

chime[®]

Code of Business Conduct & Ethics





Why Does Chime Have a Code?

Chime Financial, Inc. (**Chime** or the **Company**) was founded to create and deliver products and services that are fair, transparent and reliable. Our members rely on us, and we know we need to continually earn their trust. Most of all, we respect the rules 🌀 , because it is core to who we are.

Our Code of Business Conduct and Ethics (**the Code**) isn't just a document we comply with and reference. **It's a set of principles we live by and embody—one that gives voice to our values.** It's not just about respecting the rules we have in place. It's about doing right by our members, respecting our teammates, and effecting positive change in our industry by operating ethically and transparently, always

This Code isn't all-encompassing or one size fits all. Nor does it provide definitive answers to all questions. That's not possible. During your time here, you're bound to face scenarios and dilemmas not covered below. That's okay! **You'll be expected to use your best judgment and our Ethical Decision Checklist (more on this in a bit) to determine whether a course of action is consistent with our ethical standards.** If it's not obvious, please seek guidance from your manager or our in-house **Ethics Office, Chief Compliance Officer, or General Counsel** when appropriate. They'll be able to provide thoughtful, practical guidance as it relates to your day-to-day duties.

No Chimer simply works here. **You're a custodian of Chime's good name,** and you have a personal responsibility to ensure that your conduct protects and promotes both the letter and the spirit of our Code of Business Conduct and Ethics. It's fundamental to our long-term success.

