

**SECURITY NATIONAL FINANCIAL CORPORATION
AUDIT COMMITTEE
WHISTLEBLOWER PROCEDURE**

Ratified March 22, 2024

I. Procedure for Receiving Complaints

Employees with concerns or complaints regarding matters covered by the Audit Committee Whistleblower Procedure of Security National Financial Corporation (the “Company”) may report such concerns or complaints directly to the Manager of Internal Audit, the Chairman of the Audit Committee, or any of the Audit Committee Members listed below.

- E-mail – kevin.cantwell@securitynational.com
- Direct Line – Kevin Cantwell – Manager of Internal Audit (801) 713-2494
- Intercompany Mail –Kevin Cantwell – Corporate Office
- Regular Mail – Security National Financial Corporation, Attn: Manager of Internal Audit, 433 Ascension Way, 6th Floor, Salt Lake City, Utah 84123
- Direct Line – Gilbert A. Fuller – Audit Committee Chairman – (801) 201-4024 or gil.fuller23@gmail.com
- Direct Line – H. Craig Moody – Audit Committee Member – (801) 541-8848 or hcmoody@comcast.com

The Senior General Counsel of the Company shall notify the Manager of Internal Audit of any report submitted pursuant to SEC rules and regulations that include evidence of a material violation of state or federal securities laws, a material breach of fiduciary duty or similar violation of any federal or state law.

II. Scope of Matters Covered by these Procedures

- 1) Fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
- 2) Fraud or deliberate error in the recording and maintaining of financial records of the Company;
- 3) Deficiencies in noncompliance with Company’s internal accounting controls;
- 4) 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;
- 5) Deviation from full and fair reporting of the Company’s financial condition; and

- 6) Mail fraud, wire fraud, bank fraud, securities fraud, violation of any SEC rule or regulation or violation of any federal law relating to fraud against shareholders.

III. **Procedure for Handling Complaints**

1) **Receipt of a Complaint**

Upon receipt of a complaint, the Manager of Internal Audit or the Audit Committee Chairman will forward a copy of the complaint to the Company's Senior General Counsel and, when possible, acknowledge receipt of the complaint to the sender. (Considering that most complaints will be anonymous, it is understood that such acknowledgement may not be possible.) The Manager of Internal Audit and the Senior General Counsel will verify that the complaint actually pertains to a matter covered by these procedures and develop a recommended strategy for the investigation of the complaint.

If the Manager of Internal Audit and the Senior General Counsel determine that the complaint does not pertain to the items contained within the Whistle Blower Policy, the matter will be forwarded to the appropriate individuals within the Company for investigation and resolution of the complaint. The same rules of confidentiality will be maintained in these situations, consistent with the need to conduct the investigation and resolve the matter.

2) **Audit Committee Oversight**

The Manager of Internal Audit will promptly report all complaints relating to material matters covered by these procedures and the recommended strategy for investigating the complaint to the Chairman of the Audit Committee. The Chairman shall provide direction and oversight to the Manager of Internal Audit, the Senior General Counsel or such other person as the Chairman shall deem appropriate to conduct the investigation.

3) **Confidentiality**

Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review.

4) **Corrective Action**

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

5) **Procedure Prohibiting Retaliation**

In compliance with Section 806 of the Sarbanes-Oxley Act of 2002, the Company will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee in the terms and conditions of his or her employment based upon the

lawful action of any such employee with respect to good faith reporting of a matter covered by these procedures.

IV. Reporting and Retention of Complaints and Investigations

The Manager of Internal Audit will maintain records of all complaints covered by these procedures, including tracking their receipt, investigation and resolution. Copies of all complaints and investigation records will be retained for a period of time as deemed appropriate by the Manager of Internal Audit and the Senior General Counsel.