



Our Impact

LendingClub's 2023
Environmental, Social &
Corporate Governance Report



Our mission is to empower our members on a path to better financial health, giving them new ways to pay less on their debt and earn more on their savings. That is especially critical today, as economic volatility and the rising costs of food, gas, healthcare, housing, education, and more have contributed to millions of everyday Americans having insufficient financial reserves or living paycheck to paycheck, including almost 50% of those earning over \$100,000 annually. We aim to offer lower cost solutions than traditional credit products to help them bridge cash flow gaps and manage their financial lives.

Since 2007, over 4.7 million individuals have become members, joining the Club to help achieve their financial goals.

We believe that our business is inherently aligned with supporting Environmental, Social and Governance (“ESG”) matters. With oversight from our Nominating and Corporate Governance Committee, we intend to build upon our strategy, progress and disclosures on ESG matters over time based on stakeholder feedback and new rulemaking on the topic.

*Information contained within this impact report can be found in our 2023 Proxy Statement on our Investor Relations Website at <http://ir.lendingclub.com> under the Filings & Financial menu in Annual Meeting.

Values

Our values are the foundation of what we strive to be, individually and collectively. They guide everything from corporate decisions to hiring and job performance.

Do What's Right. We are committed to acting with honesty and integrity. We act in the best interest of our customers and everyone involved. We recognize that trust and confidence are critical to our marketplace, so we stand up for what's right—even when it's hard.

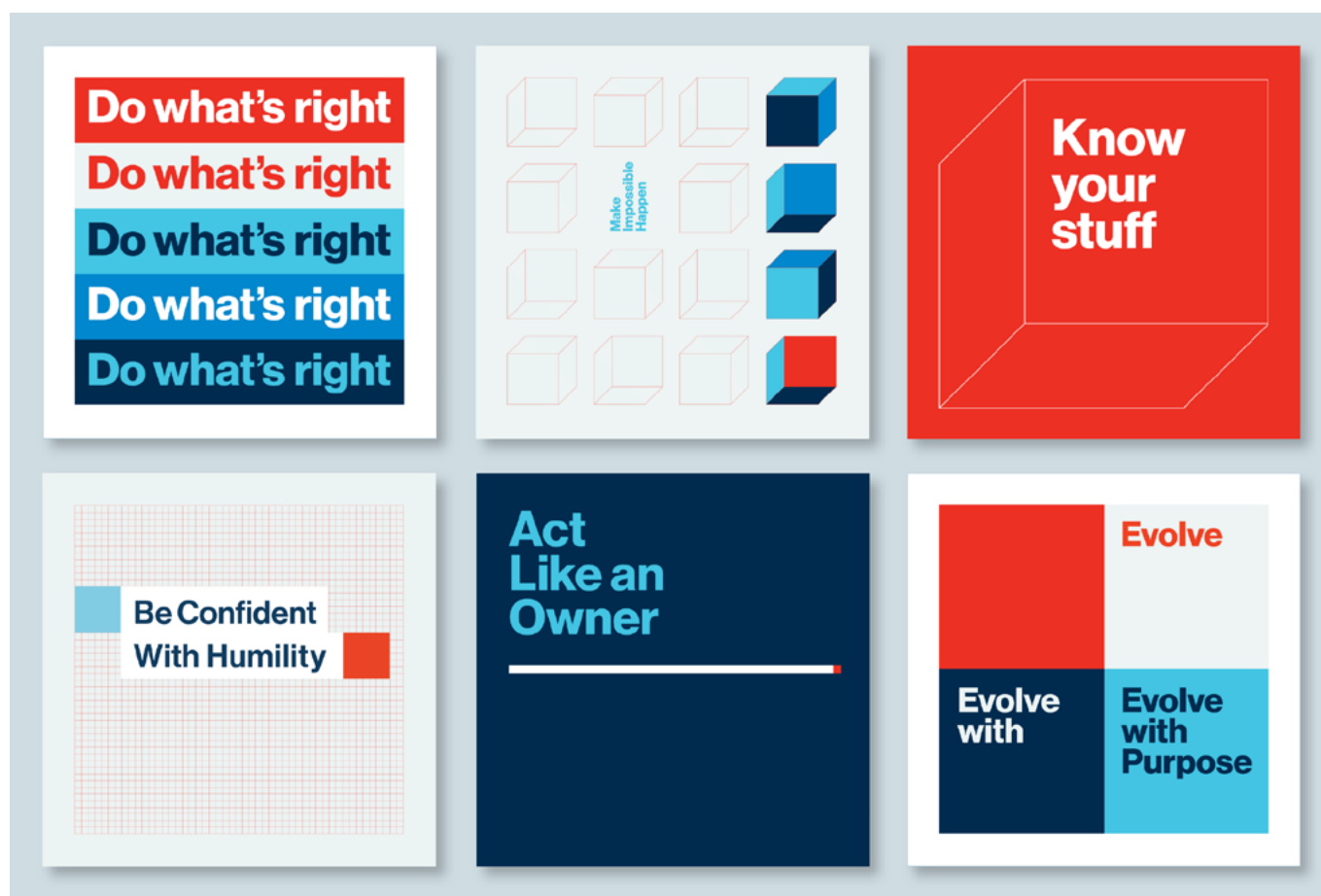
Make Impossible Happen. We look beyond what is possible today to boldly imagine new and better ways to improve the lives of our customers. We take on big challenges and drive relentlessly forward to overcome all obstacles to make our vision a reality.

