

Environmental Policy

Version 4.0 – April 23, 2024

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I. What We Believe

Triumph recognizes that our activities may have an impact on our planet. We are committed to sustainable finance, balancing environmental stewardship with responsible business operations, and complying with all applicable laws. We focus our efforts on responsible resource use while creating comfortable, safe, and healthy workplaces for our team members and stakeholders.

We recognize that we have a responsibility to conduct our operations in a sustainable, responsible manner. Given our size and the nature of our business, our direct impacts are de minimis, but Triumph recognizes elements such as, but not limited to, electricity use, possible emissions from HVAC equipment, utilities related waste water, and refuse disposal consisting mostly of paper products.

II. How We Translate Our Beliefs Into Action

Sustainable Finance:

We conduct business responsibly and actively work with stakeholders to serve our various constituents best. For certain types of lending, we may evaluate our customers' environmental risks as well as some aspects of social risks, such as the background of the borrower, character and ethical considerations during the underwriting process. This can include such activities as enhanced due diligence, depending on the type of business and size of the credit, as well as inquiries to determine if the borrower is a known bad actor or represents a reputational risk to the company. Triumph has established governance controls to identify environmental exposure and risk and avoid business relationships and activities in violation of Federal law.

Where appropriate, we prefer environmentally friendly products and services and actively recycle in our all our facilities. We do this through enterprise wide paper recycling programs, the implementation of LED lighting in our workplaces, and working to reduce our reliance on disposable products. As we renovate or build new facilities we try to leverage renewable sources for power and HVAC through the deployment of solar panels and heat pumps. We have also invested in tools and capabilities that allow our team members to work remotely as appropriate.

Triumph impacts the environment through our operations and recognizes that we lend to entities whose operations may impact the environment. To manage this impact, we seek to maintain an appropriate awareness of the potential negative impacts that could arise from those activities. We avoid lending activities that could cause irreparable damage to the environment.

III. How We Drive Accountability

Relationship Managers ("RMs") have the responsibility for knowing the Borrower and understanding the nature of the business. The RMs and credit personnel are charged with identifying and monitoring specific risks associated with various industries and transactions.



For business clients that deal with consumers, such as a consumer finance company, the Bank requires scheduled compliance and regulatory audits to ensure we partner with good citizens in that space. The Bank also has access to tools which allow us to monitor ongoing environmental risks associated with our real estate portfolio.

Finally, as part of its oversight function and how we view good corporate governance, our Board of Directors regularly considers health and safety, social or environmental matters either through self-directed conversations or based on managerial input and guidance.

Revision and Approval History

REVISION DATE	REVISION VERSION	APPROVAL DATE	APPROVAL
January 2022	1.0	January 26, 2022	Triumph Bancorp, Inc. Board of Directors and TBK Bank Board of Directors
January 2023	2.0	January 24, 2023	Triumph Financial, Inc.. Board of Directors and TBK Bank Board of Directors
July 2023	3.0	July 25, 2023	Triumph Financial, Inc.. Board of Directors and TBK Bank Board of Directors

Revision Date	Revision Version	Board Approval Date	Board	Revision Summary
4/23/24	4.0	4-23-24	TBK Bank, SSB Triumph Financial, Inc.	No recommended changes from management

