

# Code of Business Conduct and Ethics

2024

Roblox’s vision is to reimagine the way people come together to create, play, explore, learn, and connect with one another. We can only achieve our vision and uphold our values—“Respect the Community;” “We are Responsible;” “Take the Long View;” and “Get Stuff Done”—if we conduct our business with the highest degree of honesty and ethical behavior. Creating a culture of honesty and accountability will enable us to fulfill our commitment to one another, our community, users, developers, creators, partners, and securityholders—all of whom are integral to our business.

Roblox’s Code of Business Conduct and Ethics (the “Code”) is by no means exhaustive, but summarizes some of our most important policies, which are based on standards that underlie our business ethics, professional integrity, and our foundational values and standards that apply to all Roblox representatives, wherever you may be based. This Code serves as a guide, but you are expected to use good judgment and adhere to the high ethical standards to which the Company is committed at all times. Many of the principles described in this Code are general in nature, and may be covered in more detail in our People Practices available on our intranet, Confluence. Use common sense and good judgment in applying the Code.

As a representative of Roblox, you are expected to read the Code and our People Practices carefully and thoroughly and to understand and comply with the standards and policies contained in each. Should you become aware of violations of these policies, your responsibility is to communicate the information promptly as outlined in the Code under the section, “Reporting A Concern”.

If you have any questions about the Code or our People Practices please email the Legal Team at [legal@roblox.com](mailto:legal@roblox.com).

Thank you,  
David Baszucki  
Chief Executive Officer  
November 25, 2024

## Who does the Code apply to?

The Code applies to all directors, officers, employees, contractors, consultants, and agents (who, unless otherwise specified, will be referred to jointly as “**Personnel**”) of Roblox Corporation (together with any subsidiaries and affiliates, collectively “**Roblox**” or the “**Company**”), and provides an overview of our fundamental policies on business conduct.

## What does the Code require from me?

Everything you do is a reflection of Roblox. All Roblox Personnel are required to:

- Read and comply with the Code, the People Practices, and all applicable internal policies and legal requirements.
- Respect the Community. Act lawfully, honestly, ethically, and in the best interests of Roblox and the Roblox community at all times.
- Complete required training, use the Code, and speak up when you have a question or concern.
- Use good judgment, common sense, and ask questions. When in doubt about how to proceed, discuss it with your manager, the People Team, or the Legal Team.
- Speak up if you see behavior that is unethical, unsafe, or potentially violates the Code.
- Fully cooperate in any Roblox investigation, and keep any information shared with you confidential to safeguard the integrity of the investigation.

Individuals who lead or manage Roblox Personnel are also required to:

- Lead by example, including by championing the importance of abiding by the Code and Company policies. Our behaviors and decisions influence others.
- Promote and maintain a positive work environment in which everyone feels included and empowered to do the right thing and speak up when they have ideas, feedback, or concerns—this means listening to questions and concerns and escalating when needed.
- Promptly report potential or known violations of the law, this Code or Company policies to the Legal Team or the Employee Relations Team.

Compliance is everyone’s responsibility. We are all expected to know and follow the Code, Roblox policies, procedures, and guidelines. Any failure to comply with the Code—or failure to report a violation—may result in disciplinary action, up to and including termination of service.

## Reporting a Concern

Speaking up is important if you see or suspect a violation of the law, this Code, or any Roblox policies. You don’t need to have all the information or details to ask questions or speak up.

You can trust that your question or concern will be treated seriously and dealt with promptly and as confidentially as possible. The Board of Directors will oversee investigations of potential violations by directors or executive officers and the Compliance Officer will oversee investigations of potential violations by other Personnel and each may designate others to conduct or manage investigations on their behalf and recommend disciplinary action.

To report a concern, a violation of this Code, or other Company policies, applicable laws, and regulations (including complaints or concerns about accounting, internal accounting controls, or auditing matters), or if you have a concern about a situation that you believe does not reflect the Company's culture and values, you can contact any of the following via the reporting method you feel most comfortable with:

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Your manager

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Employee Relations Team      [er@roblox.com](mailto:er@roblox.com)

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Legal Team      [legal@roblox.com](mailto:legal@roblox.com)

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People Team      [people@roblox.com](mailto:people@roblox.com)

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Whistleblower hotline      Via online web portal at  
<https://ir.roblox.com/governance/whistleblower>  
or via phone at **888-829-8316** if you wish to  
report anonymously

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Audit and Compliance      **3150 S. Delaware St.**  
Committee of the Board      **San Mateo, California 94403**  
of Directors  
(the "Audit Committee")

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If your concerns relate to accounting, internal controls, or auditing matters, or if the Chief Executive Officer, the Chief Financial Officer, or an executive officer is implicated in any violation or suspected violation, you may also contact the "Audit Committee".

If you make an anonymous report, please provide as much detail as possible, including copies of any documents you think could be relevant or submit your report through the Company's anonymous whistleblower hotline above. If you choose not to be anonymous, Roblox will keep your identity as confidential as possible although your identity may become apparent during an investigation or may need to be disclosed in regulatory proceedings.

## We Prohibit Retaliation

Roblox will not retaliate—and will not tolerate retaliation—against any individual for reporting a good-faith concern or complaint to a manager, the People Team, or the Legal Team, or for participating in the investigation of a concern or complaint.

