

2021 ENVIRONMENTAL, SOCIAL
AND GOVERNANCE (ESG) REPORT

A CLEAR PATH FORWARD



FORWARD-LOOKING STATEMENTS

This document contains forward-looking statements. Any statements about our expectations, beliefs, plans, predictions, forecasts, objectives, assumptions, or future events or performance are not historical facts and may be forward-looking. You can identify forward-looking statements by the use of forward-looking terminology such as “believes,” “expects,” “could,” “may,” “will,” “should,” “seeks,” “likely,” “intends,” “plans,” “pro forma,” “projects,” “estimates,” or “anticipates” or the negative of these words and phrases or similar words or phrases that are predictions of or indicate future events or trends and that do not relate solely to historical matters. You can also identify forward-looking statements by discussions of strategy, plans or, intentions. Forward-looking statements involve numerous risks, and uncertainties, and you should not rely on them as predictions of future events. Forward-looking statements depend on assumptions, data, or methods that may be incorrect or imprecise, and we may not be able to realize them. We do not guarantee that the transactions and events described will happen as described (or that they will happen at all). The following factors, among others, could cause actual results and future events to differ materially from those set forth or contemplated in the forward-looking statements: business and economic conditions generally and in the bank and non-bank financial services industries, nationally and within our local market areas; our ability to mitigate our risk exposures; our ability to maintain our historical earnings trends; changes in management personnel; interest rate risk; concentration of our business in the transportation industry; credit risk associated with our loan portfolio; lack of seasoning in our loan portfolio; deteriorating asset quality and higher loan charge-offs; time and effort necessary to resolve nonperforming assets; inaccuracy of the assumptions and estimates we make in establishing reserves for probable loan losses and other estimates; risks related to the integration of acquired businesses and any future acquisitions; lack of liquidity; fluctuations in the fair value and liquidity of the securities we hold for sale; impairment of investment securities, goodwill, other intangible assets, or deferred tax assets; our

risk management strategies; environmental liability associated with our lending activities; increased competition in the bank and non-bank financial services industries, nationally, regionally, or locally, which may adversely affect pricing and terms; the accuracy of our financial statements and related disclosures; material weaknesses in our internal control over financial reporting; system failures or failures to prevent breaches of our network security; the institution and outcome of litigation and other legal proceedings against us or to which we become subject; changes in carry-forwards of net operating losses; changes in federal tax law or policy; the impact of recent and future legislative and regulatory changes, including changes in banking, securities, and tax laws and regulations, such as the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”) and their application by our regulators; governmental monetary and fiscal policies; changes in the scope and cost of the Federal Deposit Insurance Corporation insurance and other coverages; failure to receive regulatory approval for future acquisitions; and increases in our capital requirements. While forward-looking statements reflect our good-faith beliefs, they are not guarantees of future performance. All forward-looking statements are necessarily only estimates of future results. Accordingly, actual results may differ materially from those expressed in or contemplated by the particular forward-looking statement, and, therefore, you are cautioned not to place undue reliance on such statements. Further, any forward-looking statement speaks only as of the date on which it is made, and we undertake no obligation to update any forward-looking statement to reflect events or circumstances after the date on which the statement is made or to reflect the occurrence of unanticipated events or circumstances, except as required by applicable law. For a discussion of such risks and uncertainties, which could cause actual results to differ from those contained in the forward-looking statements, see “Risk Factors” and the forward-looking statement disclosure contained in Triumph’s Annual Report on Form 10-K, filed with the Securities and Exchange Commission on February 14, 2022.



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MESSAGE FROM OUR CEO

This report focuses on five main elements: diversity and inclusion, the environment we create for our team members, operating a responsible business, sustainable practices, and engaging with our communities.

When I describe our company, I refer to it as a team. When I talk about the people who work here, I intentionally use the term “team members.” Why? Because we are a group of people who have assembled ourselves with the common goal of creating the most valuable experience in financial services — which is how we define winning.

Teams that win the most in sport and business have three common characteristics: a clear vision, a healthy culture, and the best athletes for the positions they play. A great “athlete” at Triumph is a team member with subject matter expertise who consistently demonstrates our core values, including transparency, respect, and humility. Our culture is anchored around the concept of servant leadership, and our focus on creating value helps our team members thrive, our customers succeed, and our communities prosper.

This value set creates natural alignment with investor expectations around environmental, social, and governance (“ESG”) reporting. I have apprehension around this type of reporting, as I believe it can be used to virtue signal or capitalize on populist trends. Even worse, it can influence a company’s motivation to hit arbitrary thresholds instead of creating value and doing the right thing simply because it is the right thing to do. That being said, I understand the need to share with our stakeholders the things we are doing to be responsible corporate citizens.

Last year, we published our first corporate sustainability report, emphasizing sustainability, fairness, community, and risk management. This year, we have updated those elements of the report while expanding and updating certain topics that communicate the progress we’ve made on the initiatives our stakeholders value.

This report focuses on five main elements: diversity and inclusion, the environment we create for our team members, operating a responsible business, sustainable practices, and engaging with

our communities. Our Diversity & Inclusion section expanded considerably this year. In 2020, I launched the CEO’s Council on Diversity & Inclusion (“the Council”) with the stated goals of:

- building a fact base,
- developing a formal vision for the enterprise on diversity and inclusion,
- constructing a detailed action plan to achieve those goals, and
- regularly reporting on our progress toward those goals to both myself and our Board of Directors.

I trust you’ll find that section an informative window into how we think about our team members and communities.

In conclusion, we came together as one team in 2021. We grew profitability, ensuring that the company has the stability and capital to serve our various constituents. We remained focused on providing equality in opportunity, access to capital, and mitigating environmental impact. As I said in our last report, we are committed to maintaining a culture that values all people, serves others with humility, and operates prudently, working to protect our stakeholders.

I hope that the values we express as a team align with your own. I look forward to continuing the journey with you to *Help People Triumph!*

Respectfully,

Aaron P. Graft

Vice Chairman and
Chief Executive Officer



THE COMPANY: AT A GLANCE

TRIUMPH AT A GLANCE

Triumph Bancorp, Inc. (Nasdaq: TBK) is a financial holding company headquartered in Dallas, Texas, offering a diversified line of payments, factoring, and banking services. We are a leading provider of factoring services and innovator of payment solutions for the transportation industry. Our focus on creating value helps our team members thrive, our customers succeed, and our communities prosper.

FIVE BRANDS — ONE PURPOSE: HELPING PEOPLE TRIUMPH.



TBK Bank, SSB, is a Texas state savings bank that offers commercial and consumer banking products focused on meeting client needs in Colorado, Illinois, Iowa, Kansas, New Mexico, and Texas.



Triumph Business Capital² is a provider of invoice factoring for the transportation industry.



TriumphPay³ is the open payments network for freight brokers, factors, shippers, and carriers in the US trucking industry.



Triumph Commercial Finance⁴ is a provider of asset-based lending and equipment finance solutions for small- to mid-sized businesses nationwide.



Triumph Insurance Group, Inc.⁵ is an insurance agency specializing in transportation, offering customized coverage and flexible payment options.

