



Company-wide Policy Manual

Non-discrimination and Anti-harassment

Policy

It is the policy of Discover Financial Services (the "Company") to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, religion, age, gender, gender identity, sexual orientation, national origin, citizenship, disability, marital status, pregnancy (including unlawful discrimination on the basis of a legally protected pregnancy/maternity leave), veteran status, or any other characteristic protected by law.

Discrimination and sexual and other unlawful harassment are against Company policy and illegal under federal, state, and local laws.

The Company prohibits and will not tolerate any such discrimination or harassment, whether committed by management or non-supervisory personnel, employees of temporary agencies, vendors, contractors, or guests.

This policy prohibits all such harassing conduct whether done verbally or nonverbally, including through e-mail or other Company electronic systems.

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Rationale

Consistent with our business principles, the Company is committed to a work environment in which all individuals are treated with respect and dignity. Each individual should have the ability to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, the Company expects that all relationships among persons in the workplace will be business-like and free of bias, prejudice, and harassment.

Scope

This policy applies to all applicants and employees, and prohibits harassment, discrimination, and retaliation whether engaged in by fellow employees, by a supervisor or manager or by someone not directly connected to the Company. Persons not employed by the Company (e.g., an outside vendor, consultant, temporary agency employee, or customer) are also advised of this policy and are

expected to comply with it in all respects. The purpose of this policy is not to outline every example of conduct that is inconsistent with a work environment that promotes dignity, respect, and equal employment opportunity. Employees are expected to at all time exercise sound judgment, to follow the "stop and reflect" approach set forth in the Code of Conduct, and to avoid behavior or activity that may negatively affect the Company's image and reputation.

Conduct prohibited by this policy is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings, and business-related social events.

Similarly unacceptable under this policy is participation in work-related activities whether in or outside the workplace that:

- are inconsistent with a professional atmosphere and an environment that promotes dignity, respect, and equal employment opportunity or
- are exclusionary with respect to any individual's race, color, religion, age, gender, gender identity, sexual orientation, national origin, citizenship, disability, marital status, pregnancy, veteran status, or any other characteristic protected by law. This includes patronizing, in connection with work-related activities, adult entertainment establishments or facilities that exclude use by any individual on the basis of his or her protected status.

Requirements

The Company requires the reporting of all incidents of discrimination, harassment, or retaliation, regardless of the offender's identity or position, so that an effective and thorough investigation can be conducted as promptly and discreetly as the circumstances permit, and effective remedial action can be taken when appropriate. Complaints will be accepted in writing or orally.

Early reporting has proven to be a highly effective method of resolving actual or perceived incidents of harassment or discrimination. Therefore, the Company strongly urges the prompt reporting of complaints or concerns so that the Company can promptly investigate and, when appropriate, take corrective action.

Individuals who believe they have experienced, or who otherwise have learned of, conduct that is prohibited by the Company's policy or who have concerns about such matters must contact their Human Resources Representative for their business unit. However, if these representatives are not available or if the circumstances make it inappropriate to contact them, then individuals must contact the representative set forth below:

Marcelo Modica
Vice President Human Resources
224-405-0224
marcelomodica@discover.com

Deane Ilukowicz
Director Human Resources
224-405-1877
deaneilukowicz@discover.com

Dino Lagattolla
Director Human Resources
224-405-1749
dinolagattolla@discover.com

In addition, individuals may always take their complaints to the C.A.R.E. Program Administrator at 1-877-CARE-406.

Allegation Investigation

Any reported allegations of harassment, discrimination, or retaliation will be investigated promptly. The investigation may include individual interviews with the parties involved and, when necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge.

Confidentiality will be maintained throughout the investigation process to the extent consistent with adequate investigation and appropriate corrective action. Individuals involved in the investigation process are expected to provide their full cooperation and to maintain confidentiality as appropriate.

At the conclusion of the investigation, the Company will advise the individual who has made a complaint under this policy that the investigation has concluded and share any other information (if any) as the Company may consider appropriate under the circumstances.

Retaliation

The Company prohibits retaliation against any individual who, in good faith, reports discrimination or harassment, or any individual who participates in, or otherwise supports, an investigation of such reports. Anyone who exhibits retaliatory behavior against an individual under such circumstances will be subject to corrective action up to and including termination.

