

Remitly Global, Inc.
Global Code of Conduct
As adopted on November 14, 2024

A Note From Our CEO

By living our cultural values as we strive toward ambitious goals, we pave the way to achieving our vision: To transform lives with **trusted** financial services that transcend borders.

The integrity of our vision depends on the daily actions of our people, and an unwavering commitment to our customers. My ask of every Remitian is that you are intentional about *how* you get things done; that you reflect regularly on our cultural values and align yourself to them. As we continue to build this business and serve increasing numbers of customers around the world, let us always act with integrity. In doing so, we will preserve peace of mind and realize the significant vision that drives us every day.

WJGS,
Matt

Vision

Remitly's vision is *to transform lives with trusted financial services that transcend borders*. Focus has always been a key part of our strategy and our initial laser focus is on transforming the global remittance industry. Over time, we will leverage our trusted financial services brand and our global network to extend into additional, complementary products.

We accomplish our vision by relentlessly focusing on **culture**. We've created Remitly's *Cultural Values*, which embody how an exemplary Remitly team member and the overall Remitly team works to deliver on promises to customers everyday. That starts with putting customers at the center of everything we do.

Diversity, Equity and Inclusion

Diversity, equity, and inclusion (DEI) are deeply rooted in our purpose and mission at Remitly. Our focus every day is to tirelessly deliver for our customers, many of whom may be underrepresented in the countries they've migrated to, and have historically been left out of traditional financial systems.

Effectively serving millions of customers sending money home to their families across the globe requires global teams of committed individuals, who bring together their unique diversity of experiences and thoughts, who demonstrate a deep level of compassion and genuine curiosity, and who value varied lived experiences, perspectives, and backgrounds.

Remitly's working environment and culture are designed to unlock the best thinking and inspire impact from our diverse teams. All of this is made clear by the way we live our cultural values, as we engage with each other, our customers, and the immigrant communities we serve all over the world.

About Our Global Code of Conduct

Purpose

Each of us has a responsibility to treat each other with respect and grow our business with integrity. This Global Code of Conduct (this "Code") has been adopted by the Board of Directors (the "Board") of Remitly Global, Inc. (together with its subsidiaries, the "Company" or "Remitly") and is intended to promote honest and ethical conduct; full, fair, accurate, timely, and understandable disclosure; compliance with applicable

governmental laws, rules, and regulations; and accountability for adherence to this Code and all our Company policies. While covering a wide range of business practices and procedures, this Code cannot and does not cover every issue that may arise, or every situation where ethical decisions must be made, but rather sets forth key guiding principles that represent Company policies and establish conditions for employment at the Company.

All employees, directors, and officers of Remitly are expected to act with integrity and perform their duties ethically and honestly. Honest conduct is considered to be conduct that is free from fraud or deception. Ethical conduct is considered to be conduct conforming to accepted professional standards of conduct as addressed in this Code.

Non-compliance with this Code and any corresponding policies affiliated with this Code can have serious consequences for you and Remitly. Non-compliance may violate the law and could result in litigation, civil and/or criminal penalties, fines, and even imprisonment. Non-compliance may cause serious reputational harm to Remitly. In addition, failing to comply with this Code can result in disciplinary action, up to and including termination. Violations of this Code that involve illegal behavior will be reported to the appropriate authorities.

Policy Scope

This policy covers all Remitly employees, contractors, consultants, agents, members of our Board, as well as our distribution partners, payment processors, and other third-party vendors. Everyone covered by this Code is required to read and comply with our Code and acknowledge it annually.

Changes to this Code

From time to time Remitly will update this Code. Material changes must be approved by the Remitly Board and promptly disclosed in accordance with legal requirements. Any waiver to this Code for a Remitly employee must be approved in writing by the General Counsel or their delegate; any waiver for a Remitly executive officer or Board member must be approved by the Board and promptly disclosed in accordance with legal requirements.

