Triumph

Whistleblower Policy

Version 11.0 Annual Update – Last Updated October 27, 2026

© TBK Bank, SSB, DBA Triumph
12700 Park Central Dr., Suite 1700, Dallas, TX 75251 | 214.365.6900 | triumph.io

Table of Contents

Whistleblower Policy 1
Table of Contents 2
I. Whistleblower Policy 3
II. Receipt of Employee Complaints 3
III. Scope of Matters Covered By These Procedures 4
IV. Treatment of Complaints 4
V. Reporting and Retention of Complaints and Investigations 5

I. Whistleblower Policy

Any employee of Triumph Financial, Inc. (the "Company") may submit a good faith complaint regarding accounting or auditing matters or code of ethics violations to the management of the Company without fear of dismissal or retaliation of any kind. The Company is committed to achieving compliance with all applicable securities laws and regulations, accounting standards, accounting controls, audit practices and code of ethics compliance. The Company's Audit Committee will oversee treatment of employee concerns in this area.

In order to facilitate the reporting of employee complaints, the Company's Audit Committee has established the following procedures for (1) the receipt, retention and treatment of complaints regarding (A) accounting, internal accounting controls or auditing matters ("Accounting Matters") or (B) matters related to compliance with the Company's Standards of Conduct or Code of Business Conduct and Ethics or similar standards ("Code of Ethics Matters"), and (2) the confidential, anonymous submission by employees of concerns regarding Accounting Matters or Code of Ethics Matters.

II. Receipt of Employee Complaints

- Employees with concerns regarding Accounting Matters or Code of Ethics Matters may report their concerns to the General Counsel of the Company.
- Employees may forward complaints on a confidential or anonymous basis to the General Counsel of the Company through phone, e-mail or regular mail to:

Adam Nelson
12700 Park Central Drive
Suite 1700
Dallas, TX 75251
e-mail: anelson@tfin.com
phone: (214) 365-6900

- Employees may also forward complaints on a confidential or anonymous basis to the Company's General Counsel and Audit Committee Chairman through the Company's whistleblower hotline website and phone number posted for all employees on the Company's internal network site.

III. Scope of Matters Covered By These Procedures

These procedures relate to employee complaints relating to any questionable Accounting Matters or Code of Ethics Matters, including, without limitation, the following:

- fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
- fraud or deliberate error in the recording and maintaining of financial records of the Company;
- deficiencies in, or noncompliance with, the Company's internal accounting controls;
- misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports or audit reports of the Company;
- deviation from full and fair reporting of the Company's financial condition; or
- violation of, or conduct inconsistent with, the Company's Standards of Conduct or Code of Business Conduct and Ethics or similar standards.

IV. Treatment of Complaints

- Upon receipt of a complaint, the General Counsel of the Company will (1) determine whether the complaint actually pertains to Accounting Matters or Code of Ethics Matters, and (2) when possible, acknowledge receipt of the complaint to the sender.
- Complaints relating to Accounting Matters or Code of Ethic Matters will be reviewed under the Company's Audit Committee direction and oversight by the General Counsel of the Company, internal audit or such other persons as the Company's Audit Committee determines to be appropriate. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review.
- Prompt and appropriate corrective action will be taken when and as warranted in the judgment of the Company's Audit Committee.
- The Company will not discharge, demote, suspend, threaten, harass or in any manner dis-criminate against any employee in the terms and conditions of employment based upon any lawful actions of such employee with respect to good faith reporting of complaints regarding Accounting Matters or Code of Ethics Matters or otherwise as specified in Section 806 of the Sarbanes-Oxley Act of 2002.

V. Reporting and Retention of Complaints and Investigations

- The General Counsel of the Company will maintain a log of all complaints, tracking their receipt, investigation and resolution, and shall prepare a periodic summary report thereof for the Company's Audit Committee. Copies of complaints and such log will be maintained in accordance with the Company's document retention policy.