience based groups that serve URG communities. ERGs help to create an inclusive workplace and build community through networking, mentoring, and development opportunities and providing a space for allies.

### Inclusion, Equity and Belonging

We continued to invest in tools and resources to better support our people managers and to help them integrate IEB considerations into how they manage our employees. We piloted an inclusive leadership learning journey through an online learning and behavior change platform. People managers explore their identity, reflect on how inclusion and exclusion dynamics show up in their work groups, and reflect on how their own behaviors influence their teams. For senior leaders, we began offering an inclusive behavior inventory assessment, which helps build awareness of their inclusive behaviors and enhance their capabilities to increase IEB across teams. We integrated IEB education into the workflow for our leaders and people managers, incorporating mitigating bias and equity content into feedback loops, performance reviews, and promotions.

#### **Inclusive Hiring**

Our goal to maintain a diverse and inclusive workforce reflects the communities we serve. We are focused on sourcing and hiring talent with diverse characteristics, skill sets, and perspectives. This approach includes ensuring the consideration of people with varied attributes and lived experiences inclusive of gender identity, expression, and orientation in addition to age, race/ethnicity, religion, nationality, disability, neurodiversity, and veteran status.

Sourcing and hiring are key focus areas for advancing diverse representation at Robinhood. We are aiming to source from underrepresented communities to find and attract a diverse pool of talented candidates. Our university recruiting partnerships include Historically Black Colleges and Universities (HBCUs), Hispanic-Serving Institutions (HSIs), historically all-female universities, and boot camps training underrepresented talent for technical roles. We also feature a diverse array of employee stories on social media to help URG candidates see themselves potentially working at the company.

Our hiring process includes crafting inclusive job postings and striving to ensure that the interview process is objective and equitable. We deployed inclusive hiring workshops and additional inclusive recruitment training to hiring managers, interviewers, and recruiters. This and required compliance training were the most important training rolled out across the company, and we will continue to evolve these workshops as we grow.

### Inclusion, Equity and Belonging

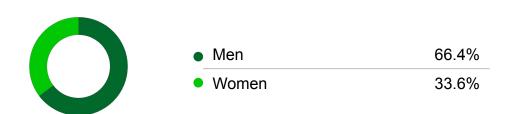
We also began piloting the Diverse Slate Approach, which requires that at least one qualified candidate at the onsite interview stage is from an underrepresented background. Once a final candidate is identified, we offer the candidate a call with our ambassador program. Ambassadors connect with candidates to give them a preview into our organizational culture at Robinhood before they accept the offer. In addition to daily job insights, we particularly emphasize programs like the ERGs which focus on creating a space to strengthen a sense of belonging.

#### **Diverse Representation**

Our program and process efforts combined with the intentions and actions of our employees to support IEB everyday helped us attract and retain a diverse employee population. As of December 31, 2022, among our U.S. employees, 5.9% identified as Black and 7.3% as Hispanic or Latino, and women made up 33.6% of our global workforce.

As we continue to make progress, we know there is a lot more work ahead of us. We know accountability and transparency are key to driving positive change. All statistics shared below are a result of employee self-identification and as of December 31, 2022.

#### **Robinhood Gender**

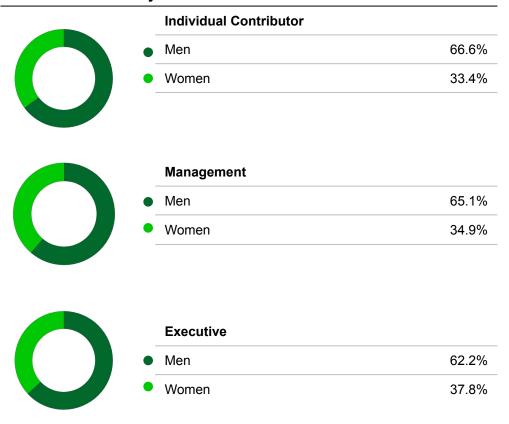


#### Robinhood Race/Ethnicity (U.S. only)

White	Asian	Hispanic or Latino	Black or African American	Multi/ Indigenous	I do not wish to answer
43.1%	34.8%	7.3%	5.9%	5.6%	3.2%

### Inclusion, Equity and Belonging

#### **Robinhood Gender By Role**



#### Robinhood Race/Ethnicity by Role

White	Asian	Hispanic or Latino	Black or African American	Multi/ Indigenous	I do not wish to answer	
Individual Contributor						
41.1%	35.9%	8.0%	5.9%	6.2%	2.9%	
Management						
51.8%	29.7%	4.4%	6.4%	2.7%	4.9%	
Executive						
51.3%	32.4%	2.7%	5.4%	5.4%	2.7%	

### Governance

We have a steadfast commitment to maintaining high standards of business and professional conduct and compliance. We seek to earn the trust of our customers and stakeholders each day by upholding our values and maintaining a culture of integrity.



