

# Accounting, Securities and Legal Violations Policy

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# 1. Scope

Truist Financial Corporation and its subsidiaries and affiliates encourage teammates to report suspected violations of: accounting, securities and other laws, rules, regulations, policies, and standards as set forth in this policy. The Accounting, Securities, and Legal Violations Policy discourages illegal activity and questionable conduct and facilitates early detection of such activity. To report suspected violations of Truist Financial Corporation's Codes of Ethics, teammates should follow the reporting guidance contained in the Codes of Ethics.

## 2. Elements & Standards

Truist Financial Corporation encourages clients, vendors, teammates, agents, shareholders, and others to use the guidelines set forth in this policy to report good faith concerns regarding any:

1. Accounting Matters; and
2. Legal Matters.

### 2.1. Anonymity and Confidentiality

Good faith concerns regarding Accounting Matters or Legal Matters may be reported anonymously if the reporting person prefers. Depending on the matter reported, investigation of a suspected violation may not be possible or may be very limited unless the person reporting the suspected violation discloses his or her identity. Reports of suspected violations must be kept confidential to the extent reasonably possible, consistent with Truist Financial Corporation's need to conduct an adequate investigation and subject to Truist Financial Corporation's legal, regulatory, and disclosure obligations. The identities of persons participating in an investigation must also be kept as confidential as reasonably practicable.

#### 2.1.a. Truist Financial Corporation Reporting and Investigating

An individual who wishes to report an Accounting Matter or Legal Matter does so in the manner set forth below.

1. The individual should call Truist Financial Corporation's hotline (managed by a third party) at **1-800-432-1911**. Any such report can be submitted confidentially and anonymously.
2. Upon receipt of a report of a suspected Accounting Matter, the Chief Legal Officer evaluates the report. The Chief Legal Officer, with oversight by the Audit Committee, must investigate or cause the prompt investigation of the reported suspected Accounting Matter. Prompt and appropriate corrective action is then taken as warranted in the judgment of the Audit Committee.
3. Upon receipt of a report from an attorney of a suspected Legal Matter, the Chief Legal Officer handles the matter consistent with [Part 205](#), which requires attorneys appearing and practicing before the SEC to report Legal Matters to Truist Financial Corporation's representatives. Part 205 provides procedures for reporting and investigating a

complaint, together with procedures for the investigation of the complaint and reporting of the results to both the Audit Committee and reporting attorney. In addition to the obligations imposed by Part 205, attorneys employed by Truist Financial Corporation who become aware of Legal Matters should report such matters to the Chief Executive Officer (CEO) of Truist Financial Corporation. In the event that the Chief Legal Officer becomes aware of a Legal Matter, the Chief Legal Officer must report such information to the CEO. Attorneys employed by Truist Financial Corporation who comply in good faith with the provisions of Part 205 and this policy are not subject to discipline by Truist Financial Corporation. Prompt and appropriate corrective action is then taken as warranted in the judgment of Truist Financial Corporation.

4. Upon receipt of a report from a non-attorney of a suspected Legal Matter, the Chief Legal Officer must investigate or cause the prompt investigation of the reported suspected Legal Matter. Prompt and appropriate corrective action is then taken as warranted in the judgment of Truist Financial Corporation, including compliance with Paragraph 3 above and Part 205.

Complying with these standards in no way limits the rights of those who suspect Accounting Matters or Legal Matters to report their good faith suspicions to governmental or regulatory authorities.

### **2.1.b. Non-Retaliation Commitment**

Any person who, in good faith, reports an Accounting Matter or Legal Matter, is protected against retaliation from Truist Financial Corporation as provided by law, as well as the Truist Financial Corporation Code of Ethics. Any person who participates in an investigation of a suspected violation is similarly protected against retaliation from Truist Financial Corporation. Truist Financial Corporation must not directly or indirectly discharge, demote, suspend, threaten, harass, or otherwise discriminate or retaliate against any teammate who reports a suspected violation in good faith or who participates in an investigation of, or a judicial or administrative action of the SEC based upon or related to, a reported suspected violation.

