



Whistleblower and
Complaint Policy

Effective as of November 16, 2023

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I. Purpose

Redfin Corporation (together with its subsidiaries, “**Redfin**”) is committed to promoting high standards of ethical business conduct and compliance with applicable laws, rules, and regulations. As part of this commitment, Redfin has adopted this Whistleblower and Complaint Policy (this “**Policy**”). Employees are encouraged to promptly report any known or suspected wrongdoing as laid out in this Policy. This Policy is designed to provide employees with confidential or anonymous reporting methods. Redfin will post a current copy of this Policy on Fin.

Nothing in this Policy limits, impedes, or restricts your ability to contact, report to, or file a charge or complaint with, the Securities and Exchange Commission, or any other federal, state, or local government agency or commission (“Government Agencies”). This Policy also does not limit your ability to participate and/or assist in any investigation or proceeding that may be conducted by any Government Agencies, including providing documents or other information without notice to Redfin. Nothing in this Policy limits your right to seek and/or receive an award for information provided to any Government Agencies or prohibits you from providing truthful information in response to a subpoena or other legal process.

II. Reporting Violations

Employees should report to their supervisors, managers, or the Compliance Officer (as defined below) known and suspected violations of (a) laws, governmental rules and regulations, (b) internal accounting controls or accounting and auditing standards, or (c) any Redfin policies. This includes complaints or reports received from people outside Redfin and complaints regarding third parties who provide services to Redfin.

Supervisors and managers must promptly consider the information submitted to them and take appropriate action in accordance with the law, governmental rules and regulations, Redfin policies, and good business practices. They must also provide any such information to Redfin’s Compliance Officer (the “**Compliance Officer**”). The Compliance Officer will, in his or her discretion, provide it to the Chairperson (the “**Chair**”) of the Audit Committee of the Board of Directors (the “**Audit Committee**”) in the event the alleged wrongdoing involves, or could reasonably be expected to involve, financial loss to Redfin in excess of \$5,000, improper acts by any member of Redfin’s finance team or executive team, or such other wrongdoing as the Compliance Officer believes, in his or her discretion, is sufficiently material that reporting to the Chair is appropriate. Redfin has designated its General Counsel as its Compliance Officer. If the General Counsel is unavailable, the Chief Financial Officer will serve as the interim Compliance Officer.

If you are not comfortable discussing the suspected violation with any of your direct supervisors or managers, or the Compliance Officer, you may report the suspected violation **confidentially and anonymously** by the following means:

- By calling Redfin's compliance hotline toll-free at (877)702-4910;
- By letter addressed to Redfin's corporate headquarters at 1099 Stewart Street, Suite 600, Seattle, WA 98101, marked "Attention: Compliance Officer";
- Through the [Ethics Complaint Website](#); or
- You may also choose to contact, report to, or file a charge or complaint with a Government Agency.

Any employee reporting a suspected violation is encouraged to provide as much detail as possible regarding the subject matter of the complaint or concern because Redfin's ability to investigate will be largely dependent on the quality and specificity of such information. The Compliance Officer (or his or her designee) will be responsible for reviewing, or overseeing the review, of any report of a suspected violation from any source. The Compliance Officer (or his or her designee) will notify the sender and acknowledge receipt of the report, unless the report was submitted anonymously.

If you wish to report a matter directly to the Audit Committee, you may send an email to auditcommittee@redfin.com or you may send a letter addressed to Redfin's corporate headquarters marked "Attention: Audit Committee." **You may report confidentially and anonymously if you wish, but, if reporting by email, please remember to take appropriate steps to ensure your anonymity is maintained.** The Audit Committee will take whatever steps it deems necessary to respond to a report that it receives, which may include referring the matter to the Compliance Officer for investigation.

III. Statement of Non-Retaliation

It is against Redfin policy, and in many jurisdictions, a crime, for anyone to intentionally retaliate against any person who provides truthful information to a law enforcement official concerning a reasonable good faith belief that a possible violation of any federal, state, or foreign law has occurred. Moreover, Redfin does not permit any form of intimidation or retaliation by any Redfin employee, contractor, subcontractor, director, or agent against any employee because of any lawful act done by the employee to:

- provide information, cause information to be provided or otherwise assist in an investigation regarding any conduct which the employee reasonably believes constitutes a violation of laws, rules, regulations or any Redfin policies; or
- file, cause to be filed, testify, participate in or otherwise assist in a proceeding filed or to be filed relating to a violation of any law, rule or regulation by Redfin.

The prohibited forms of intimidation or retaliation include, but are not limited to, discharge, demotion, suspension, threats, harassment or any other manner of discrimination with respect to an employee's terms or conditions of employment based on lawful actions of such employee described above with respect to a good faith report or cooperation or assistance with an investigation conducted by Redfin.

IV. Statement of Confidentiality

In cases in which an employee reports a suspected violation in good faith and is not engaged in the questionable conduct, Redfin will attempt to keep its discussions and actions confidential to the extent possible and in compliance with applicable laws and regulations governing employee privacy. All reports and records associated with complaints or reports made under this Policy are considered confidential information and access will be restricted to members of the Board of Directors, Redfin's internal and external legal counsel and others involved in investigating a complaint or report under this Policy. Access to reports and records may be granted to other parties at the discretion of the Compliance Officer.

V. Investigation and Record Keeping

Employees should not independently conduct their own investigation but instead should make their complaint or report by following the procedures in this Policy. The Compliance Officer (or his or her designee) will review all complaints and reports of a suspected violation and will coordinate the investigation and resolution of all such complaints and reports to ensure that corrective action, as necessary and appropriate, is taken.

VI. Record Retention

The Compliance Officer (or his or her designee) will maintain a log of all complaints and reports, tracking their receipt, investigation and resolution. Redfin will preserve records of complaints and reports made under this Policy and associated log(s) for a period of time to be determined by the Compliance Officer. After the

established retention period, the records and associated log(s) may be disposed of in accordance with Redfin policy.

VII. Reporting to the Audit Committee

The Compliance Officer will report to the Audit Committee on the nature of all material reports of suspected violations received since the previous meeting of the Audit Committee. If the Compliance Officer (or his or her designee) determines that reporting prior to the next scheduled Audit Committee meeting is necessary or appropriate, the Compliance Officer (or his or her designee) will contact the Chair, or such other person designated by the Audit Committee, to decide whether a special Audit Committee meeting should be called in order for the Compliance Officer to provide a report of a suspected violation in advance of the next scheduled Audit Committee meeting.

The Audit Committee will take whatever steps it deems necessary to respond to any violation report received by Redfin.

VIII. Policy Administration

The Audit Committee is responsible for reviewing this Policy and confirming that the procedures contained in this Policy are in place. It may request reports from Redfin executives about the implementation of this Policy and take any other steps in connection with that implementation as it deems necessary. The Audit Committee may amend this Policy and procedures associated with this Policy at its discretion.