

# Accounting, Securities, and Legal Violations Policy

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## 1. Scope

Truist Financial Corporation and its subsidiaries and affiliates encourage Teammates and other individuals to report suspected violations of: accounting, securities and other laws, rules, regulations, policies, and requirements as set forth in this policy. This policy discourages illegal activity and questionable conduct and facilitates early detection of such activity. To report suspected violations of Truist Financial Corporation's Code of Ethics, Teammates should follow the reporting guidance contained in the [Code of Ethics](#).

This policy aligns with and supports compliance with Section 922 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank), as further outlined in Section 2.1.c. below.

## 2. Elements & Standards

Truist Financial Corporation encourages clients, vendors, Teammates, agents, shareholders, and others to use the guidance 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 may do so confidentially and anonymously in the manner set forth below. In addition, a report may be escalated to the Chief Legal Officer and Head of Public Affairs (CLO), in his or her role as CLO, through other means, including but not limited to the Reporting Teammate Concerns link on Truist's intranet or through Teammate Relations or the Ethics Office.

1. The individual may 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 CLO evaluates the report. The CLO, with oversight by the Audit Committee of the Board of Directors (Board Audit Committee), must investigate or cause the prompt investigation of the reported suspected Accounting Matter. Upon the completion of the investigation, the CLO reports the investigative findings regarding suspected violations that are deemed to be legitimate or otherwise significant to the Board Audit Committee. Prompt and appropriate corrective action is then taken as warranted in the judgment of the Board Audit Committee.
3. Upon receipt of a report from an attorney of a suspected Legal Matter, the CLO handles the matter consistent with [Part 205](#) which requires attorneys appearing and practicing before the Securities and Exchange Commission (SEC) to report Legal Matters to Truist Financial Corporation's representatives. [Part 205](#) also 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 Board 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 CLO or Chief Executive Officer (CEO) or both the CLO and CEO of Truist Financial Corporation. 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 for making such report.

4. Upon receipt of a report from a non-attorney of a suspected Legal Matter, the CLO must investigate or cause the prompt investigation of the reported suspected Legal Matter and report the results of the investigation to the Board Audit Committee if there are suspected violations that are deemed to be legitimate or otherwise significant. 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](#).
5. More details on the receipt, intake, investigation, notification and reporting of Accounting Matters and Legal Matters can be found in [PALT-CGSLP-100 Accounting, Securities, and Legal Violations Management Procedure](#).

Complying with this policy 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 for making the report 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 on account of such participation. 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 because such Teammate reported the violation or participated in the investigation or action.

### **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 in a Federal court or administrative action in which the SEC obtains monetary sanctions exceeding \$1 million. The SEC also pays an award based on amounts collected in certain Related Actions.

## **3. Exceptions & Reporting**

### **3.1. Board Directives**

The Accounting, Securities, and Legal Violations Policy establishes the expectations and requirements for the reporting of good faith concerns regarding any Accounting Matters and Legal Matters to ensure that the execution of associated risk management and governance activities appropriately align to the Board's established strategy and risk appetite. Further, the Board Audit

Committee authorizes a set of associated policies, committees and/or processes in order to govern and execute these expectations, including but not limited to the following:

- The Enterprise Ethics Office is directed to 1) engage a third party to manage the Truist Financial Corporation hotline to facilitate the confidential and anonymous reporting of suspected Accounting Matters and Legal Matters, as defined in this policy, and 2) establish and execute the supporting processes, training, and internal procedures to internally support the hotline.
- The Public Affairs and Legal Team (PALT) is directed to establish and execute the supporting processes and internal procedures to appropriately receive, investigate and handle Accounting Matters and Legal Matters and report such suspected violations to the Board Audit Committee.

### 3.2. Exceptions

There are no exceptions to this policy.

Identified gaps or violations of the requirements in this policy are subject to the definitions and requirements for the identification of issues as outlined in the [RMO-ERMRR-ERMPF-1000 Enterprise Issues Management Policy](#).

### 3.3. Reporting

All Truist Financial Corporation Teammates should report any known or suspected violations that fall within the scope of this policy.

As set forth in section 2.1.a of this policy, upon the completion of the investigation, the CLO reports the investigative findings relating to suspected violations that are deemed to be legitimate or otherwise significant to the Board Audit Committee. The Board Audit Committee monitors compliance with this policy.

## 4. Roles & Responsibilities

### **Audit Committee of the Board of Directors (Board Audit Committee)**

Periodically reviews, recommends changes to, and monitors compliance with this policy. Also oversees the investigation of reported Accounting Matters and Legal Matters and approves prompt and appropriate corrective action as warranted.

### **Chief Legal Officer and Head of Public Affairs (CLO)**

Administers and addresses questions pertaining to this policy. Investigates or causes the prompt investigation of reported Accounting Matters and Legal Matters and reports investigative findings to the Board Audit Committee as provided in Section 2.1.a. The CLO, in his or her absolute discretion, may delegate an investigation to or use the services of the Chief Audit Officer; Truist Financial Corporation's Chief Compliance Officer; Human Resources; PALT; Corporate Investigations 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.

### **Truist Teammates**

Responsible for compliance with the responsibilities and reporting procedures set forth within this policy.

## 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>

[Part 205](#)

[Code of Ethics](#)

[PALT-CGSLP-100 Accounting, Securities, and Legal Violations Management Procedure](#)

[RMO-ERMRR-ERMPF-1000 Enterprise Issues Management Policy](#)

## 6. Point(s) of Contact

This policy applies to all Truist Financial Corporation Teammates. Questions regarding this policy are directed to the CLO, who administers this policy. The Board of Directors must approve this policy annually. PALT 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 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.

## 8. Appendix

N/A