BAR HARBOR BANKSHARES
CODE OF CONDUCT AND BUSINESS ETHICS

Approved By the
Governance Committee 07-18-2023

CODE OF CONDUCT AND BUSINESS ETHICS
RECORD OF REVIEW/CHANGE

Date	Type of Review/Change	Recorded by
11/16/2016	General updates. Updates approved by Littler Mendelson employment attorney.	Sara O'Connell
12/19/2017	General updates. Attorney reviewed.	Marsha Sawyer
7/17/2018	General updates.	John W. Land
7/10/2019	No changes	Jenny Svenson
6/30/2020	No changes	Jenny Svenson
5/3/2021	Anti-money laundering programs and know your customer	K. Carter
8/2/2022	General updates. Policy reviewed by Littler employment attorney.	Alison DiPaola
7/5/2023	Change to gifts permitted from $50 to $100	Alison DiPaola

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CODE OF CONDUCT AND BUSINESS ETHICS

The purpose of this Code

The honesty, integrity, and sound judgment of our directors, officers, and employees is fundamental to the reputation and success of Bar Harbor Bankshares and its subsidiaries (the "Company").

In order to promote and assure the proper and ethical performance of its business and to maintain the confidence of the public and our stockholders in the Company, the Board of Directors has adopted the following Code of Conduct and Business Ethics (the "Code") as a set of expectations and guidance for all directors, officers, and employees. The Company believes that it is essential for all directors, officers, and employees to avoid unethical, improper, or unlawful activities (and activities that could give the impression of impropriety), including, but not limited to, those that could damage the Company's reputation or lead to adverse consequences for the Company or for the individuals involved.

All directors, officers, and employees are expected to be familiar with this Code and to seek guidance on any matters that they feel are unclear.

The Company's specific procedures contained in memoranda, policies, e-mail, or other guidance, which the Company may distribute from time to time to its directors, officers, and employees, are separate requirements from this Code and are in addition to and not in derogation of this Code.

The Company will not interpret this Code or any of its policies in a way that prevents employees from communicating with each other lawfully about wages, hours, or other terms and conditions of employment or properly engaging in activities protected under the National Labor Relations Act.

I. Honest and candid conduct

Each director, officer, and employee is expected to perform the individual's duty to the Company with integrity, adhering to high standards of business ethics. Such standards include being honest and candid with stockholders, with customers, with regulators, and with each other, while still maintaining confidential information consistent with Company policies.

II. Compliance with laws, rules, and regulations

Obeying the law, both in letter and in spirit, is one of the foundations on which the Company's ethical standards are built. All directors, officers, and employees must respect and obey all applicable laws, rules, and regulations in the cities, states, and countries in which the Company operates. It is the responsibility of all directors, officers, and employees to adhere to the standards and restrictions imposed by those laws, rules, and regulations. Although not all directors, officers, and employees are expected to know the details of these laws, rules, and regulations, it is important to know enough to determine when to seek advice from senior managers or outside professionals. All directors, officers, and employees are expected to seek guidance whenever the legality of any activity is in doubt.

III. Anti-Money Laundering programs

It is the policy of Bar Harbor Bank & Trust (BHBT) and its subsidiary Bar Harbor Wealth Management (collectively "BHBT" or Bar Harbor Bank & Trust), to comply with all the applicable anti-money laundering laws, including the Bank Secrecy Act (BSA). To ensure compliance with the BSA reporting requirements as well as all other anti-money laundering laws, BHBT has implemented a Bank Secrecy Act and Anti-Money Laundering (BSA & AML) Compliance Program. This program establishes a system of internal controls to ensure ongoing compliance with the BSA and anti-money laundering laws.