## The Code and the Law

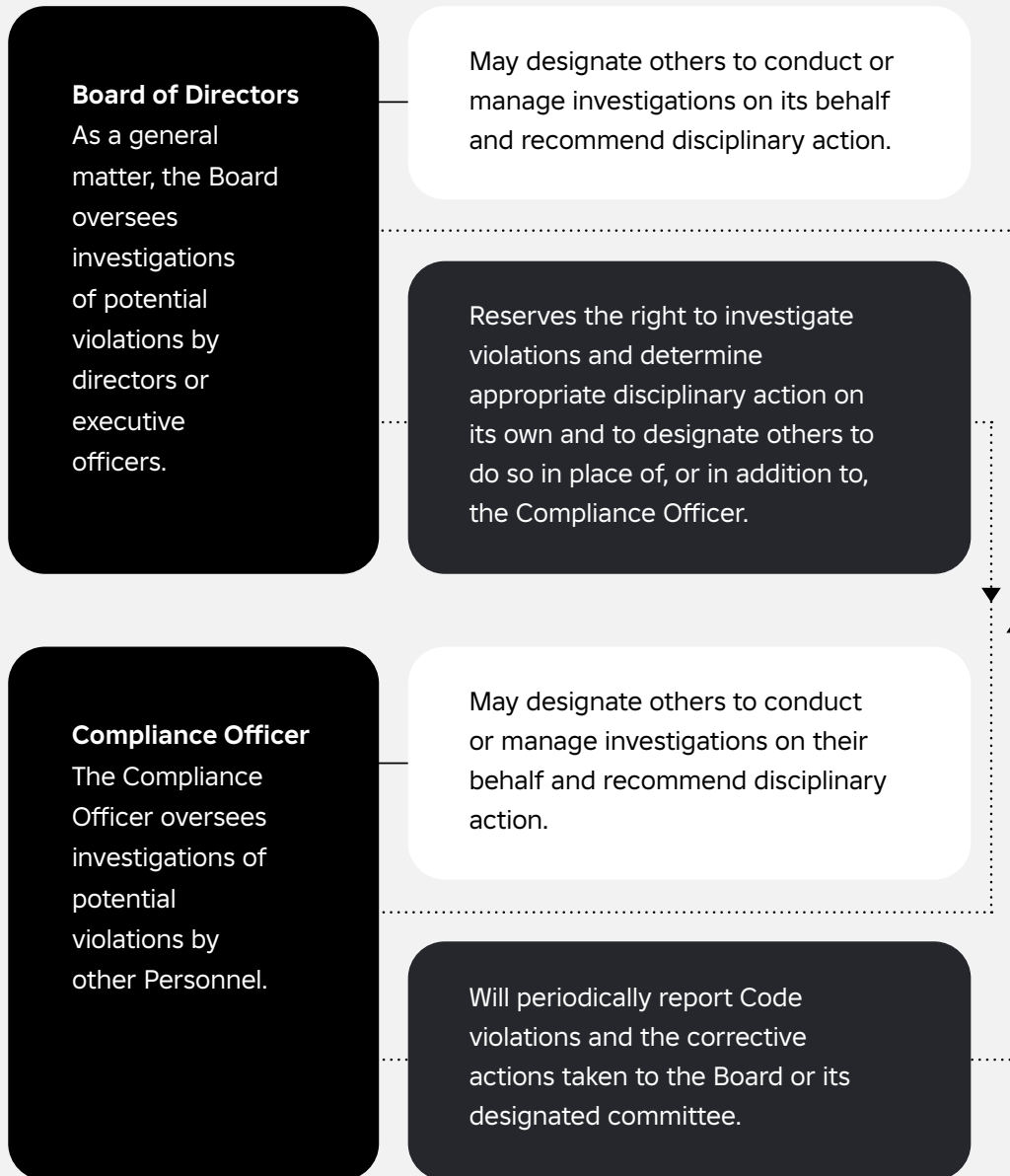
Roblox is subject to many different laws both domestically and internationally, including those relating to employment, governance, compliance, and privacy. We strive to comply with all applicable laws in every jurisdiction in which we operate. We each have a responsibility to be aware of and compliant with the laws that apply to Roblox's business. While these laws may appear straightforward, we understand that their application can sometimes be complex. Roblox's Code, policies, procedures, and guidelines are intended to help you navigate the complexity. If Roblox's requirements ever conflict with an applicable law, then Roblox follows the law. If you have any questions about our compliance with laws, contact the Legal Team. For purposes of the Code, our most senior legal officer shall serve as, or shall designate an individual to serve as, our Compliance Officer and such Compliance Officer shall be responsible for applying and interpreting these policies to specific situations in which questions may arise.

**Roblox will not retaliate—and will not tolerate retaliation—against any individual for reporting a good-faith concern or complaint to a manager, the People Team, or the Legal Team, or for participating in the investigation of a concern or complaint.**

# Investigations

## *What happens once I report a potential Code or Policy Violation?*

Reported violations are promptly and thoroughly investigated.



If you suspect a violation, report it. Please do not conduct an investigation on your own. All Personnel are expected to:

- **fully cooperate** with compliance investigations, including answering questions full and truthfully; and
- **maintain and safeguard the confidentiality** of an investigation to the extent possible, except as otherwise provided below or by applicable law.



**Making false statements to or otherwise misleading internal or external auditors, investigators, legal counsel, Company representatives, regulators, or other governmental entities may be grounds for immediate termination of employment or other relationship with the Company and may also be a criminal act that can result in severe penalties.**

# Workplace Behaviors



## No Discrimination or Harassment

Respecting the Community means treating each other and our developers, creators, and suppliers with respect. Roblox is dedicated to maintaining a diverse, inclusive, and supportive work environment in which all Personnel feel safe to express their thoughts and concerns and are supported to express creativity and be innovative. Roblox does not tolerate discrimination or harassment of Personnel or anyone with whom we have a business, service, or professional relationship. This applies to all interactions where you represent Roblox, including interactions with Personnel, developers, creators, and users, suppliers, and applicants for employment. For more information, please see the EEO and [Harassment Prohibition Policy](#) on Confluence.

