

# Accounting and Legal Violations Policy

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# 1. Scope

This Policy addresses the reporting and investigation of Accounting Matters and Legal Matters.

## 2. Elements & Standards

### 2.1. Policy in Support of Reporting

Any person may and is encouraged to report a good-faith complaint or concern about an Accounting Matter or Legal Matter. Such a report may be made anonymously. Truist will keep confidential a good-faith report about an Accounting Matter or Legal Matter, the identity of the reporting person, and the identities of others who participate in an investigation, in each case, to the extent reasonably possible consistent with and subject to this Policy, applicable legal obligations, and Truist's need to conduct an adequate investigation. An investigation of an Accounting Matter or Legal Matter may not be reasonably possible or may be limited depending on the complaint or concern reported, the facts and circumstances disclosed, and the anonymity of the reporting person.

Nothing in this Policy or any other policy or procedure of Truist is intended to limit any person's ability (i) to report any complaint, concern, issue, or potential violation of law, (ii) to initiate communications directly with, respond to any inquiries from, provide truthful testimony before, provide confidential information to, or file a claim or assist with an investigation directly with any regulatory or other governmental entities or any self-regulatory organizations, such as the Board of Governors of the Federal Reserve System, the Consumer Financial Protection Bureau, the Federal Deposit Insurance Corporation, the SEC, the U.S. Department of Justice, the Financial Industry Regulatory Authority, the National Labor Relations Board, and the Equal Employment Opportunity Commission, or (iii) to make other disclosures that are protected under the whistleblower provisions of any applicable federal or state law. Such a report, communication, disclosure, or other action does not require any notice to or permission from Truist, and Truist will take no action to impede any person from taking such an action. Despite the foregoing, no Truist Party may reveal to any other person or entity, including any regulatory or other governmental entity or any self-regulatory organization, information that the Truist Party learned during service to Truist and that is protected from disclosure by any applicable privilege, including the attorney-client privilege or the attorney-work-product doctrine. Truist does not waive any applicable privileges or the right to protect its privileged attorney-client information, attorney work product, and other privileged information.

### 2.2. Reports and Investigations of Accounting Matters and Legal Matters

Any person may report a good-faith complaint or concern about an Accounting Matter or Legal Matter by calling Truist's hotline, which is operated by a service provider, at 1-800-432-1911. Reports to Truist's hotline may be submitted confidentially and anonymously. Truist Parties may also submit such a report by using the Reporting Teammate Concerns link on Truist's intranet or by contacting Truist Teammate Relations, the Truist Ethics Office, the CLO, or any Deputy General Counsel. Any Truist Attorney who becomes aware of evidence of a Legal Matter must report it as required by Part 205.

Truist Teammate Relations, the Truist Ethics Office, each Deputy General Counsel, and each Truist Attorney must promptly refer to the CLO any report of a good-faith complaint or concern about an Accounting Matter or Legal Matter. The CLO must assess and, if reasonably possible and appropriate in the judgment of the CLO, oversee the investigation of a reported Accounting Matter or Legal Matter. The CLO may inform the Audit Committee or its Chair of such a pending assessment and investigation if warranted in the judgment of the CLO.

If a reported Accounting Matter or Legal Matter is substantiated, the CLO must report it to the Audit Committee within a reasonable time under the circumstances. In such a case, Truist must take or cause to be taken any corrective action directed by the Audit Committee or the Board of Directors of TFC or Truist Bank.

If a reported Accounting Matter or Legal Matter cannot be reasonably investigated or is not substantiated, the CLO must report this conclusion to the Audit Committee at its next regular in-person quarterly meeting.

The Audit Committee, in its discretion, may conduct its own special investigation of a reported Accounting Matter or Legal Matter and, in doing so, may retain outside counsel and other advisers and service providers to assist it.

Truist strictly prohibits intimidation or retaliation, in any form, against any person who reports a good-faith complaint or concern about an Accounting Matter or Legal Matter, who participates in a related investigation, or who takes any other action permitted in Section 2.1. Truist may not directly or indirectly discharge, demote, suspend, threaten, harass, or otherwise discriminate or retaliate against any Truist Party who engages in such an action. Any person who has concerns about or is aware of such an intimidating, retaliatory, or discriminatory act may and is encouraged to report it to Truist Teammate Relations, the Truist Ethics Office, the CLO, any Deputy General Counsel, or the Audit Committee. In such a case, Truist must take or cause to be taken appropriate corrective action and to report the corrective action to the Audit Committee.