The Company is committed to maintaining an effective BSA & AML compliance program, which enables Bank employees to adequately detect, prevent and report suspected criminal activity. The Company is committed to operating in a safe and sound manner while striving to prevent the use of its services for illicit purposes. As part of our commitment to maintaining and enhancing our reputation as a highly ethical financial institution, it is our policy to strive to do business only with individuals and organizations of good reputation and standing. BHBT only deals with individuals and entities engaged in legitimate businesses and transactions and shall not establish a banking relationship with, or otherwise conduct a transaction for, individuals or entities that BHBT deems to carry an unacceptable level of risk in the BSA and money laundering areas.

In an effort to prevent abuse of the financial system, the Company and its subsidiaries are committed to implementing a strong and effective program to comply with the spirit and specific provisions of all laws and regulations designed to combat money-laundering activity, including those rules and regulations requiring reporting of transactions involving currency, certain monetary instruments, and suspicious activity.

The Company complies with both the letter and spirit of the BSA and all other anti-money laundering laws by establishing and adhering to the highest and strictest of legal and ethical standards and takes all reasonable steps to prevent, detect and react to money laundering activities.

The Company requires strict compliance with information/documentation gathering requirements and monitors account and transaction activity in order to detect unusual and/or suspicious activity and report such activity to the appropriate law enforcement agencies. For situations requiring immediate attention, in addition to filing a timely SAR, when appropriate, the Bank will promptly notify, by telephone or other available means, an "appropriate law enforcement authority" and, as necessary, the Bank's primary regulator.

The cornerstone of the compliance program is the adoption and implementation of comprehensive Customer Due Diligence (CDD) policies, procedures, and processes for all customers, particularly those that present a higher risk for money laundering and terrorist financing. The objective of CDD is to enable the Bank to understand with relative certainty the types of transactions in which a customer is expected to engage. These processes assist the Bank in determining when transactions are potentially suspicious. The concept of CDD begins with verifying the customer's identity and assessing the risks associated with that customer. Processes include enhanced CDD for higher-risk customers and ongoing due diligence of the customer base.

The Customer Identification Program includes policies and procedures to ensure that the Bank is verifying the identity of any person seeking to open an account, to the extent reasonable and practicable, so as to establish a reasonable belief that the institution knows the true identity of the person. Procedures are intended to be risk-based but are important to assist in preventing possible fraud or misconduct by new customers that can result in loss of funds or reputation risk for the Bank.

> Know Your Customer – ID Verification Criteria: Customer authentication is not only a regulatory requirement; it is also a principal practice in protecting customer data, and a key component in identifying fraud and identity theft. Every effort needs to be taken to ensure the customer is correctly identified and the account(s) being accessed and worked with are correct.
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> When customers or other individuals contact the Bank requesting account, transaction, customer or other sensitive information, or employees must clearly confirm the identity of the customer before proceeding. If the customer cannot be positively authenticated, information must not be released. This standard applies to all employees, contractors and vendors that have access to Bar Harbor Bank & Trust systems or resources. Violations of this standard can result in disciplinary action to include dismissal.
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> The BSA Officer conducts a risk assessment at least annually that includes a review of customers, products, services, and identification that the Bank requires.

Quality Assurance and BSA review all new accounts and generate a monthly exception report to identify any new relationships established without gathering all appropriate information and CDD. Exceptions are tracked until the information is gathered/corrected or the relationship is closed.

These procedures may be amended in response to applicable legal requirements or as necessary to improve and address ongoing concerns.

IV. Integrity of financial records and proper recordkeeping

Directors, officers, and employees must ensure that all of the Company's documents and other records, whether in electronic, digital, or any other format, are completed accurately, truthfully, in a timely manner, and properly authorized.

The integrity, reliability, and accuracy of the Company's books, records, and financial statements (for example, internal financial records, customer documents, contracts, invoices, time sheets, personal leave sheets, expense reports and corporate financial statements) are fundamental to the Company's business success. Employees, officers, and directors must comply with all internal control procedures established by the Company for the safeguarding of assets and proper reporting and disclosure of financial information in compliance with all applicable laws and accounting practices.