If you feel that you have been harassed or discriminated against or have witnessed such behavior, report the situation to the Compliance Officer, Employee Relations Team, the whistle-blower hot-line (which may be done anonymously), or through any of the other reporting options listed under “Reporting a Concern” above.



**The Company prohibits discrimination against or harassment of any team member on the basis of:**

- Race, religion, or religious creed (including religious dress and grooming practices)
- Color, ethnic, or national origin
- Sex (including pregnancy, childbirth, breastfeeding, or related medical conditions)
- Nationality
- National origin
- Ancestry
- Immigration status or citizenship
- Age
- Physical or mental disability
- Medical condition (including genetic information or characteristics, or those of a family member)
- Military service or veteran status
- Marital status or family care status
- Sexual orientation
- Family medical leave
- Gender (including gender identity, gender expression, transgender status, or sexual stereotypes)
- Political views or activity
- Status as a victim of domestic violence
- Sexual assault or stalking
- Or any other basis or classification protected by applicable federal, state, or local law

Any employee who is found to have discriminated against another employee or found to have discriminated against another individual is subject to discipline up to and including termination.

## Health and Safety

A safe workplace is a respectful workplace. You are responsible for using good judgment to help ensure a safe and healthy workplace for yourself and your colleagues. This includes following safety and health rules and practices and reporting accidents, injuries, and unsafe equipment, practices, or conditions.

Comply with all Company policies related to physical security, including visitors, access to facilities, and use of Roblox Personnel badges.

Violence and threatening behavior will not be tolerated. Personnel, other than authorized personnel or law enforcement, are prohibited from bringing firearms or other weapons into any Roblox campus or Roblox event. For more information, please see the [Workplace Violence Prevention Plan](#) on Confluence.

You should report to work in good condition to perform your duties, free from the influence of illegal drugs, marijuana, or alcohol. The use of illegal drugs or marijuana in the workplace, at Roblox-sponsored events, or while conducting Roblox business will not be tolerated.

At work events, if alcohol is being served, if you choose to drink, do so responsibly. Do not feel pressured or ever pressure others to consume alcohol at work events or with work colleagues. For more information, please see the [Responsible Alcohol Use Policy](#) on Confluence.

## Environmental Compliance

Roblox is committed to conducting its business in an environmentally responsible way that minimizes environmental impact. Violations of environmental laws can be a criminal offense and can involve monetary fines and imprisonment. You are expected to comply with all applicable environmental laws and be mindful of the environment.

# Protecting Roblox

## Protecting Roblox

Your creativity and innovation have created a successful business with valuable assets, intellectual property, and confidential or proprietary information. The At-Will Employment, Confidential Information, Invention Assignment, and Arbitration Agreement that you signed when you joined Roblox outlines the use and disclosure of our confidential information.

You have an obligation to use all reasonable efforts to safeguard the Company's non-public information which continues even after you leave the Company. Disclosing confidential information outside of Roblox or to those who do not need it for legitimate business purposes can hurt Roblox's business and reputation.

### **What are examples of "confidential information"?**

Below are some examples of confidential information at Roblox. If you are unsure if something would be considered confidential information, assume it is confidential and ask the Legal Team for additional guidance:

- Proprietary data
- Trade secrets
- Product plans
- Cybersecurity incidents
- Inventions
- Technical or engineering specifications
- Roblox User, Developer, Creator, or brand partner data
- Roblox Personnel data (other than your own or that which you are authorized to share)
- Financial information
- Budgets
- Pricing
- Business plans or other business information
- Internal conversations regarding business decisions
- Information presented in Roblox Weekly Stand Ups or All Hands
- Information about potential mergers and acquisitions

**Protecting Roblox's Confidential Information means:**

- Understand what Roblox defines as confidential information (please see our People Practices).
- Do not disclose confidential, proprietary, competitive, or other sensitive information to a third-party unless there is an approved purpose under a nondisclosure agreement (“NDA”) or other agreement as appropriate. Remember, even hinting at such information is against Company policy.
- Do not share confidential information internally beyond those who need it for their job.
- Comply with terms of NDAs or applicable agreements when dealing with third-party confidential information, including obtaining express written consent if asked to share third-party confidential information with another third-party.
- Do not share confidential information with family, significant others, friends, or neighbors.
- Do not bring or share any confidential proprietary information belonging to a former employer or entity to Roblox.
- Do not take any Roblox confidential information with you if you leave Roblox, and return it if you inadvertently do.
- Never leave confidential information where others can access or see it.
- Promptly forward all press and media inquiries to [press@roblox.com](mailto:press@roblox.com), and only speak to the media if explicitly authorized by the Communications team.
- Understand the obligations under your confidentiality agreement.
- Be aware of your surroundings. Your badge, swag, or even your laptop stickers may identify your work for Roblox. Be aware of your surroundings when working outside of the office or at home to prevent inadvertent leaks of confidential information.
- Don't have confidential work conversations in public places. If you want to work in a public setting—for example, on a plane or train, in a park, or at a coffee shop—always use a privacy screen on your computer.
- When working from home, take care not to reveal sensitive or confidential information in front of anyone.
- Even at our campuses and in our buildings, be cautious. Visitors could be present and hear and see things that are meant to be kept confidential and internal.

