

2024 MODERN SLAVERY ACT TRANSPARENCY STATEMENT

Introduction

This statement is for the financial year ending December 31, 2024 and is made by Discover Financial Services (UK) Limited (DFS UK) demonstrating our support of Section 54(1) of the Modern Slavery Act 2015 (the Act). DFS UK is a wholly-owned subsidiary of Discover Financial Services (Discover, Company), and DFS UK is located and operates in the United Kingdom.

Who We Are

Discover is a banking and payment services company headquartered in the United States. Discover issues the Discover card and offers personal and home loans, checking and savings accounts, and certificates of deposit through its direct banking business. Discover operates the Discover Global Network, the payments brand of Discover Financial Services, by connecting three payment networks - Discover Network, PULSE Network, and the Diners Club Network - and thirty-two alliance partners from around the world, enabling millions of cardholder transactions each day. DFSUK provides services that support the Discover Global Network. The Discover mission is to help people spend smarter, manage debt better and save more so they achieve a brighter financial future. For more information, visit the About Discover section of our website: www.discover.com.

Our Commitment

In alignment with the Discover core value of “Doing the Right Thing,” DFS UK is fully committed to our responsibility in prohibiting forced labor and human trafficking within our business and supply chains. DFS UK expects that all business relationships are conducted ethically with honesty and integrity consistent with the Discover Code of Conduct and Business Ethics (the Code), and related internal policies. DFS UK will continue to be transparent and communicate enhancements to our policies and our due diligence process as it relates to Modern Slavery.

Office of Ethics and Conduct

The Office of Ethics and Conduct was established to ensure that our Company meets the highest standards of ethical behavior and compliance. The Ethics and Conduct Program develops standards that align with industry best practices and regulatory commitments. The Program sets the bar for ethical behavior and supports accountability at every level of the organization.

Our Supply Chain

The Discover supply chain consists of both third parties and partners that support the Company's global operations, including those performed within the UK by DFS UK. Third parties range from small to large corporations and provide a wide assortment of services and products supporting our consumers and employees. Third parties include, but are not limited to, consulting firms, technology providers (software, hardware, and consulting), marketing agencies, and law firms. Partners are business entities involved in facilitating payment transactions between merchants, Discover Global Network, and cardholders for the purchase of goods/services; or involved in the facilitation of commercial payments between buyers and suppliers.

Our Policies and Due Diligence

DFS UK expects employees, contractors, and suppliers to work in accordance with the highest ethical standards and to comply with all relevant laws and regulations, including those relating to Modern Slavery. We communicate our expectations to employees through company policies and the Code, and to our third parties and partners through service contracts, agreements, and the Supplier Code of Conduct. Listed below are policies and processes applicable to DFS UK that further communicate expectations and mitigate the risk of DFS UK unknowingly dealing with a third party or partner that is committing illegal and/or unethical behavior.

❖ Code of Conduct and Business Ethics

The Discover Code of Conduct and Business Ethics applies to all employees and members of the Board of Directors of Discover Financial Services and its subsidiaries and affiliates, including all employees of DFS UK. The principles defined within provide direction around the ethical and legal responsibilities we share as Discover Financial Services, its subsidiaries and affiliates. To support our commitment of prohibiting forced labor and human trafficking within our business and supply chains, the Code sets forth an obligation to report any suspicion of non-compliant and/or unethical behavior either by Discover, its employees, or any of our suppliers, third parties or partners.

Discover preserves the Code's relevancy by requiring all employees to complete and acknowledge training on the underlying principles and policies annually.

Additionally, Compliance checks are carried out on all new employees and contractors to ensure applicable regulatory and company requirements are met prior to performing work (i.e., confirmed work authorization and/or background checks). Discover also requires that suppliers of contractors or temporary resourcing carry out their own checks of individual's legal rights to work.

❖ **Supplier Code of Conduct**

The Discover [Supplier Code of Conduct](#) applies to all suppliers in our network (including supplier employees, agents, contractors and other representatives who may act on behalf of Discover). Within our Supplier Code of Conduct we outline the expectation that our suppliers act with integrity and stand with Discover in opposition to human rights violations including, but not limited to, violations related to child labor, forced labor, day labor, elder abuse, slavery, and human trafficking.

❖ **Third Party Program**

The Discover Third-Party Program was created in accordance with regulatory guidance for managing third party risk. The program is comprehensive and rigorous in its approach to managing third party engagements throughout their entire lifecycle. Third parties that provide goods or services to or on behalf of Discover and its subsidiaries and affiliates, including DFS UK, are risk assessed and managed commensurate with the level of risk and complexity of the engagement. In addition, third parties are evaluated on their ability to provide the contracted goods or services, how they comply with applicable laws and regulations, as well as their adherence to the Company standards. The program emphasizes oversight and review of third-party engagements that have a substantial impact on the Company's financial condition, are critical to the Company's ongoing operations, involve sensitive customer information, consist of new bank products or services, or pose material compliance risk. Discover requires issues or vulnerabilities identified during due diligence to be evaluated and remediated pursuant to internal policies and standards. Third party risk is aggregated, monitored, and reported through the Company's risk governance framework.

❖ **Customer and Partner Due Diligence**

Discover collects sufficient information when establishing a relationship with a customer or partner to understand the nature and the purpose of the business arrangement. Risk-based due diligence is performed on customers and partners to develop an understanding of the expected activity of those relationships and establish an overall risk profile to support the ongoing maintenance of the relationship. This risk profile serves to identify customers or partners that may require additional due diligence or heightened scrutiny required throughout the life cycle of the respective relationship. If a customer or partner is determined to be a higher risk, Discover may obtain additional information, conduct more frequent and in-depth reviews including on-site visits, and monitor transactions to ensure the risk mitigation activities are commensurate with the risk profile as determined by due diligence review.

❖ **Anti-Money Laundering:**

It is the Company's policy to maintain a risk-based anti-money laundering ("AML") program that prevents its products and services from being used to support human trafficking, launder money, finance terrorism, or violate sanctions. The AML program also aids law enforcement in combatting these crimes; and complies with AML Laws, including foreign laws and regulations.

Closing Remarks

In the spirit of continuous improvement and in alignment with our Company Value of “Doing the Right Thing,” we are committed to reviewing our internal practices and maturing our efforts to combat human trafficking and Modern Slavery.

This statement is made pursuant to Section 54 of the UK Modern Slavery Act and approved by the Discover Financial Services (UK) Limited Board of Directors on May 16, 2025.

Signed,

A handwritten signature in black ink, appearing to read "Ege Vamukos".

Director, Discover Financial Services (UK) Limited