Reporting and Enforcement

Speaking up isn't always easy. Acting with integrity requires us to be constructively direct when we observe or experience behaviors or practices that don't reflect our cultural values. If you suspect violations of this Code or other suspected illegal conduct or unethical behavior, it's critical that you report it.

We understand there may be unique situations that are difficult to speak about in a direct way. If using a Constructively Direct approach does not feel possible, you should promptly report any concerns about a violation of ethics, laws, rules, regulations, or this Code by submitting a case with Convercent, our anonymous reporting platform. In the case of accounting, internal accounting controls, or auditing matters, a reporting individual can indicate during the intake process that the concern should be delivered directly to the Audit & Risk Committee (the "Audit Committee") of the Board.

To report an incident through Convercent, call 1-800-461-9330 or submit a case online. If concerns or complaints require confidentiality, including keeping an identity anonymous, the Company will endeavor to protect this confidentiality, subject to applicable law, regulation or legal proceedings. We will conduct investigations of alleged or actual violations of our policies and procedures, and applicable laws, rules, and regulations. You are required to cooperate with any Company investigation.

For more information, please see our **Fair Employment Policy** and our **Whistleblower and Speak Up Policy**.

The provisions of this Section are qualified in their entirety by reference to the Section, "Reporting Violations to a Governmental Agency" below.

Non-Retaliation

Remitly does not tolerate retaliation and strictly prohibits any form of retaliation against anyone who makes a good faith report of a potential violation of this Code or misconduct. Non-retaliation also extends to anyone who participates in a Code investigation, even if it turns out to be unfounded. Open communication of issues and concerns without fear of retribution or retaliation is vital to the successful implementation of this Code.

For more information and examples of specific behaviors prohibited at Remitly, please refer to our **Fair Employment Policy** and our **Whistleblower and Speak Up Policy**.

Reporting Violations to a Governmental Agency

You understand that you have the right to:

- Report possible violations of law or regulation that have occurred, are occurring, or are about to occur to any governmental agency or entity, or self-regulatory organization;
- Cooperate voluntarily with, or respond to any inquiry from, or provide testimony before any self-regulatory organization or any other regulatory or law enforcement authority;
- Make reports or disclosures to law enforcement or a regulatory authority without prior notice to, or authorization from, the Company; and
- Respond truthfully to a valid subpoena.

You have the right to not be retaliated against for reporting, either internally to the Company or to any governmental agency or entity or self-regulatory organization, information which you reasonably believe relates to a possible violation of law. It is a violation of law to retaliate against anyone who has reported such potential misconduct either internally or to any governmental agency or entity or self-regulatory organization. Retaliatory conduct includes discharge, demotion, suspension, threats, harassment, and any other manner of discrimination in the terms and conditions of employment because of any lawful act you may have performed. It is unlawful for the Company to retaliate against you for reporting possible misconduct either internally or to any governmental agency or entity or self-regulatory organization.

Notwithstanding anything contained in this Code or otherwise, you may disclose confidential Company information, including the existence and terms of any confidential agreements between yourself and the Company (including employment or severance agreements), to any governmental agency or entity or self-regulatory organization.

The Company cannot require you to withdraw reports or filings alleging possible violations of law or regulation, and the Company may not offer you any kind of inducement, including payment, to do so.

Your rights and remedies as a whistleblower protected under applicable whistleblower laws, including a monetary award, if any, may not be waived by any agreement, policy form, or condition of employment, including by a predispute arbitration agreement.

Even if you have participated in a possible violation of law, you may be eligible to participate in the confidentiality and retaliation protections afforded under applicable whistleblower laws, and you may also be eligible to receive an award under such laws.

Honest and Ethical Conduct

Conflicts of Interest

Our employees, officers, and directors have an obligation to act in the best interest of the Company. You must act within guidelines that prohibit real and potential conflicts of interest with your role at Remitly. Before engaging in any activity, transaction, or relationship that might give rise to a conflict of interest, you must first notify your manager or our General Counsel or, if you are a Board member, to the Chair of the Audit Committee.