¹ TBK Bank, SSB. Member FDIC. Equal Housing Lender.

² Advance Business Capital d/b/a Triumph Business Capital

³ TriumphPay, a division of TBK Bank, SSB.

⁴ Triumph Commercial Finance, a division of TBK Bank, SSB.⁵

⁵ Triumph Insurance Group, Inc. d/b/a in CA Triumph Risk and Insurance Solutions.



OUR CORE VALUES

We base our core values on biblical principles and sound business practices.

TRANSPARENCY

Communicate the truth consistently, directly, and professionally. Open communication is the foundation of strong relationships.

RESPECT

Treat others as you want to be treated. Put the needs of others and the needs of the team before promoting your own agenda.

INVEST FOR THE FUTURE

Do not allow the immediate to crowd out the important. Success that endures is built upon a long-term perspective.

UNIQUE IS GOOD

Be aware of following the crowd. Being unique can be difficult, but if it were easy, everyone would do it.

MISSION IS MORE THAN MONEY

Make everything you're involved in better. This includes doing good in the areas of greatest need — in your community and around the world.

PEOPLE MAKE THE DIFFERENCE

In any situation, the most important criteria for success are the quality of people and the quality of their thinking.

HUMILITY

Model humility in all that you do. Humility is not passivity, as it requires the courage to prefer others' needs over your own.

RELATIONS WITH STAKEHOLDERS

Triumph endeavors to engage all stakeholders — shareholders, team members, customers, and our communities — transparently and respectfully. Our goal is to understand their concerns and identify emerging trends that may affect operations, team member health and welfare, and shareholder value. We work to identify potential social and environmental risks that we can mitigate through our programs or policies. We employ several intake points for issues, including Human Resources, Investor Relations, and Corporate Communication.

We are firmly committed to providing equal employment and advancement opportunities to all qualified individuals and will not tolerate any illegal discrimination or harassment of any kind.

OUR CREED

At Triumph, we are committed to diversity, equity, and inclusion. Building a better tomorrow includes celebrating the uniqueness of our team members, customers, partners, and communities while promoting a culture of understanding and acceptance. We dedicate ourselves to creating an environment where we value and listen to everyone with humility, and we act with respect regardless of gender, race, creed, orientation, ability, and background. We invest in our future by building a team of diverse individuals at every level of business or relationship.

OUR BELIEF

The diversity of Triumph's team members is a tremendous asset. We are firmly committed to providing equal employment and advancement opportunities to all qualified individuals and will not tolerate any illegal discrimination or harassment of any kind. Team members are expected to immediately report any improper discrimination or harassment to the appropriate supervisor and Human Resources.

In August 2020, our CEO directed the formation of the CEO's Council on Diversity & Inclusion ("The Council") at Triumph. The Council consists of a diverse group of team members — 51% females and 49% males, and various experiences, races, and ethnicities. With members coming from all levels of the organization, the Council focuses on diversity and inclusion in our workforce, workplace, community, and suppliers. They are responsible for connecting our diversity and inclusion activities with our broader business strategies. Additionally, we created a Leader of Diversity & Inclusion position to provide direction and leadership as we build processes, initiatives, and special programs aimed at diversity and inclusion.

COUNCIL ON DIVERSITY & INCLUSION 2021 UPDATE

The Council's main objectives in 2021 were to:

- **Build the Fact Base** – Identify and gather key input from internal and external audiences. Gather and analyze primary and secondary data regarding workforce diversity, talent acquisition and recruitment strategies, retention statistics, CRA investment activity, policies, training programs, etc.
- **Develop Triumph's Vision on Diversity & Inclusion** – Engage the organization to develop a compelling strategic vision on diversity and inclusion in concert with Triumph's brand purpose, "Helping People Triumph."
- **Construct a Detailed Action Plan** – Define the course of action necessary to advance Triumph's vision on diversity and inclusion, including establishing objectives and key milestones.
- **Report Progress** – Provide ongoing status reports on the program's implementation and performance, including measuring key metrics.

During its first year, The Council partnered with the Diversity & Inclusion Center of Excellence to establish placement goals at the executive, mid-management, and sales workers levels for underrepresentation across gender and ethnicity. The Diversity & Inclusion Center of Excellence is a center of excellence within our Human Resource function, responsible for establishing diversity and inclusion goals at every level of the organization and creating the strategic plans to achieve them, including such elements as Triumph's affirmative action plans. The board has oversight over this function and receives frequent updates on diversity and inclusion initiatives and progress.

The Council will leverage this positive momentum to execute the 2022 priority initiatives below.

- Team Member Engagement Survey (Action Planning):**
 The Council will leverage Gallup Q12 survey data to identify trending concerns that may negatively impact our working culture regarding representation, fairness, and teamwork. The Council will develop action plans at the organizational level.
- Establish Diversity Creed Presence Across Triumph:**
 Display our Creed, stated previously in this document, across all brands, departments, and branches, to include common areas visited by our customers.
- Implement Triumph Champion Program:**
 As a Triumph-wide initiative, the goal of the Triumph Champion Program is to promote diversity, equity, inclusion, and team member engagement across all brands and the communities we serve by fostering interpersonal relationships that are built on fairness and making team members, customers, and the community feel accepted, respected, and valued.
- Ethnic and Commemorative Observances:**
 Commemorate the life achievements of minorities by posting celebratory messages in #OneTeam Today, our internal intranet, to honor Black History Month, Women’s History Month, Asian-Pacific Islander Heritage Month, Hispanic Heritage Month, Native American (Indigenous People) Heritage Month, Juneteenth, etc.

In addition to the above, The Council will continue to serve as a resource and sounding board for corporate matters, requiring reasonable accommodations based on customer needs and preferences. The Council will also continue to be a voice to combat underrepresentation across our brands and work with the Diversity & Inclusion Center of Excellence on related affirmative action plans.

