

TWFG, INC.

COMPLAINT PROCEDURES FOR ACCOUNTING AND AUDITING MATTERS

Any employee of TWFG, Inc. or its subsidiaries (together, the “*Company*”), as well as any other person, may submit a good faith complaint regarding accounting, internal accounting controls 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 Audit Committee of the Company’s Board of Directors (the “*Audit Committee*”) will oversee treatment of employee and third-party concerns in this area.

In order to facilitate the reporting of complaints, the Audit Committee has established the following procedures for (i) the receipt, retention and treatment of complaints regarding accounting, internal accounting controls, or auditing matters (“*Accounting Matters*”) and (ii) the confidential, anonymous submission by employees and third parties of concerns regarding questionable accounting or auditing matters. Employees who suspect violations regarding Accounting Matters are required to report such concerns and should do so according to these procedures.

Receipt of Complaints

- Individuals may report complaints on a confidential or anonymous basis by calling a toll-free hotline at 833-333-3624 or filing a report at <https://www.whistleblowerservices.com/twfg>.

Scope of Matters Covered by These Procedures

These procedures relate to complaints relating to any Accounting 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; or
- deviation from full and fair reporting of the Company’s financial condition.

Treatment of Complaints

- Upon receipt of a complaint, the Chairperson of the Audit Committee will (i) determine whether the complaint actually pertains to Accounting Matters and (ii) when possible, acknowledge receipt of the complaint to the sender. If the Chairperson deems it appropriate, he or she may forward a complaint to outside counsel for the Company or to special counsel retained by the Audit Committee.
- Complaints relating to Accounting Matters will be reviewed under Audit Committee direction and oversight by Company counsel, Internal Audit or such other persons as the Audit Committee determines to be appropriate. The Audit Committee will remain apprised of the outcome of investigations related to such complaints. 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 Audit Committee.
- The Company will not discharge, demote, suspend, threaten, harass or in any manner discriminate 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 otherwise as specified in Section 806 of the Sarbanes-Oxley Act of 2002.

Reporting and Retention of Complaints and Investigations

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