

REDDIT, INC.
BUSINESS ETHICS POLICY

(Effective as of March 20, 2024)

I. INTRODUCTION

This Business Ethics Policy (this “Policy”) contains general guidelines for conducting the business of Reddit, Inc. and its subsidiaries (collectively, “Reddit”) consistent with the highest standards of business ethics. To the extent this Policy requires a higher standard than required by commercial practice or applicable laws, rules, or regulations, we adhere to these higher standards.

This Policy applies to all of our directors, officers, employees, contingent workers, and consultants. In this Policy, we refer to our principal executive officer, principal financial officer, principal accounting officer, and controller, or persons performing similar functions, as our “principal financial officers.”

Seeking Help and Information

This Policy is not intended to be a comprehensive rulebook and cannot address every situation that you may face. If you feel uncomfortable about a situation or have any doubts about whether it is consistent with Reddit’s ethical standards, please bring it to the attention of Reddit. We encourage you to contact your supervisor or primary point of contact at Reddit, as applicable, for help first. If your supervisor or primary point of contact cannot answer your question or if you do not feel comfortable contacting your supervisor or primary point of contact, contact Reddit’s Chief Legal Officer or such other person as the Board of Directors of Reddit (the “Board”) may designate from time to time (the “Compliance Officer”). Reddit has also established an Ethics Hotline that is available 24 hours a day, 7 days a week at:

Website: [Reddit Business Ethics Portal](#)
Phone Number: +1 (800) 461-9330

Any reports submitted via the Ethics Hotline will be reviewed by the Compliance Officer and reported to the Chair of the Audit Committee of the Board (the “Audit Committee”). You may remain anonymous and will not be required to reveal your identity in calls to the Ethics Hotline, although providing your identity may assist Reddit in addressing your questions or concerns.

Reporting Violations of the Policy

All employees, contingent workers, consultants, officers, and directors have a duty to report any known or suspected violation of this Policy, including violations of the laws, rules, regulations, or policies that apply to Reddit. If you know of or believe there has been a violation of this Policy, immediately report the conduct to your supervisor, primary point of contact, or the Compliance Officer. The Compliance Officer will work with you and your supervisor, primary point of contact, or other appropriate persons to investigate your concern. If you do not feel comfortable reporting the conduct to your supervisor or primary point of contact or you do not get a satisfactory response,

you may contact the Compliance Officer directly. Nothing in this Policy prevents you from communicating directly with relevant government authorities about potential violations of law.

You may also report known or suspected violations of the Policy on the Ethics Hotline that is available 24 hours a day, 7 days a week at:

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Any reports submitted via the Ethics Hotline will be reviewed by the Compliance Officer and reported to the Chair of the Audit Committee. You may remain anonymous and will not be required to reveal your identity in calls to the Ethics Hotline, although providing your identity may assist Reddit in investigating your concern. All reports of known or suspected violations of the law or this Policy will be handled sensitively and with discretion. Your supervisor, primary point of contact, or the Compliance Officer, as applicable, and Reddit will protect your confidentiality to the extent possible, consistent with applicable law and Reddit's need to investigate your concern.

It is Reddit policy that any employee, contingent worker, consultant, officer, or director who violates this Policy, or who directs or approves a violation of this Policy, may be subject to appropriate discipline, which may include termination of employment or the other working relationship with Reddit, as appropriate. This determination will be based upon the facts and circumstances of each particular situation. Employees, contingent workers, consultants, officers, and directors who violate the law or this Policy may expose themselves to substantial civil damages, criminal fines, and prison terms. Reddit may also face substantial fines and penalties and may incur damage to its reputation and standing in the community.

Policy Against Retaliation

Reddit prohibits retaliation against an employee, contingent worker, consultant, officer, or director who, in good faith, seeks help or reports known or suspected violations. Any reprisal or retaliation against an employee, contingent worker, consultant, officer, or director because that individual, in good faith, sought help or filed a report will be subject to disciplinary action, including potential termination of employment or the other working relationship with Reddit, as applicable.

Waivers of the Policy

Any waiver of this Policy for our directors, executive officers, or other principal financial officers may be made only by the Board and will be disclosed to the public as required by law or the rules of the New York Stock Exchange. Waivers of this Policy for other employees, contingent workers, or consultants may be made only by the Compliance Officer and will be reported to the Audit Committee.

II. CONFLICTS OF INTEREST

Identifying Potential Conflicts of Interest

A conflict of interest can occur when an employee's, contingent worker's, consultant's, officer's, or director's private interest interferes, or appears to interfere, with the interests of Reddit as a whole. You should avoid any private interest that influences your ability to act in the interests of Reddit or that makes it difficult to perform your work objectively and effectively.