ANTI-DISCRIMINATION

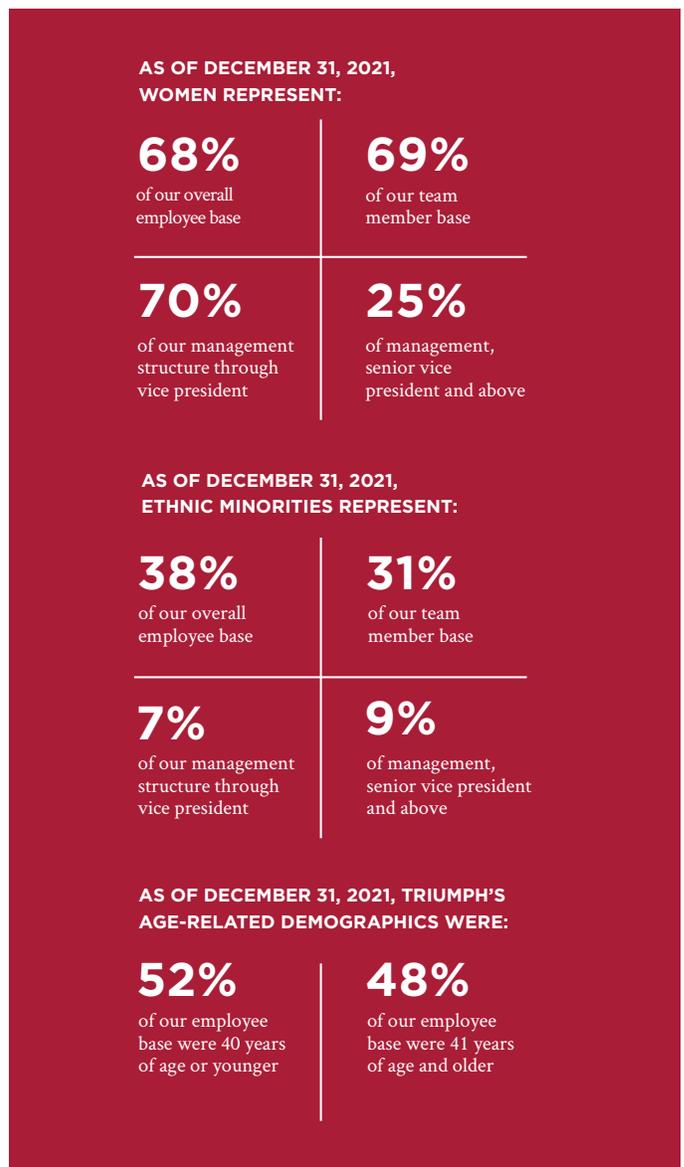
Triumph complies with all local, state and federal laws and regulations prohibiting discrimination in all personnel activities. We charge every team member with the responsibility of adhering to our anti-discrimination policy and do not tolerate illegal discrimination of any kind. Our fundamental guiding principle is to treat others the way each of us want to be treated, with dignity, respect and kindness. As a result, it is our desire to implement practices across our enterprise that encourage and respect the dignity of all of our team members and customers. Further we believe it is the duty and responsibility of each team member to report conduct they believe violates this policy to their supervisor or the Human Resources Department. As a measure of accountability for management to our team members, TBK publishes demographic data by region to our internal intranet, allowing team members to see various demographic slices of TBK compared to those specific areas they serve.

ANTI-HARASSMENT

Triumph takes the anti-discrimination policy one step further, stating the Company will not tolerate any form of harassment of team members, whether imposed by a team member, independent contractor, vendor, customer, or visitor. This policy is intended to be interpreted as broadly as possible. While an action may not be so severe as to constitute harassment in the legal sense, it is commonly understood to be abusive or disrespectful towards others. Triumph is particularly aware that some issues are more pressing than others and that some groups are more vulnerable than others — for example, women and equal pay. We actively work to combat such inequalities.

BOARD AND LEADERSHIP DIVERSITY

We are proud of the diversity of our leadership team. Our Board of Directors consists of 10 members — 90% of whom are independent; 30% of our board members are women, and 20% are minorities. We also strive for diversity throughout the rest of our organizational structure.



INVESTING IN OUR TEAM MEMBERS

Our success at Triumph directly reflects our ability to attract, develop, and retain the best, most diverse, and highest-performing talent. To do this, we make substantial investments in our team members, providing them with opportunities to learn, develop, and advance their careers. We believe in fostering a strong culture based on our core values, which creates an impact at work, generates long-term value for our stakeholders, and makes lasting contributions to our communities.

TRAINING & EDUCATIONAL ASSISTANCE

Triumph Bancorp and all subsidiaries support team members who want to continue their education in subjects and fields directly related to the Company's operations, activities, and objectives. We encourage our team members to pursue educational opportunities that will help improve job performance and professional development. We reimburse tuition and specific fees for satisfactory completion of approved academic courses and certain certifications to further this goal. College credit courses at accredited colleges and universities, continuing education courses, and certification exams are included. Triumph must approve all courses and certifications before enrollment to be eligible for reimbursement. Team members are encouraged to contact the Human Resources Department for details, registration, and learn about the approval process.

TEAM MEMBER SATISFACTION

Triumph partners with Gallup to gauge employee engagement and solicit feedback from team members on ways management can improve team members' working environment and overall team member engagement. Management has specific goals developed through these surveys to improve the work environment and team member engagement continually.

LABOR PRACTICES

At Triumph, how we do business in our communities is as important to us as the business we do in those communities. In keeping with that philosophy, Triumph decided in 2021 to

support a living wage, moving all team members to a minimum wage of no less than \$15.00 per hour. We did this without exception for location in our urban and rural communities.

We strive to ensure our team members have access to working conditions that provide a safe and healthy environment, free from work-related injuries and illnesses. Our locations require employ badges and keypads to enter restricted areas. Triumph also employs a security team to track and remediate vulnerabilities in our physical, transactional, and team member security. We encourage team members to raise concerns about actual or suspected misconduct through management or via a self-service platform called AskHR, implemented in January 2022. Triumph provides comprehensive medical, dental, and vision plans, health savings accounts, PTO and sick time, long-term disability, term life, dependent life, AD&D insurance, childcare and dependent care programs, flexible spending accounts, FMLA, 401K, and employee assistance and wellness programs. We also implemented a highly successful employee stock purchase program. Currently, 32% of our team members are participating in the program. We are committed to providing our team members with certain rights and freedoms, such as good working conditions, open communication, YouEarnedit recognition (an internal points- and prize-based peer recognition program), reasonable job security, personal growth opportunities, training and education, and communication of job expectations.



Triumph’s commitment to responsible business practices is fundamental to our success. We strive to exemplify our core values in our daily interactions with customers and work to maintain high standards of ethics and accountability in our Board, leadership, and team members.

Our day-to-day operations closely link to our corporate responsibility efforts by focusing on ethics and good governance. As part of delivering on that purpose responsibly, we understand the importance of managing risk effectively. Ethical business practices guide us and enable responsible, sustainable growth. We accomplish this through effective internal controls, our code of business conduct and ethics, and robust data protection practices.

ENTERPRISE RISK MANAGEMENT (“ERM”)

The Board of Directors of Triumph Bancorp, Inc. maintains a standing Risk Management Committee to oversee the assessment of risk across the Company and its subsidiaries. The committee’s function is to provide an enterprise-wide review and evaluation of a broad range of risks, including environmental and social risks and risk trends impacting, or potentially impacting, Triumph and our stakeholders.

SECURITY OVERVIEW

We have invested heavily in creating an enterprise-wide security footprint. We developed a robust security framework with the fourth quarter 2019 creation of a Chief Security Officer (“CSO”)/Risk Mitigation Executive role. The framework has focused on fraud prevention, physical and personnel security enhancements, and enterprise-wide information and data protection as the core of its vision and strategy. Regarding fraud prevention, security has been integral in reviewing threats from external fraud-related schemes affecting all enterprise business lines by educating TBK personnel on existing complex fraud-related schemes undertaken by national and international criminal organizations or individual perpetrators.

Security has integrated fraud prevention software tools throughout our business lines. Through these efforts, TBK security has identified and prevented PPP/SBA-related fraud, loan fraud, and identity theft, and has shared intelligence on new variants of existing fraud schemes with law enforcement and the financial sector.

Security undertook efforts to standardize physical security, including security resources working directly with the Preparis software package deployment for business continuity.

