

**LOYALTY VENTURES 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, Treasurer and certain other senior financial officers of Loyalty Ventures Inc. (the “*Company*”), as well as the chief financial officer (or persons performing similar functions) of each reporting segment (including AIR MILES[®] Reward Program and BrandLoyalty) (each a “*Senior Financial Officer*”). The Code supplements the Code of Ethics of the Company and its segments (“*Loyalty Ventures’ Code of Ethics*”), which governs the professional and ethical conduct of all employees, officers and directors of the Company and its segments.

The Code sets forth written standards designed to deter wrongdoing and 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 segments 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 segments;
- Compliance with applicable governmental laws, rules and regulations;
- The prompt internal reporting of violations of the Code to the appropriate person or persons identified in the Code; 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. Senior Financial Officers who violate the Code or Loyalty Ventures’ Code of Ethics 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. Only the Board of Directors of the Company (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.

Code Provisions

To comply with the Code, each Senior Financial Officer shall:

1. Act with honesty and integrity, avoiding actual or apparent conflicts of interest between personal and professional relationships, and disclose any material transaction or relationship that reasonably could be expected to give rise to such a conflict to the

Company's General Counsel or the Audit Committee of the Board;

2. Subordinate his or her 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 segments;
3. Provide information that is full, fair, accurate, timely and understandable, including information included in the Company's filings with the SEC;
4. Act in good faith, fairly and responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing his or her independent judgment to be subordinated;
5. Comply with laws, rules and regulations of federal, state, provincial and local governments, and other appropriate private and public regulatory agencies, including rules and regulations governing insider trading;
6. Respect and maintain the confidentiality of information acquired in the course of their work, except when and to the extent authorized or otherwise legally obligated to disclose;
7. Use confidential information acquired in the course of his or her 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 registered public accounting firm;
9. Not destroy 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 him or her;
11. Proactively promote ethical behavior among peers in his or her work environment; and
12. Promptly report any suspected or known illegal or unethical behavior or any possible violations of the Code to the appropriate individuals or channels identified in the Company's Code of Ethics, or, where appropriate, to the Company's General Counsel or Audit Committee of the Board, and cooperate in any internal investigation of such matter.

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