Code of Conduct and Ethics

Adopted by the Nominating and Corporate Governance Committee on March 10, 2020
(amended on March 21, 2024)

Introduction

Redfin Corporation has adopted this Code of Conduct and Ethics (this “Code”) to set high standards of ethical conduct and guide the decisions of every Redfin employee, officer, and director.

Scope

This Code applies to all Redfin employees and directors. Redfin may modify or update these policies and procedures from time to time and adopt new policies and procedures in the future. Nothing in this Code is intended to alter the existing legal rights and obligations of Redfin or any of its employees or directors, including “at will” employment arrangements or the terms of any employment-related agreements.

Responsibility

Every employee and director is responsible for reading and understanding this Code and to use it as a guide for performing his or her role for Redfin. Redfin trusts its employees to make thousands of decisions every day, and this Code can't address every ethical situation that may arise. Please apply common sense and a high standard of personal ethics, honesty, and integrity to comply with the letter and spirit of this Code when it has no specific guideline. Even well-intentioned actions that violate the law or this Code may result in negative consequences for Redfin and for the individuals involved. Employees and directors should also consider the conduct of their family members and others who live in their household. Redfin expects all of its directors and employees to help foster a sense of commitment to this Code and to foster a culture of fairness, honesty, and accountability within Redfin. This responsibility is particularly acute for executives and other managers at Redfin. Redfin also expects its employees and directors to ensure that Redfin’s agents and contractors conform to this Code when acting on Redfin’s behalf.
Compliance

Any employee that needs help understanding this Code, or how it applies to a particular situation should contact his or her manager or Redfin’s General Counsel, who has been designated as Redfin’s Compliance Officer (the “Compliance Officer”). If the General Counsel is unavailable, Redfin’s Chief Financial Officer is authorized to act as the Compliance Officer in the interim. Employees should also be alert to possible violations of this Code by others and should promptly report suspected violations to the Compliance Officer or in accordance with Redfin’s Legal and Compliance Policy and Redfin’s Whistleblower and Complaint Policy.

Conflicts of Interest

A conflict of interest exists where the interests or benefits of one person or entity conflict or appear to conflict with Redfin’s interests or benefits. While it is not possible to describe every situation in which a conflict of interest may arise, Redfin employees and directors must never use or attempt to use their position with Redfin to obtain improper personal benefits. Any employee or director who is aware of a conflict of interest, or is concerned that a conflict might develop, is required to discuss the matter with a higher level of management or the Compliance Officer promptly. Please see Redfin’s Employee Handbook and Related Party Transactions Policy for more information on conflicts of interest.

Insider Trading

Every employee and director is prohibited from using “inside” or material nonpublic information about Redfin, or about companies Redfin does business with, in connection with buying or selling Redfin’s or such other companies’ securities and is also prohibited from “tipping” others who might make an investment decision based on this information. Please review Redfin’s Insider Trading Policy for additional information.

No Bribery or Corruption

All forms of bribery, kickbacks and corruption are prohibited. We will not tolerate bribery, payment or receipt of kickbacks or corruption in any form or for any purpose. There is no potential benefit that can justify damaging our integrity and reputation or the trust others place in us.

All persons subject to this Code must comply fully with the Foreign Corrupt Practices Act (FCPA) and other applicable laws that prohibit bribery, kickbacks and corruption. Many of these laws
are very broad and apply to both government and private or commercial bribery, kickbacks and corruption.

You are responsible for ensuring that you understand the applicable laws and applicable provisions in our Employee Handbook. If you have a question regarding any gift, entertainment or other expense, consult with our Compliance Officer before you incur or authorize the expense.