No director, officer, or employee may cause the Company to enter into a transaction with the intent to document or record it in a deceptive or unlawful manner. In addition, no director, officer, or employee may create any false or artificial documentation or book entry for any transaction entered into by the Company. Similarly, officers and employees who have a responsibility for accounting and financial reporting matters have a responsibility to accurately record all funds, assets, and transactions on the Company's books and records.

Ensuring accurate and complete business and financial records is everyone's responsibility, not just the obligation of accounting and finance personnel. Accurate recordkeeping and reporting reflects on the Company's reputation and credibility, and ensures that the Company satisfies its legal and regulatory obligations. Always record and classify transactions properly, never falsify any document, and never distort the true nature of any transaction or other company information.

Business records and communications often become public, so they may not contain guesswork or inappropriate characterizations of people and companies that might be misunderstood. This applies equally to e-mail, internal memos, and formal reports.

The Company does not tolerate acts of fraud. Fraud, whether large or small, harms the Company, our employees, our customers, and our business partners. If an employee becomes aware of actual or suspected fraud, including, but not limited to, embezzlement, forgery, alteration of checks or other documents, employees must utilize the established channels to report such concerns to enable the Company to take proper corrective action as soon as reasonably possible, unless reporting such a matter would impede an employee's or the Company's ability to report the matter or communicate with an appropriate government authority.

Only authorized personnel may sign contracts and commit the Company to financial expenditures. All such activities must be undertaken with approval from the appropriate finance and legal personnel.

Records should always be retained or destroyed according to our applicable policies. The Company seeks to comply fully with all laws and regulations relating to the retention and preservation of records. Under no

circumstances may Company records be destroyed selectively or maintained outside Company premises or designated storage facilities.

When there is actual or potential litigation or reasonable likelihood of an external investigation, the Company may determine that it is necessary to preserve information relating to the matter, such as e-mails and other documents that might otherwise be deleted in the ordinary course of business. If an employee becomes aware of any actual or potential litigation, subpoena, or other legal proceeding involving the Company, they should notify the Company so that it can determine what additional document preservation may be necessary, unless doing so would impede an employee's or the Company's ability to report the matter or communicate with an appropriate government authority. Directors, officers, and employees must comply with any document retention or preservation instructions that you receive from the Company.

V. Trading in Company stock

The Company believes that it is important for directors, officers, and employees to invest in the Company's stock, if they are financially able and can make an informed investment decision. Such investments reflect confidence in the Company's business strategy and its ability to compete. Such investments also inspire confidence among the Company's independent investors and the community. However, great care must be taken when insiders make such investments.

Directors, officers, and employees who have access to confidential information are not permitted to use or share that information for stock trading purposes or for any other purpose except for the conduct of the Company's business. All non-public information about the Company should be considered confidential in this context. To use non-public information for personal benefit or to "tip" another person or party, including family members, who might make an investment decision based upon this confidential information, is unethical, in violation of this Code, and illegal. The consequences of such improper trading activity can be severe, including fines, civil judgments, and criminal sanctions against the individuals involved, as well as severe damage to the credibility and reputation of the Company.

Confidential information regarding the Company includes any information regarding the Company's business activities, any information regarding the Company's directors, officers, and employees, and any information regarding the Company's clients for which disclosure, by an individual authorized to make such disclosure, has not been previously made. For the avoidance of doubt, all information regarding the Company's revenue, assets under management, fee structures, number and types of clients, and business plans is confidential unless such information has been previously disclosed by an individual authorized to make such disclosure.

Information is non-public until it has been made available to investors such as through its inclusion in reports filed by the U.S. Securities and Exchange Commission, press releases by the issuer of the securities, or reference to such information in publications of general circulation such as The Wall Street Journal or The New York Times.

Directors, officers, and employees are expected to exercise great care and discretion when trading in Company stock and are reminded to consult with the Chief Financial Officer ("CFO") or the Company's Clerk to ensure that all protocols for timing and reporting stock trades are followed.

Also see the Company's Insider Trading in Securities Policy.