SAFETY FIRST

#### Code of Conduct

#### **Corporate Governance Guidelines**

The Robinhood Markets, Inc. Board of Directors (Board) adopted Corporate Governance Guidelines to set the basis for corporate governance at Robinhood and promote compliance with applicable laws and the Nasdaq corporate governance listing standards. The Corporate Governance guidelines address conduct of Board meetings, director qualifications and tenure, Board diversity, term limits, director stock ownership requirements, leadership development, and succession planning. The Corporate Governance Guidelines and other relevant documentation are located on Robinhood's Investor Relations website.

#### **Living by Our Code of Conduct**

We seek to maintain robust, transparent governance and oversight practices through written policies, procedures, and internal controls to guide our actions and promote high levels of responsibility, integrity, and legal compliance across our businesses.

Our <u>Code of Conduct</u> applies to all directors, employees, officers, and contingent workers. Our <u>Vendor Code of Conduct</u> applies to third parties. The Board also adopted a <u>Code of Ethics for Senior Financial Executives</u>. These codes are posted on the <u>Investor Relations page on our website</u> and our <u>disclosure library</u>. We intend to promptly disclose any material future amendments to and any waivers under either code (of Ethics or Code of Conduct) on our <u>website</u>, <u>newsroom</u>, or report filed with the U.S. Securities and Exchange Commission (the "SEC") within four days of the amendment or waiver.

All employees receive regular compliance training on our Code of Conduct as well as our cybersecurity and anti-bribery, anti-harassment, anti-money laundering, and insider trading policies. Employees may also receive targeted compliance training specifically related to their role or function. New employees are trained in compliance during their onboarding.

#### **Speak Up and Non-Retaliation Policy**

As a Safety First company, if an employee identifies a concern or has a question relating to ethical conduct, we encourage them to speak to their manager, the people team, the ethics office, or to make a report through the Anonymous Integrity hotline. The helpline is available 24 hours a day, seven days a week. Callers have the option to remain anonymous when reporting concerns. All reports are investigated in accordance with our Speak Up and Non-Retaliation Policy.

SAFETY FIRST

### Ethics and Compliance

#### **Ethics and Compliance**

Robinhood works tirelessly to build trust with our customers, and we are determined to build that same level of protection and support for our fellow employees. There is zero tolerance for retaliation against employees for making a good faith complaint, bringing inappropriate conduct to our attention, helping a colleague make a good faith report, or cooperating in an investigation.

Our Board has oversight responsibility for our ethics and compliance programs. The ethics office and compliance teams oversee training, communication, policies, procedures, controls, and regular reporting to the Board on these matters. We have a robust governance model that provides for regular risk assessments and audits of our compliance programs. We regularly test controls and assess aspects of each program on an annual or semi-annual basis, or as necessary.

We seek to uphold market integrity and never tolerate fraudulent behavior. We do not tolerate misleading, fraudulent, or unethical behavior, and we do our part to protect the integrity of the financial markets. We have controls and monitoring protocols designed to detect and prevent fraud as well as other manipulative or deceptive practices that could harm Robinhood, our customers, suppliers, and other stakeholders in the market.

We select reputable business partners. We conduct due diligence on our business partners before engaging and periodically monitor their activity after onboarding in order to ensure they adhere to high standards of business conduct and ethics.

We keep accurate records. The accuracy and completeness of our business records are essential to our business and legal compliance. Robinhood forbids falsifying or altering company records of any kind. We seek to promote honesty and accuracy in everything we do, including when recording and reporting information, and maintain such records in accordance with all legal and regulatory requirements. These practices help support responsible business decisions which comply with governing laws and regulations.

We seek quality execution on every order. We perform regular and rigorous reviews of execution quality on a daily, monthly, and quarterly basis.

# Ethics and Compliance

When we review, we evaluate critical factors that go into receiving a quality execution like execution price, speed, and price improvement, as well as market conditions. See our Best Execution practices web page to learn more.

