Wealthfront Corporation Whistleblower and Non-Retaliation Policy

Version 1.0

Effective Date: December 11, 2025

Purpose

Wealthfront Corporation (the "Company") is committed to high standards of ethics, integrity and accountability and to complying with applicable laws, rules and regulations related to its business. We have established this Whistleblower and Non-Retaliation Policy (the “Policy”) to enable employees, members of our Board of Directors (“Board”), and other stakeholders to report activity they suspect to be unlawful or a violation of Company policies to facilitate the investigation and resolution of any potential violations as quickly, thoroughly and efficiently as possible.

You are required to perform your duties and responsibilities with honesty and integrity and to comply with all applicable laws, rules, regulations, and Company policies. You must acquire appropriate knowledge of, and comply with, the laws, rules and regulations applicable to your position and area of responsibility and be able to recognize the potential consequences of non-compliance. You must participate in training made mandatory by the Company for all employees and service providers, as well as training required for your particular position. If you do not believe you have been provided with the appropriate information or training regarding laws, rules and regulations that apply to your position, please speak with your manager. Always seek guidance if you have any questions or concerns about how you should conduct yourself.

Situations that may involve an ethical violation or a violation of applicable laws, regulations, or Company policies may not always be clear and may require difficult judgment. If you become aware of an actual or suspected violation of our policies or of any applicable laws, rules or regulations, it is your responsibility and obligation to report it promptly. All reports must be made in good faith, which means you must have a reasonable belief that the information you are providing is true and accurate to the best of your knowledge. Good faith reporting does not require that you have all the facts or be certain of a violation, but rather that you have a genuine concern and are not deliberately making false or misleading statements. You should report any actual or suspected violations without fear of reprisal or retaliation of any kind.

You are encouraged to use the guidance provided by this Policy to report all known and suspected improper activities as described below. This Policy is designed to provide you with a confidential or anonymous method for reporting any activities that are known or suspected to be improper. It is important to note that this Policy does not cover personal grievances, such as individual workplace disputes, compensation issues, or performance-related matters, unless they involve systemic issues or violations of law, regulation, or company policy. Such personal matters should instead be addressed through the appropriate People Operations channels.

You should understand, however, that nothing in this Policy (nor any other Company policy or agreement) 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") at any time. 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 the Company. The Company is committed to fully cooperating with all government investigations and regulatory inquiries. 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.

Employees are protected when making such external reports in good faith and with reasonable belief of a violation.

Persons covered by this policy

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

When should violations be reported

We ask that you follow this Policy to report good faith concerns regarding known or suspected violations of any of the following:

1. laws, governmental rules or regulations;
2. Company policies (including, but not limited to, our *Code of Business Conduct and Ethics*); or
3. Problems with money, expenses, accounting, internal accounting controls, auditing matters or financial records.

Some examples of reportable violations include illegal activities or rule-breaking, including those involving insider trading, falsifying company books and records, bribery, violations of Company policies, undisclosed outside business activities, failure to disclose conflicts of interest, discrimination, and harassment.

Information that should be included in a report

When making a report, please include as much detailed information as possible, such as:

- Date(s) and/or time(s) of the incident(s)
- Names of individuals involved
- Names and/or descriptions of systems or technology involved, if any
- Precise location where the incident occurred, if applicable
- Detailed description of the observed or suspected violation
- Any available supporting evidence or documentation
- Contact information (if the report is not being made anonymously) for potential follow-up questions. Keep in mind that your reporting obligation includes complaints or reports you might get from people outside of the Company, Company employees, and/or service providers that you supervise or that may report to you or interact with you regularly, as well as complaints regarding third parties who provide services to us, whether directly or indirectly.

How to report violations

If you believe that any violation has occurred or is occurring, or you have a good faith concern regarding conduct that you reasonably believe may be a violation, including experiencing or witnessing retaliation, you are required to promptly take one or more of the steps outlined below.

1. Notify your manager, supervisor, or the Chief Compliance Officer of the known or suspected violation.

2. Report the known or suspected violation confidentially through our whistleblower hotline at (800) 461-9330 or online at wealthfront.com/whistleblower (you may choose to remain anonymous).

3. In case of immediate threats to personal safety, physical security, or potential imminent harm, you should call local emergency services (911) immediately. Immediate threats include, but are not limited to, physical violence, credible threats of harm, immediate safety risks, or situations that could cause significant damage to people or company property.

If you have a concern that is not a suspected violation as described above, or if you are not sure whether your concern is a suspected violation, you may report concerns to internal departments as appropriate in light of the nature of the concern or report as outlined below:

1. If you would prefer to speak to someone other than your manager or supervisor, or if your manager or supervisor is involved in the matter, you can report concerns to our Chief Compliance Officer or to our Legal, People Operations, or Finance teams, as appropriate.
2. For additional support and resources, you can contact Compliance by emailing compliance@wealthfront.com. Some resources are also available on our policy wiki.

Remember that you always have access to our whistleblower hotline and other reporting methods mentioned above.