All the best,



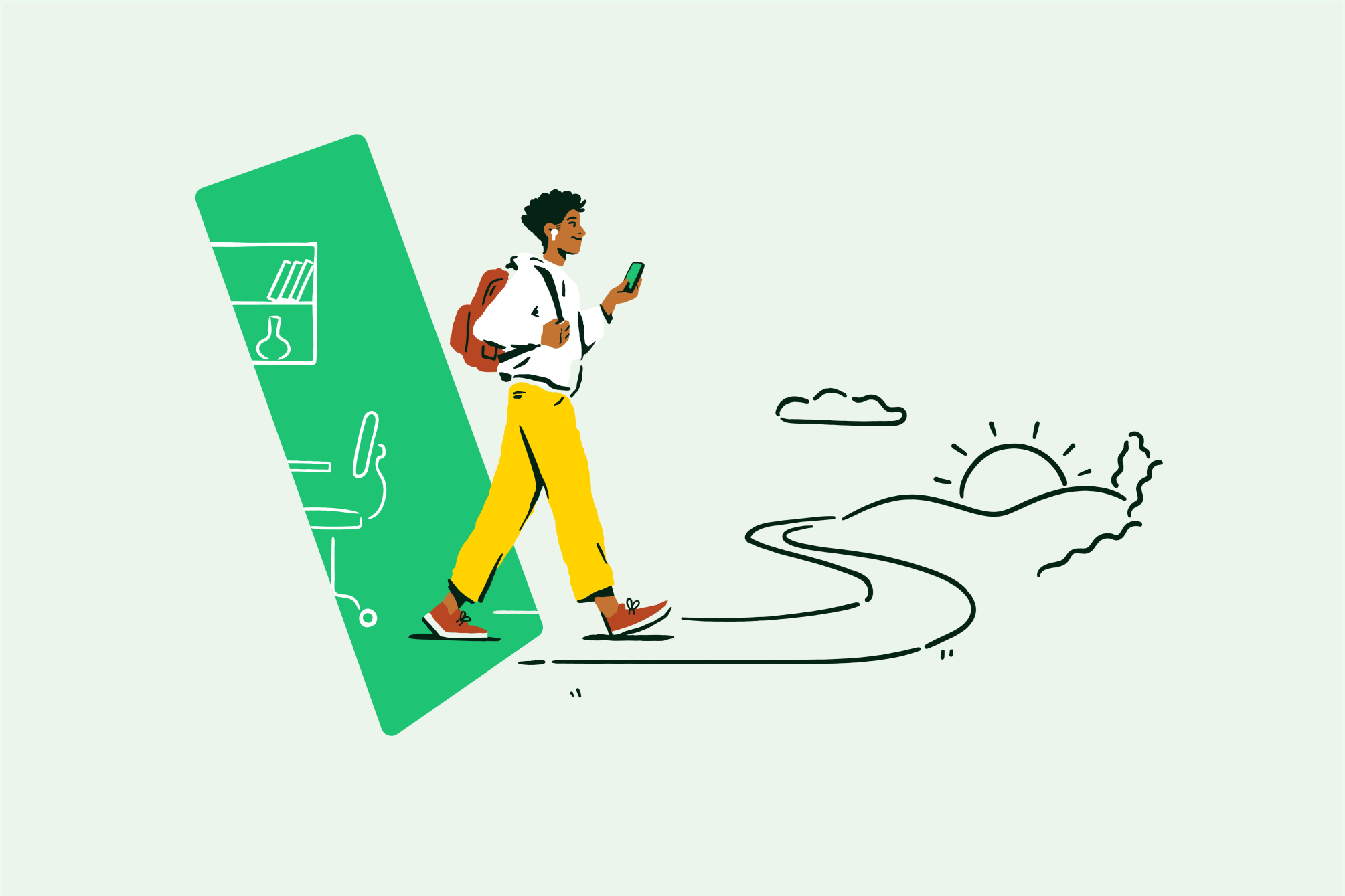
Chris Britt
Co-founder and CEO



Ryan King
Co-founder

Who Does the Code Apply to?

Our Code of Business Conduct and Ethics has been adopted by Chime's Board of Directors, and applies to all of Chime's directors, officers and employees.



Who Does the Code Protect?

It may sound cliché, but our Code of Business Conduct and Ethics protects us all.

It protects:

Chime’s reputation and good standing as a business

Chimers from acting unethically by providing Chime’s standards of conduct and resources to ask questions when the ethical choice is unclear

Chimers who raise good-faith concerns from being retaliated against

Our members’ privacy and prevents their data from getting into the wrong hands

The relationships we share and our accountability towards our stakeholders



Our Responsibilities

Our Code of Business Conduct and Ethics is more than a set of rules. It keeps us aligned with our mission and values at all times, no matter the task. In order to achieve this, we all must understand our personal responsibilities within the Code and how our day-to-day decisions and actions at work contribute to a cause that's infinitely larger than ourselves.



Chimers are required to:



Follow all applicable laws, rules, and regulations



Report concerns and violations of Chime's policies



Remain vigilant in our individual and corporate commitment to ethics



Complete all Code of Business Conduct and Ethics training and certification in a timely manner



Chime in/speak up when something doesn't feel right



Ask questions or seek guidance when unsure

Lastly, because we take this Code and all Company policies seriously, violations can result in disciplinary action up to, and including, termination of employment.



How Do We Make Good, Ethical Decisions?

Our Code of Business Conduct and Ethics provides foundational guidelines for Chimers to follow when serving our members and conducting our business.

Chimers are expected to follow both the letter and the spirit of the Code at all times. **When in doubt about how a policy applies, don't be shy!** Reach out to the Ethics Office, our Legal team, or your manager. That's what they are here for.

As comprehensive as our Code of Business Conduct and Ethics may be, it doesn't cover every situation or ethical dilemma you'll ever encounter during your time here. In these scenarios, Chimers are expected to use strong judgment, act with the company's best interests at heart, and consult our Ethical Decision Checklist.

The Ethical Decision Checklist

In a pinch, the following questions can help you navigate situations that feel ethically gray or ambiguous:

☐ Is it legal to do so?

☐ Does this comply with our Code of Business Conduct and Ethics and company policy?

☐ Does it align with Chime's company values and culture?

☐ Would this reflect positively on Chime if it were reported in the news?

If the answer to any of these questions is no, **do not proceed**. Go back to the drawing board and seek help. Perhaps there's an alternative route or strategy you didn't consider. And **Chime in**  if you witness a coworker struggling with a similar issue. Remind them that it's always preferable to err on the side of caution than to throw prudence to the wind, cross your fingers, and hope for the best.



Chime Values and Behaviors



Be member-obsessed

Everything we do at Chime is guided by a deep understanding of our members' needs and a tireless commitment to earning, keeping, and strengthening their trust so that we can be the clear market leader in our space.

Be human. We connect with our members as people, making them feel understood and seen. We're relentlessly curious about their lives and committed to being transparent, empathetic, and straightforward in every interaction with them.

We're inspired by our members' grit and hustle and go above and beyond to provide radically better products and experiences than competitors.

We sweat every detail of our members' experience with Chime. By solving their most critical challenges, we earn their trust and the opportunity to serve them for years to come.

