Wealthfront Corporation
Code of Business Conduct and Ethics

Version 1.0

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Purpose and Introduction

At Wealthfront, we understand that establishing, maintaining, and growing trust are critical to our success. Trust and transparency are at the core of our client experience, and the success of our business depends on our ability to build that trust and maintain a business model that is aligned with our clients' success. To make this possible, each of us at Wealthfront must understand and uphold a set of core values and principles as we do business. Wealthfront Corporation (the "***Company***") has adopted this *Code of Business Conduct and Ethics* (this "***Code***") to aid our understanding of these values and principles and to serve as a guide to help answer potential ethical and legal questions that may arise in the course of our work. While this Code is not meant to address every potential situation that could arise, it will hopefully serve as a reminder of the other policies the Company has adopted that may provide more specialized guidance, and of the Company's expectation that all of us at Wealthfront will demonstrate good judgment and integrity at all times.

All Wealthfront employees, officers, and directors are required to read and comply with this Code. It is meant to reflect the standard of conduct expected from our employees, contractors, consultants, agents, and representatives. Accordingly, any persons who provide services as contractors, consultants, or other representatives of the Company are also required to adhere to this Code. If you have questions about our standards of conduct or how to handle a particular situation, consult your supervisor or the compliance officer designated by our Board of Directors ("***Board***"), a committee thereof or an executive officer of the Company (the "***Designated Compliance Officer***") before proceeding. The Company's Chief Compliance Officer shall serve as the Designated Compliance Officer unless another individual has been designated by the Board, a committee thereof, or an executive officer. The person serving as the Designated Compliance Officer for purposes of this Code will be identified on the Company's wiki. Questions about this Code should be directed to the Designated Compliance Officer.

This Code applies in addition to, and should be read in conjunction with, the Company's other policies relating to employees' activities and conduct. Together with this Code, these policies form a framework that Wealthfront employees, officers, and directors must follow at all times. These policies can be accessed through the Company's wiki and include our:

- *Anti-Money Laundering and Sanctions Compliance Policy*;
- *Foreign Corrupt Practices Act Policy;*
- *Insider Trading Policy;*
- *Public Communications Policy;*
- *Related Party Transactions Policy; and*

- *Whistleblower and Non-Retaliation Policy.*

Please note in particular that this Code is separate from the *Code of Ethics* adopted by the Company's subsidiaries Wealthfront Advisers LLC and Wealthfront Strategies LLC (the "***Adviser Code of Ethics***"), which applies to all "access persons" of each of those entities.

You are expected to familiarize yourself with the policies and procedures applicable to your role, adhere to these policies and procedures at all times, and raise any questions or concerns to the Designated Compliance Officer or to other persons referenced herein or in other applicable policies or procedures. In the event of any conflict between this Code and any other applicable policies or procedures, the more restrictive requirement applies.

Applicability of this Code

This Code applies to our employees, officers, contractors, consultants, agents, representatives, and members of our Board.

Our company values

Wealthfront is a product-driven company, and we serve clients solely through the digital experiences we deliver. Our values as a company determine which products we build, and they also reflect what we want our company to be in the future. The values we believe matter most to our company culture include:

- **Our clients' well-being.** We strive to understand who our clients are, what they need, and how we can help them live the lives they want. The relationships we form with our clients should last decades. Their needs and lives will evolve, and our products must evolve with them.

- **Endurance.** Every decision, from building our technology infrastructure to answering client questions, is an opportunity to improve our company over the long term.

- **Fresh perspectives.** To reimagine an industry, we need new insights and ideas that challenge our assumptions and reveal our blind spots. We have built Wealthfront by thinking about our products differently than incumbents, and we believe continuing this approach will allow us to reach our potential.

- **Information that empowers.** We share information so everyone can contribute to the discussion and make good decisions for themselves and the Company. We emphasize transparency and recognize the importance of sharing context.

Our operating principles

Wealthfront has five operating principles that guide how the Company operates. These principles are meant to guide behavioral decisions; they set the standard for how we work individually, in teams, and across the Company. These principles are:

- Demonstrate urgency;
- Ask, don't assume;
- Make decisions;
- Disagree and commit; and
- Show respect.