We are committed to taking action against money laundering. We are committed to compliance with applicable laws and regulations aimed at preventing money laundering, securities fraud, and other financial crimes. The Robinhood Anti-Money Laundering (AML) compliance program includes the following components:

- Designation of a Global AML Compliance Officer
- Independent testing
- A system of internal controls and the establishment of internal policies and procedures
- Periodic training for appropriate personnel
- Risk-based procedures for conducting ongoing customer due diligence

We promote fair competition and trade. We strive to comply with antitrust and other trade regulation laws that prohibit agreements or actions that eliminate or discourage competition, establish or create the intention of a monopoly, artificially maintain prices, or otherwise illegally impact commerce.

We take action against bribery and corruption. At Robinhood, we take measures to prevent and detect bribery and corruption and strictly prohibit our employees from offering anything of value in exchange for an improper advantage, whether to a government official or a private citizen.

We abide by economic and trade sanctions. We take our customer relationships seriously and do not conduct business with sanctioned parties. Robinhood has implemented measures to comply with all economic sanctions, laws, and regulations overseen by the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) and other similar bodies.

We abide by tax obligations. We work diligently in order to ensure that Robinhood satisfies the tax obligations of each jurisdiction where we conduct business.

# Privacy and Security

#### **Privacy and Security**

As our values reflect, we are a Safety First company with a Radical Customer Focus. Protecting our customer and employee data is a top priority. We put these values into action by working to continuously improve the protections we afford our customers and the data they entrust to us. Privacy and Security work in concert from risk management planning through product design and incident response.

#### **Privacy**

We integrate Privacy and Safety by design at Robinhood. We engage Privacy and Security experts at every stage of product development to identify and mitigate risks within and across all impacted functions. Privacy expertise is engaged early and consistently throughout the software development lifecycle and operational design processes.

We believe privacy and data protection can create competitive advantages and brand differentiation. To embed privacy as a key component of the customer experience, we built a Customer Experience (CX) team that includes dedicated privacy specialists. We also built a self-service feature into our products that enables our customers to take advantage of the data rights granted them by the California Consumer Privacy Act.

Our global privacy program is rooted in our commitment to protect customer data. The Chief Privacy Officer leads the program and is supported by our privacy engineering and privacy legal teams and the Privacy Advisory Council, a cross functional team of senior leaders from legal, engineering, product, and compliance. All employees and contractors receive mandatory annual security and privacy training. Where appropriate, employees and contractors also receive role-based training focused on content specific to their role at Robinhood.

What is data privacy?

Data privacy describes the use and governance of personal data in compliance with data protection regulations. Data privacy is focused on how personal data is collected, stored, managed and shared.

# Privacy and Security

Our <u>Privacy Policy</u> outlines our commitments to data privacy. Specific guidance related to handling of personal information is included in our internal data governance policies. The policies describe information we collect and how it is used and disclosed, our relationships with third parties, and how customers can make meaningful choices about their information. We are committed to complying with applicable data protection laws and creating a privacy program that is scalable and agile enough to adapt to and harmonize with global privacy laws across the locations where we operate.

Our goal is to be upfront with our customers about the way we collect, use, and share their personal information. We communicate this information through our Privacy Policy, in-app notifications, and our customer experience (CX) help desk. Customers are also encouraged to contact us directly through our dedicated <u>privacy inbox</u> if they have any questions or concerns about our data practices.

#### **Global Information Security Program**

Our customers and employees trust us with their data and money, and we're committed to implementing security controls to protect their information and funds. Our Chief Security Officer leads the global information security program designed to raise security awareness and to continuously improve robust security policies and safeguards to protect personal and financial data.

Robinhood has a threat detection, threat intelligence, and incident management program, which monitors systems, people, and our environment for potential attacks. Our vulnerability management program performs regular vulnerability scans and relies on our risk-based information security program to promote coverage of critical areas. Robinhood has established an offensive security team that actively tests our security controls, imitating methods an attacker might use to identify any weaknesses.

We maintain an incident response plan that includes required responses in the event of an information security incident. Our goal is to treat security incidents with the highest priority and attention. We are committed to notifying regulators and any affected individuals of any security breaches in accordance with applicable laws and internal policy.