Know Your Stuff. We are a data-driven business. Each of us must be an expert in our areas, continuously rooted in a deep understanding of the data. We measure our efforts so that we can manage, make well-informed decisions, and identify new opportunities.

Be Confident With Humility. We are exceptionally capable individuals who put our egos aside and focus on our collective goals. We listen first and assume positive intent. We get the right people together to inform our collective perspective, evaluate the implications, and debate the trade-offs—so we can move forward quickly, collaboratively, and with confidence.

Evolve With Purpose. We embrace and create change. While we set our strategy for the long term, we stay flexible to adapt to new opportunities. We test bold ideas in real-world situations, without the fear of failure, so we can improve and evolve.

Act Like an Owner. We take ownership and hold ourselves accountable to our commitments. We roll up our sleeves and pick up tasks that need doing, even if they're not in our job description. We are committed to LendingClub's future and we act that way.



Environmental

We're Doing Our Part

We aim to do our part in conserving the environment by incorporating environmental-related considerations and risks into certain aspects of our operations. Key actions we've taken to support the environment include:

Light Physical Footprint. As a digital marketplace bank we operate online, which provides our members with access to banking services anywhere, anytime. This reduces the environmental impact associated with brick and mortar bank branches, including the impact of members visiting a bank branch.

Sustainability. We advocate for the use of sustainable or re-usable products in our spaces, such as providing compostable materials in our offices, and in our work, such as leveraging electronic signature platforms when possible.

Facilities. We lease LEED Gold certified buildings in San Francisco and Utah. When renovating our facilities, we emphasize recycling and the use of environmentally friendly materials.

Efficient Data Centers. We use leading third-party data centers for data storage that enable us to remain environmentally efficient even as we grow our business, customer base and data.

Hybrid Work. We have adopted a hybrid work model for our employees, reducing the environmental impact associated with a fully in-office work environment, including the impact of our employees commuting to our offices each day and reduced office space needs.

Member Focused. Our core business is focused on relatively small loans to individual consumers and small businesses, not large loans to corporations that may negatively impact the environment.



Empowering Our Members On Their Path to Financial Health

LendingClub is a social impact business with a mission of empowering our members on their path to better financial health. We advance this mission through a technology enabled business model focused on the economic empowerment of Americans across the income spectrum, especially those who have not been well served by traditional banks.

LendingClub aspires to champion the financial success of its members with fairness, simplicity and heart. This aspiration, combined with our values, has driven us to lead the financial industry in advancing several policies and programs designed to reduce disparities, protect consumers and small businesses from irresponsible financing practices, and encourage innovation that supports financial health.

Championing Financial Health

Through our digital marketplace bank, we help our members on their path towards financial health by enabling them to pay less on their debt and earn more on their savings. By receiving a loan through LendingClub's platform, many of our members take the first step toward financial health by refinancing out of higher cost debt.

