



**Code of Ethics  
for  
Senior Financial Officers  
of  
Trustmark**

Effective Date: January 1, 2024

## **Code of Ethics for Senior Financial Officers of Trustmark**

This Code of Ethics applies to the Chief Executive Officer, principal financial officer, principal accounting officer or controller, and persons performing similar functions (“Senior Financial Officers”) at Trustmark Corporation and Trustmark National Bank (collectively, “Trustmark”). In addition to the provisions of this Code of Ethics, Senior Financial Officers are also subject to the provisions of the separate Code of Ethics that is generally applicable to all Trustmark associates (the “All-Associate Code of Ethics”).

A Senior Financial Officer must be honest and ethical; ethically handle actual or apparent conflicts of interest between personal and professional relationships; help ensure that Trustmark gives full, fair, accurate, timely and understandable disclosures in reports and documents that Trustmark files with, or submits to, the Securities and Exchange Commission (“SEC”) and in other public communications made by Trustmark; and comply with applicable governmental laws, rules and regulations.

### **I. Conflicts of Interest**

To avoid a conflict of interest, a Senior Financial Officer should avoid conduct that conflicts, or appears to conflict, with his or her duty to act in Trustmark’s best interest and must not allow his or her interest to conflict or compete with Trustmark’s interest. A Senior Financial Officer must not:

- serve as a director, advisory director or officer of another financial institution, insurance company, trust company or investment company (except a subsidiary or affiliate of Trustmark),
- solicit or accept a thing of value to influence, or as a reward in connection with, business or transactions of Trustmark, except as allowed by the Bank Bribery Act and federal regulations,
- engage in insider trading or violate any provision of Trustmark’s Insider Trading Policy,
- use for personal gain any information he or she obtains as a result of his or her position as a Senior Financial Officer, which has not been disclosed to the general public,
- use his or her position for personal gain (except for salary or other compensation or benefits appropriately and ethically paid in the usual course of business), or
- take for himself or herself a business opportunity available to Trustmark. A business opportunity is an opportunity related to Trustmark’s existing or planned business activities or an opportunity in which Trustmark has expressed an interest or which Trustmark has attempted to pursue.

A Senior Financial Officer must promptly disclose to Trustmark’s General Counsel any possible conflict of interest. Trustmark’s Audit Committee or its designee will investigate the matter appropriately and decide if a potential conflict is an actual conflict of interest. If a matter is not a conflict of interest, a Senior Financial Officer may proceed. If a matter is determined to be a conflict of interest, the committee or its designee will determine an appropriate resolution, which determination may be made in consultation with Trustmark’s executive management, Board of Directors, counsel, or other Trustmark or committee advisor, as appropriate. If the conflict of interest can be managed in a way that is consistent with the best interests of Trustmark and its

shareholders, the committee or its designee will take appropriate action to do so. If the conflict of interest cannot be managed in a way that is consistent with the best interests of Trustmark and its shareholders, the committee or its designee will take appropriate action to eliminate the conflict, which may include requiring the officer to divest himself or herself of the conflicting interest.

Trustmark's General Counsel will maintain records of disclosures, investigations, determinations and resolutions. (Deposit or trust services to a Senior Financial Officer, made according to applicable law and on the same terms afforded customers in similar situations, are not conflicts of interest and need not be disclosed.)

Potential conflicts of interest that involve transactions between Trustmark and Senior Financial Officers and their related persons must also be consistent with Trustmark's Related Party Transactions Policy.

## **II. Disclosures**

To give full, fair, accurate, timely and understandable disclosures, a Senior Financial Officer must respond candidly and completely to Trustmark directors, auditors, attorneys, and examiners, must maintain accurate books and records, and must abide by generally accepted accounting principles.

## **III. Compliance Matters**

Senior Financial Officers are subject to the provisions of this Code and the All-Associate Code of Ethics, including the reporting and implementation provisions of that Code. Accordingly, Senior Financial Officers are required to promptly report violations of this Code of Ethics, the All-Associate Code of Ethics, or any other Trustmark code of conduct or policy in accordance with the procedures set forth in the "Report Code Violations" section of the All-Associate Code of Ethics. Any violation of a rule stated in this Code of Ethics may result in disciplinary action up to and including involuntary separation.

In addition to their obligations under this Code of Ethics and the All-Associate Code of Ethics, Senior Financial Officers are required to promptly report all violations or suspected violations of state or federal laws, rules and regulations applicable to Trustmark, and should also promptly report complaints regarding accounting, internal accounting controls or auditing matters and concerns regarding questionable audit or accounting matters. Senior Financial Officers may report any such matters by contacting our independent online reporting center at [www.trustmark.ethicspoint.com](http://www.trustmark.ethicspoint.com) or calling the Trustmark Hotline at 1-866-979-3769 in accordance with the Procedure to Report Violations of Law or Accounting or Audit Irregularities.

Finally, Senior Financial Officers are reminded that they are prohibited from illegally trading in Trustmark securities while in possession of material nonpublic information about Trustmark and must comply with Trustmark's Insider Trading Policy.

Senior Financial Officers are required annually to certify to Trustmark's General Counsel that he or she is in compliance with this Code of Ethics.

Any waiver of the provisions of this Code of Ethics or the All-Associate Code of Ethics, in the case of any Senior Financial Officer, must be approved by Trustmark's Corporate Board of Directors. Any such waiver of this Code of Ethics or the All-Associate Code of Ethics granted to a Senior Financial Officer will be publicly disclosed along with the reasons for the waiver as required by the SEC and/or the national exchange on which Trustmark's securities are listed for trading.

#### **IV. Questions about the Code**

If a Senior Financial Officer does not know whether an action or circumstance may violate the Code of Ethics or has any other question regarding the Code of Ethics, he or she should consult the General Counsel.

First approved this 23rd day of July, 2013

Amended and approved this 12th day of December, 2017

Further amended effective January 1, 2021

Further amended effective January 1, 2024

Board of Directors

Trustmark Corporation

Trustmark National Bank