

EQUAL EMPLOYMENT OPPORTUNITY AND AFFIRMATIVE ACTION POLICY STATEMENT

Consistent with our core values of *Excellence* and *Do the Right Thing*, this policy statement reaffirms support by Capital One and every member of our management team for Capital One's policy of nondiscrimination and equal opportunity and the Company's affirmative action programs.

Capital One will accord equal employment opportunity to qualified individuals in all personnel practices, including recruitment, selection, promotion, training, tuition assistance, compensation, benefits, transfer, layoff, termination, and social and recreational programs. We are committed to maintaining policies and practices free from unlawful discrimination based upon sex (including pregnancy, childbirth or related medical conditions), race, color, age, national origin, religion, disability, genetic information, marital status, sexual orientation, gender identity, gender reassignment, citizenship, immigration status, protected veteran status, or any other basis prohibited under applicable federal, state or local law. Our Associates, as well as applicants and others with whom we do business, will not be subjected to sexual, racial, religious, ethnic, or any other form of harassment. All employment decisions are based only on valid job requirements. In addition, Capital One provides reasonable accommodation to the known physical or mental limitations of an otherwise qualified Associate or applicant for employment, 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.

Equal opportunity can only be achieved through leadership, commitment, and implementation of an affirmative action program. Our affirmative action programs covering minorities, women, individuals with disabilities, and protected veterans, all have been adopted in compliance with applicable laws and regulations¹. They set forth specific affirmative action and equal employment opportunity responsibilities of managers, supervisors, and all Associates. All Associates are expected to demonstrate commitment to our affirmative action efforts to assure that equal opportunity is available to all, to encourage diversity within Capital One, and to demonstrate sensitivity to and respect for others. In addition, all Directors, Officers, Associates and Agents are responsible for compliance with equal employment opportunity and affirmative action laws.

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. Kaitlin Haggerty, Chief Human Resources Officer and Chief Diversity & Inclusion Officer, has been designated as Capital One's Equal Employment Opportunity Officer ("EEO Officer"). She and her staff will be responsible for designing, coordinating the implementation of, and monitoring our progress under our affirmative action programs. She will also report periodically to other members of our top management team on these matters.

Capital One is committed to maintaining a work environment that is free from any and all forms of unlawful discrimination and 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.

Any Associate who believes that our policies prohibiting discrimination, harassment, or retaliation have been violated is encouraged to come forward without fear of reprisal. 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 discrimination, harassment, or retaliation. 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. Associates who violate our policies prohibiting discrimination, harassment, or retaliation will be subject to appropriate disciplinary action, which may include termination.

We look forward to working with you in compliance with these programs we have established. Thank you for your support of our efforts.

¹ The non-confidential portions of the Affirmative Action Programs for individuals with disabilities and protected veterans are available for inspection during regular business hours (8:00-5:00 ET) to any U.S. Associate or applicant for employment. If you would like to review it or need to request a copy of this statement in an alternative format, please contact the Capital One HR Help Center by phone at 1-888-376-8836.