

Engage with us.

A Message from Synchrony Financial

Synchrony Financial and each of its affiliates and subsidiaries (collectively, "Synchrony Financial" or "Synchrony") are committed to demonstrating the highest level of integrity and ethical standards in all that we do and earning our reputation every day. Our Code of Conduct- referred to as Our Code- articulates important Synchrony Financial policies governing integrity and business conduct. Our Code applies to anyone who provides services/products to or represents Synchrony Financial- including, but not limited to suppliers, contractors and consultants referred in this guide collectively as Suppliers. Suppliers and their subcontractors are expected to comply with the terms below in addition to their other contractual responsibilities.

Please contact your Synchrony Financial Supplier Manager if you have any questions about Our Code or the standards of business 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/services you offer; engage in prudent risk management; and commit to treating customers fairly.

Fair Dealing: Protect the reputational interests of Synchrony Financial by dealing fairly, honestly and in a transparent manner with Synchrony's clients, customers, regulators, employees and the public. Additionally, no one should be unfairly advantaged through manipulation, concealment, abuse of privileged information, or misrepresentation of facts.

Controllership: 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 -where applicable - Synchrony Financial'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 illegal activity.

Fair Employment Practices: Observe applicable laws and regulations governing wages and hours and employee rights. Prohibit illegal discrimination and treat all employees with dignity and respect by embracing diversity and inclusion. Employment decisions should be made without regard to a person's race, color, religion, national or ethnic origin, sex (including pregnancy), sexual orientation, gender identity or expression, age, disability, veteran status or other characteristic protected by law.

Protecting People, Assets, Information & Privacy: Protect people, assets, information and operations; safeguard customer and employee information; ensure 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: 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.

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 Financial 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 Financial in the investigation of a concern.



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Prompt reporting is crucial. You may raise your concern promptly by contacting your Synchrony Financial Supplier Manager; or by contacting any Synchrony Compliance Resource; or calling the Synchrony Financial Helpline @ 1-800-477-6531. Synchrony prohibits and has zero tolerance for retaliation against any person raising a concern.

The full version of Our Code can be found @ <http://investors.synchronyfinancial.com/corporate-governance>.

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