Identifying potential conflicts of interest may not always be clear-cut. The following situations are examples of conflicts of interest:

- Outside Employment. No employee or officer should be employed by, serve as a director of, or provide any services to a company that the individual knows or has reason to believe is a material customer, supplier, or competitor of Reddit (other than services to be provided as part of an employee's or officer's job responsibilities for Reddit).
- Improper Personal Benefits. No employee, contingent worker, consultant, officer, or director should obtain any material (as to him or her) personal benefits or favors because of his or her position with Reddit. For instance, no employee, contingent worker, consultant, officer, or director should make side deals with Reddit's customers in which that individual is separately compensated by the customer or a third party.
- Financial Interests. No employee or officer should have a significant financial interest (ownership or otherwise) in any company that the individual knows or has reason to believe is a material customer, supplier, or competitor of Reddit. A "significant financial interest" includes (i) ownership of greater than 5% of the equity of a material customer, supplier, or competitor or (ii) an investment in a material customer, supplier, or competitor that represents more than 5% of the total assets of the employee or officer.
- Loans or Other Financial Transactions. No employee or officer should obtain loans or guarantees of personal obligations from, or enter into any other personal financial transaction with, any company that the individual knows or has reason to believe is a material customer, supplier, or competitor of Reddit. This restriction does not apply to or prohibit arms-length transactions with banks, brokerage firms, or other financial institutions.
- Service on Boards and Committees. No employee, officer, or director should join, or serve on, a board of directors or trustees or on a committee of any entity (whether profit or not-for-profit) whose interests reasonably would be expected to materially conflict with those of Reddit.
- Actions of Family Members. The actions of family members outside the workplace may also give rise to the conflicts of interest described above because they may influence an employee's or officer's objectivity in making decisions on behalf of Reddit. For purposes of this Policy, "family members" include your spouse or life-partner, brothers, sisters, parents, in-laws, and children whether such relationships are by blood or adoption.

For purposes of this Policy, a company is a “material” customer if the company has made one or more payments to Reddit in the past year in the aggregate in excess of \$120,000. A company is a “material” supplier if it has received one or more payments from Reddit in the past year in the aggregate in excess of \$120,000. If you are uncertain whether a particular company is a material customer or supplier, please contact the Compliance Officer for assistance.

Conflict of interest issues concerning Reddit’s directors will be addressed by the Audit Committee.

Disclosure of Conflicts of Interest

Reddit requires that employees, contingent workers, consultants, officers, and directors disclose any situation that reasonably would be expected to give rise to a conflict of interest. If you reasonably believe that you have a conflict of interest, or something that others would reasonably perceive as a conflict of interest, you must report it in writing to your supervisor, primary point of contact, or the Compliance Officer. Your supervisor or primary point of contact, as applicable, and the Compliance Officer will work with you to determine whether you have a conflict of interest and, if so, how best to address it. In addition, please review Reddit’s Conflict of Interest Policy and complete Reddit’s Conflict of Interest Review Form. Although conflicts of interest are not automatically prohibited, they are not desirable and may only be waived as described in “Waivers of the Policy” above.

III. CORPORATE OPPORTUNITIES

As an employee, contingent worker, consultant, officer, or director of Reddit, you have an obligation to advance Reddit’s interests when the opportunity to do so arises. If you discover or are presented with a business opportunity through the use of corporate property or information or because of your position with Reddit, you should first present the business opportunity to Reddit before pursuing the opportunity in your individual capacity. No employee, contingent worker, consultant, officer, or director may use corporate property, information, or his or her position with Reddit for personal gain or should compete with Reddit while serving as an employee, contingent worker, consultant, officer, or director of Reddit.

If you are an employee, you should disclose to your supervisor the terms and conditions of each business opportunity covered by this Policy that you wish to pursue. Your supervisor will contact the Compliance Officer and the appropriate management personnel to determine whether Reddit wishes to pursue the business opportunity.

Except as described in the Company’s Certificate of Incorporation, if you are a director, you should disclose to the Board the terms and conditions of the opportunity.

If you are a contingent worker or consultant, you should disclose the terms and conditions of each business opportunity covered by this Policy that you wish to pursue to either your supervisor (if applicable) or primary point of contact at Reddit. Your supervisor or primary point of contact will contact the Compliance Officer and the appropriate management personnel to determine whether Reddit wishes to pursue the business opportunity.

If Reddit waives its right to pursue the business opportunity, you may pursue the business opportunity on the same terms and conditions as originally proposed and consistent with the other ethical guidelines set forth in this Policy; provided that any pursuit of such business opportunity shall not interfere in any way with or otherwise interrupt your work, duties and responsibilities as an employee, contingent worker, consultant, officer, or director of Reddit.