We chime in to make things better. By using our products every day, we put ourselves in our members' shoes. And we live by a simple rule: If it isn't good enough for us, it's definitely not good enough for our members—and we need to make it better.

Ask yourself: If we don't go all in for our members, who will?



Be bold

We've always had outsized ambitions and confidence that if we innovate and hustle hard, we will achieve outsized success. We all share that mindset and belief.

We dream big, set ambitious goals, and do things no one else can.

We're fast and fearless. We don't wait to have all the answers; we make a plan and go.

We never settle for "good enough." If we see a way to level up, we chime in and push ourselves to reach for more.

We're willing to take big risks and aren't afraid to fail. Because we aim high, we sometimes fall short. But we never give up on a great idea at the first "no"; we see failure and its lessons as part of the path toward winning.

Ask yourself: If we don't aim high, how will we achieve our full potential?



Win together

We hire and retain incredibly talented people who share a Chime-first mentality. Working as one team, we push each other to raise the bar and win as a team.

We team up to deliver the best solutions for our members and bring out the best in each other. We create an environment that welcomes and is better for diverse perspectives.

We keep it small, knowing that tight teams with clear goals outperform larger, more bureaucratic ones. We stay focused and united no matter what.

We hold each other accountable. We ask for open, honest feedback, and Chime in to provide it to others. We believe that clarity is kindness.

We assume positive intent and see disagreement as an opportunity to build stronger relationships and land on smarter solutions.

We're all Chime-first, all the time. We leave our egos at the door and put the success of Chime and our members above our own.

Ask yourself: If we're not united, how will we win?



Respect the rules

Helping people manage their money is both a huge responsibility and a privilege. We take seriously our obligations to our members, regulators, partners, and the public. For us to win, we must earn and keep people's trust.

We move fast, but we don't break things. With hustle and grit, we know we can be first to market every time—without cutting corners or compromising on safety.

We build responsibly, and put our members' best interests first in everything we do.

We know the rules and understand the rationale behind them. When necessary, we push for changes that enable us to better serve our members.

If we see something, we chime in and say something. We know we risk failure if we ever break the regs.

We operate with integrity. Whether we're interacting with a member or another Chimer, we hold ourselves accountable to the highest-possible standards.

Ask yourself: If we don't set the gold standard, who will?



Be an owner

We are all shareholders, so we treat the company like it's our own. We work tirelessly to out-execute competitors and exceed goals, knowing we'll all benefit when we win. Despite our early success, we have much more to do to achieve our vision. Even though we compete with some of the biggest companies in the world, we know that if we hustle, we can win.

We make it happen. We work smart and focus ruthlessly on making the biggest possible impact. We refuse to be out-hustled and are willing to run through walls to deliver for our members and fellow Chimers.

We act quickly and decisively. We build talented, nimble teams with aligned goals and a bias for action. And we speak up when we see bureaucracy.

We stay scrappy and make the best of what we have. If there's a gap in a team, we roll up our sleeves and fill it. When we see inefficiency or waste, we take action.

We hold ourselves accountable to our teams, our company, and most importantly, our members. We set a high bar for performance, push hard to hit our goals, and measure the impact of our work.

We operate with a Chime-first mindset, prioritizing work that best serves our members and our business, over and above what serves us as individuals or functions.

Ask yourself: If we don't make it happen, who will?

Conflicts of Interest

At Chime, we have our sights set on fixing an industry that many consider to be flawed. Naturally, our standards are high, and we expect every Chimer, while in the course of doing their jobs, to not only exemplify them but to always act professionally and with the Company's best interests at heart.



What Is a Conflict of Interest?

Basically, it's **any time our personal interests come in direct conflict with Chime's**. These scenarios can manifest themselves in a variety of ways—from using your position within the Company for personal gain to taking on an outside cause or job that could influence your work and decision-making here.

Be Aware of Appearances, Too

Optics are so important when it comes to potential conflicts of interest. In our industry, even the appearance of a conflict of interest—whether true or not—can severely undermine public trust in our Company and damage our credibility. That's why it's so crucial we look out for any situation that has the potential to be construed as improper or unethical and disclose it to the Ethics Office. See the Conflicts of Interest policy for additional guidance.

Conflicts of Interest Can Be Tricky

They are difficult to define and virtually impossible to list in their entirety. But because they can affect so many aspects of our operations, it's crucial to spot and avoid potential and actual conflicts of interest whenever possible! If you are unsure whether a particular situation involves a conflict of interest, or even the appearance of a conflict, reach out to the Ethics Office who can help review and evaluate the issue.