Brand partners, suppliers, developers, users, and other third parties may disclose confidential information to Roblox during the course of business. All Personnel are responsible for protecting and maintaining the confidentiality of any information entrusted to us by our partners.

Compromising that trust may damage relations with our community and partners and can also result in legal liability. Remember to abide by the terms of any non-disclosure agreements you or the Company enter into. Only accept non-public information from third parties if it is necessary or appropriate to accomplish the purpose of receiving it. If more detailed or extensive information is offered and it is not necessary or appropriate for your immediate purposes, you should refuse it. Non-public information from third parties should only be used for the purpose for which it was disclosed and should only be disseminated to other Company Personnel on a need-to-know basis.

Never obtain or use the materials, products, intellectual property, proprietary, or nonpublic information or other assets of anyone, unlawfully. Never coerce or improperly induce past or present employees of other companies to disclose proprietary or nonpublic information of their former or other employers.

## Safeguard Roblox Assets

All Personnel are responsible for protecting the Company's assets and ensuring their efficient use. Keep track of the assets and information Roblox has entrusted to you to prevent loss, misuse, waste, or theft.

### **Safeguarding Roblox's assets means you:**

- Follow established guidelines, based on the asset type and business strategy, to protect Roblox intellectual property ("IP") and all confidential information.
- Respect the IP rights and confidential information of everyone, including third parties, all Personnel, competitors, and users.
- Use Roblox's assets and resources with care and for legitimate business purposes—assets should not be stolen, wasted, or used for personal gain.
- Be aware of attempts at social engineering.
- Follow Roblox policies and guidelines when using Roblox's assets and resources for personal use.
- Maintain the security of Roblox-provided technologies and personal devices used for Roblox business.
- Comply with all applicable laws, regulations, and Roblox policies concerning record-keeping and records retention.
- Report any signs of fraud or abuse in connection with Roblox assets.

For more information on how to protect Roblox assets please see the [Technology, Confidentiality, and Intellectual Property Policy](#) and [Company policies related to international travel](#) on Confluence. Remember all electronic information on Company assets remains the sole property of the Company.

## Press Inquiries and Other External Communications

All Personnel are responsible for complying with the Company's [External Communications Policy and Social Media Policy](#), which can be found on Confluence. You may not communicate externally on behalf of the Company unless you are authorized to do so.

Always be thoughtful and use judgment when posting opinions or information online about Roblox. Be clear that you are expressing your own opinions and not representing Roblox. Avoid forwarding or supporting third-party information in a way that can be seen as an endorsement of such information by Roblox.

### Question

I'm an expert in artificial intelligence and I've been contacted by a reporter to talk about Roblox's initiatives related to artificial intelligence. Can I speak to the reporter?

### Answer

Please contact [press@roblox.com](mailto:press@roblox.com) immediately and let them know about the request. Our communications team can discuss this press request with you and determine the best next steps.

### Official spokespeople

Chief Executive Officer  
 Chief Financial Officer  
 Investor Relations personnel  
 Authorized designees

Marketing	Financial matters
Technical	Public Comment
Press	Other Information

## Records Retention

Proper handling of records and information can help us operate more efficiently and reduce risk. The Company has established specific guidelines in managing its records. All Personnel are responsible for managing and protecting information and records in accordance with the Company's record retention policies. Privacy laws may dictate how long these records can be retained. At times, Roblox will need to retain records and information beyond the normal retention period for legal reasons or audits. If you have records and information that are categorized as under a "legal hold" you should not alter, destroy, or delete them in any way. The Legal Team will notify you of any legal holds you may be subjected to and what is required. In addition, all Personnel must only use company approved software in the course of their work— including communication tools, AI assistants, records storage, etc.

## Financial Integrity

Accurate and reliable financial records are essential to Roblox's success, enabling us to make good business decisions and comply with the law, and is a key factor in maintaining the confidence and trust of our community, Personnel, security holders, and other stakeholders. Roblox is required to follow strict accounting principles and standards, to report financial information accurately and completely in accordance with these principles and standards, and to have appropriate internal controls and procedures to ensure that our accounting and financial reporting complies with law.

You should ensure that all records and reports, including timecards, user information, technical and product information, correspondence, and public communications are comprehensive, fair, accurate, timely, and understandable. Do not misstate facts, omit critical information, or modify records or reports in any way to

### Question

I recently heard of a great new tool that will auto-generate meeting transcripts for me for every video conference. Now, I no longer need to take notes during my calls. Am I allowed to use it?

### Answer

Never opt into or turn on any generative AI features without first seeking approval from the Corp Eng team and Legal Team. The Company may need to retain records, including call transcripts for legal or audit reasons, and these features need to be reviewed for compliance.

mislead others, and never assist others in doing so. Intentional manipulation of Roblox's records is a form of fraud.

Each employee involved in the Company's disclosure process must familiarize themselves with the disclosure requirements applicable to the Company and the business and financial operations of the Company, and must not knowingly misrepresent or cause others to misrepresent, facts about the Company to others, whether within or outside the Company, including to the Company's independent auditors, governmental regulators, and self-regulatory organizations. You must seek in good faith to adhere to relevant accounting and financial reporting principles, standards, laws, rules, and regulations and the Company's financial and accounting policies, controls, and procedures. If you are a senior officer, you should seek to ensure that the internal controls and procedures in your business area are in place, understood, and followed. Personnel involved in preparing financial or accounting records or reports, must be diligent in assuring that those records and reports are complete, accurate, and timely. Anyone representing or certifying as to the accuracy of such records and reports should make an inquiry or review adequate to establish a good faith belief in their accuracy.