VI. Background checks and insurance bonding

The Company is a provider of banking and financial services and its conduct and performance is subject to intense regulatory oversight. In addition, because the relationship between the Company and its customers is built on trust, the Company must ensure that its directors, officers, and employees reflect the highest ethical

standards. To that end, all prospective directors, officers, and employees are subject to appropriate background checks as a condition of appointment or employment and continued appointment or employment. In addition, a blanket surety bond covers all directors, officers, and employees. Any director, officer, or employee who becomes uninsurable under this surety bond will not be able to continue, and must terminate, the individual's relationship with the Company.

As an employee, you must inform your supervisor and the Human Resources Department when you are charged with or indicted for a criminal offense, provide status updates, including, but not limited to, any final disposition (whether you are found guilty of, or plead guilty or no contest to, a criminal offense), and provide information and documentation related to the criminal proceedings. For some employees, the situation will also have to be reported to regulators. A pending criminal proceeding against an Employee may be considered in appropriate circumstances for business-related reasons and result in employment consequences, consistent with applicable law.

Many motor vehicle-related offenses of a less serious type (e.g., minor traffic violations, speeding) are not criminal offenses, and do not have to be reported. If you are not sure whether a charge, guilty finding, plea or other criminal proceeding should be reported, you should discuss the situation with your supervisor or the Human Resources Department.

Employees who personally become the subject of an inquiry or action by a financial services regulator or similar authority (including any disqualification or denial or suspension of a license) or any legal claims asserting fraud, dishonesty, or unfair or unethical conduct related to financial services, whethersuch inquiry, action or claims relate to the business of the Company or not, must immediately report this information to Human Resources, unless otherwise prohibited by law.

The Company is in the business of managing other people's money. Therefore, as employees, we are expected to responsibly manage our own finances. Employees experiencing personal financial difficulties should discuss the situation with their supervisor or the Human Resources Department.

VII. Compliance with the Federal Bank Bribery Law of 1985

In general, it is both illegal and against Company policy for any director, officer, or employee to solicit, for themselves or for another, anything of value from anyone in return for a business service or confidential information of the Company, or to accept anything of value in connection with the business of the Company, either before or after a transaction is discussed or consummated. The Federal Bank Bribery Law of 1985 prohibits gifts given, offered, solicited, or accepted with the intent to influence or be influenced. Ultimately, a director, officer, or employee cannot be certain as to another's intention in offering or making a gift. Consequently, a director, officer, or employee must exercise great caution in acceptance of any gift and no gift or entertainment should ever be offered, given, or provided except as described below.

Gifts Permitted – The Company recognizes that in the ordinary course of doing business, directors, officers, and employees, without risk of corruption, may accept something of nominal value ($100.00 or less) from those doing or seeking to do business with the Company. The most common examples are business lunches, flowers, a holiday season gift, or a thank you gift from a customer.

Other occasions when directors, officers, and employees may accept things of value in connection with Company business are as follows:

- Gifts, gratuities, amenities, or favors may be accepted for any amount from family members or friends when the circumstances make it clear that the relationship, and not Company business, is the motivation for the gift, gratuity, amenity, or favor.

- Meals, refreshments, travel arrangements, accommodations, or entertainment, all of nominal value, may be accepted in circumstances where it is clear that the expense is a business expense under the Internal Revenue Service regulations, is intended to facilitate business discussions or foster better business relations, and would be paid by the Company as a reasonable business expense if not paid by another party.
- Advertising or promotional material of nominal value, such as pens, pencils, note pads, key chains, calendars, and similar items generally available to all vendor clients, may be accepted.
- Discounts or rebates on merchandise or services that do not exceed those available to other customers may be accepted.
- Civic, charitable, educational, or religious organizational awards of nominal value recognizing service and accomplishment may be accepted.
- Loans from other banks or financial institutions may be accepted on customer terms to finance proper and usual activities of Company directors, officers, and employees.
- Gifts of nominal value relating to commonly recognized events or occasions, such as a promotion, new job, wedding, retirement, new baby, Christening, or Bar or Bat Mitzvah may be accepted.