In fact, our borrowers have told us that approximately 80% of personal loans received through LendingClub's platform are used for refinancing or consolidating credit card debt. They also told us that we improved their

financial health by reducing the APR on their debt by approximately four percentage points on average while providing a responsible paydown plan. We believe we are well positioned to increase our engagement with existing members by offering additional products and services to enable them to manage and improve their financial health.

In order to champion the financial success of our members with fairness, simplicity, and heart, we have implemented a number of initiatives to support our borrowers during difficult times. All of our members have a 15-day grace period to make loan payments with no penalty. We also launched a loan extension program, which extends the repayment term for eligible borrowers that fell behind on their loan payments and have resumed making regular payments. The program allows such borrowers to become current on their loan and pay any past-due amounts at the end of the loan's new repayment term, and helps borrowers that may have experienced temporary financial difficulty. Additionally, we offer relief programs to eligible borrowers to provide flexibility during tough times like natural disasters. During COVID-19, we waived late fees for existing borrowers and launched new hardship plans tailored for the COVID-19 pandemic, which helped borrowers preserve their financial health in a difficult economic and credit environment. To support our small business borrowers, we leveraged our digital banking capabilities to support the Paycheck Protection

Federal Reserve researchers found that LendingClub facilitated loans maintain exceptionally low default rates while extending access to credit to riskier borrowers.

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Social

Program ("PPP"). Throughout the pandemic, we cumulatively facilitated over \$870 million of PPP loans to help small businesses keep over 75,000 people employed.

Competitive Interest Rates and Increased Savings

Our technology is fundamental to our ability to deliver better rates and products. Over the past 15 years, we've refined our advance credit decisioning and machine-learning models with more than 150 billion cells of data and over \$80 billion in loans. With this underwriting technology, we're able to underwrite loans more efficiently, which enables us to offer lower interest rates to our borrowers.

Researchers from the Federal Reserve Bank of St. Louis found that LendingClub loans have had lower APRs than credit cards across FICO bands. Additionally, researchers from the Federal Reserve Bank of Philadelphia have found that "consumers pay smaller spreads on loans from LendingClub than from credit card borrowing", which is supported by our data that indicates that our members save approximately \$1,800 on average over the term of a personal loan from LendingClub. These savings also extend to our auto refinance loans, which reduce the APRs members pay by over three percentage points and results in average savings of approximately \$2,100 over the life of the auto loan.

In addition to providing lower APRs, we have focused on being a responsible lender and have voluntarily committed to a 36% APR cap on our loans. We have also supported legislation in California and Illinois to establish statewide 36% APR caps. Through our support of the American FinTech Council, we also marshal fintech support for federal 36% APR cap legislation.

As a digital marketplace bank, we are also placing emphasis on helping our members build up savings

"The value of disparate impact analysis was recently pointed out, and endorsed by, the largest personal loan company in the country, LendingClub, in its responses to requests for input by the CFPB."

Mike Calhoun, President of the Center for Responsible Lending, Senate Testimony 2019

Researchers from the Federal Reserve Bank of Philadelphia have found that "LendingClub's consumer lending activities have penetrated areas that may be underserved by traditional banks, such as in highly concentrated markets and in areas that have fewer bank branches per capita."

through products and services built to help them make the most of their money, like our award winning high-yield savings and checking accounts. Through our high-yield savings account, members can earn one of the best interest rates in the country on their account balance. There are no monthly maintenance fees, fees to wire funds or overdraft fees for our high-yield savings account, resulting in more savings and benefits for our members. With our checking accounts, members can earn interest at rates higher than the national average

and unlimited cash back on qualified purchases with a checking account debit card. Members also save more using our checking accounts as we do not charge a fee for using ATMs, we rebate ATM fees charged by other banks, and as there are no monthly maintenance fees, overdraft fees or incoming wire

transfer fees. Our checking accounts have also earned official certification by the national Cities for Financial Empowerment Fund as meeting the BankOn National Standards for trust and affordability for consumer transactional accounts. Through these digital marketplace bank products and services, our members can effectively manage their cash flow and meet their financial goals.

