



ABOUT THIS REPORT

This is Synchrony Financial's first report under the Task Force on Climate-related Financial Disclosures' (TCFD) recommendations, and should be read together with our 2021 Environmental, Social and Governance (ESG) Report published in April 2022. This report covers the period from January 1, 2021 to December 31, 2021, and all data in this report is as of December 31, 2021, except as otherwise noted.

The disclosures in our ESG report and this TCFD report are voluntary disclosures. The definition of materiality used for our filings with the U.S. Securities and Exchange Commission is not the same as that used for our voluntary ESG and climate-related disclosures. It should not be assumed that information included in this TCFD report is material under the definition of materiality established under the U.S. federal securities laws.

This TCFD report includes certain non-financial data and information which is subject to measurement uncertainties resulting from limitations inherent in the nature and the methods used for determining such data. The selection of different but acceptable measurement techniques can result in materially different measurements. The precision of different measurement techniques may also vary.

This TCFD report contains forward-looking statements that are provided under the "safe harbor" protection of the Private Securities Litigation Reform Act of 1995, including statements regarding our ESG and climate-related goals, impacts, programs, and other business plans, initiatives and objectives. Forward-looking statements include all statements that do not relate solely to historical or current facts and involve a number of known and unknown risks, uncertainties and other important factors that may cause actual results and outcomes to differ materially from any future results or outcomes expressed or implied by such forward-looking statements. Such risks, uncertainties and other important factors include, without limitation, those described in our recent filings with the SEC, including, without limitation, in Risk Factors and Management's Discussion and Analysis of Financial Condition and Results of Operations in our Annual Report on Form 10-K for the fiscal year ended December 31, 2021 and our subsequent Quarterly Reports on Form 10-Q and Current Reports on Form 8-K. If a circumstance occurs after the date of this TCFD report that causes any of our forward-looking statements to be inaccurate, whether as a result of new information, future developments or otherwise, we undertake no obligation to announce publicly the change to our expectations, or to make any revision to our forward-looking statements, to reflect any change in assumptions, beliefs or expectations, or any change in events, conditions or circumstances upon which any forward-looking statement is based, unless required by law.

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INTRODUCTION

Synchrony Financial is a premier consumer financial services company delivering one of the industry's most complete, digitally enabled product suites. We connect our partners and consumers through our dynamic financial ecosystem and provide them with a diverse set of financing solutions and innovative digital capabilities to address their specific needs and deliver seamless, omnichannel experiences. We focus primarily on consumer lending, and our offerings include private label, dual, co-brand and general purpose credit cards, as well as short- and long-term installment loans and consumer banking products.

At Synchrony, we are driven by our vision to build a future where every ambition is within reach. This vision powers all facets of our business, including our ESG initiatives. Doing what's right on the ESG issues most significant to us and our stakeholders has earned Synchrony places on lists such as the Fortune's 100 Best Companies to Work For[®] list, JUST 100 list of America's best corporate citizens, and JUST Capital's list of U.S. Companies Supporting Healthy Communities and Families.

To deliver on our vision for the future, we have a responsibility to do our part to address climate change. At this stage in our journey, we aim to meet that responsibility by continuing to develop processes for identifying and evaluating climate-related risks and opportunities for our business and to improve our understanding of those risks and opportunities.

We believe implementation of the TCFD recommendations over the coming years will enhance our efforts to address climate risk by sharpening our focus and promoting integration of climate-related risk and opportunity consideration in our business processes. As a result, we believe the publication of our inaugural report under the TCFD recommendations marks a significant milestone in our journey.

Our responses to the TCFD recommendations in this report are organized into sections that align with the TCFD framework: Governance; Strategy; Risk Management; and Metrics and Targets. Our report reflects input from subject matter experts from multiple functions and outreach into several areas of our business.

GOVERNANCE

Disclose the organization's governance around climate-related risks and opportunities

BOARD OVERSIGHT

Synchrony and its leadership believe thoughtful stewardship of ESG topics that impact our company and its stakeholders is the right thing to do, and can reduce risks and create sustainable value for our customers, partners, employees, suppliers and communities.

Our full Board receives regular updates on ESG topics, including climate-related matters, as well as committee reports throughout the year. As a consumer financial services company, we view our most significant ESG topics as fair lending; responsible marketing; financial inclusion and access; data privacy and information security; human capital management (including equity, diversity and inclusion); and community investment. We identified these topics based on an ESG materiality assessment, which we first conducted in 2018 and refreshed in 2021. Our latest assessment incorporated internal and external inputs. Among other resources, we considered our strategic priorities and plans; our enterprise risk assessments; feedback from a cross-functional group of our senior leaders; statements on ESG priorities from our regulators; policy statements and direct feedback from our stockholders; and topic guidelines for our industry sector under ESG disclosure frameworks.

