

ON DECK CAPITAL, INC.

BOARD DIVERSITY POLICY

(Adopted May 4, 2018)

The Board of Directors (the “*Board*”) of On Deck Capital, Inc. (the “*Company*”) is committed to promoting diversity within the Company and recognizes the value of diversity in achieving Company objectives and maintaining sound governance practices. Diversity brings together individuals with different perspectives and ideas, from varying backgrounds and experiences, to create balanced and thoughtful decision-making that best serves stockholder interests.

In identifying qualified candidates for nomination to the Board, the Corporate Governance and Nominating Committee (the “*Nominating Committee*”) seeks to maintain a Board comprised of talented and dedicated directors with a diverse mix of experience, skills and characteristics that reflect the diverse and dynamic nature of our business and meet the needs of the Company at any given time. For purposes of this Policy, diversity refers to a broad array of individual characteristics that collectively enable the Board to operate effectively and fulfill its responsibilities. These characteristics include, but are not limited to, professional qualifications, business experience, age, gender, race and ethnicity.

Any search firm engaged to assist the Board or the Nominating Committee in identifying qualified candidates for appointment to the Board will be apprised of the objectives of this Policy and directed to include diverse candidates in any slate of potential nominees.

The Board will periodically evaluate its composition to ensure that the mix of directors is appropriate to perpetuate the success of the Company as a whole while meeting the objectives of this Policy.