Regardless of whether you are otherwise required to be familiar with finance or accounting matters, the Company expects you to use all reasonable efforts to ensure that every business record or report with which you deal is accurate, complete, and reliable. You may not intentionally misrepresent the Company's financial performance or otherwise intentionally compromise the integrity of the Company's reports, records, policies, and procedures.

For information on expense reporting, please refer to the [Travel and Expense Policy](#) on Confluence.

**For example, you may not:**

- report or enter information in the Company's books, records, or reports information that fraudulently or intentionally hides, misrepresents, or disguises the true nature of any financial or non-financial transaction or result;
- disburse corporate funds or property without adequate supporting documentation and authorization;
- establish any undisclosed or unrecorded fund, account, asset, or liability for any improper purpose;
- enter into any transaction or agreement that accelerates, postpones, or otherwise manipulates the accurate and timely recording of revenues or expenses;
- intentionally misclassify transactions as to accounts, business units, or accounting periods; or
- knowingly assist others in any of the above.

## Dealing with Auditors

Our auditors have a duty to review our records in a fair and accurate manner. You are expected to cooperate with independent and internal auditors in good faith and in accordance with law. In addition, you must not fraudulently induce or influence, coerce, manipulate, or mislead our independent or internal auditors regarding financial records, processes, controls, or procedures or other matters relevant to their engagement. You may not engage, directly or indirectly, any outside auditors to perform any audit, audit-related, tax, or other services, including consulting, without written approval from the Chief Financial Officer and the Audit Committee.

You should make appropriate inquiries in the event you may see, for example:

- financial results that seem inconsistent with underlying business performance;
- inaccurate financial records, including travel and expense reports, time sheets, or invoices;
- the circumventing of mandated review and approval procedures;
- transactions that appear inconsistent with good business economics;
- the absence or weakness of processes or controls; or
- persons within the Company seeking to improperly influence the work of our financial or accounting personnel, or our external or internal auditors.

## Obligation to Investigate and Report Potential Violations

Dishonest or inaccurate reporting can lead to civil or even criminal liability for you and the Company and can lead to a loss of public faith in the Company. You are required to promptly report any case of suspected financial or operational misrepresentation or impropriety.

## Online Safety & Illegal Harms

Roblox is an immersive platform for connection and communication, where millions of users come to create, play, learn, and connect with each other in experiences built by a global community of creators. Roblox is committed to working to make the platform a safe environment for our users and to creating a culture that promotes online safety. All Personnel are required to review, consider and abide by the Company's online safety policies and launch review processes, which can be found respectively here:

- [Roblox Community Standards](#)
- [Content & Product Safety Policies](#)
- [Trust By Design](#)
- [Guided Community Standards](#)
- [Bloxlink Acceptable Use Policy](#)

All Personnel, especially those involved in creating safety systems and processes, are required to follow the Company's policies, procedures, and internal controls that are designed to prevent bad actors from utilizing the Roblox Platform to upload, share, or disseminate illegal or harmful content, or engage in illegal or harmful behaviors. If you have concerns relating to illegal content on the service or have questions with how Roblox moderates content, please submit your question using this [Roblox support form](https://www.roblox.com/support) (<https://www.roblox.com/support>).



# Business Integrity



## Fair Competition and Trade Practices

We succeed by competing with other businesses on the quality of our products and services. Competition makes us a better, more innovative company. Competition laws, also known as antitrust laws, ensure that companies don't unreasonably restrict competition or use market power in ways that harm competition. Complying with competition laws helps us avoid investigations, lawsuits, fines, restrictions, and even criminal penalties. The Company is committed to complying with antitrust laws throughout the world where it does business.

All Personnel should compete fairly. Competing fairly means:

- Make business decisions independently from our competitors, not in agreement or collaboration with them (this includes not influencing our brand partners when they are selecting developers to work with for their experiences).
- Never agree with or exchange information with competitors regarding price, policies, contract terms, costs, inventories, marketing plans, capacity plans, or other competitively significant data.
- Never agree with competitors to refrain from dealing with a particular company.
- Never agree with competitors to refrain from either (i) recruiting or hiring their (or anyone else's) employees or (ii) competing on salary or other terms of employment.
- Do not exchange or communicate competitively sensitive information with competitors, unless approved in advance by the Legal Team.
- Competitively sensitive information includes information that is proprietary, confidential, or non-public and that is related to an individual company's operations or relationships with users or other third parties.

## Follow Global Trade Laws

Roblox is committed to complying with and respecting global export, import, and sanctions laws. We transact with users, developers, brand partners, suppliers, entities, and individuals all over the globe. This means we have a duty to respect applicable customs, trade, and sanctions laws and regulations where we serve.

U.S. regulations on export control are complex and apply both to exports from the United States and to re-exports of products from other countries when those products contain U.S.-origin components or technology. U.S. regulations also cover the release of source code or technology to a foreign national (someone who is not a U.S. citizen or lawful permanent resident, or "green card" holder) even when located in the United States—a "deemed" export. Some of the strictest export controls are maintained by the United States against countries and identified individuals or entities that the U.S. government considers unfriendly or as supporting international terrorism.

Employees must comply with all applicable trade controls and must not cause the Company to be in violation of those laws. If an employee becomes aware of any information suggesting that the Company has or may in the future engage in a transaction that could violate applicable economic sanctions, they should report this information to the Compliance Officer immediately. In addition, please consult the Compliance Officer in relation to any proposed export of Company products or services.