Our Board delegates primary responsibility for more frequent and direct oversight of Synchrony's ESG strategy and performance to our Nominating and Corporate Governance Committee (NCGC). The NCGC receives at least quarterly updates from management on ESG, including periodic discussions on climate-related matters. At the same time, all Board committees engage in matters that impact our ESG strategy, risk assessment and mitigation, and performance through the various activities that are overseen at the board level.

For example, ESG is an area of increased emphasis in the operation of our Enterprise Risk Governance Framework, which the Risk Committee of our Board oversees, and reviews and approves at least annually. Many risks associated with our most significant ESG topics are covered by our key risk governance processes, and our Risk Committee oversees ongoing efforts by our Enterprise Risk team to monitor ESG touchpoints through our Enterprise Risk Assessment (ERA) program described under the "Risk Management" section.

MANAGEMENT'S ROLE

Synchrony's executive leadership team directly engages in our ESG initiatives and strategy. We maintain a cross-functional ESG Working Group comprised of senior executives and employees who monitor our current ESG progress, including our ongoing efforts to develop processes to identify, evaluate and better understand our climate-related risks and opportunities. In addition to developing our ESG strategy, the working group partners with our business and operational leaders to further integrate ESG across our company.

We formalized management roles and responsibilities, with a dedicated ESG leader and an ESG manager within the office of our General Counsel. Our General Counsel, ESG leader and ESG manager are invited to attend all NCGC meetings, and provide the committee with ESG updates at least quarterly.

Our ESG Working Group includes representatives from the Environmental, Health and Safety (EHS) team that is directly responsible for improving the energy efficiency of our operations, reducing our consumption of natural resources and waste generation, and reducing our greenhouse gas (GHG) emissions. Our EHS and Business Continuity and Disaster Recovery teams are led by our Chief Technology and Operating Officer, who is responsible for building our technology and operations strategy, and plays a key role in assessing and monitoring external pressures on our operations including climate-related implications.

Our Chief Risk Officer manages our independent risk management team and, as the chair of our Enterprise Risk Management Committee (ERMC), is responsible for establishing and implementing standards for the identification, management, measurement, monitoring and reporting of risk, including any ESG risks, on an enterprise-wide basis. Our ERMC is a management committee which reports to the Risk Committee of our Board and provides oversight and ensures the effectiveness of risk management governance and activities across our business and functions.

Our Chief Audit Executive, who functionally reports to the chair of the Audit Committee of our Board, and the Internal Audit function creates an Annual Internal Audit Plan, which identifies areas of our business that will be audited in the coming year. Coverage of ESG is a consideration in the formulation of the Annual Internal Audit Plan.

SYNCHRONY BOARD OF DIRECTORS



STRATEGY

Disclose the actual and potential impacts of climate-related risks and opportunities on the organization’s businesses, strategy, and financial planning where such information is financially material

To date, climate-related risks have not been determined through our risk management processes to be material to our operations at this time, because we are a financial services company primarily focused on consumer lending with geographically dispersed partners, consumers and employees. Additionally, we operate our deposits platform online only without physical branches. We continue to monitor closely both internal and external developments to identify potential impacts of climate-related risks and opportunities.

Synchrony recognizes that every company has a role to play in the transition to a more sustainable economy. To support this transition, we seek to:

- improve the environmental sustainability of our operations through initiatives to improve energy efficiency, reduce consumption, conserve resources and lower emissions and waste;
- monitor and address our suppliers’ commitment to strong ESG practices, including their climate-related initiatives;
- identify and mitigate climate-related risks that may impact our business; and
- identify and investigate climate-related opportunities that align with our strategic imperatives and are in line with our risk appetite.

We utilize enterprise-wide processes to develop strategic plans and strategic imperatives that are informed by our risk processes and are in line with our risk appetite. Historically, our consideration of potential climate-related

risks has been undertaken at a regular interval primarily through our ERA. Looking ahead, we seek to incorporate potential impacts of climate-related risks and opportunities within our processes to inform our business, strategic and financial planning.

Climate-related risks that may implicate our business include:

- Operational risks arising from:
 - acute physical risks, such as reduced revenue from business disruptions or restoring damaged facilities;
 - chronic physical risks, such as increased costs associated with greater need for heating or cooling due to changing temperatures;
 - technology transition risks, such as increased costs related to data center resiliency; or
 - regulatory transition risks, such as increased costs of utilities due to any new fuel and energy taxes and regulations applicable to our utility providers; and
- Reputational risks arising from certain transition risks, such as changes in regulator, investor, consumer and other stakeholder expectations or preferences.