Directors, officers, and employees who are offered or receive something of value outside the scope of this Policy are required to make a written report to the Human Resources Department regarding all relevant facts about the gift. The Human Resources Department shall maintain these written reports and review them with the Company's Chief Executive Officer (the "CEO") and Board of Directors to determine whether the gift or other item that has been offered or accepted is reasonable and does not threaten or impugn the integrity of the individual or the Company.

VIII. Conflicts of Interest

Directors, officers, and employees must avoid any activity or personal interest that creates, or reasonably could create the appearance or potential of, a conflict between their interests and the interests of the Company or a customer. A conflict of interest occurs when a person's private interests interfere in any way, appear to interfere, or potentially could interfere, with the interests of the Company or its customers. A conflict of interest situation can arise when a director, officer, or employee takes actions or has interests that may make it difficult for individuals to perform their Company work objectively or effectively. Conflicts of interest may also arise when a director, officer, or employee or a member of the individual's family, receives improper personal benefits as a result of the individual's position at the Company.

However, it is customary and routine for directors, officers, and employees and their families to do business with a local community bank such as the Company. The Company encourages such relationships as beneficial to both the Company and the customer so long as the relationships are fair, reasonable, and conducted on terms and conditions generally available to those afforded to any similarly situated customer.

Under no circumstances will two relatives or people who share a financial or close personal relationship be permitted to work (i) in positions where there is a direct reporting relationship, (ii) when either one has the authority to influence, directly or indirectly, any term or condition of employment of the other, or (iii) in any situation in which there is an actual, perceived or potential conflict of interest, without prior approval of the department Manager and Human Resources. For example, relatives and people who share a financial or close personal relationship cannot perform functions or tasks that serve as controls or provide control oversight for each other, such as sharing joint codes or combinations, securing assets in joint custody, or serving in an auditing, compliance, operations risk, override, verification or approval function. If two employees are or become relatives or people who share a financial or close personal relationship and are in any of the above prohibited situations, both employees must promptly disclose the relationship to their Manager(s) and to Human Resources.

Directors, officers, or employees who have family members or friends working for businesses seeking to provide goods or services to the Company may not use their personal influence to affect negotiations. Employees who have relatives or friends who work for competitors of the Company, where such relationships might present an actual, perceived or potential conflict of interest with the Company, should bring this fact to the attention of their immediate supervisors.

When an employee refers a relative or a person with whom they share a financial or close personal relationship to the Company for any business opportunity (e.g., employment, independent contractor, supplier, customer), the referring individual must disclose the relationship and have no direct or indirect involvement in, or directly or implicitly attempt to influence, the Company's decision regarding the business opportunity.

Because it is almost always a conflict of interest for a Company employee to work simultaneously for the Company and a competitor, customer, or supplier, no Company officer or employee may work for or serve as a consultant to a customer or supplier of the Company without the express written permission of the Company.

Officers and employees may not borrow money from customers or suppliers except where the customer or supplier's normal business practices includes lending, and any such borrowing must be at market rates and on other terms generally available to any similarly situated customer.

Officers and employees are prohibited from processing or performing any transaction in which they have a personal interest or any transaction on their own account, or the account of a relative or someone with whom they are involved in a financial or close personal relationship, including, without limitation, submitting requests for fee reversals. Personal interest includes both the interest of the employee or the employee's immediate family members. These transactions must be handled by another authorized but disinterested officer or employee.

As used in this Code, "relative" includes spouse, domestic partner, parties to a civil union, parties in a romantic relationship, parent, child, grandchild, grandparent, sibling, and guardian. Parent, children, and siblings include biological, adopted, step and in-law relations. Unrelated individuals sharing housing will also be considered "relatives" under this Code (whether they are significant others or simply sharing rent or housing for economic reasons). The list of who is considered a "relative" or a person with a financial or close personal relationship under this Code is not all inclusive. There may be instances, for example, when it is inappropriate to process certain transactions for individuals with whom you have a personal relationship, such as cousins, nieces, or nephews. Employees should raise any concerns as to whether a personal relationship creates or could create a conflict of interest with Human Resources.