## **3. Exceptions & Reporting**

### **3.1. Board Directives**

No separate directives of the Boards of Directors of TFC and Truist Bank exist beyond the content of this Policy.

### **3.2. Exceptions**

The policy-exception process provides a proactive mechanism to confirm that policy-exception requests are routed to the appropriate policy-content owner for approval. Exceptions to this Policy are allowed.

Only the Audit Committee may approve an exception to this Policy. Policy exceptions may be escalated to the Board of Directors of TFC for awareness, depending on materiality, and at the discretion of the Audit Committee. An overview of approved policy exceptions is provided to the Board of Directors of TFC as an accompaniment to the Policy for Policy approval, on at least an annual basis if the policy approval timeline exceeds one year. Policy exceptions are housed in the Archer Policy Exception Module. The Deputy General Counsel, Litigation and Legal

Operations will approve policy exceptions in Archer after the Audit Committee has given its approval.

### **3.3. Reporting**

Reporting is described in Section 2.2 of this Policy.

Additional reporting will be provided to the Boards of Directors of TFC and Truist Bank, the Audit Committee, or the CEO on request.

## **4. Roles & Responsibilities**

### **Audit Committee**

The roles and responsibilities described in Section 2.2

### **CLO**

The roles and responsibilities described in Section 2.2

### **Deputy General Counsel**

The roles and responsibilities described in Section 2.2

### **Truist Attorneys**

The roles and responsibilities described in Section 2.2

### **Truist Ethics Office**

The roles and responsibilities described in Section 2.2

### **Truist Parties**

The roles and responsibilities described in Section 2.1 and 2.2

### **Truist Teammate Relations**

The roles and responsibilities described in Section 2.2

## **5. Associated Citations, Documents & References**

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

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

[Part 205](#)

[Code of Ethics](#)

GALT-CGSLP-100 Accounting, Securities, and Legal Violations Management Procedure

## **6. Point(s) of Contact**

Questions about this Policy must be directed to the CLO or the Deputy General Counsel for Litigation. The Government Affairs and Legal Team owns this Policy. The Joint Audit Committee of the Boards of Directors must approve this Policy at least annually.

## 7. Glossary

### **Accounting Matter**

An accounting, internal accounting control, or auditing matter involving Truist that is or is suspected of being questionable, inappropriate, or illegal, including the following:

- fraud or deliberate error in the preparation, evaluation, review, or audit of any financial statements of Truist,
- misrepresentation of events, transactions, or other significant information in or by omission from any financial statements of Truist,
- manipulation, falsification, or alteration of the accounting records or supporting documents of Truist,
- noncompliance with or weaknesses or significant deficiencies in the internal accounting controls of Truist,
- misrepresentation or false statement to or by a senior officer or accountant about a matter in the accounting records, financial reports, or audit reports of Truist,
- intentional misapplication of accounting principles relating to amounts, classification, manner of presentation, or disclosure of Truist,
- misappropriation involving theft of Truist's assets that may cause financial statements not to be presented, in all respects, in conformity with generally accepted accounting principles, or
- deviation from full and fair reporting of Truist's financial condition

### **Audit Committee**

The joint Audit Committee of the Boards of Directors of TFC and Truist Bank

### **CLO**

The Chief Legal Officer of TFC

### **Legal Matter**

An actual or suspected material violation of an applicable federal or state securities law, material breach of fiduciary duty arising under applicable federal or state law, or similar material violation of any federal or state law, in each case, by Truist or a Truist Party.

### **Part 205**

17 C.F.R Part 205 as amended

### **SEC**

U.S. Securities and Exchange Commission

### **TFC**

Truist Financial Corporation

### **Truist**

TFC and its subsidiaries

### **Truist Attorneys**

Attorneys appearing and practicing before the SEC on behalf Truist, including attorneys who direct or supervise other attorneys appearing and practicing before the SEC on behalf of Truist

### **Truist Party**

Each director, officer, teammate, and contract worker of Truist

## **8. Appendix**

N/A