The climate-related opportunities we seek include reducing operating costs by improving the energy efficiency of our facilities and reducing our consumption of resources such as water, paper and plastics. We also actively pursue opportunities to innovate our products and product strategies to address consumer preferences with respect to climate change.

RISK MANAGEMENT

Disclose how the organization identifies, assesses and manages climate-related risks

Responsibility for risk management flows to individuals and entities throughout Synchrony, including our Board of Directors, various board and management committees and senior management. Our corporate culture and values, in conjunction with the risk management accountability incorporated into the integrated Enterprise Risk Governance Framework, which includes governance structure and three distinct Lines of Defense, facilitates the evolution of an effective risk presence across Synchrony.

OUR LINES OF DEFENSE

Our “First Line of Defense” consists of the business areas whose day-to-day activities involve decision-making and associated risk-taking for our company. As the business owner, the first line is responsible for identifying, assessing, managing and controlling that risk, and for mitigating our overall risk exposure. The first line formulates strategy and operates within the risk appetite and risk governance framework.

Our “Second Line of Defense,” also known as the independent risk management organization, provides oversight of first line risk-taking and management. The second line assists in determining risk capacity, risk appetite, and the strategies, policies and structure for managing risks. The second line owns the risk governance framework.

Our “Third Line of Defense” is comprised of Internal Audit. The third line provides independent and objective assurance to senior management and to our Board and the Audit Committee of our Board that the first and second line risk management and internal control systems and its governance processes are well-designed and working as intended.

Synchrony utilizes several risk management programs to assess and manage our climate-related risks.

ENTERPRISE RISK MANAGEMENT (ERM) PROGRAM

Our enterprise risk management philosophy is to ensure that all relevant risks are appropriately identified, measured, monitored and controlled. Our approach

in executing this philosophy focuses on leveraging risk expertise to drive enterprise risk management using a strong Enterprise Risk Governance Framework structure, a comprehensive ERA program and an effective risk appetite framework.

We organize our risk management around six major risk categories: Credit Risk, Market Risk, Liquidity Risk, Operational Risk (including Compliance), Strategic Risk, and Reputational Risk. ESG, including climate-related risk, is primarily addressed in Operational Risk and Reputational Risk.

Operational Risk includes the risk of loss arising from external events such as extreme weather and other natural disasters. Reputational Risk arises from negative perception on the part of customers, counterparties, shareholders, investors, rating agencies, regulators and employees that can adversely affect our ability to maintain existing talent and customers and establish new business relationships with continued access to sources of funding. We evaluate the potential impact of a risk event on Synchrony by assessing the partner and customer, financial, reputational, and legal and regulatory impacts.

A key component of our ERM program is the ERA process, which is designed to identify, assess and quantify risk across our primary risk categories and serves as a basis to determine our risk profile. ESG considerations are incorporated into our Reputational Risk rating scale. The ERA uses a methodology that measures each risk’s likelihood, impact, vulnerability and the speed of onset and then generates a final risk rating. The ERA is performed three times a year, and is the basis of our material risk inventory, which is a key input in our strategic planning and capital planning processes.

Looking ahead on our journey to build our processes for identifying and assessing climate-related risks, we expect to assess climate-related physical and transition risks and opportunities to improve our understanding of potential impacts of climate change on our business and operations. We anticipate taking into consideration emerging regulations and evolving stakeholder expectations, alongside factors such as operational disruptions and impacts on our employees and communities.

BUSINESS CONTINUITY AND DISASTER RECOVERY PROGRAMS

Our Business Continuity Program focuses primarily on the resilience of operations across our business processes, while our Disaster Recovery Program focuses primarily on the recovery of applications and infrastructure supporting business operations. Both programs partner with our Crisis Management team on our emergency response to enhance resilience for our people, processes and technology, including in the event of climate-related and other natural disasters. Consistent with regulatory guidance, we evaluate potential risks in our hubs' geographic areas, including

considerations for flood-prone areas, or areas affected by tornadoes or hurricanes. Our Business Continuity Program uses threat intelligence sourced from a leading provider of threat data to evaluate and mitigate continuity risks faced by the geographic hubs that support our business.

Risks to business continuity and disaster recovery, and transition risks arising from public policy changes and rapidly evolving stakeholder expectations on ESG are addressed in our Enterprise Risk Governance Framework through the activities in the ERA and noted as risk factors in our public disclosures.