**Competition and Fair Dealing**

Redfin competes with tenacity to outperform its competitors, but we don’t use unethical or illegal methods to do it. Every employee and director must use integrity when dealing with Redfin’s competitors, brokerage partners, employees, and anyone else he or she encounters in performing his or her duties. No employee or director may take unfair advantage of anyone through manipulation, concealment, abuse or privileged information, dishonesty, or any other unfair dealing practice. Antitrust laws are designed to protect customers and the competitive process. These laws generally prohibit Redfin from working with competitors to fix prices, share pricing or other information to allocate markets or services, boycott service providers, customers, or competitors, or attempt to monopolize a particular market through anticompetitive conduct. Violating antitrust and unfair competition laws can have very bad consequences for Redfin, so employees and directors are urged to seek assistance from the Compliance Officer whenever they have a question about these laws.

**Maintenance of Corporate Books, Records, and Accounts; Financial Integrity; Public Reporting**

Redfin strives to maintain complete integrity of its records and public disclosure. Redfin’s corporate and business records, including all supporting entries to its books of account, must be completed honestly, accurately, and intelligibly. Redfin depends on its books, records, and accounts accurately and fairly reflecting, in reasonable detail, its assets, liabilities, revenues, costs and expenses, as well as all transactions and changes in assets and liabilities. Redfin’s disclosure controls and procedures are designed to help ensure that Redfin’s public disclosures are full, fair, and accurate, that they fairly present its financial condition and results of operations, and that they are timely and understandable. Employees who collect, provide or analyze information for, or otherwise contribute in any way to preparing or verifying these reports, should adhere to all disclosure controls and procedures and generally assist Redfin in producing financial disclosures that contain all of the material information about Redfin that is
required by law and would be important to enable a reasonable investor to understand Redfin’s business and its attendant risks. If any employee becomes aware that Redfin’s public disclosures are not full, fair, or accurate, or if any employee becomes aware of a transaction or development that he or she believes may require disclosure, he or she should report the matter immediately to the Compliance Officer. If appropriate, the Compliance Officer will report the matter to the Audit Committee.

Conduct of Senior Financial Officers

Redfin’s Finance Department has a special responsibility to promote integrity throughout the organization, with responsibilities to stakeholders both inside and outside of Redfin. Because of this special role, Redfin requires that the principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions, to:

- Act with honesty and integrity and use due care and diligence in performing his or her responsibilities.
- Avoid situations that represent actual or apparent conflicts of interest with his or her responsibilities to Redfin, and disclose promptly to the Nominating and Corporate Governance Committee, any transaction or personal or professional relationship that reasonably could be expected to give rise to such an actual or apparent conflict.
- Provide constituents with information that is accurate, complete, objective, relevant, timely, and understandable, including information for inclusion in Redfin’s submissions to governmental agencies or in public statements.
- Comply with applicable laws, rules, and regulations of federal, state, and local governments, and of any applicable public or private regulatory and listing authorities.

Waivers

Redfin’s Board of Directors (in the case of a violation by a director or an executive officer) or the Compliance Officer (in the case of a violation by any other person) may, in their or his or her discretion, waive any violation of this Code. Any waiver for a director or an executive officer will be disclosed as required by applicable laws, rules and regulations.

No Rights Created

This Code is a statement of fundamental principles, policies and procedures that govern Redfin’s employees, officers, and directors in the conduct of Redfin’s business. It is not intended to and does not create any legal rights for any customer, partner, competitor, stockholder, or any other person or entity.
Reporting Concerns

If you have a concern about actual or possible violations of this Code or any of our policies, you should report it promptly. You may raise any concern orally or in writing through several channels. Use the channel that is most comfortable for you. Your supervisor or manager is often in the best position to resolve a concern quickly. However, you can always report a concern to our Legal Department, the next level of management or anonymously. Consult the process set forth in our Whistleblower Policy for additional ways to report concerns. Please note that nothing in this Code (nor any other Redfin policy or agreement) limits, impedes, or restricts your ability to contact, report to, or file a charge or complaint with, the SEC, or any other federal, state, or local government agency or commission (“Government Agencies”) at any time. This Code 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 Code 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.