Kiting, or inflating the balance in an account with artificial funds, usually through manipulating the clearing system and banking machines to gain unauthorized access to cash or credit, is never acceptable, even if it does not cause a loss to the Company. Retail kiting, defined as transacting by check or debit to receive cash against an insufficient balance, is also prohibited.

Officers and employees may not accept a legacy or gift from a customer of the Company under a will or trust instrument unless there is an immediate family relationship. Officers and employees functioning in the Trust Department may not be executor, executrix, trustee, or have any fiduciary responsibility with respect to any accounts unless there is an immediate family relationship.

Any director, officer, or employee, who is uneasy about a situation that might present a potential or actual conflict of interest, or even the appearance of a conflict of interest, should seek clarification from the Company's Chief Human Resources Officer ("CHRO").

IX. Fair dealing

The Company is committed to promoting the values of honesty and fairness in the conduct of its business and seeks to maintain a work environment that fosters mutual respect, openness, and individual integrity. The Company seeks to outperform competitors fairly and honestly through superior performance, and never through unethical or illegal business practices. Directors, officers, and employees are expected to deal fairly with the Company's customers, suppliers, and competitors and are strictly prohibited from:

- making any false or misleading statements to customers or suppliers;
- personally benefiting from opportunities that are discovered through the use of the Company's property, contacts, information, or position;
- soliciting, demanding, accepting, or agreeing to accept anything of value from any person or entity in conjunction with employment or the performance of duties at or on behalf of the Company; or
- offering something of value to a person or entity the director, officer, or employee transacts business with if the benefit is not otherwise available to similarly situated Company customers or suppliers under the same circumstances and conditions.

The Company will not pay any bribes or kickbacks to any person or entity, including clients, customers and their families or their agents, to facilitate the sale of the Company's products and services. Should any such payment be requested from any director, officer, or employee; the CEO and CHRO should be notified promptly.

The Company has a long history and a strong reputation as an honest and ethical business competitor. The Company does not seek a competitive advantage by using a competitor's confidential information, by misrepresentation of facts, or by speaking disparagingly of competitors, their products or services or their employees. Directors, officers, and employees who engage in such practices, however beneficial to the Company's business, are acting in violation of this Code.

X. Confidential and proprietary information

One of the most important provisions of this Code is the topic of confidentiality.

This Code strictly prohibits the use of confidential information about the Company or its businesses, customers, suppliers, directors, officers, or employees for personal benefit, or the disclosure of such information to others outside of a director's, officer's, or employee's normal duties on behalf of the Company. Directors, officers, and employees shall maintain the confidentiality of all information entrusted to them by the Company, its business partners, or its customers, except when such disclosure is authorized by the Company or is legally required.

Confidential information includes, without limitation: information marked "confidential" or "for internal use only"; business or marketing plans, proposals or strategies; Company earnings projections; financial records and information; personnel information; client or customer names, addresses, personal identifying information, lists, account numbers and other information, financial holdings, transactions, preferences, and tax documents; prospect lists, identities and information; pricing, billing and product information; business methods; contracts and contractual forms; software programs; information deemed confidential under applicable law or by any federal or state government banking agency or other agency with oversight over banks or other financial institutions (e.g., Federal Deposit Insurance Corporation, Federal Reserve Bank, Office of the Comptroller of the Currency, Consumer Financial Protection Bureau, Maine Bureau of Financial Institutions, etc.), including any Confidential Supervisory Information; information which relates to the Company's business, which is not available generally to the public and which has been developed or acquired by the Company with considerable effort and expense; other nonpublic information that if disclosed might be of use to the Company's competitors or otherwise harmful to the Company or its customers and business partners.