### **2.1.c. Office of the Whistleblower**

Pursuant to Section 922 of The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank), the SEC has adopted rules to create a whistleblower program that provides monetary incentives for individuals who voluntarily report possible violations of federal securities laws to the SEC. The program rewards eligible individuals who provide the SEC with original information that leads to a successful enforcement action by the SEC of a Federal court or administrative action in which the SEC obtains monetary sanctions totaling more than \$1 million. The SEC will also pay an award based on amounts collected in certain Related Actions. Certain categories of personnel with “established professional obligations” to report compliance violations are not eligible.

### 3. Exceptions & Reporting

There are no exceptions to this policy.

All Truist Financial Corporation teammates are responsible for monitoring violations that should be reported under this policy. Upon report of an Accounting Matter or Legal Matter, the Chief Legal Officer must report the suspected violation to the Audit Committee.

### 4. Roles & Responsibilities

**Audit Committee of the Board of Directors** – Periodically review, recommend changes to, and monitor compliance with this policy.

**Chief Legal Officer** – Administer this policy. The Chief Legal Officer, in his or her absolute discretion, may delegate an investigation to or use the services of the General Auditor, Truist Financial Corporation's Chief Compliance Officer, Human Systems, Legal Department, Corporate Investigations Department, Audit Services Department, the Ethics, Business Practices and Conduct Committee, the Enterprise Ethics Officer, other teammates and departments, outside legal counsel, accounting services, other professional services, or any other person or body he or she deems necessary.

### 5. Associated Citations, Documents & References

Detailed information about the SEC's whistleblower program is available at:

<http://www.sec.gov/spotlight/dodd-frank/whistleblower.shtml>

<http://www.sec.gov/whistleblower>

### 6. Point(s) of Contact

This policy applies to all Truist Financial Corporation teammates. Questions regarding this policy are directed to the Chief Legal Officer, who administers this policy. The Board of Directors must approve this policy annually. The Legal Department owns this policy.

### 7. Glossary

**Accounting Matter(s)** – An accounting, internal accounting control, or auditing matter. Accounting Matters include but are not limited to:

- Fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of Truist Financial Corporation;
- Misrepresentation in, or intentional omission from, the financial statements of events, transactions, or other significant information;
- Manipulation, falsification, or alteration of accounting records or supporting documents;
- Material weaknesses, significant deficiencies in, or noncompliance with, Truist Financial Corporation's internal accounting controls;

- Misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the accounting records, financial reports or audit reports of Truist Financial Corporation;
- Intentional misapplication of accounting principles relating to amounts, classification, manner of presentation or disclosure;
- Misappropriation involving theft of Truist Financial Corporation's assets that may cause financial statements not to be presented, in all material respects, in conformity with generally accepted accounting principles; or
- Deviation from full and fair reporting of Truist Financial Corporation's financial condition.

**Legal Matter(s)** – Material violations of applicable federal or state securities laws, rules, or regulations by Truist Financial Corporation or a Truist Financial Corporation director, officer, teammate, independent contractor, consultant, or agent of Truist Financial Corporation; material breaches of fiduciary duties arising under federal or state laws, rules, or regulations; and similar material violations of any other federal or state law, rule, or regulation. Legal matters include, but are not limited to:

- Suspected violations of Security and Exchange Commission (SEC) rules or regulations; and
- Suspected violations of any other laws or regulations that govern Truist Financial Corporation's actions.

**Part 205** – Refers to Part 205 of Title 17, Chapter 2 of the Code of Federal Regulations, as amended.

**Related Action** – A judicial or administrative action that 1) is brought by the Attorney General of the United States, an appropriate regulatory authority, a self-regulatory organization, or a state attorney general in a criminal case; 2) is based on the same original information that the whistleblower voluntarily provided to the SEC; and 3) led the SEC to obtain monetary sanctions totaling more than \$1,000,000.