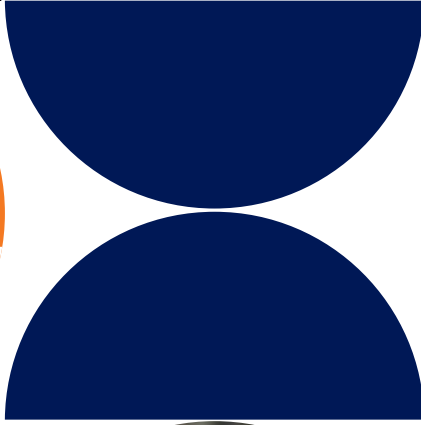
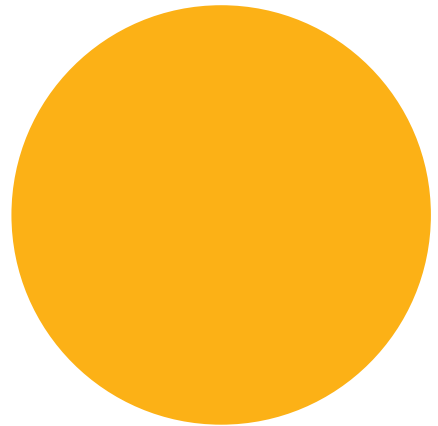




# Supplier Code of Conduct



## 1.0 Our Values

The promise we make  
to our consumers,  
shareholders, community,  
and to each other:

- D** - doing the right thing
- I** - innovation
- S** - simplicity
- C** - collaboration
- O** - openness
- V** - volunteerism
- E** - enthusiasm
- R** - respect



## 2.0 Supplier Code of Conduct

At Discover, a division of Capital One, N.A., we believe that ethical conduct is essential to our business success.

Our mission is to help people spend smarter, manage debt better, and save more so they achieve a brighter financial future, and we can achieve that by doing the right thing.

Our suppliers are also an integral part of our success, and we cannot achieve our vision and mission without the collaboration of companies equally committed to ethical business practices and corporate, social, and environmental responsibility. By working together to uphold the highest ethical standards, we'll create the best experience for our employees, customers, and other partners.

This Supplier Code of Conduct Policy helps suppliers (including supplier employees, agents, contractors, and other representatives acting on behalf of Discover) and Discover employees working with them, navigate our ethical expectations, in addition to (but not in conflict with) the governing agreements they enter into with us. Discover prizes partners who share these values, and not adhering to this Code of Conduct may impact current or future business opportunities. To help ensure the standards prescribed herein are in place, we may exercise our right to review or audit our suppliers to the extent provided in the underlying agreements or ask our suppliers to provide written information, including policies, procedures, and data related to topics included in this Code of Conduct.



## 3.0 Ethical Business Practices

Suppliers doing business with, or on behalf of, Discover® should both act with the highest standards of integrity and adhere to all applicable local, state, and federal or foreign laws and regulations. Practices Discover expects its suppliers to uphold include:

- **Zero tolerance for illegal activities.** Our suppliers must not engage in, or be associated with, other organizations or individuals who take part in illegal activities, such as bribery, corruption, money laundering, or terrorist financing.
- **Avoidance of conflicts of interest.** Suppliers should avoid both impropriety and the appearance of it, and as such, should avoid entering into an engagement when a conflict of interest exists, or introducing a conflict of interest to an existing engagement.
- **Sound financial judgment, data protection, and information security.** Handle information and data related to Discover with care and in adherence with all applicable data privacy laws. Suppliers must properly protect Discover assets from cyber-related attacks, abuse, theft, and other types of loss. Suppliers should promptly notify Discover in the event of a bankruptcy filing, acquisition, ownership change, business closure, data breach, or other incident that compromises data security.
- **Intellectual property.** Suppliers are prohibited from using trademarks owned by Discover for any purpose without written permission and under no circumstances may trademarks owned by Discover be altered, modified, or changed. All intellectual property is governed by the applicable agreement and Discover [Terms of Use](#).
- **Confidentiality.** Suppliers have a responsibility to protect confidential information and are expected to comply with all applicable statutory, regulatory, and other legal obligations governing the protection or processing of Discover's proprietary, personal, or confidential information. Discover considers material nonpublic information (also known as insider information) as a form of confidential information, which includes all non-public information that may have a significant impact on the price of a security or other financial instrument or that a reasonable investor(s) would likely consider important in making investment decision(s). Suppliers must comply with all applicable statutory, regulatory, and legal requirements and restrictions related to the possession, treatment, and nondisclosure of material nonpublic information.