The threat of ransomware attacks, business email compromises, and network intrusions by criminal organizations and nation states against financial institutions dramatically increased during 2021. As a result, the CSO and Chief Information Security Officer (“CISO”) worked to identify and isolate potential cyber-related threats. The CSO educated IT assets and users on present and emerging cyber threat trends, refining relationships with the FBI, the Department of Homeland Security, and the Intelligence community. The increased visibility this brought to our understanding of domestic and international cyber threat actors, including their tools, techniques, and patterns used against the domestic and international financial sectors, increased incident response efforts to cyber-related matters.

DATA PRIVACY & SECURITY

We strive to protect customer, team member, and third-party data. We do this through technology, training, and policies and procedures that are in place to prevent unauthorized access or use, prevent and detect fraud, and prevent improper disclosure of sensitive information.

Triumph performs a risk assessment process to identify threats and vulnerabilities to data security. Risk assessments are regularly updated and evaluated to maintain oversight. Information Security also applies a layered security strategy to mitigate data security risks, including but not limited to vulnerability assessments, prevention and detection controls, and audits. Independent third-party auditors perform security control testing to validate the Company’s Information Security controls and the program’s effectiveness.

ADDRESSING DATA SECURITY RISKS AND VULNERABILITIES

The following are ways in which Triumph identifies and addresses data security risks and vulnerabilities:

- Information Security performs vulnerability assessments regularly to identify network vulnerabilities. Vulnerabilities are continuously tracked and remediated. External vulnerability scans are also performed.
- Triumph partners with a cybersecurity firm to help detect cyber intrusions. The network is monitored 24/7 for suspicious network activity. Threat intelligence is leveraged to correlate suspicious activity. The Company uses endpoint detection response (“EDR”) to identify, block, and remediate malware on systems.
- Email security blocks malicious attachments and phishing emails. Emails containing confidential data are encrypted.
- Triumph utilizes a next-generation firewall to detect and block threats, incorporating GEO-blocking. Internet filtering is used to stop team members from visiting malicious websites.
- Access rights to financial systems are regularly reviewed.
- Remote access requires multi-factor authentication to gain access to a virtual desktop. The virtual desktop is isolated from team members’ personal computers.
- Information Security has an incident response policy, plan, and playbook.
- All team members perform annual information security training. Information Security conducts monthly phishing tests to educate team members on identifying phishing tactics and techniques. Team members who fail a phishing test are required to take mandatory training.

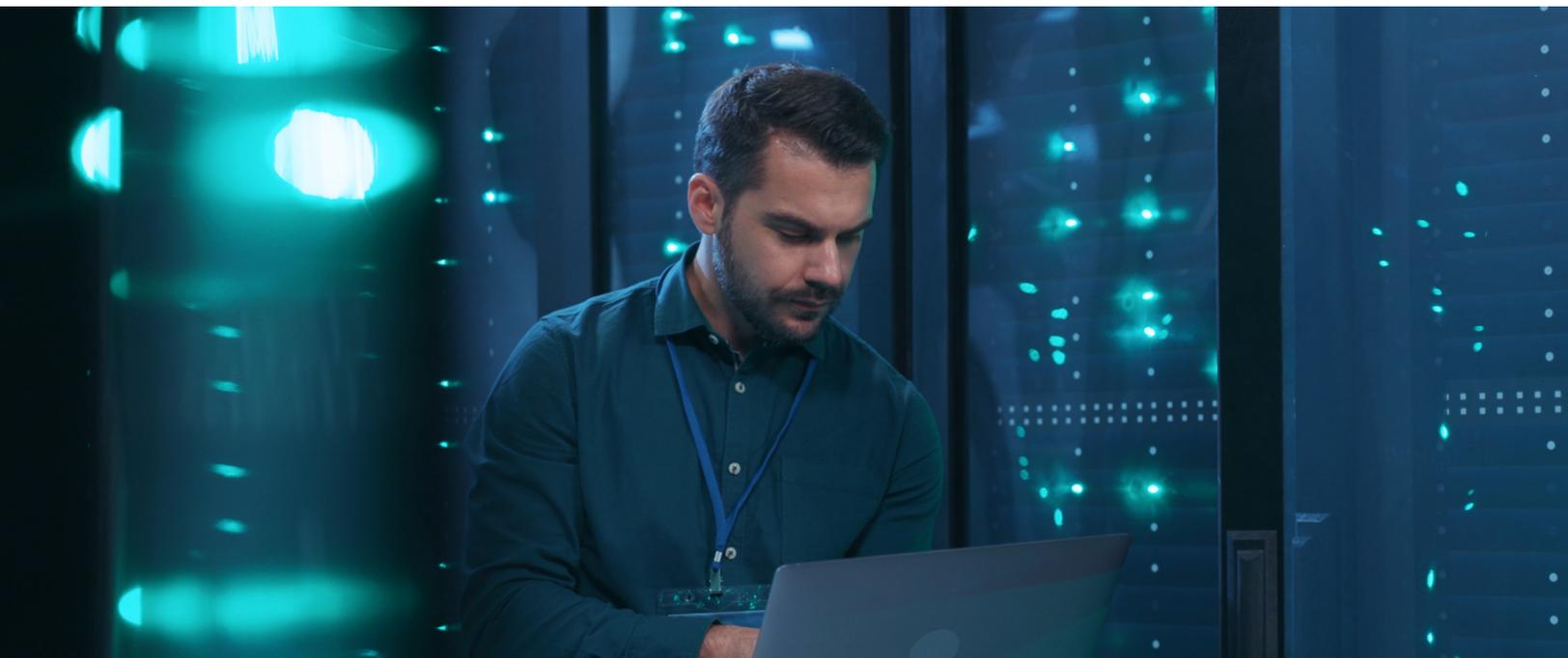
TRENDS IN DATA SECURITY AND INFORMATION ATTACKS

Triumph observed trends in type, frequency, and origination of attacks to its data security and information systems. Phishing attacks from many countries continue to rise. Triumph blocks approximately 51,000 emails per week from known malicious IP addresses, emails containing viruses or spam, and spoofing attempts.

DISCLOSURE OF CUSTOMER INFORMATION BREACHES

Triumph has policies and procedures for the timely disclosure of events related to customer information breaches. When Triumph becomes aware of an incident of unauthorized access to customer information and, after a reasonable investigation, it is determined that misuse of the data has occurred, notice is provided to the affected customers in a timely manner. Customer notice may be delayed if an appropriate law enforcement agency determines that notification will interfere with a criminal investigation and provides the Company with a written request for delay. In the case of delay, pursuant to such written notice, Triumph will notify its affected customers as soon as notification no longer interferes with the investigation.

If customer notification is not required, it may be prudent to issue a general statement, either in a regular customer mailing or a notice on the website, or both, about the possible exposure of some customer information. This notice should remind customers of the importance of monitoring their account activity.