Social



Fighting Discrimination

We are committed to fighting discrimination in the financial services industry. For example, we were the first company to express support for “disparate impact” regulation when these anti-discrimination protections were under reconsideration by the federal government. Through comment letters to the Consumer Financial Protection Bureau (the “CFPB”), Federal Trade Commission and the U.S. Department of Housing and Urban Development, we articulated and advocated for the pro-innovation value of disparate impact regulation. We have also worked with the National Community Reinvestment Coalition on a consensus statement from civil rights organizations and fintech companies in support of strengthening these critical anti-discrimination protections. Further, we have supported disparate impact regulation in order to prevent algorithmic discrimination in lending to communities of color.

Our loan products also help our members avoid discrimination in the financial services industry. For example, research by the National Consumer Law Center shows that when a consumer finances the purchase

of a vehicle at a dealership, auto dealers are twice as likely to add markups to loans of Black borrowers than to White borrowers. Those markups are also routinely two-to-four times higher for Black people. Our auto refinancing loans result in savings for all of our members, with our Black members seeing about 12% greater savings than White borrowers because those Black borrowers were more likely to be overcharged by their previous lender.

Financial Inclusion

We promote an inclusive financial system in which responsible innovation of products and practices cultivates better financial health outcomes. We strive to lend to those underserved by traditional banks and our digital marketplace allows us to fill credit gaps for consumers where bank branches may be less available, making for a financial system that is more accessible to all Americans. For example, our small business program with Accion Opportunity Fund has seen over 50% of its loans go to minority-owned businesses, as compared to less than 10% of loans by conventional small business lending banks. Further, researchers from

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the Federal Reserve Bank of Philadelphia have found that our credit model risk ratings have a low correlation with FICO scores while still effectively predicting credit risk at a high level of performance. This means that our digital credit models are able to identify consumers who would be overlooked or overpriced by traditional FICO-based models, providing more consumers with access to lower-priced credit. Additionally, a study by Federal Reserve researchers using LendingClub data found that fintech small business lending can create a more inclusive financial system by allowing small businesses that were less likely to receive credit from traditional lenders to access credit and do so at lower costs.

We've also advocated for policies that encourage lending to minority-owned small businesses, such as urging the CFPB to implement Section 1071 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, which requires lenders to report data on how they are serving minority- and women-owned firms. We believe that such policies will encourage innovation in lending, which may allow better inclusion of minority- and women-owned businesses by the financial services industry.

Helping Small Business

We are focused on supporting small businesses. We've partnered with the nonprofit community development financial institution Accion Opportunity Fund to increase small business owners' access to transparent, affordable, and responsible credit. We believe that our small business lending activities have helped create or sustain over 100,000 jobs, in addition to helping the over 75,000 people that were able to remain employed with the over \$870 million of PPP loans we facilitated during the pandemic. Further, a study from the Federal Reserve Bank of Philadelphia using LendingClub data found that

fintech lenders, like LendingClub, "have been able to expand credit access to those underserved small business owners who are not likely to receive funding from traditional lenders... and in those areas that face a higher local unemployment rate."

Through our partnership with Accion Opportunity Fund, we have achieved 5x and 4x the representation of minority-owned and women-owned businesses, respectively, in our small business lending, compared to conventional banks.

We also helped form the Responsible Business Lending Coalition to drive responsible practices in the small business lending sector. With the Responsible Business Lending Coalition, we co-wrote the Small Business Borrowers Bill of

Rights, the first cross-sector consensus on responsible small business lending and the rights that small business owners deserve when obtaining a loan. Since its creation, the Small Business Borrowers Bill of Rights has been signed by over 110 nonprofits, community development financial institutions, fintechs and banks and has inspired a wave of small business protection laws across the U.S.

We believe that innovation in the financial services industry can lower prices for small businesses. However, in order for small business customers to identify and benefit from lower prices, they need to be able to easily compare the prices they are being offered. Accordingly, LendingClub and its coalition partners helped lead the passage of the nation's first small business truth-in-lending law, California Senate Bill 1235, to help protect small businesses from irresponsible lending that disproportionately harms entrepreneurs of color. Similar legislation has since passed in New York and has been introduced in Connecticut, Maryland, New Jersey and North Carolina. Finally, we recently endorsed a bill introduced in the United States House and Senate that would extend the transparency standards of the federal Truth in Lending Act to small business financing.