Honest and ethical conduct

Wealthfront is committed to maintaining high standards of honesty and ethical conduct. We strive to improve the quality of our services, products, and operations and to maintain a reputation for honesty, fairness, respect, responsibility, integrity, trust, and sound business judgment. We expect our people to adhere to high standards of business and personal integrity as a representation of our business practices, at all times consistent with their duty of loyalty to the Company. We also expect everyone to strive for excellence, work with integrity, and help ensure that our business runs ethically across our operations.

While this Code does not address every situation that may arise in the course of your relationship with the Company, you are expected to remain aware of the principles discussed below. As you face challenges, you must remain mindful of our legal and regulatory compliance obligations, ensure that you have followed the right steps and consulted the right stakeholders, and consider how your actions might look to our clients, our regulators, your colleagues, or other outside parties in both the short term and long term. We cannot gain the trust of our clients or effectively improve the Company over the long term by cutting legal or ethical corners.

Managing conflicts of interest

A key to maintaining our standards of ethical conduct is to minimize our exposure to conflicts of interest. Accordingly, you are expected to avoid actual and potential conflicts of interest in connection with your role at the Company. A conflict of interest exists when personal interests may interfere with the best interests of the Company. Because we seek to align our interests with our clients' success, it is imperative that everyone at Wealthfront remain aware of potential conflicts of interest at all times.

Identifying conflicts is not always straightforward, and even the appearance of a conflict may be problematic. Unless specified otherwise, before engaging in any activity, transaction, or relationship that might give rise to a conflict of interest, employees must first notify their managers or our Designated Compliance Officer, and then receive written approval from the Designated Compliance Officer, to engage in the activity, transaction, and/or relationship. Unless otherwise specified, directors should report actual or perceived conflicts of interest to the Nominating and Corporate Governance Committee of the Board (the "***Governance Committee***") or the Designated Compliance Officer.

While conflicts of interest are generally fact-specific, the following are examples of types of situations that could constitute conflicts of interest and should be disclosed:

- Conflicting employment: You are considering outside employment or consulting work, or a family member is working or consulting for (or considering working or consulting for) a competitor or potential competitor. As a general matter, Wealthfront employees are required to seek approval for all outside business activities, and may not engage in, or encourage or assist other persons to engage in, employment or activity that would divert business opportunities away from the Company, compete with the current or future business of the Company, or cause disruption of the Company's operations or prospects. Members of our Board are not prohibited from engaging in outside employment or consulting work, but are expected to avoid any action, position or interest that conflicts with, or may be perceived to be in conflict with, the Company's interests.
- Board or advisory service: Serving as a board member or advisor for an outside company or organization. Wealthfront employees are required to obtain preapproval of any such outside board or advisory service from the Designated Compliance Officer.
- Hiring related parties: Hiring (as an employee, contractor or consultant) or supervising family members or others with whom you have a close, personal relationship.
- Business transactions with Related Parties: Hiring or engaging a company (*e.g.*, as a service provider) in which an employee, board member, or executive officer of the Company (or a friend or family member of any such person) holds an interest, whether as an employee, owner, investor or otherwise.
- Investments: Owning or having a substantial interest in a partner, service provider (including a contractor), or competitor.
- Gifts: Accepting gifts, discounts, favors or services from a client, potential client, or service provider, unless equally available to all Company employees or nominal in value (*e.g.*, a branded article of clothing). Note that it could constitute a conflict of interest if you accept a gift from a potential service provider and then decide to engage that service provider without evaluating any competitors. Note that all gifts accepted by Wealthfront employees must comply with other applicable policies, as described further below.
- Company loans: Receiving a loan or guarantee from the Company benefitting you or your family member.
- Otherwise taking personal advantage of the Company's business opportunities.

Employees must always seek approval from our Designated Compliance Officer before participating in any transaction that could result in an actual or potential conflict of interest. In addition, the Company's *Related Party Transactions Policy* may apply to transactions involving the Company and certain directors, officers, and other related parties.