NEW AND EMERGING CYBER THREATS TO THE FINANCIAL SERVICE INDUSTRY

Triumph has multiple data and system security efforts related to addressing new and emerging cyber threats and attack vectors facing the financial services industry:

- Triumph takes a layered security approach to combat ransomware. The use of EDR detects and blocks ransomware from running on computer systems. The email security system and firewall perform security checks and block malicious files entering the network. IT performs data and system backups daily.
- The Bank utilizes Mimecast for email security. Mimecast performs security checks to detect and block malicious emails from entering team members' inboxes.
- IT uses air gapping technology to prevent ransomware from infecting backups and keep data backups safe from ransomware
- The following network security monitoring is in place to detect ransomware:
 - Anti-Virus to detect and block known malware.
 - Network logs are correlated and monitored for network intrusions.
 - Varonis detects ransomware running on a file share and alerts Information Security.
- IT regularly applies security patches to remove network vulnerabilities. Information Security specifically validates known vulnerabilities that have been remediated through the Vulnerability Assessment Process.
- Information Security maintains a comprehensive Incident Response Playbook that details response procedures for various cyberattacks, such as ransomware.
- Multi-factor authentication is used to prevent unauthorized access to the corporate network.
- Mobile banking is monitored for fraud and requires customers to answer security questions when log-on attempts occur during irregular times or in different geographic locations.

EXTERNAL STANDARDS AND INFORMATION SECURITY EFFICACY

We leverage external standards and frameworks to measure the success and maturity of our Information Security Program. Triumph operates under the regulatory environment provided by the Federal Financial Institutions Examination Council ("FFIEC"), Sarbanes-Oxley Act ("SOX"), and interagency state guidelines. The Information Security Program is measured to the FFIEC Cybersecurity Assessment Tool ("CAT"). The CAT is a tool designed to assist financial institutions in measuring their cybersecurity preparedness by identifying risks to determine cybersecurity maturity. The Information Security Program is also measured to the Center for Internet Security ("CIS") Top 20,

a security industry benchmark. The CIS consists of cybersecurity best practices in applying security controls and processes to a network. The benchmark is widely adopted across industries, including financial services and transportation industries, and is used to measure the effectiveness and maturity of cybersecurity programs.

BANK SECRECY ACT/ANTI-MONEY LAUNDERING AND OFFICE OF FOREIGN ASSETS CONTROL

As outlined in our subsidiary TBK Bank's Bank Secrecy Act/Anti-Money Laundering ("BSA"/"AML"), Customer Identification Program ("CIP"), Beneficial Ownership, and Office of Foreign Asset Control ("OFAC") Program, all team members are required to refer potentially suspicious situations, activity, or transactions to their manager or the BSA Officer in a timely manner. The Board of Directors is responsible for, and committed to, establishing a program designed to effectively combat money-laundering and ensure that the Company properly identifies its customers. The policy's purpose is to guard against fraud (impersonation and identity theft) and prevent money laundering or the handling of criminal or terrorist property. This policy complies with all relevant legislation and regulation requirements, and the Company will assist law enforcement by providing information on customers being investigated following a Suspicious Activity Report ("SARS"). Management is responsible for monitoring applicable reports and activity within their respective business lines for suspicious activity, and ensuring SARs are filed within required timeframes and all team members are familiar with and adhering to said policy's requirements. Each team member is responsible for compliance with Triumph's BSA/AML, and OFAC programs. Compliance training is required annually for all team members, enterprise-wide, including the board of directors. Additional training is provided to those job roles that have increased exposure to identifying suspicious activity. This training is tailored to job role(s).

Examples of compliance include, among other items, immediately:

- Referring potentially suspicious activity as soon as a team member becomes aware of the activity.
- Referring potentially suspicious criminal or fraudulent activity that may be detected through direct customer interaction or by another team member.

Team members are expected to adhere to the CIP principles of "Know Your Customer" and should never disclose to a customer or third party that Triumph is considering filing or has filed a SAR.

Triumph uses several methods, including but not limited to Financial Crime Risk Manager ("FCRM") automated alerts, currency aggregation reports, quarterly trend reviews for Monetary Instrument Sales, and Cross-Border ACHs to detect suspicious activity inclusive of Marijuana-related Business ("MRB") activity. Triumph expects the management of each



company, division, and department (“line of business”) to oversee portfolios, customers, accounts, and relationships in a manner that the respective risks are adequately monitored, and detection of suspicious activity is promptly reported to the BSA/AML Department.

The commercial credit process does not utilize any automated approval or origination processes. Our lending team vets each loan request, underwriting processes, and due diligence. These include collecting financial information to evaluate the history of the business and the capacity to repay, reviewing the purpose of the loan, and the collateral quality. The applicant’s entity formation documentation is reviewed, and identification is obtained per the CIP and Beneficial Ownership policies and procedures. All of this mitigates the risk of stacking and other fraud attempts before loan origination.

RESPECTING HUMAN RIGHTS

At Triumph, we are focused on “Helping People Triumph.” It’s our brand purpose, and our core values align with that purpose. We believe that our customers, team members, communities, and shareholders benefit from it. As a result, how we do business is as important to us as what is achieved through our efforts. That belief forms the basis of the core values that our team members honor. They carry those values into the communities where they live and work. These values are delineated in our [Human Rights Statement](#).

The Board of Directors and management are committed to maintaining a work environment where every team member is treated with dignity and respect, free from the threat of discrimination and harassment. As stated in our Board-approved code of business conduct and ethics, we expect these same standards to apply to all stakeholders and our interactions with customers, vendors, and independent contractors. Triumph expects these values to be applied globally and that those we

do business with similarly respect individual human rights and conduct their business operations free from human rights abuses, including human trafficking, child labor, and slavery.

Honoring protections for human rights is consistent with these values. We intend our support for these measures to apply broadly to all persons. It is embodied in our company culture, core values, and our code of business conduct and ethics. We have a responsibility to our customers, communities, and each other as team members. Our team members, vendors, business partners, and our Board of Directors are held to the highest standards of ethics. They are responsible for demonstrating behaviors consistent with those high standards and our core values. Compliance with laws, rules, and regulations is only the beginning. We encourage our team members to obey the law, both in letter and spirit. This forms the foundation on which our ethical standards are built. All of our team members, officers, and directors must respect and obey the laws and regulations of the United States, as well as the cities and states in which we serve our customers. Although not all team members are expected to know the details of these laws, it is essential to know enough to determine when to seek advice from supervisors, managers, or other appropriate resources.

Triumph requires team members and the board of directors to annually complete training on our code of business conduct and ethics, certifying that they have read and understand Triumph’s policies and principles on the subject of human rights. Further, as part of our tri-annual review process, all team members, regardless of position, are evaluated, in part, against conformance to our stated values, providing opportunities to monitor adherence to those values throughout the year.

Triumph knows that we are responsible for protecting our planet and understands that reducing our business's environmental impact is key to a sustainable future. We are committed to minimizing our collective impact on the environment, balancing environmental stewardship with responsible business operations, and complying with all applicable laws. We have embedded environmental reviews throughout our products, services, operations, and culture to drive efficiencies and responsible resource use while creating comfortable, safe, and healthy workplaces for our team members and stakeholders. Please see our [environmental policy](#) for further information.

SUSTAINABLE ENVIRONMENTAL PRACTICES

Triumph impacts the environment through our operations and through the financing of the operations of other companies that could pose risks to the environment. To manage this impact, we manage our environmental impact according to sustainability principles and consider the environmental impacts of our business activities, ensuring that our lending activities do not encourage business activities that could cause irreparable damage to the environment.