A “conflict of interest” occurs when a person’s private interest interferes in any way, or even appears to interfere, with the interest of the Company. A conflict of interest may arise when a person takes an action or has an interest that may make it difficult for them to perform their work objectively and effectively. Conflicts of interest may also arise when a person (or their family members) receives improper personal benefits as a result of their position in the Company. When in doubt about any potential conflict of interest, contact our legal department. Please refer to our **Conflicts of Interest Policy**, and in the case of our executive officers and directors our **Conflict of Interests, Confidentiality and Corporate Opportunity Policy**, for more information on activities that are considered conflicts of interest that include but are not limited to, outside employment, business with related parties, investments and business interests, corporate opportunities, loans, personal relationships, political activity, business expenses, and/or gifts.

Complying with the Law

Everyone at the Company is expected to comply with the law. Laws can be complex and at times, even counterintuitive. Although it’s impossible to know all aspects of every law, you should understand the major laws, rules, and regulations that apply to your work. If you are unsure or have any questions or concerns related to your work, please contact our legal department.

Anti-Bribery and Corruption

We do not tolerate any form of bribery or corruption in our business. Ever. To ensure compliance with anti-bribery laws such as the Foreign Corrupt Practices Act and other applicable laws, we have implemented our **Policy Regarding Improper Influence of Foreign Officials**. As detailed in that policy, you should never participate in any act involving bribery or corruption, and if you ever are unsure about what to do, ask the compliance team.

Trade Compliance and Sanctions

We are a global business, so are careful to comply with trade compliance and sanctions laws, including with respect to doing business with those subject to embargoes or sanctions. Always consult with our compliance team for guidance on this topic.

Privacy

We are committed to complying with applicable privacy laws and to protecting the privacy and security of the information of our customers, personnel, and other parties. For more information, please refer to our **Privacy Policy**.

Insider Trading

You may not trade or enable others to trade in stock or other securities in violation of insider trading laws. If you have any questions as to whether certain activity constitutes unlawful insider trading, please contact our legal department. And for more information, please see our **Insider Trading Policy**.

Competition

Competition laws prohibit agreements among competitors on such matters as prices, terms of sale to customers, and allocating markets or customers. Competition laws can be very complex, and violations may subject the Company and its personnel to criminal penalties, including fines, jail time, and civil liability. If you have any questions, please contact our legal department.

Workplace Safety and Security

The Company is committed to conducting its business in compliance with all applicable environmental and workplace health and safety laws and regulations. The Company strives to provide a safe and healthy work environment and to avoid adverse impact and injury to the environment and communities in which we conduct our business. Achieving this goal is the responsibility of all Remitlians.

We expect you to treat others fairly and with respect and to be professional at all times. 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 your local Global Facilities team leader.

Harassment & Discrimination

We are committed to maintaining a work environment free of inappropriate or unlawful discrimination or harassment. It is strictly against our policy for anyone to harass or discriminate against any individual employed by or working for Remitly. We also prohibit harassment or discrimination against Remitly customers, vendors, clients, suppliers, independent contractors, and others doing business with Remitly. In addition, we prohibit customers, vendors, clients, suppliers, independent contractors, and others doing business with Remitly from harassing or discriminating against our personnel.

For more information and examples of specific behaviors prohibited at Remitly, please refer to our **Fair Employment Policy**.

Our Assets and Systems

Each Company office has policies to ensure the security and confidentiality of our communications, to protect our assets from theft, loss, misuse, or destruction, and to keep you and the Company safe.

Financial Matters and Business Practices

You are expected to act responsibly and exercise sound judgment with respect to our finances, financial reporting, intellectual property (IP), software content, records, and data. The Company has a responsibility to provide full and accurate information in our public disclosures, in all material respects, about the Company's financial condition and results of operations. Our reports and documents filed with or submitted to the Securities and Exchange Commission and our other public communications shall include full, fair, accurate, timely, and understandable disclosure. If you are involved in the preparation of these materials or are otherwise aware of inaccuracies, it is your responsibility to notify the appropriate personnel and do your best to ensure that accurate information is included.