# Privacy and Security

#### **Enhancements**

To enhance protection of Robinhood's customers we have:

- Instituted passkeys, a major step toward enabling better overall security and prevention of password compromisation
- Deployed an email campaign warning customers of rising and common phishing tactics and provided clarity to customers on how we empower meaningful security and privacy choices
- Improved in-app warnings for customers to more easily recognize scams
- Launched a help center article around identifying and reporting scams



#### **Board of Directors**

# Robinhood Markets, Inc. Board of Directors and Managerial Oversight

The Board oversees and manages our business and affairs. Our Board monitors corporate governance best practices, changing regulatory requirements, and feedback from stakeholders to make decisions that are in the best interests of Robinhood and its stockholders. We have established a strong corporate governance framework that is designed to protect the interests of our stakeholders, including composing a Board that includes highly skilled, diverse, and independent directors. Our independent directors appointed Jonathan Rubinstein to serve as Lead Independent Director with robust responsibilities that promote effective independent oversight. We will continue to evaluate and update our governance practices as appropriate and as our company matures.

#### **Board Diversity Policy**

The Board is committed to fostering a culture of integrity, inclusion, dignity, and mutual respect and believes its composition should reflect the wide variety of Robinhood's shareholders, employees, customers, and other stakeholders. The Board seeks to combine the skills and experience of its longstanding Board members with the fresh perspectives, insights, skills, and experiences of new members from different backgrounds. The Board believes that Robinhood benefits from differences in skills, regional and industry experience, social and ethnic background, race, gender, and other distinctions between directors such as cognitive and personal strengths. To that end, it is the policy of the Board that when searching for director nominees, the Board's Nominating and Corporate Governance Committee includes women and individuals from historically underrepresented communities in the pool and will recommend director nominees with individual attributes that contribute to the total diversity of viewpoints, experience, and expertise represented on the Board.

What is a Board of Directors and what do they do?

A Board of Directors is elected by shareholders to oversee management of the business and affairs of an organization and to advise management regarding the strategic direction of the company. A BOD serves to advise and counsel management regarding future direction of the company.

### **Board of Directors**

**Board Size** 

The following diversity matrix reflects the membership of our Board as of April 28, 2023:

Total number of directors				8
Part I: Gender Identity	Male	Female	Non-Binary	Gender Undisclosed
Number of directors	5	3		
Part II: Demographic Background				
African American or Black		1		
Alaskan Native or Native American				

## Asian 1 Hispanic 1 or Latinx Native Hawaiian or Pacific Islander White 3 2 Two or More Races or Ethnicities LGBTQ+ 1 Demographic Background Undisclosed

Why does Board diversity matter?

Studies show that companies with diverse boards perform better financially than those without, suggesting that diversity can be a key driver of business success. This is partly due to diverse boards lending unique perspectives, which can lead to more effective decision-making and promote connection to stakeholders and the broader community.

## Roles and Responsibilities of Our Board Committees

#### **Roles and Responsibilities of our Board Committees**

Our Board has established four committees which oversee key business risks. Each of our committees operates under a written charter setting forth the key responsibilities and areas of oversight noted below. The committee charters are available on the Governance Documents page of our website.

#### **Audit Committee**

Under its charter, the Audit Committee's responsibilities includes oversight of, among other matters:

- The qualifications, independence, and performance of the independent registered public accounting firm
- The performance of the Internal Audit function
- The integrity of the our financial statements and its accounting and financial reporting processes
- The effectiveness of the Robinhood's internal control over financial reporting
- The company's processes and procedures relating to assessment and management of financial, disclosure, and reporting risks
- Related person transactions

## Nominating and Corporate Governance Committee

Under its charter, the Nominating and Corporate Governance Committee's responsibilities include, among other matters:

- Recommending to the Board candidates for director to be nominated by our Board and submitted to a stockholder vote at the annual meeting of stockholders
- Recommending to the Board (i) the criteria for selection of directors and (ii) strategies for Board refreshment and director succession planning
- Making recommendations to our Board with respect to director independence, including overseeing our Board's annual evaluation of the independence of each director
- Overseeing the annual self-assessment of our Board and its committees, overseeing periodic assessments of the individual directors, and reviewing the results of all such assessments
- Overseeing management's strategy and reporting efforts with respect to ESG matters, including general oversight of (i) any ESG, corporate social responsibility, or sustainability report, (ii) ESG ratings of the Company, and (iii) environmental and governance risks facing the Company
- Recommending to our Board corporate governance principles applicable to Robinhood and annually reviewing and making appropriate recommendations to our Board for revisions to our Corporate Governance Guidelines
- Advising our Board on other Board composition and corporate governance matters, including recommendations to our Board with respect to our Board size and the structure and composition of our Board committees

## Roles and Responsibilities of Our Board Committees

## People and Compensation Committee

Under its charter, the People and Compensation Committee's responsibilities include, among other matters:

- Evaluating, reviewing, approving, and/or recommending executive officer and director compensation arrangements, plans, policies, and programs maintained by Robinhood
- Administering Robinhood's executive bonus plans or programs and equitybased compensation plans
- Providing oversight of Robinhood's other compensation policies and plans and overall compensation philosophy
- Providing oversight of the Company's HCM and related policies, strategies, and initiatives
- Reviewing management's assessment of major risk exposures associated with our compensation programs, policies, and practices and the mitigation thereof at least annually

## Safety, Risk and Regulatory Committee

Under its charter, the Safety, Risk and Regulatory Committee's responsibilities include, among other matters:

- Reviewing and discussing with management our significant financial, strategic, operational, and compliance risk exposures, trends in our major risk concentrations, and the steps management has taken to assess, monitor, and manage such risk exposures, trends, and concentrations
- Reviewing on a periodic basis our enterprise risk management process, and the measures implemented by management to help identify, assess, monitor, and mitigate material risks
- Reviewing management's exercise of its responsibility to identify, assess, manage, monitor, and mitigate material risks not allocated to the Board or another committee, which may include, for example, cybersecurity and data privacy and liquidity and capital adequacy
- Reviewing periodically our enterprise wide compliance program and its financial crimes framework policies, including reports from management regarding overall effectiveness of, and ongoing enhancements to, those programs and policies, as appropriate
- Reviewing and discussing compliance risks, the level of compliance risk, management actions on significant compliance matters and reports concerning our compliance with applicable laws and regulations

# Why does the Board have committees?

The Board delegates oversight of certain matters to smaller groups of directors so that appropriate attention and focus can be given to important subjects, like financial reporting, compensation, director nominations, and risk oversight.

## Role of Our Board in Risk Oversight

Robinhood has implemented a multi-layered approach to manage risk in our operations, including through Board, Board committees, and management oversight such risk. The Board's committees assist the Board in risk oversight by addressing and overseeing certain categories of risk management within the purview of each committee as described in the below chart.

#### **Board of Directors**

Regularly reviews the Company's strategy and management of associated short-term, intermediate-term, and long-term risks, including through discussions with management, Board committee reports highlighting all significant committee activities, management reports, and meetings with external advisors with expertise on relevant risk-related matters, as well as evaluates relevant risks when reviewing or approving significant transactions



#### Audit Committee

# Nominating and Governance Committee

#### People Committee

#### Safety Committee

Oversees our financial, reporting, and disclosure risks, including risks related to our internal control over financial reporting and disclosure controls and procedures; the qualifications, independence, and performance of our independent auditors; and the performance of our internal audit function

Also discusses with management and our independent auditor guidelines and policies with respect to risk assessment and risk management Oversees our corporate governance framework and ESG strategy, reporting efforts, and program, including risks related to our corporate governance practices; the performance of our Board; and the composition of our Board Oversees risks relating to executive compensation and Human Capital Management (HCM), including risks related to our executive compensation plans and arrangements; our compensation philosophy and practices; succession planning; and other HCM matters, including risks related to, among other things, culture and IEB efforts

Oversees risks related to significant financial, strategic, and operational matters as well as legal and compliance matters; creation and application of regulations and policies; trends in our major risk concentrations; and the steps management has taken to assess, monitor, and manage such risk exposures, trends, and concentrations; the delegation of certain risk oversight and responsibility; our cybersecurity risk management programs; and our enterprise-wide compliance programs

Also consults with the chairs of other Board committees to discuss risk-related matters delegated to those committees in relation to the Company's enterprise risk management framework and regulatory compliance programs

## Role of Our Board in Risk Oversight



#### Management

Responsible for day-to-day risk management processes, including through our Enterprise Risk Committee and functional owners' interactions with employees, committee members, and Board members



#### **Internal Audit**

#### Compliance

#### Enterprise Risk Management

Provides independent and objective assurance regarding the effectiveness of internal controls that mitigate current and emerging risks, in order to strengthen the internal controls ecosystem within the Company

Establishes and maintains the company's compliance with internal and external regulations and requirements

Establishes and maintains financial compliance with internal control over financial reporting and SEC disclosure controls by advising on controls implementation and through routine testing of control effectiveness to mitigate financial reporting and disclosure risks

Establishes the standards for identifying, measuring, and monitoring the risks facing Robinhood, thus facilitating informed risk-based decisions

Principal role is one of oversight and governance

Our management Enterprise Risk Committee comprises senior leaders at Robinhood and reviews compliance and other top risks