The above list of potential conflicts of interest is not intended to be exhaustive. Similarly, while the following subsections of the Code highlight certain of these potential conflicts, you should exercise good judgment and diligence in seeking to identify potential conflicts of interest.

Outside employment

Employees may not engage in any outside employment that would interfere with their job performance or responsibilities, including taking on a second job or performing services for a third party (particularly where that third party is a current or potential competitor or service provider). All employees must inform and receive approval from their manager, as well as from our Compliance team, before taking on any outside employment.

Personal relationships

Being in a personal relationship (*e.g.*, dating, living together, etc.) with another employee, job applicant, contractor, or employee of a service provider or competitor may create a conflict of interest. Employees should disclose all such relationships to the People Operations team or to the Designated Compliance Officer. Personal relationships between managers and employees who are direct or indirect reports of that manager, or over whom the manager otherwise has the ability to influence the terms and conditions of employment, must in all circumstances be disclosed immediately to the Designated Compliance Officer. With respect to personal relationship disclosure requirements, members of our Board are expected to complete all required regulatory questionnaires and notify the Designated Compliance Officer or Chief Legal Officer of any updates to the information requested in such questionnaires, but need not report to the People Operations team.

Hiring or doing business with related parties

Similarly, a conflict of interest can arise if the Company hires or engages a third party with whom, or with which, you have a personal relationship. If an employee becomes aware that the Company is considering hiring or engaging a relative or other person with whom the employee has a personal relationship (or a company that any such person owns or works for), whether as an employee, a consultant, a contractor, or a service provider, the employee should, at a minimum, discuss the situation with their manager and the People Operations team and remove themselves from the decision-making process. If an employee discovers after the fact that we have hired or engaged such a related party, they should promptly report the situation to our Designated Compliance Officer. Please also refer to our *Related Party Transactions Policy*, which may apply to such situations, for more information.

Outside advisory or board service

Service on another entity's board of directors or advisory board, or appointments to industry groups, may present conflicts of interest. Prior to accepting any such position or appointment, you should consider whether it might create an actual or perceived conflict of interest in light of your role with the Company. For employees, such positions require approval from our Designated Compliance Officer. Employees must also disclose to their manager, in advance, outside activities that may or will impact the employee's ability to perform the essential functions of their position at the expected level on a full-time basis.

Investments and business interests

If you, a relative or a member of your household (including a roommate) are considering investing in one of our partners, service providers, or competitors, make sure the investment does not compromise your obligations to the Company.

Things to consider in determining whether there is a real or seeming conflict:

- The size and nature of your investment;
- Your ability to influence the Company's decisions with respect to its relationship with that entity, and your potential ability to influence the entity's own business-related decisions;
- Your access to our confidential information; and
- The nature of the relationship between us and the other company.

If you are an employee, officer, consultant, or other representative other than a Board member and believe a conflict of interest may exist in connection with a current or proposed investment or other business interest, or have any questions about a proposed investment or business interest, you should promptly notify the Designated Compliance Officer. If you are a Board member and believe such a conflict of interest has arisen or will arise, you should notify the Governance Committee, the Designated Compliance Officer, or the Chief Executive Officer.

Meals, gifts, and entertainment

If you are offered, or have occasion to offer, meals, gifts, or entertainment in connection with Wealthfront's business relationships, you must exercise good judgment and ensure that any such meal, gift, or entertainment is reasonable and consistent with customary and prudent business practices. While the occasional exchange of modest gifts and/or entertainment in a business setting may be appropriate, you must ensure that your actions do not appear to create a conflict of interest, trigger anti-corruption law, or violate other applicable Company policies, including the *Adviser Code of Ethics*. You should not solicit or request gifts and you may not use personal funds or resources to do something you cannot do with Company funds or resources. You also may not provide anything of value to a government official without obtaining preapproval from the Designated Compliance Officer. Please also refer to the "Political activities" section below, and note that other Wealthfront policies, including the *Adviser Code of Ethics* and the Wealthfront

Brokerage LLC written supervisory procedures, may also limit your ability to provide gifts or entertainment to government officials.

Any business gift or entertainment you give or receive must be:

- Offered only in connection with legitimate business activities, such as relationship building with an established service provider;
- Given openly, transparently, and legally; and
- Reasonable in value and frequency.

