

## Robinhood Markets, Inc.

### CHARTER OF THE SAFETY, RISK AND REGULATORY COMMITTEE

The Board of Directors (the “**Board**”) of Robinhood Markets, Inc. (the “**Company**”) has established the Safety, Risk and Regulatory Committee (the “**Committee**”) and has adopted this Committee Charter (this “**Charter**”).

This Charter defines the duties and responsibilities of the Committee.

#### **Purpose**

The Committee shall assist the Board in fulfilling its fiduciary responsibilities, including oversight of:

- the Company’s enterprise risk management; and
- the Company’s ethics and regulatory compliance programs.

The Committee’s role shall be one of oversight; it is management’s responsibility to design and implement the Company’s enterprise risk management and ethics and regulatory compliance programs. As appropriate, the Committee will review and make recommendations to the Board or management with respect to the formulation (or re-formulation), implementation, maintenance, and monitoring of such matters (including, without limitation, recommendations with respect to the Company’s Code of Conduct, which applies to all directors, officers, and employees (the “**Code of Conduct**”)).

#### **Membership**

The Committee shall consist of at least two members of the Board. Each Committee member shall be appointed by, and will serve at the discretion of, the Board. The Board shall designate one of the Committee members to serve as the Chair of the Committee. In the absence of that designation, the members of the Committee may elect a Chair by majority vote of all members.

Each member of the Committee shall be independent, as determined in accordance with the listing standards of the Nasdaq Stock Market (“**Nasdaq**”) and the rules of the SEC as in effect from time to time.

Each member shall also meet any other requirements imposed by applicable law, regulations or rules, subject to any applicable exemptions and transition provisions.

#### **Committee Resources and Information**

The Committee shall have the authority to select, retain, and supervise advisors to the Committee as the Committee deems necessary, in its discretion, to fulfill its mandates under this Charter. The Committee shall also have the authority to compensate, at the expense of the Company, such advisors and employ such resources as are necessary to fulfill its mandates under this Charter. In discharging its oversight role or as it otherwise deems necessary or appropriate, the Committee is empowered to investigate any matter brought to its attention within the scope

of its responsibilities. Without limiting the foregoing, the Committee shall have the authority to retain and terminate advisors, including legal counsel, accountants, and other experts, to assist the Committee in connection with its functions, including any studies or investigations, and will have direct oversight of the work performed by such advisors.

### **Duties and Responsibilities**

The Committee shall have the following duties and responsibilities, in addition to any other duties or responsibilities the Board may from time to time delegate to the Committee:

#### **General**

- (a) Review and discuss with management the Company's significant financial, strategic, operational and compliance risk exposures, trends in the Company's major risk concentrations, and the steps management has taken to assess, monitor, and manage such risk exposures, trends and concentrations;
- (b) In the Committee's discretion, make recommendations to the Board that oversight responsibility for any particular types of risk, where not already delegated, be delegated to, or reviewed by, other committees of the Board;
- (c) As appropriate, consult with the Chairs of the 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, and report the results of those discussions to the full Board;
- (d) Review the Committee's performance and this Charter annually and recommend any proposed Charter changes to the Board;

#### **Oversight of Enterprise Risk Management**

- (e) Review on a periodic basis the Company's enterprise risk management framework, infrastructure, and controls implemented by management to help identify, assess, manage and monitor the Company's material risks;
- (f) Review management's exercise of its responsibility to identify, assess, and manage material risks not allocated to the Board or another Committee, including, for example, data privacy, cybersecurity, business continuity, liquidity and capital adequacy, new product risk and compliance with financial regulations;
- (g) Periodically review the organization, responsibilities, systems, and resources of the enterprise risk management function;

#### **Oversight of Ethics and Regulatory Compliance**

- (h) Periodically review the Company's 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;

- (i) Review significant alleged violations of the Company's regulatory compliance policies or the ethical standards established by the Code of Conduct, including all significant alleged violations by Executive Officers, as that term is defined in Rule 3b-7 promulgated under the Securities Exchange Act of 1934, as amended;
- (j) Review and discuss compliance risks, the level of compliance risk, management actions on significant compliance matters (e.g., significant remediation actions or compliance initiatives, or remediation progress of open regulatory actions) and reports concerning the Company's compliance with applicable laws and regulations;
- (k) Review standards and procedures implemented by the Company designed to help reduce the prospect of violation of corporate policies and legal rules and regulations and the communication of such standards and procedures to all employees and other agents;
- (l) Oversee the Company's Whistleblower and Non-Retaliation Policy and regularly review any whistleblower complaints (other than with respect to accounting, internal accounting controls, and auditing matters, which are reviewed by the Audit Committee);
- (m) Review as necessary results of significant audits and assessments conducted by the Company as part of its regulatory compliance programs and, as necessary, the Audit Committee's or internal audit's reports with respect to internal or external audits related to compliance, if any;
- (n) Review the Company's policies and procedures for corporate political and lobbying expenditures and make recommendations to the Board as appropriate;
- (o) Review the status of any significant legal and regulatory matters and any material reports or inquiries received from regulators or government agencies (*i.e.*, such matters that could reasonably be expected to have a significant impact on the Company's financial statements or reputation);
- (p) Review and make recommendations (as appropriate) to the Board regarding revisions to the Code of Conduct; and
- (q) Periodically review the organization, responsibilities, systems, and resources of the Company's compliance functions.

### **Committee Meetings and Actions**

The Committee shall meet a sufficient number of times in order to carry out the mandated requirements of this Charter, but no less than three times each year, and at such times and places as the Committee determines. A majority of the members of the Committee shall constitute a quorum. The Committee shall also meet periodically, and at least once each year, in separate executive sessions during regularly scheduled meetings.

The Committee may also meet periodically with members of management, including the individuals responsible for the enterprise risk management function and the ethics and

regulatory compliance functions, in separate executive sessions as the Committee deems appropriate.

Any action required or permitted to be taken at any meeting of any Committee may be taken without a meeting if all members of the Committee consent thereto in writing or via electronic communications. In addition, the Committee may, in its sole discretion, delegate any of its responsibilities to one or more subcommittees of one or more directors who are members of the Committee as the Committee may deem appropriate.

### **Minutes and Reports**

The Committee shall regularly report on its meetings, actions and recommendations to the Board or as otherwise requested by the Board; and the Committee or its designee shall prepare minutes of each meeting and shall cause such minutes, as approved by the Committee, to be made available for review by any member of the Board.

Nothing in this Charter shall preclude the Board from itself taking any action set forth herein, except where such action is required by applicable law or Nasdaq listing standards to be taken by the Committee.