OPERATIONAL EFFICIENCY

- Where appropriate, we prefer environmentally friendly products and services and actively recycle in all of our facilities.
- Our Elgin, Illinois, location is LEED Gold Certified.
- We use Fiserv's "Director" software to reduce paper usage for document imaging.
- Our newest branch in Dallas, Texas, has solar panels, and another has geothermal heat and heat pumps.
- Newly constructed offices use LED lighting and occupancy sensor lighting, and several existing branches have been similarly upgraded; more are in progress.

SUSTAINABLE FINANCE

Triumph works hard to ensure that its lending activities do not encourage business activities that could cause irreparable damage to its reputation or the environment. As a result, we try to

conduct business responsibly and actively work with stakeholders to serve our various constituents best. We monitor our customers' environmental, social, and human rights risks along with credit risks. This process involves management and Board oversight and controls such as enhanced due diligence and a reputation risk review.

Triumph has established governance controls to identify and monitor high-risk businesses and prevent doing business with prohibited businesses. Our internal policies and procedures define these and how to identify and recognize them during the onboarding process. We are committed to continuously evaluating and improving governance controls.

Triumph has identified the following sorts of business activities it will not knowingly participate with in any way, including:

- Bribery — offering, receiving, or requesting bribes
- Human trafficking — child and forced labor or slavery
- Marijuana-related businesses or other illicit drug enterprises — Triumph Bancorp is a federally regulated financial institution and is bound by federal laws, including federal criminal laws. As a result, we are expressly prohibited from directly banking or lending to marijuana-related businesses. To protect the Company, we have created credit and account policies to identify and insulate the Company from marijuana-related businesses.



- Other business activities are not illegal but are considered high risk. These require further review to be sure they align with our stated values. For example, certain lending sectors require greater due diligence than others. We recognize that our lending activities can have environmental risks, which may be elevated in certain sectors. Energy lending may carry social risks, and those issues may include, among others: local community engagement (including indigenous peoples), water rights, and social perceptions. Triumph supports small to medium enterprises with ancillary ties to the energy industry, mainly in the transportation space. We provide equipment loans (e.g., trucks and trailers) and working capital to customers servicing this sector. The Bank seeks to avoid any material concentrations on projects that involve the mining of carbon-related assets.

ENVIRONMENTAL LENDING AND COMMUNITY REINVESTMENT

Triumph recognizes that we impact the environment indirectly through our lending relationships and, as such, seeks to monitor and minimize the potential negative impacts that could arise from those activities.

ENVIRONMENTAL LENDING IN PRACTICE

We generally evaluate each credit or transaction on its individual merits, with the larger deals receiving more attention and deeper analysis. Our underwriting process regularly looks at governance issues and seeks to incorporate relevant industry risks.

The Bank has set certain formal limits on concentrations of certain types of lending or industries and, even informally, stays aware of industries to which we seek to limit our exposure. We have strong capabilities to report on industry concentrations as we see changing or evolving trends which would require attention.

The Bank's lending and credit areas are governed by several policies, including but not limited to the Commercial Loan Policy, the Environmental Risk and Liability Policy, and the Fair Lending Policy.

When considering credit, we take into account environmental, social, and governance issues as we evaluate individual businesses. We seek to understand issues related to Boards, shareholders, principals, and management, including factors that would speak to character and/or ethical concerns. These factors impact our risk grading and our overall willingness to engage with Borrowers.

On real estate loans, we require environmental due diligence in accordance with our policy to understand the environmental risks associated with the transactions. Potential environmental concerns related to a property and/or the business operating within the property materially impact the Bank's structure and willingness to provide financing. In some instances, the Bank requires funds to be set aside for site remediation to move forward on a transaction.

HOW WE MONITOR ESG ISSUES IN LENDING

Relationship Managers ("RMs") have the primary responsibility for knowing the Borrower and understanding the nature of the business, including issues that would impact ESG factors. The RMs and credit personnel have access to tools to search public information databases, industry research, and media reports to identify and monitor 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 Collateral 360, a tool which allows us to monitor ongoing environmental risks associated with our real estate portfolio.

OVERSIGHT OF LENDING ACTIVITIES

As it relates to ESG oversight in lending, the bank employs both external review and a Board-level committee approval structures.

Our External Loan Review is in place to help identify emerging risks that may not have been identified by bank personnel. External Loan Review makes recommendations to loan committees on salient risks found in their review. Currently, between 70% and 75% of our portfolio balances are reviewed by External Loan Review annually.

The Bank also employs a Committee approval structure, defined in the Commercial Loan Policy, which ensures that a group of individuals bear the responsibility of understanding the nature of risk, allowing for a healthy vetting and discussion of all relevant risk factors. This Committee includes senior management and Board members.

STRESS TESTING

To respond to the emerging topic of Environmental, Social, and Governance ("ESG") considerations and disclosures, during 2021, management considered whether climate change loss factors should be included in our credit loss forecasting assumptions. The forecasting assumptions used by Triumph do not currently contemplate climate change. Based on management's discussion with representatives from our credit loss assumptions source, there are certain European forecasts that incorporate climate change.

Because of the long-term time horizon of climate change, many of these forecasts frontload much of the physical costs of climate change, effectively applying the impact of 30 years of future climate change into the present day. As a result, these forecasts are inconsistent with ASC 326, requiring management to establish reasonable and supportable forecasts.

Management considered pursuing other forecasts that could incorporate climate change differently; however, it was determined that the use of such forecasts was not necessary given the unique short-term nature of TBK's loan portfolio as follows:

- As of December 31, 2021, approximately 35% of the loan portfolio consisted of factored receivables that turn every 35–36 days. An additional 16% of the loan portfolio comprises short-term mortgage warehouse lending whose assets turn on average every three weeks. The impact of climate change on expected future losses related to these assets, which make up approximately 51% of our loan balances, is not material.
- As of December 31, 2021, just \$330 million, or only 6.8%, of our loan portfolio carried contractual maturities greater than five years. As such, it is not likely that climate change would have a material impact on expected future losses when stress testing our loan portfolio.

We do consider the environmental impacts of climate change in individual lending decisions. For example, the Bank regularly evaluates the effects of water shortages in Colorado and New Mexico related to our agricultural portfolio and other impacted businesses. The Bank also monitors and studies the expected impact on commodity prices resulting from the impact of climate change. These considerations are more immediate and impactful to our decisioning than models meant to study risk on long maturing portfolios.

COMMUNITY REINVESTMENT

Triumph recognizes the importance of meeting the credit needs of the communities in which it operates, including low-to-moderate income (“LMI”) individuals and geographies. In compliance with the Community Reinvestment Act (“CRA”), the Company seeks to serve the members of its communities through its lending, investment, and service.

