

ETHICS HELPLINE FREQUENTLY ASKED QUESTIONS

Q: Who manages the Ethics Helpline?

A: The Ethics Helpline is an online reporting system run by NAVEX, an independent third party, and is available 24 hours a day, every day.

Q: How do I file a report on the Ethics Helpline?

A: There are two ways to file a report on the Ethics Helpline:

- **Online:** To file a report online, please visit www.breadfinancial.ethicspoint.com where you can fill in a form to submit your concern.
- **By Phone:** To file a report by phone, call 877-217-6218 (U.S. and Canada) or 000 800 9191 189 (India).

Q: What types of concerns should I report through the Ethics Helpline?

A: The Ethics Helpline can be used to report concerns or make inquiries. Examples of concerns that can be raised through the Ethics Helpline include, among others:

- Harassment
- Discrimination
- Retaliation
- Conflict of Interest
- Theft
- Violence or Threat
- Fraud
- Violation of a Policy
- Accounting and Auditing matters
- Bribery or Corruption

Reports to the Ethics Helpline are confidential and can be made anonymously if you wish.

Q: What kind of information should I provide in the report?

A: To help facilitate a thorough investigation, the more information and specific details you can provide the better, such as:

- The background, history and reason for the concern
- Names of people involved or who know about the matter causing the concern
- Dates when the issue occurred
- Any other relevant information
- Any documents that may support your report

Q: Can I file anonymously?

A: Yes – you can share your concerns anonymously through the Ethics Helpline. We do, however, encourage you to identify yourself and provide as much information as possible so we can efficiently and effectively investigate the reported issue. If you choose to file anonymously, it is **very important** that you check back periodically after filing the report using the “report key” (discussed below) – which allows you to access the website to check for feedback, additional questions and progress on your report.

The Ethics Helpline also has an anonymous real-time online chat feature that allows the person investigating the report to chat online with the reporter while still ensuring anonymity. This chat feature can be extremely effective and shorten the investigative timeline, particularly when there are follow-up questions.

Q: What happens after I file a report?

A: Bread Financial takes every report of possible misconduct seriously. Once a report has been filed, Bread Financial’s Ethics Office is notified and conducts an initial review. Based on the nature, urgency and potential impact of the concern, the Ethics Office will determine the appropriate team (*i.e.*, People & Culture, legal, audit, finance, ethics, external advisors) to investigate the report. Investigations are conducted in an independent, fair and unbiased manner with respect to all parties. Details of the case, your identity and the identity of others mentioned in the report are kept confidential to the greatest extent possible and are only shared on a need-to-know basis.

Q: How do I follow up on my report?

A: After you submit your report (online or by phone), you will receive a unique code called a “report key”. This key will allow you to access the website to check for feedback, additional questions and progress on your report. This report key is particularly important if you choose to remain anonymous when filing the report, as we can only contact you through the website. It is important to check back periodically after filing a report in case there are additional questions for you. As mentioned above, the Ethics Helpline has an anonymous real-time online chat feature that is helpful when the reporter is anonymous and there are follow-up questions.

Q: What if I am asked to participate in an investigation?

A: You have a responsibility to cooperate with any investigation of reported unethical behavior, whether the investigation is conducted internally by Bread Financial or externally by a third party. Bread Financial will not retaliate against any associate who assists or participates in the resolution of a report or in an internal or external investigation.

Q: Will I be protected if I speak up?

A: Bread Financial encourages associates to speak up about suspected misconduct and will not retaliate or tolerate retaliation against any associate who reports a concern in good faith. Our policy does not, however, protect associates who maliciously raise a concern that they know to be false.

If you experience or become aware of retaliation against you or any other person for raising a concern in good faith or participating in the investigation of a report, report it immediately through the Ethics Helpline or one of the other channels available.