# Forward-Looking Statements and Disclosures

# Forward-Looking Statements

This report contains forward-looking statements (as such phrase is used in the federal securities laws), which involve substantial risks and uncertainties. Forward-looking statements generally relate to future events or our future financial or operating performance. In some cases, you can identify forward-looking statements because they contain words such as "believe," "may," "will," "should," "expect," "plan," "anticipate," "could," "intend," "target," "project," "contemplate," "estimate," "predict," "potential" or "continue" or the negative of these words or other similar terms or expressions that concern our expectations, strategy, plans or intentions. This report includes, among others, forward-looking statements relating to our business plans and objectives; our strategies and systems for implementing our goals; our commitments to programs and policies; and our expectations and priorities for ESG initiatives. Our forward-looking statements are subject to a number of known and unknown risks, uncertainties, assumptions, and other factors that may cause our actual future results, performance, or achievements to differ materially from any future results expressed or implied in this report. Reported results should not be considered an indication of future performance. Factors that contribute to the uncertain nature of our forward-looking statements include, among others: our limited operating experience at our current scale; the difficulty of managing our business effectively, including the size of our workforce, and the risk of continued declining or negative growth; the fluctuations in our financial results and key metrics from quarter to quarter; our reliance on transaction-based revenue, including payment for order flow (PFOF), and the risk of new regulation or bans on PFOF and similar practices; our exposure to fluctuations in interest rates and rapidly changing interest rate environments; the difficulty of raising additional capital (to satisfy any liquidity needs and support business growth and objectives) on reasonable terms or at all; the need to maintain capital levels required by regulators and self-regulatory organizations; the risk that we might mishandle the cash, securities, and cryptocurrencies we hold on behalf of customers, and our exposure to liability for processing, operational, or technical errors in clearing functions; the impact of negative publicity on our brand and reputation; the risk that changes in business, economic, or political conditions that impact the global financial markets, or a systemic market event, might harm our business; our dependence on key employees and a skilled workforce; the difficulty of complying with an extensive, complex, and changing regulatory environment and the need to adjust our business model in response to new or modified laws and regulations; the possibility of adverse developments in pending litigation and regulatory investigations; the effects of competition; our need to innovate and invest in new products and services in order to attract and retain customers and deepen their engagement with us in order to maintain growth;

# Forward-Looking Statements

our reliance on third parties to perform certain key functions and the risk that processing, operational or technological failures could impair the availability or stability of our platform; the risk of cybersecurity incidents, theft, data breaches, and other online attacks; the difficulty of processing customer data in compliance with privacy laws; our need as a regulated financial services company to develop and maintain effective compliance and risk management infrastructures; the volatility of cryptocurrency prices and trading volumes; the risk that our platform could be exploited to facilitate illegal payments; and the risk that substantial future sales of Class A common shares in the public market, or the perception that they may occur, could cause the price of our stock to fall. Because some of these risks and uncertainties cannot be predicted or quantified and some are beyond our control, you should not rely on our forward-looking statements as predictions of future events.

# Forward-Looking Statements

More information about potential risks and uncertainties that could affect our business and financial results is included in the section of our Form 10-Q report for the quarter ended March 31, 2023 titled "Risk Factors" and our other filings with the SEC, which are available on the SEC's web site at www.sec.gov. Moreover, we operate in a very competitive and rapidly changing environment; new risks and uncertainties may emerge from time to time, and it is not possible for us to predict all risks nor identify all uncertainties. The events and circumstances reflected in our forward-looking statements might not be achieved and actual results could differ materially from those projected in the forward-looking statements. Except as otherwise noted, all forward-looking statements are made as of the date of this report, and are based on information and estimates available to us at this time. Although we believe that the expectations reflected in our forward-looking statements are reasonable, we cannot guarantee future results, performance, or achievements.

Except as required by law, Robinhood assumes no obligation to update any of the statements in this report whether as a result of any new information, future events, changed circumstances or otherwise. You should read this report with the understanding that our actual future results, performance, events and circumstances might be materially different from what we expect. The standards of measurement and performance contained in this report are developing and may be based on assumptions, estimates or information collected on a delayed or incomplete basis. The inclusion of information in this report is not an indication that Robinhood deems such information to be material or important to an understanding of the business or an investment decision with respect to Robinhood securities.

#### Disclosures

All investing involves risk.