Small businesses/farm/ag or SBA 7(a) (working capital loans) or 504 (CRE) loans as of 12/31/2021

- Renewable energy (such as Solar/PACE, wind turbine, hydro)
 - Nine Loans — \$188 thousand— Alternative energy such as geothermal, solar, and wind generation
- Recycling centers, chemical remediation centers
 - One loan — \$201 thousand — recycling including remediation services for chemical products
- 17,056 loans totaling \$1.32 billion
 - SBA — 156 loans totaling \$39.5 million
 - Ag — 631 loans totaling \$42.5 million
 - Farmland — 244 loans totaling \$33.2 million
 - Small Business (Community Bank) — 3,025 loans totaling \$439.7 million
 - Of the total above, 111 loans totaling \$14.7 million were PPP loans

- Commercial Finance Small Business — 13,000 loans totaling \$766.4 million
 - Includes Triumph Business Capital — 12,979 factoring relationships totaling \$765.9 million
- Student/education
 - Schools, education programs, support services — 11 loans totaling \$4.5 million
- Loans to non-profits
 - Tax-exempt loans — 14 loans totaling \$4.3 million

COMMUNITY REINVESTMENT

Currently \$40.5 million in CRA-qualifying investments, including:

- \$23.95 million of MBS secured by loans to low-to-moderate income (“LMI”) borrowers or in LMI geographies within the communities the Company serves.
- \$1.75 million committed to Small Business Investment Companies (“SBICs”)
- \$5 million invested in a CRA Shares Fund, which invests in affordable housing, community services, economic development, and the revitalization and stabilization of LMI geographies in communities served by Triumph.
- \$2 million invested in a Community Development Financial Institution (“CDFI”) created to make homeownership available to the Hispanic community by offering first-lien residential mortgages in underserved, LMI communities throughout Texas.
- \$250,000 equity investment in a public benefit corporation (“PBC”) was created to empower at-risk women in Uganda and Dallas, Texas, by offering employment and personal development programs. Triumph also originated and renewed a two-year, \$700 thousand loan at 0.1% interest to the PBC.
- In July 2020, Triumph committed to a \$3 million investment in an SBIC focused on investing in small businesses with a positive social impact on workforce engagement and well-being, thriving communities, environmental services, health, and wellness education and training, resource conservation, and healthy foods.
- Approximately \$1.9 million is currently invested in bonds benefiting LMI individuals or geographies in communities served by Triumph.
- In November 2021, Triumph committed to a \$3 million investment in FVLCRUM, an impact-focused fund established to invest in lower middle market, minority-owned companies that operate in geographies with significant minority and low- and moderate-income populations.



We encourage corporate social responsibility and urge our team members to actively participate in their communities through volunteerism and philanthropy.

Triumph supports team members' efforts in this area whenever possible through our philanthropic practices, volunteer hours, and matching donations. As a general rule, Triumph does not donate to political parties or lobby groups, preferring to focus our support through charitable activities that directly benefit causes we and our team members believe in.

THE MISSION IS MORE THAN MONEY

We focus on doing the most good in the areas of greatest need through our philanthropic endeavors. When we make our communities around us better, we all Triumph.

Our Philanthropic Vision is focused on four key areas we support at home and around the world:

- Training Future Leaders
- Giving People a Second Chance
- Serving the Less Fortunate
- Establishing Viable Communities

SERVICE

- During 2021:
 - Triumph team members served a total of 5,338 volunteer hours.
 - Team members performed 202 volunteer hours focused on financial literacy training.
- Triumph has also donated over \$13,800 to financial literacy efforts such as Junior Achievement.
- TBK Bank hosted a virtual Junior Achievement Job Shadow Day in December 2021 for students from four Dallas-area high schools to learn about TBK Bank as an organization and careers in the banking industry. Twenty-one team members volunteered to share their career path and their roles, within the bank.

- Triumph created a financial literacy video library in 2021 to assist our team members to virtually serve their communities while they are unable to gather in person. These videos allow our team members to teach financial literacy concepts while also completing activities virtually with attendees. These videos are used to train elementary through high school students or adults.
- Team Members in each TBK Division are regularly involved in teaching financial literacy classes in their communities in partnership with local schools, correctional facilities, community groups, and non-profit organizations.

NON-PROFIT/CHARITABLE INITIATIVES

- Triumph has committed to donating at least 1% of the organization's net earnings each year back to our communities. The total amount given in 2021 was over \$900,000.
- Triumph employs a Director of Community Engagement who manages the organization's philanthropic efforts. This position also leads the Philanthropy Committee, a diverse group of team members who meet quarterly to make recommendations regarding the Company's involvement with non-profit organizations, fundraising events, and service opportunities.
- Through the Matching Gift Program, Triumph supports organizations important to team members by matching their charitable contributions to qualified organizations, dollar-for-dollar, up to \$500 for each employee, each calendar year.
- Triumph encourages team members to serve their communities by offering 24 hours of paid time away from work each year to volunteer at approved charitable organizations meaningful to them.



CURRENT MAJOR CHARITABLE INITIATIVES

THE WORKSHOP BY TBK BANK

In February 2021, the Company opened The Workshop by TBK Bank, a makerspace, or a shared community location, where community members can learn about, be trained on, and operate tools for woodworking, welding, machining, 3D printing, and other uses. It is where individuals can learn new and valuable skills, share knowledge, collaborate with others, and create. The Workshop provides a physical location within a moderate-income area of Dallas, Texas, where lives can be changed through training, education, and encouragement, leading to a revitalization of the entire neighborhood. The Company has spent over \$3 million in construction, equipment and furniture purchases, and operational costs to date on the project. The Workshop served over 200 people during the year through community development activities, including robotics and 3D printing workshops for area teachers and woodworking, robotics, and welding camps for students. The Workshop team members also completed the required train-the-trainer course to offer the National Center for Construction Education & Research's Core curriculum as part of the workforce development efforts in 2022. Participants referred from philanthropic Key Partners will have the cost of the course heavily subsidized by the bank.

TBK SCHOLARS PROGRAM

In 2021 TBK completed its third annual TBK Bank Scholars Program, awarding ten \$1,000 scholarships to high school seniors from LMI families in the communities the bank serves. Applicants must live in a county where TBK has a presence, have a low or moderate family income level, and complete an essay on how they plan to use their education to give back to their communities. Given the program's success, the bank has elected to award fifteen \$1,000 scholarships in 2022.

INVESTING IN CHANGE CHALLENGE

In 2021, Triumph hosted the third annual Investing in Change Challenge, a month-long volunteer initiative where team members serve in their communities and compete for prizes. All team members are given a Volunteer shirt to represent TBK in their community during the Challenge. A total of 156 team members logged 1,196 hours during October. Prizes were given for team members who volunteered together, branch locations with the most participation, and the best photo taken while volunteering.

WATERMARK COMMUNITY DEVELOPMENT CORPORATION

TBK has donated over \$100,000 to this organization since 2018 for matching funds of an Individual Development Account program to benefit LMI individuals in Dallas, Texas. Participants, many of whom have never had a bank account before, can save toward purchasing a home, transportation, education, or assets for a small business. By meeting the requirements of consistently saving, completing a 10-week financial literacy course, and committing to meeting regularly with a mentor, participants can have their personal savings matched 2:1 toward their asset purchase. The bank has committed an additional \$40,000 to this program for 2022.