Here's a non-exhaustive list of the most common conflicts of interest in our industry—ones that we look out for and consider carefully should they ever pop up.

Outside Employment, Advisory Roles, Board Seats, & Starting Your Own Business

Chimers are regular, everyday people, and some of us work second jobs to bring in additional income. We respect the hustle, to be honest. But there are a few rules that must be acknowledged and followed prior to considering a secondary position or starting your own business. These include getting approval from management and the Ethics Office, never accepting a position or advising a competitor while employed by Chime, never utilizing Chime confidential information to benefit the outside activity, and ensuring that your side gig or personal project in no way interferes with your job here.

It's important to be transparent and disclose to the Ethics Office any perceived, potential, or actual intersection between your role at Chime and the outside activity. Review the Conflict of Interest Policy for additional information and options for disclosing.

Personal Investments

To avoid any received or perceived conflicts of interest, Chimers must exercise caution and receive the appropriate permission before investing in a company that may do business with Chime. Chimers must also follow the disclosure requirements found in the Chime Conflict of Interest policy for any personal investments with companies that become partners or vendors of Chime.

Other Business Relationships & Dealings

Always disclose potential conflicts of interest to the Ethics Office and recuse yourself if you're in a position to oversee or influence a deal involving Chime and an organization in which you, your family members, or close friends have a personal stake or financial interest.

Excessive Gifts or Entertainment

Whether it's swag, a business meal, or entertainment, there's a fine line between accepting a reasonable, moderate gift from a third party and one that could be perceived as an attempt to influence or curry favor. **But that line does, in fact, exist!** And we expect Chimers to stay on the correct side of it.

We don't solicit gifts or offer anything for the sole purpose of improperly influencing a business decision, or accept any gifts that could compromise our ability to make business decisions on behalf of the Company. We also don't provide or accept gifts when they're valued above \$150, except in rare circumstances when approved by the Ethics Office. And we never offer gifts or entertainment to government officials or employees, unless doing so has been approved in advance by both our Legal team & Ethics Office. (See **Chime's Anti-Bribery and Corruption Policy** for more information.)

Influence Peddling & Corporate Opportunities

When performing our jobs and making business decisions, we always act with Chime's best interests at heart.

That means never using our positions within the Company to advance outside or personal interests in exchange for payment or benefits. Nor do we reserve alluring corporate opportunities (including those discovered through the use of the Company's property or information, or through our positions within the Company) for our own personal benefit or that of others in our networks.

Expert Networks

Expert networks are a type of connectors who recruit industry specialists to supply useful insights, information, and advice to companies interested in learning more about the specialists' industries. As such, they have a high potential to create conflicts of interest—whether actual or perceived. We don't allow Chimers to serve as an expert on these networks in any capacity, whether compensated or not, for the following reasons: a) they could feel compelled to give away our trade secrets and proprietary information, b) getting paid for the information they provide could end up swaying their loyalty to Chime, and c) it could increase the possibility of insider trading.

Chime-ly Questions

“My cousin's new start-up would provide Chime with the perfect solution for a tough issue we've been trying to address. Can I recommend her company to my manager? I bet we could get a great price!”

It's important that Chime's vendors and suppliers are chosen based on a fair selection process. Your cousin's company may be the right choice for Chime, but we'd need to make sure that their startup is evaluated based on qualifications, pricing competitiveness, and, ultimately, what's best for Chime and our Members—not just a personal relationship.

You can tell your manager about your cousin's company but not in a way that would give them an unfair advantage or exert excessive pressure on a fellow Chimer. You should also avoid being a part of the selection committee, never pass along any confidential information to your cousin or Chime, and be as transparent as possible about the personal relationship.

“One of our business partners invited me to attend an NBA game in their company's box seats. Can I accept the offer?”

Potentially. We know that interacting outside of the office, including attending events that are reasonable and customary in value, can be an acceptable part of building positive business relationships. But Chimers must also be careful to avoid any situations that can appear to look excessive or inappropriate. For instance, if the box seats were offered to just a Chimer and their family, without any business partner employees attending—this would likely be an inappropriate gift to accept. When unsure, Chimers should refer to the Conflicts of Interest Policy and contact the Ethics Office for further guidance.