**Following Global Trade Laws means we:**

- Appropriately screen individuals, companies, and countries to ensure Roblox does not violate applicable sanctions or trade restrictions.
- Comply with all applicable international trade and antiboycott laws and regulations, including those relating to the import and export of goods, services, and technical data to and from the United States and other countries.
- Raise a concern to the Legal Team if you believe there may be an inappropriate import or export of technical data.
- Check in by consulting with the Legal Team before engaging with sanctioned or embargoed countries and parties.

**Question**

I didn't think Global Trade Law concerns applied to my role. What kinds of things should I look out for?

**Answer**

These activities could present sanctions and/or trade risk:

- Business, brand, and supplier partnerships
- Payments to sanctioned countries or parties
- International shipping and transfers of technology
- Hiring decisions
- Obtaining goods and services

## Safeguard Against Money-Laundering

Developers on the Roblox Platform are able to exchange Robux for real-world currency through our Developer Exchange Program. Roblox is committed to preventing and safeguarding against criminal activity on the Roblox Platform, including money-laundering.

Money laundering generally involves conducting a transaction to conceal the illegal origins of funds or to facilitate illegal activity. All Personnel are required to review and abide by the Company's [Anti-Money Laundering Policy](#), which can be found on Confluence.

All Personnel, especially those involved in processing payments to our developer community are required to follow the Company's policies, procedures, and internal controls that are designed to prevent bad actors from utilizing the Roblox Platform to launder money and engage in other illegal activity. Stay vigilant and report any suspicious payment requests to the Company's Compliance Officer.

## Prevent Bribery and Corruption

Roblox does not engage in bribery or corruption. Roblox stands against all forms of corruption, including offering or accepting bribes, kickbacks, and other improper payments. Roblox will always choose to lose business rather than secure it through a bribe, kickback, or improper payment.

You may not offer any payment or business amenity to a public official or a government employee if doing so could reasonably be construed as having any connection with the Company's business, even if it has a nominal value or no value at all. You should be aware that what may be permissible in dealings with commercial businesses may be deemed illegal and possibly criminal in dealings with the government. You should contact the Compliance Officer for further guidance.

Whether you are located in the United States or abroad, you are also responsible for fully complying with the U.S. Foreign Corrupt Practices Act ("FCPA"). The FCPA makes it illegal to offer, pay, promise to pay, or authorize to pay any money, gift, or other item of value to any foreign official, political party, or candidate to assist the Company or another to obtain or retain business. All managers and supervisory personnel are expected to monitor continued compliance with the FCPA.

For further information, please see the Company's [Anti-Corruption Policy](#) on Confluence.

## Government Contracts

You should use all reasonable efforts to comply with all relevant laws and regulations that apply to government contracting. You should refer any contract with any governmental entity to the Compliance Officer for review and approval.

## Fair Dealing

Roblox does not seek competitive advantages through illegal or unethical business practices. Each employee should endeavor to deal fairly with the Company's service providers, competitors, business partners, and other employees. For example, employees should not try to influence our brand partners when they are selecting developers to work with for their experiences. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair dealing practice.



# Individual Accountability



## Conflicts of Interest

We avoid conflicts of interest to make the best choices for Roblox, unaffected by personal interests or relationships.

All of us have personal interests that make us unique and allow us to bring value to Roblox. Even so, we put Roblox first when we come to work or represent Roblox. We must always use our best judgment and avoid situations where our personal interests and relationships might interfere or appear to interfere with the best interests of Roblox, such as self-dealing or investing in a competitor.

Our Board of Directors may from time to time adopt separate policies with respect to directors' conflicts of interest in order to address the particular circumstances arising from their role as members of the board. Any such policy will supersede the conflicts of interest guidelines above to the extent applicable.

Avoiding Conflicts of Interests means we:

- Recognize Roblox's business is both broad in scope and evolving, which means what qualifies as a potential conflict of interest also changes.
- Avoid making a conflict-of-interest determination on our own. If you have any questions on what constitutes a conflict of interest, please review this Code and then contact the Legal Team.
- Do not allow any of our personal connections or family members to receive a personal benefit from our position at Roblox or improperly influence, or give the appearance of improperly influencing, our decision-making.
- Give our best effort at work every day, not allowing outside jobs or relationships with other businesses to hinder our contributions to Roblox.
- Are mindful that business opportunities discovered using Roblox property, information, or our position should not be used for personal gain.
- Proactively identify situations that could put Roblox's interests into possible conflict with our own.
- Refrain from engaging in an outside activity that requires review while the request is being evaluated.

Here are some examples of conflicts of interests that should be avoided<sup>1</sup>:

- **Business Opportunities with Personal Affiliates:** Roblox employees must disclose and seek permission prior to conducting business on behalf of Roblox if the company/organization they are looking to do business with includes a family member, close friend, or intimate partner. Roblox will assess to determine whether there is a bona-fide arm's length transaction where the personal relationship has not been leveraged.
- **Personal Relationships at Work:** Certain personal relationships at work may compromise your ability to perform your job duties, create uncomfortable or conflicting positions, and may raise issues of favoritism, fairness, or harassment. Our Personnel are therefore encouraged to be mindful of how their relationships within Roblox may impact and be perceived by others. Therefore romantic, physical, or familial relationships between two or more Personnel is not permitted where one person exercises authority over or supervises the other including direct or indirect reporting relationships. Additionally, no one may participate in any decision regarding the terms and conditions of employment (e.g., disciplinary or reward decisions) that would directly impact a family member, close friend, or intimate partner.
- **Interests in Other Businesses:** Do not engage in outside employment, business, advising, or consulting relationships with another company without pre-approval by the Compliance Officer. You also should not have a financial interest—including an indirect interest through, for example, a relative or significant other—in any organization if that interest would give you or would appear to give you a conflict of interest with the Company. Do not have an undisclosed material financial interest in a competitor or business partner of the Company.
- **Improper Conduct and Activities:** Do not engage in any conduct or activities that materially disrupt or impair the Company's relationship with any person or entity with which the Company has or proposes to enter into a business or contractual relationship. For example, do not serve in an elected or appointed public office unless the position does not create or appear to create a conflict of interest.
- **Loans by the Company:** Loans from the Company to directors and officers are prohibited. Loans from the Company to officers and employees must be approved in advance by the Board or its designated committee.
- **Transactions with the Company:** If you have a significant financial interest in a transaction involving the Company—including an indirect interest through, for example, a relative or significant other or a business entity—you must disclose that interest, and that interest must be approved by the Company in a manner specified by Company policy. We encourage you to seek guidance from the Compliance Officer if you have any questions as to whether an interest in a transaction is significant.

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<sup>1</sup>For purposes of determining whether there is a potential conflict of interest, "Family members" include a child, stepchild, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, and any person (other than a tenant or employee) sharing the household of an employee.

Evaluating whether a conflict of interest exists can be difficult and involves a number of considerations. Here are some factors that may be considered in evaluating whether a conflict of interest exists:

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**Job performance, responsibilities, and morale**

Would the proposed opportunity interfere with your or another Roblox employee's job performance, responsibilities, or morale?

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**Confidential information**

Would the proposed opportunity be impacted by your access to confidential information?

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**Financial impact**

What is the financial impact of the proposed activity?

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**Business relationships**

Would the proposed activity have a potential adverse or beneficial impact on the Company's business or relationships with third parties or other service provider?

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**Competitors**

Would the proposed activity enhance or support a competitor's position?

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**Appearance**

Would the proposed activity appear improper to an outside observer?

## Corporate Opportunities

Employees owe a duty to the Company to advance the Company's business interests when the opportunity to do so arises. Employees are prohibited from taking or directing to a third party to take, a business opportunity that is discovered through the use of corporate property, information, or position, unless the Company has already been offered the opportunity and turned it down. Employees are further prohibited from competing with the Company directly or indirectly during their employment with the Company and as otherwise provided in any written agreement with the Company.

Sometimes the line between personal and Company benefits is difficult to draw, and sometimes there are both personal and Company benefits in certain activities. Employees should discuss with their manager, the Compliance Officer, or the People Team if they have any questions.

## Personal Projects on Roblox

All employees are welcome to develop and publish their own experiences on the Roblox Platform where they are entitled to receive revenue earned from the experience or otherwise have editing rights to it. When doing so, however, there are rules and guidelines for employees to keep in mind when developing new projects. Also, many of our employees were developers on the platform long before they joined Roblox. These rules are not intended to change the way that those employees publish and market their experiences on the platform, but all employees need to ensure that they are not using their position at the company as a means to increase the profits or popularity of their experiences. For further information, please review the [Employee Development of Personal Projects on Roblox Policy](#) on Confluence.

### Question

I'm a long-time developer on Roblox that recently joined the Company as a full-time employee. During a recent 1-1 with my manager, I learned about some amazing new features that we are about to launch that will really help my experience grow. I wanted to get started implementing changes to my experience so that when the new features are launched, my experience can really take off. Can I start doing that now?

### Answer

No, you are prohibited from using your position at the Company as a means to increase the popularity of your experience(s). Please review the Employee Development of Personal Projects on Roblox Policy for more information.

## Giving and receiving gifts and entertainment

We responsibly invest in our business relationships but never offer or accept gifts, entertainment, or anything else of value to improperly influence people. Showing appreciation for a client or third party strengthens our business relationships when done appropriately. Exchanging gifts, entertainment, or hospitality to improperly influence business decisions erodes trust and leads to business outcomes that don't put the community using Roblox products and services first.

Giving and receiving gifts and entertainment appropriately means:

- Offering reasonable and customary gifts, entertainment, or anything else of value only where there is a legitimate business purpose and where the gift does not create an appearance of impropriety. Do not give lavish gifts.
- You should avoid providing or accepting any cash payment, or other gift that can be construed as a bribe or payoff.
- You should only accept modest gifts from private third parties that conduct business with Roblox that are reasonable, customary, lawful under local laws, and related to a legitimate business purpose and that will not appear to inappropriately bias future decision-making. Any questions about a gift should be directed to the Compliance Officer.
- All Company funds expended for gifts must be accurately recorded in the Company's books and records.
- In some business situations outside of the United States, it is customary and lawful for business executives to present gifts to representatives of their business partners. These gifts may be of more than a nominal value, and under the circumstances, returning the gifts or paying for them may be an affront to the giver. If you find yourself in such a situation, you must report the gift to the Compliance Officer. In some cases, you may be

**NO**

If the answer to any of these questions is "no," the gift or entertainment likely is not appropriate and you should not give or accept it.

Am I following Roblox policies, including the limits for government officials?

Is it reasonable and appropriate according to local law and custom?

Does it serve a legitimate business purpose?

Does it avoid the perception of improper conduct?

Does it avoid the risk of perception of bias for future decision-making?

required to turn the gift over to the Company. You must consult the Anti-Corruption Policy and obtain preapproval from the Legal Team when required before giving anything of value to government officials.