Brokerage services are offered through Robinhood Financial LLC, ("RHF") a registered broker dealer (member <u>SIPC</u>) and clearing services through Robinhood Securities, LLC, ("RHS") a registered broker dealer (member <u>SIPC</u>). Commission-free trading of stocks, ETFs and options refers to \$0 commissions for Robinhood Financial self-directed individual cash or margin brokerage accounts that trade U.S. listed securities and certain OTC securities electronically. Keep in mind, other fees such as trading (non-commission) fees, Gold subscription fees, wire transfer fees, and paper statement fees may apply to your brokerage account. Please review Robinhood Financial's Fee Schedule to learn more.

The Brokerage Cash Sweep Program is an added feature to the Robinhood Financial LLC brokerage account. Interest is earned on uninvested cash swept from the brokerage account to program banks. Program banks pay interest on your swept cash, minus any fees paid to Robinhood. The APY might change at any time at the program banks' discretion. Neither Robinhood Financial LLC nor any of its affiliates are banks.

Fractional shares are illiquid outside of Robinhood and are not transferable. Not all securities available through Robinhood are eligible for fractional share orders. For a complete explanation of conditions, restrictions and limitations associated with fractional shares, see the Fractional Shares section of our Customer Agreement.

Cryptocurrency services are offered through Robinhood Crypto, LLC ("RHC") (NMLS ID: 1702840). Robinhood Crypto is licensed to engage in virtual currency business activity by the New York State Department of Financial Services.

#### **Disclosures**

The Robinhood spending account is offered through Robinhood Money, LLC ("RHY") (NMLS ID: 1990968), a licensed money transmitter. The Robinhood Cash Card is a prepaid card issued by Sutton Bank, Member Federal Deposit Insurance Corporation (FDIC), pursuant to a license from Mastercard®. Mastercard and the circles design are registered trademarks of Mastercard International Incorporated. Early access to direct deposit funds depends on timing of the payer's submission of deposits and is not guaranteed. We generally make these funds available on the day the payment file is received which may be up to two days earlier than the scheduled payment date. Early access to direct deposit funds are not eligible for FDIC pass-through insurance if provided before the scheduled payment date of the funds. Round-up, bonus, recurring paycheck deposits, and other products and services made available within your spending account are provided by RHY. Round-up bonus varies from 10% to 100% of the total amount of funds rounded up, to a weekly maximum of \$10. Paycheck recurring investment and round-up recurring investments are made available through your brokerage account with RHF and your cryptocurrency account with RHC. You must have a brokerage account with RHF or a cryptocurrency account with RHC in order to fully utilize investment features. You must authorize the transfer of funds from your spending account to your brokerage account and place recurring trade orders with RHF to invest in securities or RHC to invest in cryptocurrencies through these programs. Cryptocurrency accounts are not available in all U.S. jurisdictions.

RHF, RHY, RHC, and RHS are affiliated entities and wholly owned subsidiaries of Robinhood Markets, Inc. RHF, RHY, RHC, and RHS are not banks. Securities products offered by RHF are not FDIC insured and involve risk, including possible loss of principal. RHC is not a member of Financial Industry Regulatory Authority (FINRA) and accounts are not FDIC insured or protected by SIPC. RHY is not a member of FINRA, and products are not subject to SIPC protection, but funds held in the Robinhood spending account and Robinhood Cash Card account may be eligible for FDIC pass-through insurance (review the Robinhood Cash Card Agreement and the Robinhood Spending Account Agreement).

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# Limited Assurance



## VERIFICATION OPINION DECLARATION GREENHOUSE GAS EMISSIONS

Apex Companies, LLC (Apex) was engaged to conduct an independent verification of the greenhouse gas (GHG) emissions reported by Robinhood Markets, Inc. (Robinhood) for the period stated below. This verification declaration applies to the related information included within the scope of work described below.

The determination of the GHG emissions is the sole responsibility of Robinhood. Robinhood is responsible for the preparation and fair presentation of the GHG statement in accordance with the criteria. Apex's sole responsibility was to provide independent verification on the accuracy of the GHG emissions reported, and on the underlying systems and processes used to collect, analyze and review the information. Apex is responsible for expressing an opinion on the GHG statement based on the verification. Verification activities applied in a limited level of assurance verification

are less extensive in nature, timing and extent than in a reasonable level of assurance verification.