You should avoid any actions that could create a perception that the Company sought favorable treatment in exchange for gifts, gratuities, meals, refreshments, entertainment or other benefits, or that could constitute a personal inducement. If you are offered a gift, travel, entertainment or other compensation by someone in connection with your role, you must ensure that it complies with any applicable regulatory requirements and applicable Company policies and procedures. If you have any questions about whether a potential business gift or entertainment is appropriate or permitted, ask the Compliance team (if you are an employee) or the Designated Compliance Officer (if you are a member of the Board).

Corporate opportunities

You may not take advantage of any opportunities discovered through your role with the Company (such as a potential product or invention, or an authorship opportunity) for personal gain, or for the personal gain of any other person, unless the opportunity is disclosed to and pre-approved by our Designated Compliance Officer. In some instances, additional approvals may also be required.

Loans

Under SEC rules, we are not allowed to provide loans (or guarantee loans) to our executive officers and directors or their family members. Any loan or extension of credit to any other employee or service provider must be approved by the Designated Compliance Officer.

Complying with applicable laws and regulations

Wealthfront is committed to compliance with applicable laws and regulations. Because our business operates in regulated industries, it is imperative that everyone at Wealthfront maintain an understanding of the laws, rules, and regulations that apply to our work. You should consult with our Legal or Compliance teams or our Designated Compliance Officer if you have any questions about the legal and regulatory landscapes in which we operate. While this Code cannot address every law and regulation applicable to our business, the Company and its subsidiaries maintain additional policies and procedures designed to help ensure our compliance with our legal and regulatory obligations, and Wealthfront personnel must adhere to those policies at all times. The following sections highlight certain key legal considerations relevant to our business.

Insider trading

Because we openly share information in keeping with our corporate values, you may find yourself in possession of inside information, which is any material nonpublic information, positive or negative, about the Company or other organizations with which we do business. Wealthfront has adopted an *Insider Trading Policy* to address our obligations with respect to material nonpublic information, and you must comply with that policy at all times.

You are prohibited from trading in securities, whether they are Wealthfront's securities or the securities of another entity, based on inside information, or from providing inside information to other persons who may trade on such information. Trading on material nonpublic information is illegal and strictly prohibited, and engaging in any activity in violation of our *Insider Trading Policy* could not only carry severe consequences for you personally, but could also undermine the trust placed in the Company by our clients, partners, investors, and employees.

Please refer to the Company's *Insider Trading Policy* for guidance on lawful trading of the Company's stock, including trading windows, blackout periods, and approved trading plans.

No bribery or corruption

All persons subject to this Code must comply fully with the Foreign Corrupt Practices Act and other applicable laws prohibiting bribery, kickbacks and corruption. Many of these laws are very broad and apply to both government and private or commercial bribery, kickbacks and corruption. The Company will not tolerate bribery, corruption, or the payment or receipt of kickbacks in any form or for any purpose.

You are responsible for ensuring that you understand and comply with all applicable laws and our *Foreign Corrupt Practices Act Policy*. If you have a question regarding any gift, entertainment or other expense, consult with our Designated Compliance Officer in advance.

Unlawfully obtaining business intelligence

Gathering information about our competitors, often called competitive intelligence, is a legitimate business practice. However, business intelligence must be obtained appropriately and from legitimate sources. Wealthfront does not permit the theft, misuse or misappropriation of other parties' proprietary or confidential information, intellectual property, products, or other materials, including that of our competitors, service providers, clients, or other third parties.

Fair marketing practices

The Company competes based solely on the merits of its products and services. Because public familiarity with our products and services is crucial to the success of our business, we engage in a range of marketing and advertising practices. We must ensure that all advertising and sales materials accurately represent the Company, its products, and its services, and do not mislead any potential customers. All marketing and advertising materials must be reviewed and approved by our Compliance team in accordance with our internal policies and procedures, including, as applicable, the specific policies and procedures maintained by our regulated entity subsidiaries. These policies and procedures are available internally on our wiki. Deliberately misleading statements, omissions of material facts, or false claims regarding the Company, its products, services, or competitors are prohibited.

