

**Remitly Global, Inc.**  
**Global Code of Conduct**  
**As adopted on August 25, 2021**

## A Note From Our CEO

By living our cultural values and striving for excellence, we pave the way to achieving our vision: To transform the lives of immigrants and their families by providing the most **trusted** financial services products on the planet.

Remitly's foundation is built on this vision and these values that guide our daily actions and the way we get things done. Building a large, transformational business that will stand the test of time requires commitment from each of us to always do what's right for our customers. When we deliver on that promise, we deliver peace of mind, earning trust and loyalty from those we serve.

My ask of every Remitlian is that you be as intentional about *how* you work, as you are about what work you do; 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, we must 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 And Mission

Remitly's vision is *to transform the lives of immigrants and their families by providing the most trusted financial service products on the planet*. 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 other financial services.

We, Team Remitly, are united through our mission - to tirelessly *deliver on our promise to immigrants sending money across the world*.

We accomplish our vision and mission 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 everyday 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.

To effectively serve millions of customers who send money home to their families in 100+ different countries, requires teams of committed individuals who demonstrate a deep level of empathy, genuine curiosity, value varied lived experiences, perspectives and backgrounds and appreciate the different ways we all think, process, present, and operate.

The working environment and culture at Remitly, and the ways of working we employ, 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 that show up in how we engage with each other, our customers and the immigrant communities we serve all over the world.

# Equal Employment Opportunity

Equal employment opportunity has been, and will continue to be, a fundamental principle at Remitly. We are committed to nondiscrimination across our global organization and in all of our business operations. Employment is determined based upon personal capabilities and qualifications. To learn more, consult our Fair Employment Policy.

# About Our Global Code 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 (“Code”) is intended to promote honest 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.

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 policy.

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.

## Policy Scope

This policy covers all employees, contractors, consultants, agents, members of our board of directors of Remitly Global, Inc and its subsidiaries (the “Company”), as well as distribution partners, payment processors and other third party vendors. Everyone covered by this policy 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 in writing by the Remitly Global, Inc. Board of Directors. Any waiver to this Code must be approved in writing by the General Counsel or his/her delegate; any waiver for a Remitly officer or board member must be approved by the full Remitly Global, Inc. Board of Directors 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, please submit a case with Convercent, our anonymous reporting platform. To report an incident through Convercent, call 1-800-461-9330 or [submit a case online](#).

We will conduct investigations of alleged or actual violations of our policies, procedures and laws, rules and regulations. All employees are required to cooperate with any Company investigation.

For more information, please see the Fair Employment Policy and Non-Discrimination Policy and our Whistleblower Policy.

## Non-Retaliation

Remitly does not tolerate retaliation and strictly prohibits any form of retaliation against anyone who makes a good-faith report of 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.

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

## Honest and Ethical Conduct

### Conflict of Interest

You must act within guidelines that prohibit real and potential conflicts of interest with your role at Remitly Global, Inc. (collectively with its subsidiaries, the “Company” or “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 Corporate Compliance team at [corporate-compliance@remitly.com](mailto:corporate-compliance@remitly.com) or, if you are a Board member, to the Chair of the Audit Committee of the Board (“Audit Committee”).

Conflicts of interest are fact-specific. When in doubt about any potential conflict of interest, contact Corporate Compliance at [corporate-compliance@remitly.com](mailto:corporate-compliance@remitly.com). Please refer to our Conflict of Interest Policy and our Conflicts of Interest, Confidentiality and Corporate Opportunities Policy in the case of our executive officers and directors 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 consult our legal team.

## Workplace Safety and Security

We expect you to treat others fairly and with respect and to be professional at all times. We promote and provide a work environment free of violence and 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 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 any employee or nonemployee to harass any individual employed

by or working for Remitly. We prohibit employees from harassing or discriminating against co-workers as well as 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 employees.

If such harassment occurs in the workplace by someone not employed by Remitly, the procedures in this policy should be followed. The workplace includes: actual worksites, any setting in which work-related business is being conducted (whether during or after normal business hours), company-sponsored events, or company owned/controlled property. Violation of this Code will subject an employee to disciplinary action, up to and including termination.

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

## Our Assets and Systems

Each Company office has policies to ensure the security and confidentiality of our communications, protect our assets from theft, misuse or destruction and keep you and the Company safe. All employees are responsible for complying with these policies and with all related systems.

## 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. It is the responsibility of all employees to ensure that our public reports and communications are accurate. 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 complete, fair, accurate 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. Employees 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 Policy. For additional details, please refer to the Financial Matters and Business Practices Policy.

## Disclosing Confidential Information about the Company and Others

We sometimes must disclose our confidential information in the course of performing our jobs. If you need to disclose confidential information belonging to the Company, you first must work with the other party to sign an approved non-disclosure agreement (“NDA”) via our Ironclad platform and legal process. 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.

You should never attempt to obtain a competitor's confidential information improperly. This includes asking another employee 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 General Counsel to determine how to proceed.

## 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 of our employees 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 Communications team. For additional information, please refer to our Corporate Communications Policy.

### Social Media

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

### Local Employee Handbooks

- Americas
  - United States
  - Nicaragua (Spanish only)
- EMEA
  - United Kingdom
  - Ireland
  - Poland
  - Germany
  - France
  - Spain
- Asia Pacific
  - Philippines
  - Singapore