#### Boundaries of the reporting company GHG emissions covered by the verification:

- · Operational Control
- Worldwide

Types of GHGs: CO<sub>2</sub>, N<sub>2</sub>O, CH<sub>4</sub>

#### **GHG Emissions Statement:**

- Scope 1: 421 metric tons of CO<sub>2</sub> equivalent
- Scope 2 (Location-Based): 1,872 metric tons of CO2 equivalent
- Scope 2 (Market-Based): 0 metric tons of CO2 equivalent
- Scope 3
  - o Category 1 Purchased Goods and Services (Location-Based): 64,386 metric tons of CO<sub>2</sub> equivalent
  - o Category 1 Purchased Goods and Services (Market-Based): 60,111 metric tons of CO<sub>2</sub> equivalent
  - o Category 2 − Capital Goods: 100 metric tons of CO₂ equivalent
  - Category 3 Fuel and Energy Related Activities (Location-Based): 834 metric tons of CO<sub>2</sub> equivalent
  - o Category 3 Fuel and Energy Related Activities (Market-Based): 701 metric tons of CO₂ equivalent o Category 6 Business Travel: 5,690 metric tons of CO₂ equivalent
  - o Category 7 Employee Commuting (includes working from home) (Location-Based): 5,996 metric tons of CO<sub>2</sub> equivalent
  - o Category 7 Employee Commuting (includes working from home) (Market-Based): 4,953 metric tons of CO<sub>2</sub> equivalent
  - o Category 8 Upstream Leased Assets (Location-Based): 291 metric tons of CO₂ equivalent o Category 8 Upstream Leased Assets (Market-Based): 297 metric tons of CO₂ equivalent

Data and information supporting the Scope 1, Scope 2 and Scope 3 GHG emissions statement were in most cases estimated rather than historical in nature.

#### Period covered by GHG emissions verification:

January 1, 2022 to December 31, 2022

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#### Criteria against which verification conducted:

- World Resources Institute (WRI)/World Business Council for Sustainable Development (WBCSD) Greenhouse Gas (GHG)
  Protocol Corporate Accounting and Reporting Standard (Scope 1 and 2)
- WRI/WBCSD Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Scope 3)
- Intergovernmental Panel on Climate Change AR6 Global Warming Potentials (GWP). AR5 GWP were utilized to calculate emissions from refrigerants.

#### Reference Standard:

• ISO 14064-3 Second Edition 2019-04: Greenhouse gasses -- Part 3: Specification with guidance for the validation and verification of greenhouse gas statements

#### Level of Assurance and Qualifications:

- I imited
- This verification used a materiality threshold of ±5% for aggregate errors in sampled data for each of the above indicators

#### **GHG Verification Methodology:**

Evidence-gathering procedures included but were not limited to:

- · Interviews with relevant personnel of Robinhood;
- Review of documentary evidence produced by Robinhood;
- Review of Robinhood data and information systems and methodology for collection, aggregation, analysis, and review of information used to determine GHG emissions; and
- Audit of sample of data used by Robinhood to determine GHG emissions.

#### **Verification Opinion:**

Based on the process and procedures conducted, there is no evidence that the GHG emissions opinion declaration shown above:

- is not materially correct and is not a fair representation of the GHG emissions data and information; and
- has not been prepared in accordance with the WRI/WBCSD GHG Protocol Corporate Accounting and Reporting Standard (Scope 1 and 2) and WRI/WBCSD Greenhouse Gas Protocol Corporate Value Chain Accounting and Reporting Standard (Scope 3).

It is our opinion that Robinhood has established appropriate systems for the collection, aggregation, and analysis of quantitative data for determination of these GHG emissions for the stated period and boundaries.



#### Statement of independence, impartiality, and competence

Apex is an independent professional services company that specializes in Health, Safety, Social and Environmental management services including assurance with over 30 years history in providing these services.

No member of the verification team has a business relationship with Robinhood, its Directors or Managers beyond that required of this assignment. We conducted this verification independently and to our knowledge there has been no conflict of interest.

Apex has implemented a Code of Ethics across the business to maintain high ethical standards among staff in their day-to-day business activities.

The verification team has extensive experience in conducting assurance over environmental, social, ethical and health and safety information, systems and processes, has over 20 years combined experience in this field and an excellent understanding of Apex's standard methodology for the verification of greenhouse gas emissions data.

#### Attestation:

Megan O'Neil, Lead Verifier

Mega K. Ohl

Program Manager

Apex Companies, LLC

Atlanta, Georgia

Scott Johnston, Technical Reviewer

**Principal Consultant** 

Apex Companies, LLC

Doral, Florida

June 21, 2023

This verification opinion declaration including the opinion expressed herein, is provided to Robinhood and is solely for the benefit of Robinhood in accordance with the terms of our agreement. We consent to the release of this declaration by you to the public or other organizations but without accepting or assuming any responsibility or liability on our part to any other party who may have access to this declaration.