Forfeiture

If an employee who has experienced conduct he or she believes is prohibited by this policy fails to take advantage of this complaint procedure, it may affect his or her ability to pursue legal action.

The availability of this complaint procedure does not preclude individuals who believe they are being subjected to harassing or other discriminatory conduct from promptly advising the offender that his or her behavior is unwelcome and requesting that it be discontinued. However, individuals must also report the conduct as set forth above.

Violations

Individuals, who engage in conduct in violation of this policy, including harassment, discrimination, retaliation or other forms of unprofessional behavior, even if such conduct would not be unlawful under applicable law, may be subject to corrective action by the Company up to and including termination. In addition, conduct that is unlawful may subject individuals to civil, and in some cases, criminal liability.

Compliance

Responsibilities

It is the responsibility of the following parties to ensure compliance to this policy.

Responsible Party	Responsibility
Employee	<ul style="list-style-type: none">• Advise an offender that his or her behavior is unwelcome and request that it stop• Contact the Human Resources Representative after experiencing or witnessing prohibited conduct• Cooperate fully in any allegation investigation• Maintain confidentiality in all related matters

Definitions

Harassment on the basis of any protected characteristic is strictly prohibited. Under this policy, harassment is unwelcome verbal, nonverbal, or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her race, color, religion, age, gender, gender identity, sexual orientation, national origin, citizenship, disability, pregnancy, marital or veteran status, or any other characteristic protected by law or that of his or her relatives, friends, or associates, and that is severe or pervasive enough to create an intimidating, hostile or offensive work environment for a reasonable individual, or otherwise adversely affects an individual's employment opportunities in a tangible way.

Harassing conduct includes, but is not limited to: epithets, slurs, or stereotyping; threatening, intimidating, or hostile acts; denigrating jokes; and display or circulation in the workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group.

Sexual harassment constitutes discrimination and is illegal under federal, state, and local laws. For the purposes of this policy, sexual harassment is generally defined as unwelcome sexual advances, requests for sexual favors and other verbal, nonverbal or physical conduct of a sexual nature when, for example:

- Submission to such conduct is made, either explicitly or implicitly, a term or condition of an individual's employment by a supervisory employee
- Submission to or rejection of such conduct by an individual is used by a supervisory employee as the basis for decisions that affect an individual's employment opportunities in a tangible way
- Such conduct is unwelcome and severe or pervasive enough to create an intimidating, hostile, or offensive work environment for a reasonable individual.

Sexual harassment may include subtle behavior and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include, but are not limited to: unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, catcalls, or

touching; insulting or obscene comments or gestures; display or circulation in the workplace of sexually suggestive objects or pictures; and other physical, verbal, or visual conduct of a sexual nature.

Related Information

Policy

Discover Financial Services Code of Conduct

Company Confidential. *Intended for internal use only.* When printed, this is an UNCONTROLLED DOCUMENT that should be used for reference only. The most current version of this document is available online.

TO: ALL U.S. EMPLOYEES AND SERVICE PROVIDERS OF THE COMPANY

RE: NON-DISCRIMINATION AND ANTI-HARASSMENT POLICY

Consistent with the business principles of Discover Financial Services ("Discover" or the "Company"), the Company is committed to providing a professional work environment that promotes equal opportunity, dignity and respect. In keeping with this commitment, and as detailed in the attached Non-Discrimination and Anti-Harassment Policy, the Company strictly prohibits and will not tolerate any form of sexual harassment, other unlawful harassment, or job discrimination. The harassing or other discriminatory conduct detailed in this Policy is unacceptable in the workplace as well as in any work-related setting outside of the workplace.

Ensuring that the Company lives up to its business principles requires that everyone give serious attention to this matter – as a result, you are required to read, understand and adhere to the Policy at all times.

If you believe that you or any other individual has experienced any job-related discrimination or harassment, you must promptly report the matter, consistent with the complaint procedure set forth in the Policy. Retaliation against someone for using this procedure is expressly prohibited by the Company.

Discover and its senior management are strongly committed to enforcement of this Policy. Employees who violate it will be subject to corrective action, up to and including termination.

The Policy applies to all types of service providers as well.

If you have any questions about the Policy or your responsibilities under it, please contact your Human Resources Representative.

Thank you for doing your part.

David Nelms
Chairman &
Chief Executive Officer
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