



BREAD FINANCIAL HOLDINGS, INC. CODE OF ETHICS FOR SENIOR FINANCIAL OFFICERS

The Code of Ethics for Senior Financial Officers (the “**Code**”) is applicable to the Chief Executive Officer, Chief Financial Officer, Chief Accounting Officer, and Treasurer of Bread Financial Holdings, Inc. (the “**Company**”), as well as certain other senior financial officers of the Company and its subsidiaries (each a “**Senior Financial Officer**”). The Code supplements Bread Financial’s Code of Ethics, which governs the professional and ethical conduct of all associates, officers and directors of the Company and its subsidiaries.

The Board of Directors of the Company (the “**Board**”) adopted this Code to promote:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Full, fair, accurate, timely and understandable disclosure in reports and documents that the Company or its subsidiaries file with, or submit to, the United States Securities and Exchange Commission (the “**SEC**”) and in other public communications made by the Company or its subsidiaries;
- Compliance with applicable governmental laws, rules and regulations;
- The prompt internal reporting of violations of the Code to the appropriate person or persons identified herein; and
- Accountability for adherence to the Code.

The Code requires Senior Financial Officers to adhere to and advocate the principles and responsibilities set forth below. Only the Board (or a duly authorized committee thereof) may grant a waiver of the provisions of the Code and any such waiver will be disclosed in accordance with applicable law or stock exchange rules.

Principles and Responsibilities

In performing their duties, Senior Financial Officers must:

1. Act with honesty and integrity, avoid actual or apparent conflicts of interest and disclose any material transaction or relationship that reasonably could be expected to give rise to such a conflict of interest in the manner set forth in Bread Financial’s Conflict of Interest Policy, or where appropriate, to the Company’s Chief Legal Officer or the Audit Committee of the Board;
2. Subordinate their individual interests to those of the Company and avoid accepting, or diverting to any other person or entity, any business or financial opportunities of the Company or its subsidiaries;
3. Provide, or cause to be provided, information that is full, fair, accurate, timely and understandable,

including information included in reports and documents filed with, or submitted to, the SEC and in other public communications made by the Company or its subsidiaries;

4. Act in good faith, fairly and responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing their independent judgment to be subordinated;
5. Comply with laws, rules and regulations of federal, state and local governments, and other appropriate private and public regulatory agencies, including rules and regulations governing insider trading;
6. Take all reasonable measures to protect the confidentiality of non-public information acquired in the course of their work and prevent the unauthorized disclosure of such information unless legally obligated to disclose;
7. Use confidential information acquired in the course of their work only for proper business purposes and not for personal advantage or any other improper purpose;
8. Not fraudulently influence, coerce, manipulate or mislead the Company's independent accountants;
9. Not destroy, alter or conceal documents related to an audit, a pending or threatened claim or other legal action, including any action brought by the government;
10. Ensure the responsible use of and control over all Company assets and resources entrusted to them; and
11. Proactively promote ethical behavior among peers in their work environment.

Reports of Non-Compliance

Senior Financial Officers must promptly report any suspected or known violations of this Code through one of the channels set forth below:

- the Company's Chief Legal Officer
- the Ethics Office
- the Company's Ethics Helpline (which allows for anonymous reporting)
- any member of the Audit Committee of the Board.

The Company will not tolerate retaliation for reports of misconduct made in good faith. All reported violations will be promptly investigated and treated confidentially to the fullest extent possible. Senior Financial Officers are expected to cooperate fully in any internal investigations.

Senior Financial Officers who violate this Code may be subject to a range of corrective actions, which may include termination of employment and, depending upon the violation, subject the Senior Financial Officer to civil or criminal liability.

November 2025

**Code of Ethics for Senior Financial Officers
Compliance Statement**

I certify to the Company that, in my role as a Senior Financial Officer, I adhere to and advocate the principles and responsibilities governing my professional and ethical conduct as set forth in the Code and understand and agree that any failure to comply with the Code or Bread Financial's Code of Ethics may result in a range of corrective actions that may include termination of my employment and, depending upon the violation, subject me to civil or criminal liability.

Date: _____

By: _____

Name: _____

Title: _____