

EQUAL OPPORTUNITY AND AFFIRMATIVE ACTION POLICY STATEMENT

Capital One has implemented the following policies and procedures as part of its longstanding commitment to diversity and inclusion and compliance with all applicable equal opportunity and affirmative action requirements.

Equal Opportunity Policy

Capital One is committed to maintaining a work environment that is free from any and all forms of unlawful discrimination and harassment. It is therefore the company's policy to prohibit discrimination and harassment against any applicant, Associate, vendor, contractor, customer, or client on the basis of sex, race, color, age, national origin, religion, physical and mental disability, genetic information, marital status, sexual orientation, gender identity/assignment, citizenship, pregnancy or maternity, protected veteran status, or any other status prohibited by applicable national, federal, state or local law. In some cases, local laws and regulations may provide greater protections than those outlined here.¹ It is also the company's policy to prohibit any and all forms of retaliation against any individual who has complained of harassing or discriminatory conduct, or participated in a company or agency investigation into such complaints.

Workplace Harassment and Discrimination

Capital One is committed to providing a work environment free from all forms of discrimination including harassment. Capital One recognizes and appreciates a working environment that supports free-flowing information, creative ideas and flexibility. In our efforts to maintain this environment, it is critical that Associates treat each other with the utmost dignity and respect. Harassment and discrimination, in any form are improper and can be unlawful, and Capital One will not tolerate these actions in the workplace.

Prohibited conduct under this policy includes harassment or discrimination based sex, race, color, age, national origin, religion, physical and mental disability, genetic information, marital status, sexual orientation, gender identity/assignment, citizenship, pregnancy or maternity, protected veteran status, or any other status prohibited by applicable national, federal, state or local law.

The Associate Relations Center is available for all Associates to address any concerns related to discrimination or harassment and can be reached by phone, 888-376-8836 option 6 or by email at AssociateRelationsCenter@capitalone.com.

Affirmative Action Policy

Capital One is also a federal contractor subject to Executive Order 11246, Section 4212 of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended ("Section 4212") and Section 503 of the Rehabilitation Act of 1973, as amended ("Section 503"). As such, Capital One is committed to taking positive steps to implement the employment-related aspects of the company's Equal Opportunity policy. Accordingly, it is Capital One's policy to take affirmative action to employ, advance in employment, and otherwise treat qualified people of color, women, protected veterans, and individuals with disabilities without regard to their race/ethnicity, sex, sexual orientation, gender identity, veteran status, or physical or mental disability. Under this policy, Capital One also will provide reasonable accommodation to the known physical or mental limitations of an otherwise qualified Associate or applicant for employment,

¹For example, in the UK philosophical belief is included as a prohibited factor.

EQUAL OPPORTUNITY AND AFFIRMATIVE ACTION POLICY STATEMENT

unless the accommodation would impose undue hardship on the operation of the company's business, in accordance with the Americans with Disabilities Act (ADA) and state and local law.

The company's affirmative action policy also prohibits Associates and applicants from being subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in (1) filing a complaint; (2) assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of Section 503, Section 4212, or any other Federal, state or local law requiring equal opportunity for disabled persons or covered veterans; (3) opposing any act or practice made unlawful by Section 503 or Section 4212 and their implementing regulations, or any other Federal, state or local law requiring equal opportunity for disabled persons or protected veterans; or (4) exercising any other right protected by Section 503 or Section 4212 or their implementing regulations.

The non-confidential portions of the Affirmative Action Program for individuals with disabilities and protected veterans shall be available for inspection during regular business hours (8:30-5:00 EST) to any U.S. Associate or applicant for employment. If you would like to review it, please contact the Capital One HR Help Center at 804-284-6600 or internally at x6600 or toll free at 1-888-376-8836 during regular business hours.

Pay Transparency Policy Statement

Capital One will not discharge or in any other manner discriminate against Associates or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another Associate or applicant. However, Associates who have access to the compensation information of other Associates or applicants as a part of their essential job functions cannot disclose the pay of other Associates or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by Capital One, or (c) consistent with the company's legal duty to furnish information. 41 CFR 60-1.35(c)

Zero Tolerance for Retaliation

Every Associate is encouraged to come forward without fear of reprisal, as Capital One's equal opportunity and affirmative action policies prohibit any and all forms of retaliation against anyone who in good faith complains that these policies are not being followed, or who otherwise participates in a company or agency investigation into such complaints, even if sufficient evidence is not found to substantiate the complaint.

The Associate Relations Center is available for all Associates to address any concerns related to retaliation and can be reached by phone, 888-376-8836 option 6 or by email at AssociateRelationsCenter@capitalone.com.

After receiving a complaint involving a violation of the company's equal opportunity or affirmative action policy, the company will investigate and take corrective action, as appropriate. Complaints and investigations will be kept strictly confidential to the maximum extent possible.

EQUAL OPPORTUNITY AND AFFIRMATIVE ACTION POLICY STATEMENT

Responsibility for Implementation

Rich Fairbank, our founder, chairman and chief executive officer of Capital One, fully supports our Affirmative Action Program and is committed to the implementation of the company's Equal Opportunity and Affirmative Action policies. He has delegated the overall responsibility for the implementation of these policies to Meghan Welch, Chief Diversity and Inclusion Officer. However, within our respective areas of responsibility, all managerial and supervisory personnel are expected to share in the responsibility to ensure Capital One's compliance with our Equal Employment Opportunity Policy and Affirmative Action Program. In addition, all Directors, Officers, Associates and Agents are responsible for compliance with equal opportunity employment and affirmative action laws.