Anti-Bribery, Anti-Corruption

Chime's mission is to help everyday people unlock their financial progress. **Members trust us with their hard-earned money because they know that integrity, honesty, and fairness underlie every decision we make and course of action we take.** We would never jeopardize that.



At Chime, we hold ourselves to the highest legal and ethical standards when it comes to bribery and corruption. Simply put, **soliciting or receiving bribes is not acceptable and never tolerated!** Bribery includes giving, promising, or offering anything of value to anyone in return for improperly influencing or securing any improper advantage for Chime.

Chime-ly Questions

A meeting with one of Chime's regulators has gone longer than expected and everyone is getting hungry. Can I offer to pay for everyone's dinner at a local restaurant so that we can continue our conversation over a meal?

There are very specific laws and Company policies that apply to providing or offering anything to government officials. Even the definition of government officials under these laws is specific and extensive. Always refer to the Chime Anti-Corruption and Bribery policy and check in with our Legal or Ethics Office before offering anything of value to a government official. That includes meals, entertainment, airfare, lodging, favors, or token gifts and branded merchandise.



Tech Garden

Meet our AI-powered chatbot OptimusChime

Sample questions you can ask OptimusChime:

- I need access to Microsoft Office
- How do I set up my Yubikey?
- How do I share files in Figma?
- Can you help me reset my password?

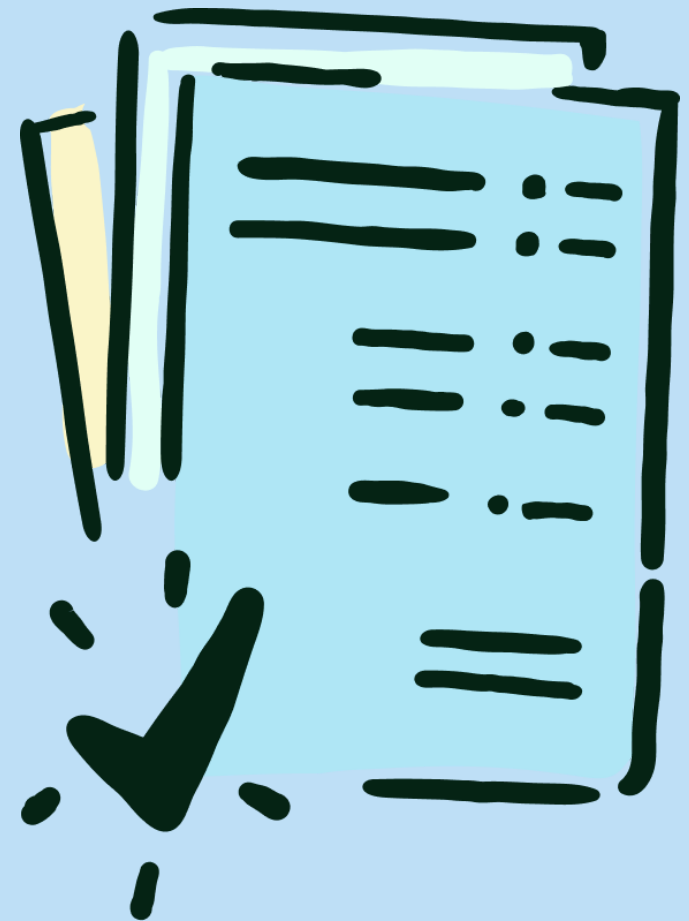


Find OptimusChime on Slack today!

We Comply With All Laws, Rules, & Regulations

One of our core values at Chime is that we Respect the Rules.

Because we know that operating in compliance with the law and with a high ethical standard is the best way to instill trust with our members and stakeholders. Chimers don't cut corners or engage in illegal activity when conducting Company business or day-to-day tasks, and we certainly never instruct others to do so. When we run into an issue that could have legal or regulatory implications, or if we have questions about what applicable law or regulation requires us to do in a given situation, we reach out to the Chime Legal or Compliance teams for help. That way we can ensure we're understanding and following the laws that apply to our work.



Insider Trading

Chimers may not trade or enable others to trade Chime's stock or stock of another company, such as a customer, vendor, supplier, competitor, potential acquisition target or business partner of Chime, while in possession of material non-public information about that company. Any questions as to whether information is material or has been adequately disclosed should be directed to the Chief Compliance Officer. Additional information regarding insider trading can be found in the Chime's Insider Trading Policy.

Political Activity

Chime encourages all Chimers to participate in the political process to the fullest extent that they desire.