METRICS AND TARGETS

Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities

As we continue our journey to formalize our efforts to do our part to address climate change, we hope to build on the progress we have made to date.

- Our efforts to improve the energy efficiency of our operations include energy-efficient buildings and office lighting, LED technology, office occupancy sensors, recycling programs and green spaces. In 2021, we undertook a series of upgrades to our roof top heating, ventilation and air conditioning units and the roof insulation at our Altamonte Springs, FL, facility. The upgrades yield a 20% reduction in energy use per roof top unit and doubling the insulation R-value of the roof.
- We lease four facilities that meet EPA ENERGY STAR status and nine facilities with LEED (Leadership in Energy and Environmental Design) certification. These account for over 50% of our global operating square footage.
- Our data center provider is transitioning to focus on renewable energy sources and has expressed a commitment to implementing technologies and strategies to achieve a more sustainable future. In 2021, our provider announced its intention to purchase 67 MW of renewable energy as part of its pledge to operate carbon-free by 2040.
- Our digital channels make it easy for our cardholders to receive statements and make payments electronically. We continue to encourage adoption of this option through regular communications with our cardholders. By the end of 2021, over 53% of our cardholders received paperless statements, as compared to just over 33% at the end of 2018. This equates to over 164 million fewer paper statements being printed and mailed in 2021 as compared to 2018.

- In 2021 Synchrony recycled nearly 200 pieces of electronic equipment totaling over 2,100 pounds of recycled material. Our ongoing environmental stewardship to reduce e-waste not only saves energy and GHG emissions, but also keeps some extremely harmful toxins such as lead, zinc, mercury and flame retardants from polluting our landfills and drinking water.

To support our goal to improve the sustainability of our operations, we have begun a journey to measure and report climate-related metrics from our operations. We have introduced an internal monitoring and review process to refine accuracy over time. We use the metrics to guide the evolution of our sustainability programs, including the development of future climate-related commitments. Recognizing the importance of defining the right metrics and targets, we will continue to evaluate the metrics we use to assess our climate-related risks and opportunities.

Reduction in GHG emissions and energy and water usage is primarily due to reductions in our total square footage and reduced overall demand related to COVID-19 work-from-home arrangements. Although we allow all our employees to work from home permanently, emissions and energy and water usage are expected to increase as some employees return to our hubs. We recognize that emissions and energy use are not eliminated because of work-from-home, and we are working to understand the interplay between the reduction of emissions from less commuting and lower energy use and the increase in home energy use.

KEY ENVIRONMENTAL METRICS

METRIC	UNIT	2021	2020 ¹	2019 ¹
GREENHOUSE GAS EMISSIONS—TOTAL ²	MT CO ₂ e	8,586	15,616	20,658
GREENHOUSE GAS—SCOPE 1 EMISSIONS	MT CO ₂ e	242	1,733	1,978
GREENHOUSE GAS—SCOPE 2 EMISSIONS	MT CO ₂ e	8,344	13,883	18,680
GREENHOUSE GAS—SCOPE 3 EMISSIONS ³	MT CO ₂ e	10,070	10,591	19,112
TOTAL ENERGY ⁴	GJ	79,025	155,294	200,411
TOTAL WATER USAGE ⁵	Gallons	14,763,776	28,477,350	43,339,803

1. 2020 and 2019 metrics reflect updates to previously disclosed metrics resulting from process and methodology changes and the availability of additional data.

2. Greenhouse gas emissions – total is the sum of Scope 1 and Scope 2 emissions. Scope 1 and Scope 2 emissions are calculated using the U.S. Environmental Protection Agency’s (EPA’s) Emissions & Generation Resource Integrated Database (eGRID) and its Simplified GHG Emissions Calculator. Scope 1 and Scope 2 emissions for locations in India and the Philippines are estimated using the EPA’s Simplified GHG Emissions Calculator by aligning those locations to the Florida-estimated subregion (FRCC).

3. Greenhouse Gas – Scope 3 emissions are calculated using the eGRID and the EPA’s Simplified GHG Emissions Calculator, and represents emissions from our data center supplier, leased car fleet miles and business air travel miles based on available data and methodologies and may not represent 100% coverage of these categories.

4. Total energy is based only on facilities where metered and/or measured data is available, and represents electricity usage for over 85% of total square footage and over 90% of total square footage with gas service in each year presented.

5. Total water usage is based only on facilities where metered and/or measured data is available, and represents water usage for over 80% of total square footage in each year presented.