Wealthfront employees are reminded that antitrust laws govern the relationships between industry competitors, and that collusion among competitors is illegal. You are prohibited from entering into any agreements, understandings, discussions, or exchanges of information with our competitors that could amount to or result in an impermissible restriction on competition, or from taking any other action that could unfairly harm the competitive landscape in which we operate.

Global trade

Although we are a US-based provider of financial services with clients residing in the US, we are committed to complying fully with applicable trade laws and regulations involving importing and exporting products, services, and technology, and we abide by applicable economic sanctions prohibiting business with affected countries, regions, individuals, or entities. If you are concerned or have questions regarding applicable requirements, you should consult with our Designated Compliance Officer.

Political activities

Wealthfront does not allow any political contribution, gift, or use of Company assets in exchange for unlawful action by federal, state or local government officials. Employees, officers and members of our Board are free to engage in political activities in a personal, individual capacity, but must not create the impression that they are doing so on behalf of the Company or use any of the Company's assets, facilities, or resources in support of personal political activities. All such political activities must also comply with applicable provisions of other Wealthfront policies, including our *Foreign Corrupt Practices Act Policy*, the *Adviser Code of Ethics*, and Wealthfront Brokerage LLC's written supervisory procedures, as applicable. To the extent the Company makes political contributions or engages in lobbying activities on the Company's behalf, all such activity must comply with applicable regulations and be preapproved by our Designated Compliance Officer.

Human rights and labor practices

Wealthfront is committed to respecting human rights and maintaining compliance with applicable labor and employment laws. Information about our employment practices is described below. Additionally, when evaluating our business relationships with third parties, we should remain mindful of those third parties' practices with respect to issues such as labor abuses (including child labor or other illegal practices) and human trafficking. Wealthfront will not condone any such practices, whether internally or tacitly through our business partners.

Financial matters and business practices

You are expected to act responsibly and exercise sound judgment with respect to our finances and our financial and other public reporting practices. Financial transactions must be properly authorized and must comply with our internal Company policies and practices. Financial and business information must be reported fairly and accurately. Because accurate reporting begins with accurate recordkeeping, you must record and report all financial transactions and business information honestly and accurately, comply with our system of internal controls, and adhere to applicable laws, regulations, and accounting practices.

We regularly file reports and other documents with regulatory authorities, including the SEC. In addition, we may make other public communications, such as press releases, from time to time. All such public communications must be made in accordance with our *Corporate Communications Policy* and any other applicable internal policies and procedures.

Depending upon your position with the Company, you may be responsible for providing information as part of our public reporting and public communication process. You are expected to use all reasonable efforts to provide complete, accurate, objective, relevant, timely and understandable answers to help ensure that our reports and communications are complete, fair, accurate and understandable. Employees involved in preparing public reports and communications, including any sustainability reports, must use all reasonable efforts to comply with our disclosure controls and procedures.

If you believe that any disclosure may be incomplete or materially misleading, or if you become aware of any material information that you believe should be disclosed to the public, it is your responsibility to promptly bring this information to the attention of our Designated Compliance Officer. If you have questions or concerns about accounting or auditing conduct or practices, you should follow the procedures set forth in our *Whistleblower and Non-Retaliation Policy*.

SEC reporting and financial statement preparation

Our periodic reports and other documents filed with the SEC, including all financial statements and other financial information, must comply with applicable federal securities laws and SEC rules. If you contribute in any way to the preparation or verification of our financial statements and other financial information, you must ensure that our books, records and accounts are accurately maintained. You must also cooperate fully with our finance and legal departments, as well as our independent public accountants and outside counsel. If you are involved in the preparation of our SEC reports or financial statements, you must:

- Be familiar with and comply with our disclosure controls and procedures and our internal control over financial reporting.
- Take all necessary steps to ensure that all filings with the SEC and all other public communications about our financial and business condition provide full, fair, accurate, timely and understandable disclosure.

Periodic compliance certifications

Wealthfront employees are required to complete periodic compliance certifications relating to our compliance, reporting, and accounting obligations. All employees are expected to complete these certifications accurately, completely, and in a timely manner. If you do not provide a certification or complete a certification completely, honestly and accurately, you may be in violation of this Code. This may result in disciplinary action up to and including termination of your service with the Company.