Committed to Sound and Effective Corporate Governance

We are committed to sound and effective corporate governance practices. We have established a strong governance foundation through highly qualified directors, with strong oversight provided by our independent chairman. Further we have instituted significant stock ownership requirements for Board members and executives to promote strong alignment with stockholder interests. We also pursue robust stockholder engagement each year and have been responsive to stockholder feedback on key issues, including Board vote requirements, Board declassification, supermajority voting requirements and executive compensation programs. We have also established key policies and guidelines that align with responsibly building value for our stockholders, including, among others, the following:

Corporate Governance Guidelines. Our Corporate Governance Guidelines promote the effective functioning of our Board and its committees, promote the interests of our stockholders, ensure a common set of expectations as to how our Board, its committees, individual directors and management should perform their functions, and provide a flexible framework within which the Board may conduct its business.

Business Conduct and Ethics Policy. Our business conduct and ethics policy applies to all our directors, officers, employees, and authorized third-party representatives, and promotes certain actions, including honest and ethical conduct, compliance with laws, rules and regulations, the protection of LendingClub assets (including corporate opportunities and confidential information), and fair dealing practices, among others.

Officer Stock Ownership Guidelines. Under guidelines adopted by our Compensation Committee, our CEO should hold equity in LendingClub with a value of

six times base salary, our CFO should hold equity with a value of three times base salary, and all other Section 16 officers should hold equity with a value of two times base salary.

Non-Employee Director Ownership Guidelines.

Each non-employee director should hold equity in LendingClub equal to at least \$400,000 in value.



Scott Sanborn, LendingClub CEO

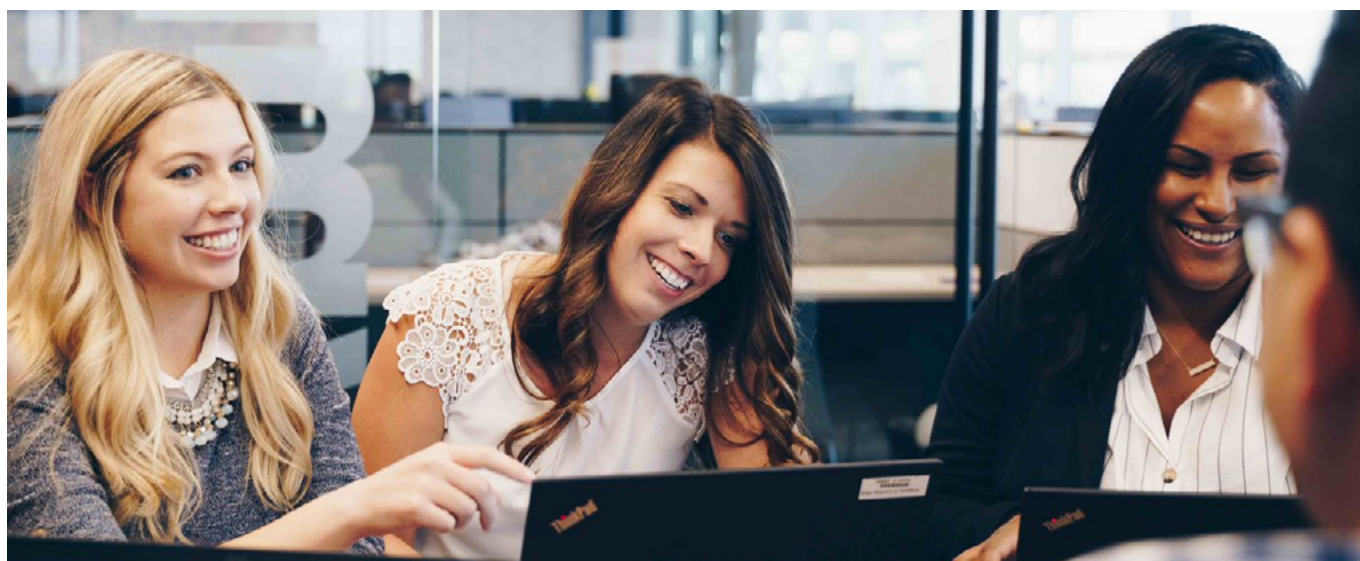
Helping Employees Reach Their Full Potential