IV. CONFIDENTIAL INFORMATION

Employees, contingent workers, consultants, officers, and directors have access to a variety of confidential information regarding Reddit. Confidential information includes all non-public information that might be of use to competitors, or, if disclosed, harmful to Reddit or its customers. Employees, contingent workers, consultants, officers, and directors have a duty to safeguard all confidential information of Reddit or third parties with which Reddit conducts business, except when disclosure is authorized or legally mandated. An employee's, contingent worker's, consultant's, officer's, or director's obligation to protect confidential information continues after he or she leaves Reddit. Unauthorized disclosure of confidential information could cause competitive harm to Reddit or its customers and could result in legal liability to you and Reddit.

Any questions or concerns regarding whether disclosure of Reddit information is legally mandated should be promptly referred to the Compliance Officer.

V. FAIR DEALING

Employees, contingent workers, consultants, officers, and directors should endeavor to deal fairly with Reddit's customers, service providers, suppliers, competitors, and other employees. No employees, contingent workers, consultants, officers, or directors may take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair dealing practice.

VI. PROTECTION AND PROPER USE OF REDDIT ASSETS

All employees, contingent workers, consultants, officers, and directors should protect Reddit's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on Reddit's financial results. All Reddit assets should be used for legitimate business purposes.

VII. REDDIT RECORDS

Accurate and reliable records are crucial to our business. Our records are the basis of our earnings statements, financial reports, and many other aspects of our business and guide our business decision-making and strategic planning. Reddit records include booking information, payroll, timecards, travel and expense reports, e-mails, accounting and financial data, measurement and performance records, electronic data files, personnel records, records relating to our intellectual property, product development and collaborations, and all other records maintained in the ordinary course of our business.

All Reddit records must be complete, accurate, and reliable in all material respects. Each employee, contingent worker, consultant, officer, and director must follow any formal document retention

policy of Reddit with respect to Reddit records within such employee's, contingent worker's, consultant's, officer's, or director's control. A request for a copy of any such document retention policy or questions concerning any such policy should be directed to your supervisor or primary point of contact, as applicable, or the Compliance Officer.

VIII. ACCURACY OF FINANCIAL REPORTS AND OTHER PUBLIC COMMUNICATIONS

As a public company we are subject to various securities laws, regulations, and reporting obligations. Both federal law and our policies require the disclosure of accurate and complete information regarding Reddit's business, financial condition, and results of operations. Inaccurate, incomplete, or untimely reporting will not be tolerated and can severely damage Reddit and result in legal liability.

Reddit's Chief Financial Officer and other employees working in Reddit's Finance Department have a special responsibility to ensure that all of our financial disclosures are full, fair, accurate, timely, and understandable. These employees, contingent workers, consultants, and officers must understand and strictly comply with generally accepted accounting principles and all standards, laws, and regulations for accounting and financial reporting of transactions, estimates, and forecasts.

IX. COMPLIANCE WITH LAWS AND REGULATIONS

Each employee, contingent worker, consultant, officer, and director has an obligation to comply with all laws, rules, and regulations applicable to Reddit's operations. These include, without limitation, laws covering bribery and kickbacks, copyrights, trademarks and trade secrets, information privacy, insider trading, illegal political contributions, antitrust prohibitions, foreign corrupt practices, offering or receiving gratuities, environmental hazards, employment discrimination or harassment, occupational health and safety, false or misleading financial information, or misuse of corporate assets. You are expected to understand and comply with all laws, rules, and regulations that apply to your job position or other working relationship with Reddit. If any doubt exists about whether a course of action is lawful, you should seek advice from your supervisor or primary point of contact, as applicable, or the Compliance Officer.

X. CONCLUSION

This Policy contains general guidelines for conducting the business of Reddit consistent with the highest standards of business ethics and in compliance with all applicable laws. If you have any questions about these guidelines, please contact your supervisor or primary point of contact, as applicable, or the Compliance Officer or the Ethics Hotline that is available 24 hours a day, 7 days a week at:

Website: [Reddit Business Ethics Portal](#)
Phone Number: +1 (800) 461-9330

Reddit expects all of its employees, contingent workers, consultants, officers, and directors to adhere to these standards. This Policy, as applied to Reddit's principal financial officers, shall be Reddit's "code of ethics" within the meaning of Section 406 of the Sarbanes-Oxley Act of 2002 and the rules promulgated thereunder.

This Policy and the matters contained herein are neither a contract of employment nor a guarantee of continuing Reddit policy. Reddit reserves the right to amend, supplement, or discontinue this Policy and the matters addressed herein, without prior notice, at any time. The most current version of this Policy is available on Reddit's website.