Business expenses

Employees must use good judgment when incurring business expenses and requesting reimbursement. Expenses must be reasonable, directly related to our business, supported by appropriate documentation, and in compliance with our policies. Expense reports should be timely, documented, and complete. If you are uncertain about our expense policies or any particular expense, check with your manager. Managers are responsible for all money spent and expenses incurred by their direct reports and should carefully review such expenses and supporting receipts before approving.

Money laundering and third-party payments

We are committed to complying with applicable anti-money laundering and antiterrorism laws. Money laundering occurs when individuals or organizations attempt to conceal illicit funds or make such funds look legitimate.

If you become aware of payments, transactions, or other activity that is potentially suspicious, you should immediately notify the Anti-Money Laundering Compliance officer. This includes activity involving the Company's clients, service providers, and employees. For additional information, see our *Anti-Money Laundering and Sanctions Compliance Policy*.

Using and protecting our business information and assets

Protecting information and intellectual property

The Company's proprietary information and intellectual property are critical to the success of our business. Because we believe in providing access to information internally, Wealthfront personnel have access to sensitive and proprietary data and information regarding our customers, products, and business plans. You must preserve the confidentiality of this information at all times and may not use it for any purpose outside the scope of the Company's business. All Wealthfront employees are required to sign invention assignment and confidentiality agreements with the Company as a condition of their employment. Contractors and consultants must also agree to similar provisions. Your compliance with your obligations under these agreements is essential to the preservation of the Company’s intellectual property rights. Similarly, if you have access to confidential information regarding our partners, service providers, or other third parties, you must treat that information with the same care we use to protect our own information, particularly if that information is subject to a non-disclosure agreement or other confidentiality obligations.

Data privacy

Trust is the foundation of our relationship with our clients. We value the confidence our clients have in us and take the responsibility of protecting their information seriously. To be worthy of their trust, we built, and will continue to grow, the Company with an emphasis on security, compliance, and privacy.

Disclosing confidential information about the company and others

If you need to share confidential information belonging to the Company with an outside party such as a service provider, you first must ensure that the outside party is obligated to preserve the confidentiality of that information. Information should only be shared pursuant to a non-disclosure agreement (“***NDA***”) approved by the Company’s Legal team or pursuant to a services agreement that contains adequate confidentiality provisions. Similarly, if a third party discloses confidential information to the Company under an NDA, we must limit our use of that information in accordance with the terms of the NDA. It is Wealthfront’s policy to comply with all applicable confidentiality restrictions, including NDAs, when handling our own confidential information or the confidential information of third parties.

Do not discuss sensitive business matters or confidential information in public places. We recognize that some of the Company’s office space is located in close proximity to other companies’ offices. You should take steps to ensure that third parties, including members of the public, are not present or nearby when discussing confidential matters.

As noted above under “Unlawfully obtaining business intelligence,” you should never attempt to obtain a competitor’s confidential information improperly. This includes asking an employee, service provider, or Board member to disclose confidential information they received while working at or for another company. Additionally, if you obtain another company’s confidential information accidentally or from an unknown source, it may be unethical or even illegal to use the information. Contact our Designated Compliance Officer with any questions or concerns you may have about any such information.

Retaining records

All Wealthfront personnel are required to preserve the Company’s business records and other information relating to our business. Business records are critical to the continuity of our business, and moreover, the Company's subsidiaries are subject to mandatory regulatory recordkeeping requirements. You must preserve records such as e-mail, instant messages, local and shared drives, and other business materials in accordance with our document retention policies. From time to time, a "legal hold" may be imposed in connection with potential litigation or regulatory investigations. When such a legal hold is in place, you may not alter, destroy, or discard relevant documents until further notice.