CROSSHAIRS CHARITABLE FOUNDATION

The Crosshairs Charitable Foundation ("CCF") is a non-profit organization. Its stated mission is to have the greatest impact in the greatest areas of need in communities served by the companies of Triumph Bancorp, Inc. through Training Future Leaders, Establishing Viable Communities, Serving the Less Fortunate, and Giving People a Second Chance. The organization was created to provide the opportunity for others to participate in community development activities alongside Triumph. This includes donations distributed from the foundation to philanthropic partners who are excellently serving and impacting our communities and participation in the community development programs offered through Triumph's makerspace project, The Workshop by TBK Bank.

TRIUMPH BANCORP SUSTAINABILITY ACCOUNTING STANDARDS BOARD (“SASB”) INDICATORS

The Sustainability Accounting Standards Board (“SASB”) is an independent standards setting organization that seeks to create reporting standards for companies to communicate financially material sustainability data to their investors. Triumph Bancorp supports the SASB framework as it provides a transparent process through which the company may disclose relevant environmental, social, and governance information to our stakeholders. This 2021 report will be Triumph’s first disclosure under the SASB standards. We expect our disclosures on these topics to evolve over time.

Triumph Bancorp’s SASB response is Financials sector-based and focused on the Commercial Banks Sustainable Industry Classifications. The following are those standards that Triumph Bancorp feels most relevant to its operations. All disclosures are based on 2018 SASB standards as published. Information is based on year-end 2021, unless otherwise noted, and presented at a consolidated level.

Information that (i) is not material or is confidential, (ii) is potentially competitively harmful if released, or (iii) is not collected in a manner consistent with SASB metrics may not be disclosed.

Disclosure Topic Code	Accounting metric	Response/Disclosure location
Data Security		
FN-CB-230a.1	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of account holders affected	Not Disclosed, See Introduction.
<u>FN-CB-230a.2</u>	Description of approach to identifying and addressing data security risks	Triumph Bancorp, Inc — <u>2021 ESG Report</u> , pages 10–12
Financial Inclusion & Capacity Building		
FN-CB-240a.1	(1) Number and (2) amount of loans outstanding qualified to programs designed to promote small business and community development	(1) Number of loans outstanding qualified to programs designed to promote small business and community development: 1,179 loans (2) amount of loans outstanding qualified to programs designed to promote small business and community development: \$278.4 million
FN-CB-240a.2	(1) Number and (2) amount of past due and nonaccrual loans qualified to programs designed to promote small business and community development	(1) Number of past due and nonaccrual loans qualified to programs designed to promote small business and community development: 5 loans and 13 loans, respectively (2) amount of past due and nonaccrual loans qualified to programs designed to promote small business and community development: \$1.3 million and \$1.6 million, respectively

Financial Inclusion & Capacity Building Continued

FN-CB-240a.3	Number of no-cost retail checking accounts provided to previously unbanked or underbanked customers	The Company does not currently gather information related to a customer's status as previously being unbanked or underbanked. The Company does offer low to moderate income programs that are low to no cost and designed to help customer's build credit or accrue savings.
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<u>FN-CB-240a.4</u>	Number of participants in financial literacy initiatives for unbanked, underbanked, or underserved customers	The Company does not currently gather information related to a customer's status as previously being unbanked or underbanked. The Company does offer financial literacy programs and information on such programs can be found in our Triumph Bancorp, Inc — 2021 ESG Report , .
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Incorporation of Environmental, Social and Governance Factors in Credit Analysis

<u>FN-CB-410a.1</u>	Commercial and industrial credit exposure, by industry	Triumph Bancorp, Inc — 2021 ESG Report , pages 21-22
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<u>FN-CB-410a.2</u>	Description of approach to incorporation of environmental, social, and governance factors in credit analysis	Triumph Bancorp, Inc — 2021 ESG Report , pages 14-16
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Business Ethics

<u>FN-CB-510a.1</u>	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations	Information on the company's legal proceedings can be found in the Triumph Bancorp 2021 Annual Report , Note 15, Legal Contingencies, page 169, document page 187
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<u>FN-CB-510a.2</u>	Description of whistleblower policies and procedures	Whistleblower Policy
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Systemic Risk Management

FN-CB-550a.1	Global Systemically Important Bank (G-SIB) score by category.	According to the BASEL Committee on Banking Supervision's assessment methodology, Triumph is not considered to be a Global Systemically Important Bank (G-SIB) and, as a result, does not have a G-SIB score
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FN-CB-550a.2	"Description of approach to incorporation of results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy, and other business activities"	While Triumph does conduct capital adequacy planning and strategic planning exercises with horizons of 3 to 5 years, according to the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, we are not required to conduct annual stress testing due to the \$10 billion asset threshold.
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Activity Metric

FN-CB-000.A	(1) Number and (2) value of checking and savings accounts by segment: (a) personal and (b) small business	<p>(1) Number of checking accounts (a) personal: 59,029 (b) small business: 5,904</p> <p>(1) Number of savings accounts (a) personal: 31,419 (b) small business: 907</p> <p>(2) Value of checking accounts (a) personal: \$811.0 million (b) small business: \$269.1 million</p> <p>(2) Value of savings accounts (a) personal: \$472.1 million (b) small business: \$56.9 million</p>
FN-CB-000.B	(1) Number and (2) value of loans by segment (a) personal, (b) small business and (c) corporate.	<p>Personal (1) Number of loans by segment: 1,672 (2) Value of loans by segment: \$10.8 million</p> <p>Small Business (1) Number of loans by segment: 16,592 (2) Value of loans by segment: \$1.33 billion</p> <p>Corporate (1) Number of loans by segment: (a) CMRE: 279 (b) C&I: 41 (c) Construction: 257 (d) Farmland: 272 (e) Warehouse Lending: 30 (2) Value of loans by segment: (a) CMRE: \$512.1 million (b) C&I: \$1.48 billion (c) Construction: \$123.5 million (d) Farmland: \$76.0 million (e) Warehouse Lending: \$770.0 million</p>

Top 10 Industries	NAICS Code	Value as of 12/31/2021*
General Freight Trucking, Long-Distance, Truckload	484121	\$ 1,638,533,330
Freight Transportation Arrangement	488510	\$ 306,958,251
Consumer Lending	522291	\$ 117,571,053
Real Estate Credit	522292	\$ 92,110,377
General Freight Trucking, Long-Distance, Less Than Truckload	484122	\$ 49,420,357
Temporary Help Services	561320	\$ 43,791,408
Used Car Dealers	441120	\$ 41,631,307
Miscellaneous Intermediation	523910	\$ 39,984,206
Other Commercial and Industrial Machinery and Equipment Rental and Leasing	532490	\$ 39,804,293
All Other Nondepository Credit Intermediation	522298	\$ 38,060,076

Industries at least 2% of overall portfolio	NAICS Code	Value as of 12/31/2021
General Freight Trucking, Long-Distance, Truckload	484121	\$ 1,638,533,330
Freight Transportation Arrangement	488510	\$ 306,958,251
Consumer Lending	522291	\$ 117,571,053

*The reported values include the notional amount of direct outstanding and unfunded legally binding lending commitments net of amounts distributed (e.g. syndicated or participated) to other financial institutions.

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