## Ethical Business Practices (continued)

- **Contract Adherence.** Suppliers should not commence work or perform any services for Discover® without a fully executed contract and/or purchase order. It is our expectation that suppliers abide by and fully adhere to all applicable, lawful terms and conditions of their contracts. If suppliers become aware of or have a reason to believe that Discover may not be adhering to a contractual requirement, we expect our suppliers to notify us as soon as possible.
- **Political Activities and Lobbying.** Suppliers may not make political contributions or provide anything of value (e.g., gifts, cash, or cash equivalents) to any candidate for public office, elected officials, political committees, or parties on behalf of Discover unless pre-approved by Discover management consistent with our applicable internal policies and procedures.

## Corporate, Social, and Environmental Responsibility

Discover believes that all people should feel valued, have a sense of belonging, be treated equitably, and enjoy the freedom to be themselves. We are committed to using our full platform of jobs, products, business spend, philanthropy, and more to advance our corporate social and environmental responsibility efforts, effect change, and help people achieve brighter financial futures. Our suppliers should be equally committed to these principles, and should work to support and improve:

- **Human rights.** Discover stands firmly against human rights violations, including, but not limited to, violations relating to child labor, forced labor, day labor, elder abuse, slavery, and human trafficking. We expect the same from our suppliers. Suppliers should adhere to all applicable laws and regulations related to working hours and provide safe and healthy environments for employees and contractors to perform their work.
- **Anti-discrimination and anti-harassment.** Suppliers should abide by all applicable laws and regulations prohibiting discrimination or harassment based on race, color, religion, sex, sexual orientation, gender identity, pregnancy, national origin, age,



# Corporate, Social, and Environmental Responsibility (continued)

marital status, disability status, protected veteran status, genetic information, or any other characteristic protected by federal, state, or local law, and provide a safe working environment for their employees. All relationships between suppliers and Discover® should be business-like and free from bias, favoritism, harassment, prejudice, discrimination, violence, and bullying of any kind.

- **Diversity, equity, and inclusion.** Diverse perspectives and experiences make us stronger and better positioned to support our employees, customers, and communities in achieving brighter financial futures. Because we value diverse employees and a diverse supplier network, we desire to engage with suppliers who integrate diversity, equity, and inclusion into their company culture through intentional talent acquisition standards, ongoing training and development, and practices that create an equitable and inclusive environment.
- **Supplier & Business Diversity.** At Discover, we are intentional in selecting the suppliers we partner with. When we form a relationship with a third party—whether they’re local providers for regional offices or company-wide service providers—it is important that we find the best possible partners who also share our commitments to diversity, equity, inclusion, and social impact.
- **Environmental Sustainability.** As we continuously consider our impact to the environment, we strongly encourage suppliers to conserve natural resources whenever possible and to develop ongoing programs that reduce their carbon footprint and emphasize sustainable business practices by following Environmental Protection Agency guidelines and pursuing recognized certifications to validate their efforts. Specifically, we expect our suppliers to include the consideration of environmental attributes and impacts in their purchasing processes and always emphasize pollution prevention.



# Reporting Concerns

Any person should have easy access to report an Ethical Concern to the Company.

If you become aware of any supplier conduct that potentially violates this Supplier Code of Conduct, the law, a regulation or a Discover® policy, or otherwise appears improper, do the right thing and promptly report your concern by following the Whistleblower Policy or by submitting an email to [suppliermanagement@discover.com](mailto:suppliermanagement@discover.com).

To raise a concern or report a violation, you can visit [discover.alertline.com](https://discover.alertline.com), email [suppliermanagement@discover.com](mailto:suppliermanagement@discover.com), or call our Integrity Hotline at 1-866-714-1305 to file a report anonymously.