Chimers may support and oppose political candidates, express their views on public policy issues and even become candidates for elected office themselves, but must do so on their own time, using their own funds and other resources, and should take care never to state or imply that they are acting on behalf of Chime in doing so.

Chime's funds and other resources may not be used to support or oppose a political candidate without the express prior approval of the Government Affairs and Public Affairs team. Additionally, Chimers should not communicate on behalf of Chime with a government official to support, oppose or otherwise address legislation, regulation or public policy, or use Chime funds to pay for anything of value given to a government official, without the express prior approval of the Government Affairs and Public Affairs team.





Protection & Proper Use of the Company's Assets

Safeguarding Company Assets and Confidential Information

All Chimers—from our executive team to those just starting out—have a duty to safeguard our Company assets, which includes everything from electronic equipment and brand collateral to member data, strategic plans and trade secrets. We're putting our trust in your hands to only use Company assets for legitimate business purposes and in the ways they were intended. Chimers must never use Company assets for their own personal gain and be a steward to protect Company assets with mindfulness and care.

More information is available in Chime's Trademark Use Guidelines.

Chimers who have received or have access to proprietary or confidential information about the Company or its customers, prospective customers, partners, distributors, vendors or suppliers are expected to take special care to keep such information confidential, except when disclosure is authorized by the Company's Chief Executive Officer, Chief Financial Officer or Chief Compliance Officer or required by law.

Misuse of Company Resources

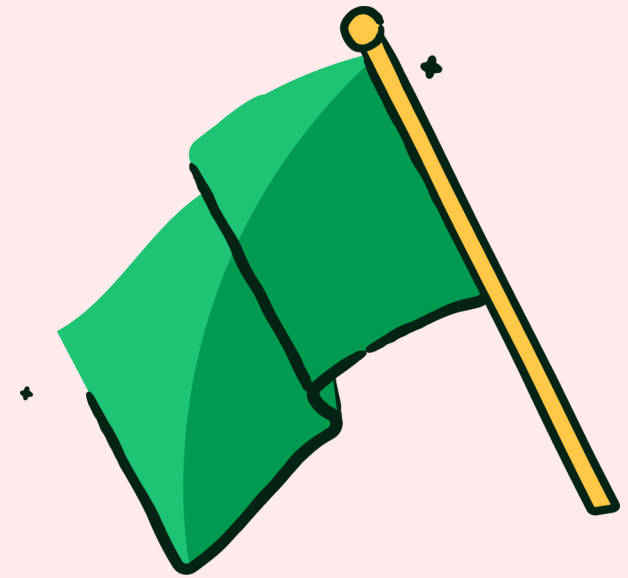
We provide resources like technology, hardware, and office equipment and spaces to help Chimers better serve our members. Misusing these resources to promote personal or business interests other than the Company's is both unethical and unprofessional—not to mention potentially illegal if connected to criminal or nefarious activity. Using company resources on a limited and occasional basis is allowed, but never for activities that are contrary to Chime's policies and values.

More information is available in Chime's Acceptable Use Policy.



Competing Fairly

Our goal is to become one of the largest and most dependable financial technology companies in the world, and we plan to get there on our own merit—one day at a Chime—based on the quality of our products and services and an abiding commitment to our values.



Competing vigorously and fairly in the market boils down to good, old-fashioned hard work. Getting ahead by any other means is fleeting and will only serve to slow down or halt our progress altogether in the long run.

Chimers always compete fairly. We do not collude with competitors in an attempt to limit competition through fixed prices, set wages, rigged bids, or boycotted vendors. We also never engage in any type of unfair behavior—whether it's soliciting proprietary information through dishonest means, participating in corporate espionage, or entering into a business arrangement with the sole purpose of harming a competitor. Doing so could result in severe, and even criminal, penalties for Chime.



Anti-Money Laundering

We take our responsibility as a financial technology company seriously, including doing our part to combat money laundering and financing of terrorist activities. We're committed to complying with anti-money laundering laws, and each Chimer shares the responsibility to support the controls we have in place to comply with these laws.

More information is available in Chime's Financial Crimes & Identity Policy.

Protecting Members’ Privacy

Make no mistake about it: our commitment to member obsession extends to **protecting and securing their personal information**. Our integrity and reputation as a financial technology company depend on it. We have comprehensive systems and procedures in place to safeguard the information members have entrusted to us, and Chimers are expected to follow our privacy and security policies—no ifs or buts!