To avoid the inadvertent disclosure of confidential information, directors, officers, and employees shall not discuss the Company's confidential information with or in the presence of any unauthorized persons, including family members and friends. Social interactions with former directors, officers, and employees of the Company present a special risk to the preservation of the Company's confidential information.

Such persons once had access to the Company's confidential information but no longer enjoy that right, and current directors, officers, and employees must take special care not to disclose or discuss confidential information with former colleagues however innocently intended.

Upon voluntary or involuntary termination, each director, officer, or employee agrees to and shall promptly deliver to the Company all memoranda, files, notes, records, disks, manuals, or other documentation containing confidential information, including all copies of such documents, whether compiled by the director, officer, or employee or furnished by any source while the employment relationship with the Company existed.

All directors, officers, and employees are subject to the requirements of the Gramm-Leach-Bliley Act of 1999, which requires the Company to maintain administrative, technical, and physical safeguards to protect sensitive customer information. The Company requires all directors, officers, and employees to participate in annual training seminars to maintain familiarity with the requirements of this law and the Company's information security program.

XI. Communicating with legal and regulatory authorities

Nothing in this Code prohibits a director, officer, or employee from engaging in lawful activity by communicating with any governmental authority or making a report in good faith and with a reasonable belief of any violations of law or regulation to a governmental authority, or disclosing confidential information which the director, officer, or employee acquired through lawful means in the course of the individual's employment or engagement to a governmental authority in connection with any communication or report, or from filing, testifying or participating in a legal proceeding relating to any violations, including making other disclosures protected or required by any whistleblower law or regulation to the U.S. Securities and Exchange Commission, the Department of Labor, or any other appropriate government authority. To the extent a director, officer or employee discloses any confidential information in connection with communicating with a governmental authority; such person will honor the other confidentiality obligations in this Code and will share such confidential information only with the individual's attorney, or with the government agency or entity. Nothing in this Code shall be construed to permit or condone any unlawful conduct, including but not limited to, the theft or misappropriation of Company property, trade secrets or confidential information.

XII. Cooperating with legal and regulatory authorities

It is the policy of the Company to cooperate fully, to the extent permitted by law, with any and all regulatory activities, examinations, or investigations promulgated by the Securities and Exchange Commission, Federal Deposit Insurance Corporation, Federal Reserve Bank, Office of the Comptroller of the Currency, Consumer Financial Protection Bureau, or the Maine Bureau of Financial Institutions.

From time to time, these regulatory bodies, seeking information regarding the Company's activities, may consult directors, officers, and employees. The Company expects and requires every director, officer, and employee to answer such inquiries forthrightly and honestly.

It is also the policy of the Company to cooperate with lawful governmental investigations to the extent permitted by law. Any employee who receives a subpoena requesting information should refer to the Company's procedures for information on how to proceed. Regardless of the matter under investigation, no director, officer, or employee shall: destroy any Company documents in an effort to avoid disclosure during the course of an investigation; alter any pre-existing Company documents or records; make false or misleading statements to any government investigator; or cause or encourage any other Company employee to provide false or misleading information to any government investigator.

XIII. Corporate news and information

The offices of the CEO, CFO, or a senior officer designated by the CEO or CFO, will handle all statements to the media concerning the Company's business. In particular, no information regarding the financial performance of the Company will be shared with any person unless such information has been published in reports to the shareholders or through an authorized press release. Release of Company financial performance information is permitted only by the CEO and CFO and then only in accordance with this Code and applicable law.

XIV. Political activities

The Company will not make any contribution to any political party or to any candidate for political office in support of such candidacy except as provided in this policy and permitted by law.

Federal law strictly controls corporate involvement in the federal political process. This policy is not intended to prevent the communication of Company views to legislators, governmental agencies, or to the general public with respect to existing or proposed legislation or governmental policies or practice affecting business operations.

To avoid any misinterpretation or endorsement, directors, officers, and employees participating in political activities must do so only as individuals and not as representatives of the Company. Personal political interests and activities must be pursued on personal time and must not interfere with the work of any director, officer, or employees that of any other director, officer, or employee.

