S&T BANCORP, INC.

POLICY #609 - Complaints Regarding Accounting, Internal Accounting Controls or Auditing Matters ("Whistleblower Policy")
POLICY TYPE: Corporate
EFFECTIVE DATE: 10/28/2026
ISSUING DEPARTMENT: Executive

PURPOSE

Pursuant to Section 301 of the *Sarbanes-Oxley Act of 2002*, the Securities and Exchange Commission and Nasdaq have adopted rules which require the audit committee of a listed company to establish procedures for:

- The receipt, retention and treatment of complaints received by the listed company regarding accounting, internal accounting controls or auditing matters, and
- The confidential, anonymous submission by employees of the issuer of concerns regarding questionable accounting or auditing matters.

SCOPE

This Policy outlines the procedures adopted by the Audit Committee of S&T Bancorp, Inc. ("Audit Committee"), which policy is applicable to S&T Bancorp, Inc. and its affiliates (collectively, "S&T"), to comply with these rules.

This Policy applies to all directors, officers, employees, shareholders of S&T and third parties, such as vendors, that do business with S&T. The Whistleblower Policy requirements are included in the Bank's annual training program.

This Policy applies to complaints relating to any questionable accounting, internal accounting controls or auditing matter ("Covered Matter"). The following, while not exhaustive, are examples of such matters:

- Fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of S&T, or in the recording and maintaining of S&T's financial records;
- Deficiencies in or noncompliance with S&T's internal accounting controls and corresponding policies;
- 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 S&T; or
- Deviation from full and fair reporting of S&T's financial condition.

Any direct or indirect retaliation, threatened or executed, against a director, officer, employee or shareholder ("Reporting Individual") for any of the following is strictly prohibited:

- Refusing to participate in something believed in good faith to be a Covered Matter;
- Participating in or providing information for an investigation of a Covered Matter;
- Internally reporting a Covered Matter in good faith pursuant to the reporting procedures outlined herein; or
- Making or stating an intent to make disclosures related to a Covered Matter to a public body:
    - Ohio: Employees must alert their employer of the alleged violation with a written report describing the alleged violation and provide the employer with 24 hours to make a reasonable, good-faith effort to correct the violation and to provide the employee with notice in writing of any effort to correct the alleged violation.

Prohibited retaliatory actions include discharge, demotion, threats, refusals to hire, and other adverse employment actions.

Persons with knowledge of any incidents of such actual or threatened retaliation may make a report pursuant to the procedures outlined herein. Any such reports will be handled as a Covered Matter complaint.

This Policy should be read in conjunction with the following policies:

- #601 – General Code of Conduct
- #608 – Code of Conduct for the CEO and CFO
- #810 – Suspicious Activity Monitoring and Reporting

PROCEDURES

Receipt of Complaints

S&T uses an independent third-party to capture reports of suspected or known illegal or unethical activity. You are required to report any allegations of suspected or known irregularities in accounting or auditing at S&T or by an S&T vendor, by calling the Ethics Helpline at 833-254-4271, or by using the online reporting tool at stbank.ethicspoint.com, or by using your mobile phone at stbank.mobile.ethicspoint.com. To the extent possible, confidentiality will be maintained during the investigation and the identity of the reporting individual will remain anonymous. All reports will be taken seriously; however, please provide enough detailed information to allow for an investigation.

No disciplinary or other retaliatory action will be taken against any person as a result of making a good faith report of any violation or suspected violation of the Code of Conduct or this Policy, even if it is determined that there was no violation. Any such retaliatory conduct is a violation of this Policy and the Code of Conduct.

All direct communications of Covered Matters to the Ethics Helpline will be on a confidential, anonymous basis, unless directed otherwise by the Reporting Individual. As stated above, it is S&T's policy to prohibit direct or indirect retaliation against a Reporting Individual who acts in good faith in reporting Covered Matters.

The Covered Matter may be reported by telephone or via the third-party web portal. The Reporting Individual is not required to provide a name or other form of identification.

Retention of Complaints

S&T counsel, with the assistance of any third-party provider and any outside counsel engaged by S&T, will record the complaint and any interactions with the Reporting Individual, and retain files with appropriate documentation of any review performed including communications.

Treatment of Complaints

1. S&T's counsel, which may include outside counsel engaged by S&T ("Counsel"), will perform an initial review of the complaint to determine whether the complaint involves an actual Covered Matter.

2. If the complaint involves a Covered Matter, Counsel will acknowledge receipt of the complaint to the complainant within ten days of receipt. Counsel, or a person designated by Counsel, will provide periodic status updates regarding resolution of the complaint; such updates to be provided no less often than monthly. Once a timeframe for resolution is reasonably identified depending on the facts and circumstances, such timeframe will be relayed to the complainant by Counsel or a person designated by Counsel.

3. Counsel will forward a copy of Covered Matter complaints to the Audit Committee Chairperson, the Chief Executive Officer ("CEO"), the Chief Financial Officer ("CFO") and the Chief Audit Executive ("CAE"), provided that the complaint does not involve the CEO, CFO or CAE.

4. If the Covered Matter complaint involves the CEO, CFO or CAE or a Reporting Individual's allegation of direct or indirect retaliation for reporting a Covered Matter, Counsel will forward a copy of the Covered Matter complaint to the Audit Committee Chairperson only. The Chairperson will review the complaint, assess its severity and materiality and determine what resources should be engaged to investigate its merits. If determined that the complaint warrants the engagement of a third party in addition to, or instead of, the CAE and the independent auditor, the Chairperson should contact other members of the Audit Committee, sufficient for a quorum, to decide on the appropriate course of action.

   Additionally, complaints related to Covered Matters received from the Compliance Risk Management, Employee Services, Financial Intelligence Group, and Security departments and/or General Counsel, related to the execution of their respective responsibilities should be promptly reported to the Audit & Advisory Services Department ("Audit"). Audit will evaluate for any financial reporting implications.

5. Complaints regarding a Covered Matter will be reviewed under Audit Committee direction and oversight by such persons as the Audit Committee determines to be appropriate.

6. The Audit Committee may request special treatment, including the retention of outside counsel or other advisors, for any Covered Matter complaint addressed to it.

7. The status of all Covered Matter complaints will be reported to and reviewed by the Audit Committee as a regular agenda item at Audit Committee meetings. Covered Matter complaints involving the CEO, CFO or CAE will be discussed without management present.

8. The Audit Committee will inform the Board of Directors of the status of complaints at regular Board meetings, unless the materiality or severity of the complaint warrants greater frequency.

9. Prompt and appropriate corrective action will be taken when and as warranted in the judgment of the Audit Committee.

RECORDS

At the direction of the Audit Committee, the CAE will maintain a log of all Covered Matter complaints, tracking their receipt, investigation and resolution, and shall prepare a periodic summary report thereof for the Audit Committee in conjunction with regular Audit Committee meetings.

RESPONSIBILITIES

Audit Committee

- Annually review and approve this Policy.

POLICY EXCEPTIONS

S&T does not permit any exceptions to this Policy.

Approved: S&T Bancorp, Inc. Board of Directors; 10/28/2026
S&T Bancorp, Inc. Audit Committee; 8/4/2026