How We Safeguard Both Chime’s and Our Member’s Information

- Only collecting, using, or accessing Member’s personal information in ways described in our Privacy Policy and other notices we’ve provided to members
- Never sharing Chime computers with anyone, including family or friends
- Strong password protocols
- Never sharing confidential information with those not authorized to see it, either internally, or with our third-party vendors or partner organizations
- Avoid reviewing sensitive information in public areas, or without leveraging compensating controls (e.g. VPNs)
- Never post private information to public channels (e.g. in public-facing emails, in Slack threads, or posting commentary on externally-facing social media platforms)
- Never send proprietary information via personal email accounts
- Never use unapproved devices or applications
- Following Chime’s Security Policies

What We Protect

- Product roadmaps
- Code
- Personal Information, including those of our members and fellow Chimers
- Proprietary information & trade secrets, patents, trademarks, and/or other copyrighted material
- Internal policies and procedures
- Business affiliations, contacts & partnership agreements
- Business opportunities
- Recordings of internal team meetings
- And many other materials!



Chime-ly Questions

Privacy:

A vendor I’m onboarding will need access to Personal Information (PI) about our members in order for the product to work. However, we will remove names and email addresses so that it’s anonymous. Does this mean that privacy input is not required?

No. You should inform the Privacy Team that Personal Information (PI) is involved. PI is any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked with a particular consumer or household. In this case, even with names and email addresses removed, the data in question is related to a person, who could still be identified. In particular, any time a vendor or team is considering the use of anonymization or other de-identification processes or tooling, the Privacy Team must be consulted to ensure that the underlying data can’t reasonably be linked back to a given individual or household.

A product that is only offered to members of one of our partner banks is going to be offered to members of another partner bank soon. I’d like to use the information from the first bank’s launch to inform the launch of this other bank. Is there anything I should be careful about?

Please consult the Privacy Team. Data obtained from one bank partner is not automatically approved for use with other bank partners. Chime is a service provider to multiple banks but we do not get to co-mingle their respective proprietary data without proper guardrails or permissions.

Security:

In order to remedy an urgent issue, I need to send sensitive information to another Chimer. I believe email is the best and only option. What’s the best way to go about sharing this sensitive information?

Use Chime’s email encryption plugin and follow the appropriate steps in the Security Hub to ensure you’re sending the email securely.

I received an important email that I’d like to maintain records of on my personal email. Can I forward my Chime email to my personal email address?

No. Your Chime email must remain on Chime’s email servers. If you receive an email that looks suspicious or requests you to forward anything along to personal email addresses, forward it to phishing@chime.com right away.





Accuracy of Records

We view keeping accurate records as an ethical imperative and a core part of how we do business.

We never knowingly misstate, falsify, or manipulate our records, or enter into a transaction with the intent to document or record it in a deceptive or unlawful manner.

Chimers can create business records on a daily basis and individual Chimers are responsible for managing and maintaining these records according to Company policy. Chimers should check in with their manager or the Legal team for any questions about business record keeping.

Accurate records instill confidence in our members and stakeholders, paving the way for informed decision-making and sustainable growth.

Check Chime's Records Retention Policy for additional information.

Public Disclosures

As a public company, the Company's periodic reports and other documents filed with the Securities and Exchange Commission (SEC), including all financial statements and other financial information, must comply with applicable federal securities laws and SEC rules. We are committed to ensuring that all of our filings with the SEC, and all other public reports and filings that we make pursuant to law or regulation, contain full, fair, accurate, truthful, timely and understandable disclosures, and generally that we deliver accurate information when we communicate to the investment community, regulators, the media and other interested parties about our business and financial performance.

All Chimers who are involved in our public disclosure process are responsible for ensuring that information which will or may be part of a public filing, including financial statement information, is accurate and complete and meets all legal requirements. They must also be familiar with and comply with our disclosure controls and procedures and our internal control over financial reporting.

All Chimers must promptly bring to the attention of the Chairman of the Board of Directors any information he or she may have concerning (a) significant deficiencies in the design or operation of internal and/or disclosure controls that could adversely affect the Company's ability to record, process, summarize and report financial data or (b) any fraud that involves management or other employees who have a significant role in the Company's financial reporting, disclosures or internal controls.