Requests by regulatory authorities

Because Wealthfront is a public company, and because the Company's subsidiaries include regulated entities, we may receive requests for information, documents, or interviews from governmental or regulatory employees from time to time. Generally, such inquiries are directed to our Legal and Compliance teams. If you receive such a request from a governmental or regulatory authority directly, please refer the matter to our Chief Compliance Officer or Chief Legal Officer immediately. Our policy is to cooperate with governmental and regulatory authorities by responding to such requests; however, it is imperative that all such responses be coordinated by our Legal and Compliance teams. You are not, however, prohibited from providing information to a government or law enforcement agency directly if you reasonably believe that the information discloses a violation of law by the Company or someone acting on our behalf.

Computers and other equipment

All equipment provided by the Company (such as your laptop) remains the property of Wealthfront and should be used responsibly. You may make limited personal use of our equipment, provided such use does not interfere with our business or violate any law or Company policy. If you use any Company equipment at a location outside of your home or our offices, you need to take precautions to protect the equipment from loss, theft, or damage. You have no right to privacy in our equipment (including laptops) or to any personal information stored on that equipment, and you may not modify any equipment in a way that makes it inaccessible to the Company. Employees and contractors who are issued Company laptops may not use their own equipment for Company work without advance permission from the Security team and Legal department and only in compliance with all policies relating to the use of such equipment. Employees may only use personal mobile devices in accordance with applicable regulatory requirements and Company policies and procedures, including but not limited to the Company's *Mobile Device Policy*.

Software and content

All software you use in your work for the Company must be appropriately licensed and approved by the Company's Security team. Any non-licensed or unauthorized software, apps, plugins or extensions should be removed. You may not make, use or share unauthorized copies of software or other copyrighted material.

Access to our offices

All employees are responsible for complying with the policies we have established to ensure the security and confidentiality of our communications, protect our assets from theft, misuse or destruction, and keep you and any guests safe, as well as all related systems and safeguards. When working from our offices, take care to ensure that you do not allow any unknown or unauthorized persons to access our workspace. Limiting access to employees, approved contractors or service providers, and approved guests is one way to help preserve the confidentiality of our systems and business information.

Communicating with others

To help ensure compliance with applicable rules and regulations, the Company designates certain authorized spokespersons to speak publicly on its behalf, as described in our *Corporate Communications Policy*. These authorized spokespersons include the Chief Executive Officer, the Chairperson of the Board, the Chief Financial Officer, the Vice President of Investor Relations, and other designated representatives. Because any external communications can affect our business, and because we are committed to providing accurate, timely, and clear disclosure, you must be thoughtful and conscientious about what you say and write in public. In general, only our authorized spokespersons may communicate publicly on behalf of the Company without express prior approval. Any inquiries from reporters or members of the press, analysts, or investors should not be answered directly and should instead be forwarded to our Communications team in accordance with our *Corporate Communications Policy*.

Social media

The Company uses certain approved social media accounts to communicate with the public. Communications that are posted on or shared from the Company's social media accounts adhere to the policies and procedures the Company has established to maintain compliance with applicable rules and regulations.

Since social media can be used in connection with both personal and business purposes, it is important to remember that this Policy applies both if and when you communicate publicly on the Company's behalf, and when you post personally on social media when your relationship with the Company is apparent. When communicating publicly on social media, please remember that you may not comment on the Company's financial condition, recommend securities transactions, provide personalized investment advice, or solicit customers. Your personal social media accounts may not be used for business-related purposes without express approval from the Communications team and Compliance.

Maintaining our work environment

We are committed to the highest standards of conduct at every level, and we depend upon the personal and professional integrity and dedication of all employees to help uphold these standards. Wealthfront strives to create a work environment that promotes job satisfaction, respect, responsibility, integrity, and value for all our employees, clients, customers, and other stakeholders. We all share in the responsibility of maintaining and improving the quality of our work environment. We believe in showing respect to everyone at Wealthfront to help foster an environment where all people are welcome and supported.

Inclusion and innovation

Wealthfront is committed to creating and maintaining a workplace in which all employees have an opportunity to participate and contribute to the success of the business, and are valued for their skills, experience, and unique perspectives. We embrace diversity of people, perspectives, and ideas. We believe that having a workforce made up of team members who bring a wide variety of skills, abilities, experiences, and perspectives is essential to our success, and that creativity and innovation flourish in an environment of openness, inclusion, and mutual respect. We strive for an environment that seeks innovation from everywhere and enables us to put our clients in control of building wealth effortlessly and give them the confidence to pursue their futures, and we expect our employees to conduct themselves in a way that helps to build that environment.