Depending upon your position with the Company, you may be called upon to provide information to help ensure that our public reports and communications are full, fair, accurate, timely, and understandable. You are expected to use all reasonable efforts to provide complete, accurate, objective, relevant, timely, and understandable answers to inquiries related to our public disclosures. Remitlians involved in preparing public reports and communications must use all reasonable efforts to comply with our disclosure controls and procedures.

If you believe that any disclosure is 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 bring this information to the attention of the Company by notifying your manager. If you believe that questionable accounting or auditing conduct or practices have occurred or are occurring, you should follow the procedures set forth in our **Whistleblower and Speak Up Policy**.

Protecting Confidential Information about the Company and Others

Confidential proprietary information generated and gathered in our business is a valuable Company asset. Protecting this information plays a vital role in our continued growth and ability to compete, and all proprietary information should be maintained in strict confidence, except when disclosure is authorized by the Company or required by law.

Proprietary information includes all non-public information that might be useful to competitors or that could be harmful to Remitly, its customers or its suppliers if disclosed. Intellectual property, such as trade secrets, patents, trademarks, and copyrights, as well as business, research and new product plans, objectives and strategies, records, databases, personnel medical information, customer, personnel, and suppliers lists, and any unpublished financial or pricing information must also be protected.

Unauthorized use or distribution of proprietary information violates Company policy and could be illegal. Such use or distribution could result in negative consequences for both the Company and the individuals involved, including potential legal and disciplinary actions. We sometimes must disclose our confidential information in the course of performing our jobs. If you need to disclose confidential information outside the Company, you first must be sure to have an approved non-disclosure agreement (“NDA”) in place. In addition, you should not discuss sensitive matters or confidential information in public places. If a third party has disclosed confidential information to you or the Company under an NDA, we must comply with the terms of the NDA and limit our use of the confidential information to the specific purpose for which it was intended.

Your obligation to protect the Company’s proprietary and confidential information continues even after you leave the Company, and you must return all proprietary information in your possession upon leaving the Company.

You should never attempt to obtain a competitor’s confidential information improperly. This includes asking other personnel to disclose confidential information they received while working at another company. 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. You should immediately contact our legal department to determine how to proceed.

The provisions of this Section are qualified in their entirety by reference to the Section, “Reporting Violations to a Governmental Agency” above. Further, nothing in this Section in any way prohibits or is intended to restrict or impede you from discussing your wages, hours, working conditions, or other terms and conditions of employment with other employees or third parties, exercising protected rights, or otherwise disclosing information as permitted by law.

Requests by Regulatory Authorities

Stewardship of the data we receive from other parties, including customers, suppliers, and vendors, is a responsibility we embrace. All government requests for our information, documents, or interviews should be referred to our legal department immediately. This does not prevent you from providing information to a government or law enforcement agency if you reasonably believe that the information discloses a legal violation by us or our agents.

Communicating with Others

Speaking on Behalf of the Company

We are committed to providing accurate, timely, and clear disclosure in our public communications. Only people who have been specifically authorized may speak on behalf of the Company without prior approval. If you are approached by anyone, including media, family members, friends, members of the investment community, or other members of the public who are not bound by a duty of confidentiality, please refer the individual to our Public Relations team. For additional information, please refer to our **Corporate Communications and Social Media Policy**.

Social Media

Remitlians may on occasion choose to use social media to share news, experiences, and thoughts about Remitly and our business. Social media communication is an opportunity to humanize Remitly, reinforce our brand, and build trust with public audiences. For the avoidance of doubt, Remitlians are free to share their views on the Company that do not constitute confidential information or material non-public information on social media, while taking care to follow the guidelines detailed in our **Corporate Communications and Social Media Policy**.

Nothing in the above Sections in any way prohibits or is intended to restrict or impede you from discussing your wages, hours, working conditions, or other terms and conditions of employment with other employees or third parties, exercising protected rights, or otherwise disclosing information as permitted by law.