

A Message from Synchrony Financial

Synchrony Financial and each of its affiliates and subsidiaries (collectively, “Synchrony”) are committed to demonstrating the highest level of integrity, ethical standards and legal and regulatory compliance in all that we do and in earning our reputation every day. Our Code of Conduct—referred to as “Our Code”—articulates important Synchrony policies governing integrity and business conduct. Synchrony seeks to work with suppliers whose values match our own, so Our Code applies to anyone who provides services and/or products to or represents Synchrony—including, but not limited to, service providers, contractors and consultants (collectively, “Suppliers”). Suppliers and their subcontractors are expected to meet the standards and principles set out in Our Code as well as applicable laws and regulations across all areas of business in addition to their other contractual responsibilities.

Compliance with such laws, regulations, standards and principles is a material consideration for Synchrony in assessing every aspect of our Supplier relationships. Moreover, Synchrony believes expanding access and promoting fairness across our Supplier base results in the best Suppliers and therefore is not only a sound business practice but also an important part of how we operate. We expect our Suppliers to provide all businesses with an opportunity to compete on a fair and equal basis to provide products and services to Synchrony. We also invest in Suppliers and organizations that prioritize access, innovation and sustainable growth, and identify creative solutions in support of our business objectives.

Please contact your Synchrony Supplier Manager if you have any questions about Our Code or the standards of conduct that all Suppliers must meet.

Responsibilities of Synchrony Suppliers

You, as a Supplier to Synchrony, commit to:

Regulatory Excellence: Observe laws and regulations in areas that are applicable to the products and/or services you offer, engage in prudent risk management and commit to treating customers fairly.

Fair Dealing: Protect the reputational interests of Synchrony by dealing fairly, honestly and in a transparent manner with Synchrony’s partners, customers, regulators, employees and the public. Additionally, no one should be unfairly advantaged or disadvantaged through manipulation, concealment, abuse of privileged information, misrepresentation of facts or any other unfair, misleading or deceptive practice.

Controllanship: Be honest, complete and accurate in accounting, billing, communications and decision making. Prepare and submit accurate and transparent reporting, including, but not limited to performance and risk indicators.

Anti-Money Laundering: Follow Synchrony’s Anti-Money Laundering policies and procedures and support Synchrony’s efforts and practices with “knowing our customers”; do not do business with prohibited parties; and be alert to possible suspicious and/or illegal activity.

Fair Employment Practices: Observe applicable laws and regulations governing wages and hours and employee rights. Respect human rights in the workplace and in all business activities. Treat all employees fairly, with dignity and respect. Employment decisions should be made without regard to a person’s race, color, religion, national or ethnic origin, genetic information, sex (including pregnancy), sexual orientation, gender identity or expression, age, disability, veteran status or other characteristic(s) protected by law. Prohibit illegal discrimination, harassment (including but not limited to sexual harassment), and retaliation.

Protecting People, Assets & Information: Protect people, assets, information and operations; safeguard business, customer, employee and regulatory information; ensure information and assets are used for legitimate business purposes only; and protect against risks posed by man-made or natural incidents that affect our people, facilities, information technology assets and systems, information, products, services, financial assets and supply chain.

Competition Law: Do not enter into any agreement with competitors that deprives customers of the benefits of competition or would inhibit operation of the free marketplace. Comply with all applicable competition laws, regulations, decrees and orders.

Improper Payments: Prohibit any practice that is or has the appearance of bribery in any country around the world with both governments and the private sector. Maintain accurate books, records and accounts that correctly reflect the true nature of all transactions.

Insider Trading and Stock Tipping: Promote the principles of fair and open markets for publicly traded securities; do not engage in insider trading or stock tipping; and do not share material non-public information with any unauthorized individual.

Sustainability: Promote sustainable practices that take into account any impacts their actions would have across all stakeholders, both internal and external. Synchrony believes in an approach to sustainability that brings together stewardship and sound business practices. We expect our suppliers to:

- Comply with all applicable environmental laws and continually strive to improve their sustainability performance, focusing on energy efficiency and reduction of waste, hazardous materials, carbon emissions, and water and natural resources consumption.
- Have an operational focus to sustainability.

Community Support: Synchrony seeks to work with suppliers who share our commitment to social impact and economic development in our local communities. We strongly encourage suppliers to engage with and contribute to the communities in which they operate.

Acknowledgement, Monitoring and Compliance

Lack of adherence to Our Code will be addressed with Suppliers during supplier evaluations and/or the supplier management process, if necessary.

All Suppliers shall monitor their activities to ensure their compliance with Our Code and applicable legal and regulatory requirements. If a Supplier identifies areas of non-compliance, the Supplier agrees to notify Synchrony as to its plans to remedy any such non-compliance.

Synchrony may request additional information from Suppliers regarding their compliance efforts and/or engage in additional monitoring activities to confirm compliance with Our Code, including on-site inspections of facilities, use of questionnaires and document requests, review of publicly available information or other measures necessary to assess Supplier performance. Synchrony reserves the right (in addition to all other legal and contractual rights) to disqualify any potential Supplier from participation in the bidding process and/or terminate any relationship with any current Supplier found to be in violation of Our Code without liability to Synchrony.

How to Raise a Concern

Subject to local laws and any legal restrictions applicable to such reporting, each Synchrony Supplier is expected to inform Synchrony promptly of any concern related to Our Code affecting Synchrony, including concerns or questions regarding ethics, discrimination, questionable practices, operational problems, inappropriate conduct and potential compliance or policy concerns—whether or not the concern involves the Supplier—as soon as the Supplier has knowledge of the concern. Synchrony Suppliers also must take such steps as Synchrony may reasonably request to assist Synchrony in the investigation of a concern.

Prompt reporting is crucial. You may raise your concern promptly by contacting your Synchrony Supplier Manager; by contacting any Synchrony Compliance Resource; or calling the Synchrony Helpline at 1-800-477-6531.

For the full version of Our Code, [click here](#).