You are encouraged to provide as much detail as possible regarding the subject matter of the complaint or concern to allow for a proper investigation. In order to better respond to any reported concerns, it would be helpful if you provide your telephone number and/or other contact information when making the report. All reports will be treated as confidential, subject to applicable law, regulation or legal proceedings. However, if you prefer to remain anonymous, you may report a concern without disclosing your name or position.

If you wish to report a matter directly to our Audit Committee, you may use the process above and indicate that the report should be delivered directly to the Audit Committee, send an email to auditcommittee@wealthfront.com, or send a letter addressed to 261 Hamilton Ave, Palo Alto, CA 94301 marked “Attention: Audit Committee.” The Audit Committee will take whatever steps it deems necessary to respond to a report that it receives, including referring the matter internally or, in the alternative, to an independently-engaged investigative resource.

Investigation

Wealthfront treats all reports of suspected violations seriously. The Company will promptly review and address each concern as appropriate. Reviews will be conducted by a qualified cross-functional team established and overseen by the Company’s Chief Legal Officer and may involve investigations where appropriate. When conducted, investigations will be conducted confidentially to the extent practical and appropriate under the circumstances, recognizing that some disclosure may be necessary to effectively investigate the complaint. Investigations will be coordinated by the Chief Legal Officer or his or her designee, and may include collecting relevant documents, conducting interviews, and consulting with outside advisors, including outside counsel. The Chief Legal Officer may also consult with, or report to, the Audit Committee as necessary or appropriate under the circumstances.

The Chief Legal Officer will oversee the documentation of findings and formulation of any recommendations resulting from the Company's review of submitted complaints and reports, including recommendations with respect to corrective action as necessary and appropriate in light of the results of the review process. The Company seeks to resolve all reports of suspected violations. Conduct or violations that may constitute criminal activity may be reported to law enforcement or regulatory authorities as appropriate in light of the surrounding circumstances.

You should not conduct your own independent investigation into any suspected violations. Instead, make a report following the procedures outlined in this Policy, keeping in mind that providing additional information in your report may facilitate a more expeditious and informative investigation by the Company. If you are a manager and a potential violation is reported to you, you are expected to report such issues through one of the channels discussed in this Policy, and encourage other employees to do the same.

We do not retaliate against whistleblowers

We strictly prohibit, and will not tolerate, intimidation, harassment, retaliation, or any kind of discrimination or adverse action against someone who reports actual or suspected violations in good faith. Any employee who engages in harassment or retaliatory or discriminatory conduct in violation of this Policy is subject to discipline, up to and including termination. In some cases, federal, state and/or local law provides that retaliatory action for reporting unlawful activity is illegal. Employees who object to or refuse to participate in a policy, practice or activity that is unlawful, fraudulent, criminal or incompatible with a clear mandate of public policy concerning the public health, safety or welfare or protection of the environment are also protected from retaliatory action.

Employees who experience retaliation may seek remedies by reporting through any of the channels described above in the section titled “How to report a violation,” as appropriate. The Company will take steps to investigate any such reports and will implement appropriate corrective action as warranted in light of the Company's findings and this Policy.

We do not permit any form of intimidation, harassment, discrimination or retaliation by any employee, contractor, subcontractor or agent of the Company against you because of any lawful act done to:

1. provide information or otherwise assist in an investigation of conduct you reasonably believe is a violation of any law, rule, regulation, or Company policy; or

2. testify, participate in, or otherwise assist in a proceeding filed or to be filed relating to a violation of any law, rule or regulation.

Any individual reporting a violation or potential violation pursuant to this Policy will be treated with dignity and respect. Nothing in this Policy in any way prohibits or is intended to restrict or impede employees from discussing the terms and conditions of their employment with co-workers or union representatives, exercising protected rights under Section 7 of the National Labor Relations Act, exercising protected rights to the extent that such rights cannot be waived by agreement or otherwise disclosing information as permitted by law.

It is also important to note that this Policy does not shield employees from the consequences of making reports in bad faith. Disciplinary action may also be taken against an employee who:

1. submits a report or complaint containing a statement, allegation, document, or fact that the individual knew or should have known was false or misleading; or

2. uses the complaint procedure for purposes other than the good faith resolution of a report or complaint of a violation of this Policy.

Disciplinary action

This Policy will be enforced on a Company-wide basis, and violations will be dealt with promptly and appropriately, which may include subjecting persons to corrective and/or disciplinary action. Employees who fail to comply with this Policy or to cooperate with any compliance investigation will also be subject to disciplinary action, as will employees who direct, approve or condone violations of this Policy or have knowledge of a violation and do not act promptly to report and correct it. Disciplinary action may include dismissal, suspension, removal from a position or office, and/or termination of employment.

Changes to this policy

Our Board or an authorized committee thereof reserves the right in its sole discretion to modify or grant waivers to this Policy. In the event of any significant changes to the Policy, an updated Policy will be made available to all employees and relevant stakeholders in a timely manner.