## Insider Trading

We are committed to protecting information that is entrusted to us, especially material non-public information about Roblox or another company, sometimes called “inside” information. For guidance on what constitutes material non-public information and other rules about trading, review our [Insider Trading Policy](#). Using material non-public information to influence investment decisions, called “insider trading,” is illegal because it provides an unfair advantage and distorts the financial markets.

All Personnel are subject to our Insider Trading Policy, which can be found on Confluence.

## Political Activities

The Company may communicate its position on important issues to elected representatives and other government officials. It is the Company’s policy to comply fully with all local, state, federal, foreign, and other applicable laws, rules, and regulations regarding political contributions.

Do not use the Company’s assets—including Company funds, employees’ work time, and Company premises and equipment—for political campaigns or political activities under any circumstances without prior written approval.

The Company does not make contributions to political candidates or political parties except as permitted by applicable laws.

You can engage in political activity as a private citizen, but not as representatives of the Company.

Your personal lawful political contribution, or decision not to make a contribution, will not influence your compensation, job security, or opportunities for advancement.

## Lobbying

You must obtain approval from the Compliance Officer for any work activity that requires lobbying communication with any member or employee of a legislative body or with any government official or employee in the formulation of legislation. Work activity covered by this policy includes meetings with legislators or members of their staffs or with senior executive branch officials on behalf of the Company. Preparation, research, and other background activities that are done in support of such lobbying communication are also covered by this policy even if the communication ultimately is not made.

## Immigration Law

The United States and other countries may impose restrictions on non-citizens visiting or working in the country. In many instances, visas or work permits must be obtained from the government. You are responsible for complying with all applicable immigration laws, including while on Ro-Flex Away. If you have any uncertainty concerning the requirements of the law, you should consult with the Compliance Officer before working in, or traveling to, a country of which you are not a citizen, or authorizing any person to do so.

## Requests by Regulatory Authorities

You must cooperate with appropriate government inquiries and investigations in accordance with law. It is important, however, to protect the legal rights of the Company with respect to its nonpublic information. All government requests for Company information, documents, or investigative interviews should be referred to the Compliance Officer. You should work with the Compliance Officer in responding to requests by regulatory authorities to ensure appropriate responses and to avoid inappropriate disclosure of attorney-client privileged materials, trade secret information, or other nonpublic information. This policy should not be construed to prevent an employee from disclosing information to a government or law enforcement agency where the employee has reasonable cause to believe that the information discloses a violation of, or noncompliance with, a state or federal statute or regulation.

# Other Aspects of Compliance

## Disciplinary Actions

The Company will take appropriate action against any employee, agent, or third party acting on behalf of the Company whose actions are found to violate the Code. Disciplinary actions may include, at the Company's sole discretion, oral or written reprimand, suspension, or immediate termination of employment or business relationship, or any other disciplinary action or combination of disciplinary actions as deemed appropriate to the circumstances. A record of the disciplinary action will be retained in the employee's personnel file or the third party's diligence file.

In determining what disciplinary action is appropriate in a particular case, the Company will take into account all relevant information, including the nature and severity of the violation, any history of warnings and violations, whether the violation appears to have been intentional or inadvertent and whether the violator reported their own misconduct. The Company will strive to enforce the Code in a consistent manner while accounting for all relevant information.

Where the Company has suffered a loss, it may pursue its remedies against the individuals or entities responsible. Certain violations of this Code may also be subject to civil or criminal prosecution by governmental authorities and others. Where laws have been violated, the Company will report violators to the appropriate authorities.

## Disclosure

Nothing in this Code limits or prohibits employees from engaging for a lawful purpose in any "Protected Activity." A "Protected Activity" means filing a charge or complaint, or otherwise communicating, cooperating, or participating, with any state, federal, or other governmental agency, including the Securities and Exchange Commission (the "SEC"), the Equal Employment Opportunity Commission, and the National Labor Relations Board. Notwithstanding any other policies in this Code (or elsewhere), employees are not required to obtain authorization from the Company prior to disclosing information to, or communicating with, such agencies, nor are employees obligated to advise the Company as to any such disclosures or communications. Notwithstanding the foregoing, in making any such disclosures or communications, employees must take all reasonable precautions to prevent any unauthorized use or disclosure of any information that may constitute Company confidential information to any parties other than the relevant government agencies. "Protected Activity" does not include the disclosure of any Company attorney-client privileged communications; any such disclosure, without the Company's written consent, violates Company policy.

## Waivers of this Code

Except as otherwise provided in the Code, the Board or its designated committee must review and approve any matters requiring special permission under the Code for a member of the Board or an executive officer. Except as otherwise provided in the Code, the Compliance Officer must review and approve any matters requiring special permission under the Code for any other employee, agent, or contractor.

Any waiver of any provision of this Code for a member of the Board or an executive officer must be approved in writing by the Board or its designated committee and promptly disclosed to stockholders, along with the reasons for the waiver, to the extent required by law or regulation. Such waiver will be disclosed in a timely manner in compliance with SEC regulations.

Any waiver of any provision of this Code with respect to any other employee, agent, or contractor must be approved in writing by the Compliance Officer.

Copies of approvals and waivers will be retained by the Company.

## Amendment

The Company reserves the right to amend this Code at any time, for any reason, subject to applicable laws, rules, and regulations.

## Acknowledgment

All new employees must sign an acknowledgment form confirming that they have read this Code and that they understand and agree to comply with its provisions. Signed acknowledgment forms will be kept in employee personnel files. Failure to read this Code or to sign an acknowledgment form does not excuse any person from the terms of the Code.

**ROBLOX**