Our success depends, in large part, on our ability to recruit, develop, motivate, and retain employees with the skills to execute our strategy. We participate in a competitive market for talent and aim to distinguish ourselves by offering our employees the opportunity to make a meaningful positive impact on the financial health of Americans in an innovative technology-oriented environment. We also offer competitive compensation and benefits. Our compensation programs consist primarily of base salary, corporate bonus, and equity awards. Our benefits programs consist of comprehensive health, dental and welfare benefits, including a 401(k) matching program and standalone mental health coverage. We are committed to providing equal pay for equal work. To support this, we've instituted pay equity assessments and benchmark ourselves against industry best practices.

On January 12, 2023, we announced a plan to streamline our operations and more closely align our expense structure to loan volume and revenue. The plan included a reduction of our workforce by 225 employees and a reorganization to align responsibilities of the operation and utilization of our investor marketplace and bank balance sheet (the "Workforce Reduction"). For employees impacted by the Workforce Reduction, we

offered severance, extended benefits coverage, and outplacement assistance.

We strive to create a welcoming and empowering environment where our employees feel that they are reaching their full potential, are highly engaged, and are doing what they do best every day to accomplish our mission and vision. We support our employees professionally through onboarding programs, on-the-job training, career development sessions and performance check-ins. We monitor employee satisfaction and engagement through semi-annual engagement surveys. Our employee experience has earned a number of external recognitions, including being ranked #38 on Newsweek's list of the top 100 most loved workplaces for 2022; being named one of the 2022 Best Workplaces in Financial Services & Insurance by Great Place to Work® and Fortune; Top Workplaces USA awards in 2022 and 2023; Top Workplaces awards for our Lehi, Utah office for every year in which we have operated an office there (2019, 2020, 2021, 2022); Greater Bay Area Top



Human Capital / Diversity & Inclusion

Workplaces award for our San Francisco, California office in 2022; a perfect score of 100 in the Human Rights Campaign Foundation's 2022 Corporate Equality Index; and inclusion on Bloomberg's Gender-Equality Index in 2022 and 2023.

We have always been committed to advancing a safe work environment for employees. In 2020 during the COVID-19 pandemic, we rapidly and effectively implemented a work from home program. In 2022, we re-opened our physical offices while periodically calibrating our return to office strategy in public health guidance in combination with the needs of our employees.

We continue to work hard to create a workplace that is welcoming and empowering for all. In addition to anti-racism, inclusive hiring, and breaking bias trainings, we have executive-sponsored programs designed to provide women and under-represented individuals with leadership tools and growth opportunities. Further, we have employee resource groups and an allyship program designed to empower employees to advocate for the growth of minorities and build a more diverse and inclusive workplace. We have also established a program focused on supplier diversity to encourage contracts and partnerships with minority-owned businesses.

Diversity and inclusion are core to our culture, and we continue to strive to improve the diversity of talent within the financial services industry. We also treat diversity as an important consideration when hiring. We believe the diversity of our employee base should represent the diversity of our customer base. For open roles at all levels, including leadership positions (i.e., VP level and above), we aim for a 50% diverse candidate slate and diverse interview panel. We promote policies and regulations that prevent and/or address discrimination, including with respect to the use of artificial intelligence and fair and responsible lending to communities of color. Our efforts were recognized by Top Workplaces in 2022 as a Diversity, Equity, and Inclusion Standout Company, reflecting our employee involvement, hiring processes, development practices and inclusive benefits. We intend to continue undertaking measures to enhance our efforts with respect to diversity and inclusion.

Workforce Demographics

Below is a summary of certain demographic information of our full-time workforce as of December 31, 2022, and specifically those employees that serve in leadership positions (i.e., VP level and above).

Full-Time Workforce



Gender Diversity

54% Male
46% Female



Racial/Ethnic Diversity

51% White
49% Non-White

Leadership Workforce



Gender Diversity

75% Male
25% Female



Racial/Ethnic Diversity

62% White
38% Non-White