Fair employment practices

We are committed to providing equal employment opportunity for all applicants and employees. We do not unlawfully discriminate in employment opportunities (such as hiring or promotions) or practices (such as discipline, compensation or benefits) on the basis of any protected characteristic, including age, race (including traits associated with race), color, religion, religious creed (including religious dress and grooming practices), national origin, ancestry, citizenship, physical or mental disability, medical condition, genetic information, marital status, reproductive health decision-making, sex (including pregnancy, childbirth, breastfeeding, or related medical conditions, gender (including gender identity or gender expression), transgender status, sexual orientation, veteran or military status, protected medical leaves, domestic violence victim status, political affiliation, off-duty and off-premises use of cannabis, or any other status protected by federal, state, or local laws.

Additionally, we are committed to providing a work environment free from discrimination, harassment, and retaliation. Discrimination or harassment on the basis of any status protected by law is strictly prohibited and will not be tolerated. The Company seeks to address reports of discrimination or harassment promptly. If you believe you have observed or been subject to discrimination or harassment in violation of our policies, you should immediately contact your manager, People Operations, our Designated Compliance Officer, or any manager with whom you feel comfortable. If you conclude that you can only report violations anonymously, please follow the procedures in our *Whistleblower and Non-Retaliation Policy*. We will not retaliate against any employee for bringing a complaint in good faith or participating in any investigation in good faith and we will not tolerate retaliation by others. You should report any concerns about retaliation immediately. See “No Retaliation” below.

Safety and security

We expect you to show respect, treat others fairly, and be professional at all times. We are committed to the safety and security of our employees and property. We will not tolerate threats of violence, acts of aggression, intimidation or hostility. You may not possess firearms, other weapons, explosive devices or dangerous substances or materials in the workplace. Any potentially dangerous situation must be reported immediately to our Designated Compliance Officer and/or Security team.

Our open-door policy

Wealthfront has an open-door policy that seeks to encourage employees to participate in decisions affecting them and their daily professional responsibilities. You are encouraged to make any concerns, questions, suggestions, or comments known to the Company. Whether you have a question about this Code or any other policy or program, or a concern about a decision affecting your role, you can make yourself heard so that your question or concern can be addressed.

Cooperating with investigations

We will conduct investigations of alleged or suspected violations of our policies and procedures, including this Code, as well as alleged or suspected violations of applicable laws, rules or regulations. All persons subject to this Code are required to cooperate with any Company investigation.

Violations of company policies

You are expected to be familiar with and comply with all applicable Company policies. If you have a question regarding any policy or course of conduct, you are encouraged to consult your supervisor or the Designated Compliance Officer. Violations of our policies may result in disciplinary action up to and including termination of employment. Examples of misconduct that may result in disciplinary measures includes:

- Violating any Company policy;
- Failing to report known or suspected violations of any Company policy;
- Failure to cooperate in a Company investigation into possible violations of Company policies; and
- Engaging in retaliation.

Reporting concerns

If you have a concern about actual or potential violations of this Code or any of our other 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. However, you can always report a concern to the Company's Designated Compliance Officer, the next level of management, or anonymously. Consult the process set forth in our *Whistleblower and Non-Retaliation Policy* for additional ways to report concerns.

Please note that nothing in this Code or any other Company 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 the Company. 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.

No retaliation

We will not tolerate retaliation against any person raising a concern or participating in any investigation in good faith. Please refer to our *Whistleblower and Non-Retaliation Policy* for further information.

Changes to this Code

Our Board reserves the right to modify or grant waivers to this Code in its sole discretion. If permitted by the rules of the securities exchange on which the Company's securities are listed, a committee of the Board may also grant waivers to this Code. Any amendments or waiver, including all waivers granted for the benefit of executive officers or directors of the Company, will be publicly disclosed to the extent required by applicable laws, rules and regulations by the means and within the timeframes specified by such laws, rules, or regulations.