



Code of Conduct and Ethics

Effective as of July 27, 2017

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I. Introduction

Redfin Corporation, a Delaware corporation (together with its subsidiaries, "**Redfin**") has adopted this Code of Conduct and Ethics (this "**Code**") to set high standards of ethical conduct and guide the decisions of every Redfin employee, officer, and director.

A. Scope

This Code applies to all Redfin employees and directors. Redfin may modify or update these policies and procedures from time to time and adopt new policies and procedures in the future.

Nothing in this Code is intended to alter the existing legal rights and obligations of Redfin or any of its employees or directors, including "at will" employment arrangements or the terms of any employment-related agreements.

B. Responsibility

Every employee and director is responsible for reading and understanding this Code and to use it as a guide for performing his or her role for Redfin. Redfin trusts its employees to make thousands of decisions every day, and this Code can't address every ethical situation that may arise. Please apply common sense and a high standard of personal ethics, honesty, and integrity to comply with the letter and spirit of this Code when it has no specific guideline. Employees and directors should also consider the conduct of their family members and others who live in their household.

Redfin expects all of its directors and employees to help foster a sense of commitment to this Code and to foster a culture of fairness, honesty, and accountability within Redfin. This responsibility is particularly acute for executives and other managers at Redfin. Redfin also expects its employees and directors to ensure that Redfin's agents and contractors conform to this Code when acting on Redfin's behalf.

C. Compliance

Any employee that needs help understanding this Code, or how it applies to a particular situation should contact his or her manager or Redfin's General Counsel, who has been designated as Redfin's Compliance Officer (the "**Compliance Officer**"). If the General Counsel is unavailable, Redfin's Chief Financial Officer is authorized to act as the Compliance Officer in the interim.

Employees should also be alert to possible violations of this Code by others and should report suspected violations in accordance with Redfin's Legal and Compliance Policy and Redfin's Whistleblower and Complaint Policy.

II. Conflicts of Interest

A conflict of interest exists where the interests or benefits of one person or entity conflict or appear to conflict with Redfin's interests or benefits. While it is not possible to describe every situation in which a conflict of interest may arise, Redfin employees and directors must never use or attempt to use their position with Redfin to obtain improper personal benefits. Any employee or director who is aware of a conflict of interest, or is concerned that a conflict might develop, is required to discuss the matter with a higher level of management or the Compliance Officer promptly.

Please see Redfin's Employee Handbook and Related Party Transactions Policy for more information on conflicts of interest.

III. Insider Trading

Every employee and director is prohibited from using "inside" or material nonpublic information about Redfin, or about companies Redfin does business with, in connection with buying or selling Redfin's or such other companies' securities and is also prohibited from "tipping" others who might

make an investment decision based on this information. Redfin strongly encourages all employees and directors to review Redfin's Insider Trading Policy for additional information.

IV. Competition and Fair Dealing

Redfin competes with tenacity to outperform its competitors, but we don't use unethical or illegal methods to do it. Every employee and director must use integrity when dealing with Redfin's competitors, brokerage partners, employees, and anyone else he or she encounters in performing his or her duties. No employee or director may take unfair advantage of anyone through manipulation, concealment, abuse or privileged information, dishonesty, or any other unfair dealing practice.

Antitrust laws are designed to protect customers and the competitive process. These laws generally prohibit Redfin from working with competitors to fix prices, share pricing or other information to allocate markets or services, boycott service providers, customers, or competitors, or attempt to monopolize a particular market through anticompetitive conduct.

Violating antitrust and unfair competition laws can have very bad consequences for Redfin, so employees and directors are urged to seek assistance from the Compliance Officer whenever they have a question about these laws.

V. Maintenance of Corporate Books, Records and Accounts; Financial Integrity; Public Reporting

Redfin strives to maintain complete integrity of its records and public disclosure. Redfin's corporate and business records, including all supporting entries to its books of account, must be completed honestly, accurately, and intelligibly. Redfin depends on its books, records, and accounts accurately and fairly reflecting, in reasonable detail, its assets, liabilities, revenues, costs and expenses, as well as all transactions and changes in assets and liabilities.

Redfin's disclosure controls and procedures are designed to help ensure that Redfin's public disclosures are full, fair and accurate, that they fairly present its financial condition and results of operations, and that they are timely and understandable. Employees who collect, provide or analyze information for or otherwise contribute in any way to preparing or verifying these reports should adhere to all disclosure controls and procedures and generally assist Redfin in producing financial disclosures that contain all of the information about Redfin that is required by law and would be important to enable investors to understand Redfin's business and its attendant risks.

If any employee becomes aware that Redfin's public disclosures are not full, fair and accurate, or if any employee becomes aware of a transaction or development that he or she believes may require disclosure, he or she should report the matter immediately to the Compliance Officer.

VI. Conduct of Senior Financial Officers

Redfin's Finance Department has a special responsibility to promote integrity throughout the organization, with responsibilities to stakeholders both inside and outside of Redfin. Because of this special role, Redfin requires that the principal executive officer, principal financial officer, and each controller, principal accounting officer, or other senior financial officer:

- Act with honesty and integrity and use due care and diligence in performing his or her responsibilities.
- Avoid situations that represent actual or apparent conflicts of interest with his or her responsibilities to Redfin, and disclose promptly to the Audit Committee, any transaction or personal or professional relationship that reasonably could be expected to give rise to such an actual or apparent conflict.

- Provide constituents with information that is accurate, complete, objective, relevant, timely and understandable, including information for inclusion in Redfin's submissions to governmental agencies or in public statements.
- Comply with applicable laws, rules, and regulations of federal, state and local governments, and of any applicable public or private regulatory and listing authorities.

VII. Compliance Standards and Procedures

For information on how to ask questions about or to report potential violations of this Code, please see Redfin's Legal Compliance Policy and Whistleblower and Complaint Policy.

VIII. Waivers

Redfin's Board of Directors (in the case of a violation by a director or an executive officer) or the Compliance Officer (in the case of a violation by any other person) may, in their or his or her discretion, waive any violation of this Code. Any waiver for a director or an executive officer will be disclosed as required by applicable laws, rules and regulations.

IX. No Rights Created

This Code is a statement of fundamental principles, policies and procedures that govern Redfin's employees, officers and directors in the conduct of Redfin's business. It is not intended to and does not create any legal rights for any customer, partner, competitor, stockholder, or any other person or entity.

X. Administration, Modification and Amendment

Redfin's Nominating and Corporate Governance Committee is responsible for overseeing the establishment of procedures for the prompt internal reporting of violations of this Code. This Code

shall be reviewed periodically by the Board of Directors and the Nominating and Corporate Governance Committee and shall be updated as deemed appropriate or necessary by the Board of Directors or the Nominating and Corporate Governance Committee.