



## **COMPLAINT PROCEDURES FOR ACCOUNTING AND AUDITING MATTERS**

Any employee of C&F Financial Corporation and its subsidiaries (the “Company”) or other person may submit a good faith complaint regarding accounting or auditing matters 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 and audit practices. The Company’s Audit Committee oversees treatment of employee concerns in this area.

In order to facilitate the reporting of complaints by employees or others, and in accordance with the Company’s Audit Committee Charter, the Company’s Audit Committee has established the following procedures for (1) the receipt, retention and treatment of complaints received by the Company regarding accounting, internal accounting controls, or auditing matters (“Accounting Matters”) and (2) the confidential, anonymous submission by employees or others of concerns regarding questionable accounting or auditing matters.

### **Receipt of Complaints or Concerns**

- Employees or others with complaints regarding Accounting Matters may report their concerns to the Company’s Chair of the Audit Committee using the contact information listed below. Any complaints or concerns may also be reported, however, to the Company’s Chief Executive Officer or Chief Financial Officer.
- Employees or others may forward concerns regarding questionable accounting or auditing matters on a confidential or anonymous basis to the Company’s Chair of the Audit Committee through email or regular mail:

**D. Anthony Peay**  
**[CFaudithotline@gmail.com](mailto:CFaudithotline@gmail.com)**

**Chair of the Audit Committee**  
**3600 La Grange Parkway**  
**Toano, VA 23168**

For anonymous concerns or complaints, please use regular mail and mark as confidential. The Company, however, encourages employees and others to provide their names so the complaint or concern can be investigated thoroughly. By law, a good faith complaint or concern can be made without fear of dismissal or retaliation of any kind.

- Nothing in this policy restricts or prohibits employees or an employee’s counsel from initiating communications directly with, responding to any inquiry from, volunteering

information to, or providing testimony before a self-regulatory authority or a governmental, law enforcement or other regulatory authority, including the U.S. Equal Employment Opportunity Commission, the Department of Labor, the National Labor Relations Board, the Department of Justice, the Securities and Exchange Commission, the Financial Industry Regulatory Authority, the Congress, and any Office of Inspector General (collectively, the “Regulators”), from participating in any reporting of, investigation into, or proceeding regarding suspected violations of law, or from making other disclosures that are protected under or from receiving an award for information provided under the whistleblower provisions of state or federal law or regulation. Employees do not need the prior authorization of the Company to engage in such communications with the Regulators, respond to such inquiries from the Regulators, provide confidential information or documents containing confidential information to the Regulators, or make any such reports or disclosures to the Regulators. Employees are not required to notify the Company that the employee has engaged in such communications with the Regulators. In connection with any such activity outlined above, the employee must inform the Regulators that the information the employee is providing is confidential.

- Employees of the Company shall not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that is made in confidence to a federal, state or local government official, either directly or indirectly, or to an attorney, and solely for the purpose of reporting or investigating a suspected violation of law, or that is made in a complaint or other document that is filed under seal in a lawsuit or other proceeding. An individual who files a lawsuit for retaliation by the Company for reporting a suspected violation of law may disclose the trade secret to his or her attorney and use the trade secret information in the court proceeding if the individual files any document containing the trade secret under seal and does not disclose the trade secret, except pursuant to court order.

#### Scope of Matters Covered by These Procedures

These procedures relate to complaints or concerns (either referred to below as a “Complaint”) relating to any questionable accounting or auditing 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;
- false statements made to independent auditors; or
- deviation from full and fair reporting of the Company’s financial condition.

### Treatment of Complaints

- If a member of management or a director is advised of a Complaint by an employee or non-employee, the member of management or director is to immediately inform the Company's Chair of the Audit Committee.
- Upon receipt of a Complaint, the Company's Chair of the Audit Committee will, when possible, acknowledge receipt of the Complaint to the sender.
- Complaints will be reviewed and, where appropriate, investigated under Audit Committee direction and oversight by the Company's general or other counsel, internal audit or such other persons as the Audit Committee determines to be appropriate. Confidentiality will be maintained to the greatest extent practicable, consistent with the Company's legal and other obligations, including the need to conduct an adequate review.
- Prompt and appropriate corrective action will be taken when and as warranted in the judgment of the Audit Committee.
- The Company will not permit retaliation of any kind by or on behalf of the Company and its directors, officers or employees, including discharge, demotion, suspension, threats, harassment, or any other manner of discrimination against an employee in the terms and conditions of employment, for participating or assisting in an investigation or for good faith reporting of Complaints, whether reported to the Company or to a proper government official or agency. Anyone who attempts to retaliate against an individual in violation of this policy will be subject to disciplinary action, up to and including termination.

### Reporting and Retention of Complaints and Investigations

- The Company's Chair of the Audit Committee or his designee will maintain a log of all Complaints, tracking their receipt, investigation and resolution and shall prepare a quarterly summary report thereof for the Audit Committee. Copies of Complaints and such log will be maintained for five years.

The Audit Committee will periodically review this policy and may amend this policy from time to time as it deems appropriate or as required by law.

Approved this 17th day of December 2024

**AUDIT COMMITTEE**

**C&F FINANCIAL CORPORATION**