Communication with External Parties

You should not disclose any material, non-public information about the Company to anyone outside of the Company (other than those who are bound by a confidentiality obligation to us and have a “need to know” the information), unless the Company has disclosed such information to the public in addition, you should not provide any Company-related information to media representatives or other outside parties without the advance approval of the Company’s Communications and Legal teams as designated in the “Guidelines for Speaking, Posting, and Publishing about Chime Externally” section of Chime’s Employee Handbook.

Unless authorized, do not give the impression that you are speaking on behalf of the Company in any communication that may become public. This includes posts to online forums, social media, blogs, chat rooms and bulletin boards. This policy also applies to comments to journalists about specific matters that relate to our businesses, as well as letters to the editor and endorsements of products or services.

More information is available in the “Guidelines for Speaking, Posting, and Publishing about Chime Externally” section of Chime’s Employee Handbook.

Truthful Marketing & Advertising



As Chimers, we mean what we say and we say what we mean. We’re straight-forward and honest when marketing or advertising our services—regardless of the medium. There are stringent laws and regulations that govern what Chime may or may not say about our products. Chimers should work with our Compliance and Legal teams to ensure that our marketing and advertising complies with our policies and applicable laws. The trust of our members and stakeholders depends on it.

Chime-ly Questions

I would like to use language that resonates with consumers such as “free” or “no fees” since Chime doesn’t charge many fees. After all, Chime is obviously consumers' best option. Can I use the term "free" or "no fees" in advertising without including any disclosures to show our commitment to our members?

No. While there are many fees we don’t charge – such as minimum balance, annual, and overdraft fees – there may be fees for certain products or services, such as out-of-network ATM and out-of-network cash deposit fees. Partner with the Compliance team when drafting marketing materials to ensure we are being transparent with our members about potential fees so they can make the best decision for themselves.

I think it will instill more trust with our members to market Chime as a bank, and some people already think we are a bank. Can I use statements that lean into that?

No. We always disclose our bank-partner relationships to our members so they understand that Chime is a financial technology company, not a bank, that offers banking services through our bank partners, The Bancorp Bank, N.A. and Stride Bank, N.A., Members FDIC.

Given the more recent bank failures, we want to ease our members' minds that their funds are FDIC insured. How do we do that?

Our bank partners are FDIC members, Chime is not. We must not portray that Chime is an FDIC member, and we must be clear that our members’ funds are FDIC insured through our bank partners, not through Chime.

Resources for Asking Questions and Reporting Issues

Chimers share a responsibility to speak up.

If you witness or suspect a violation of the Code—even if you see or hear about something that ‘just doesn’t feel right’—Chime in.

Concerns can be raised directly to Chime’s Chief Compliance Officer or General Counsel by mail:

General Counsel, c/o Chime or Chief Compliance Officer, c/o
Chime
101 California St, Suite 500
San Francisco, CA 94111

Chime will not tolerate retaliation for reports or questions asked in good faith. Any Chimer who retaliates against a fellow Chimer for raising a concern in good faith, or participating in the investigation of a concern, may be subject to discipline, up to, and including, termination of employment.



Chime’s management team, under the supervision of the Board of Directors or the Audit Committee, will take reasonable steps from time to time to monitor compliance with the Code, and when appropriate, impose and enforce appropriate preventative or disciplinary measures for violations of the Code.

All reports of compliance-related matters must be made in good faith and be truthful to the best of the reporting party’s knowledge, information and belief concerning the factual matters they report. Making a false report is prohibited.



Waivers & Amendments

Chimers are expected to regularly reference our Code of Business Conduct and Ethics and to use good judgment when following the Code and Company policies.

Waivers of any provisions of the Code for the benefit of a member of the Board of Directors or an executive officer (which includes without limitation, for purposes of this Code, the Company's principal executive, financial, and accounting officers) must be approved by the Board of Directors . Any waivers of the Code for other employees may be made by the General Counsel (or their delegates), the Chief Compliance Officer (or their delegates), or the Board of Directors.

Material changes to this Code must be approved by the Chime Board of Directors or a committee thereof.

Conclusion

Thank you for contributing to the success of our mission through your commitment to Chime's values and this Code.

Know that we're all in this together and that we're putting our trust in your hands to always do the right thing—even when it feels difficult to do so. Sure, there will be times when you'll encounter dilemmas not covered in this Code. Or, in any Code for that matter.

Remember, in those situations, that you are not alone; that you can always turn to our ethical decision making process, our Ethics Office or any of the other resources at your disposal, for advice or guidance.