Directors, officers, and employees are prohibited from making personal political contributions in the name of or on behalf of the Company, except for donations made through recognized political action committees approved by the Company.

XIV. Rendering legal advice

Customers of the Company and other individuals sometimes seek advice from the Company's directors, officers, and employees regarding the legal effect of a transaction. The Company recognizes the exclusive authority of trained and licensed individuals to practice law and to deliver such advice. Directors, officers, and employees are cautioned to avoid making any statements that could be interpreted or perceived as giving legal advice.

XV. Compliance with corporate expense policies

Receipts and disbursements must be fully and accurately described and documented in the Company's books and records. No director, officer, or employee shall request or approve any payment that was or is to be used for a purpose that is not reflected in the documents supporting the payment. No invoices or expense reimbursement documents believed to be false or fictitious may be paid by or submitted to the Company. All expense reimbursements must be for Company purposes only.

XVI. Securities trading accounts

Any employee authorized to trade securities on behalf of the Company is prohibited from conducting personal business or holding an account with any firm with which the Company does any securities trading business.

XVII. Reporting and accountability for this Code

The Company is deeply committed to promoting a culture of ethical conduct and compliance with:

- our Code, values, and policies;
- the laws, rules, and regulations that govern our business operations; and

- best practices in accounting, auditing, and financial reporting matters.

Every director, officer, and employee of the Company, in every location, in every job, at every level, and at all times, is responsible for safeguard the reputation of the Company, including by complying with this Code.

Employees must speak up and raise questions and concerns promptly about any situation that may violate this Code or policies, unless doing so would impede an employee's or the Company's ability to report the matter or communicate with an appropriate government authority. Any director, officer, and employee who becomes aware of or suspects any violation of this Code (or related policies, supplemental codes, compliance manuals, other duties owed to the Company, etc.) by any person has a responsibility to address those matters.

Any director, officer, or employee who has questions or concerns about conduct the individual believes may violate the Code, our policies, or the laws and regulations under which we do business, must utilize the Company's established channels below to promptly report such activity so that it may be properly addressed, unless doing so would impede an employee's or the Company's ability to report the matter or communicate with an appropriate government authority. Please promptly report such conduct or activity to any of the following:

- a senior manager;
- the CHRO;
- the CEO; or
- the Chairman of the Board.

If appropriate under the circumstances, the Chairman of the Audit Committee of the Board of Directors (the "Audit Committee") will be promptly informed and involved.

For more information, please review the Confidential Audit Alert Policy and the Whistleblower Policy. The Company requests that directors, officers, and employees avail themselves promptly of the provided channels to enable the Company to take prompt corrective action.

The Chairperson of the Audit Committee also maintains a private United States Post Office box to receive confidential concerns about the Company's practices. The address is listed in the Confidential Audit Alert Policy of the Company's Employment Policies. For the purposes of administering this Code, the Code Coordinator is the Corporate Clerk and the CHRO.

The Company is committed to reviewing all reported concerns and violations of this Code, conducting proper, fair, and thorough investigations tailored to the circumstances where needed, and implementing an appropriate response, including taking appropriate corrective action and preventative measures as warranted.

a. All good faith concerns and reports raised under our Code will be taken seriously and addressed appropriately.
b. All action taken by the Company in response to a concern will necessarily depend on the nature and severity of the concern.
c. The Company's action may include initial inquiries and fact-gathering to decide whether an investigation is appropriate and, if so, the form and scope of the investigation.
d. The Company complies with law in conducting investigations, and the Company expects that employees will cooperate with lawful investigations and provide truthful information to facilitate an effective investigation.
e. When a director, officer, or employee raises a concern, the Company will maintain confidentiality to the fullest extent possible, consistent with applicable legal requirements and the need to conduct an adequate investigation or review.

It is the responsibility of every director, officer, and employee to be familiar with and understand the provisions of this Code as well as other applicable Company policies, including those specifically identified in this Code. Failure of an officer or employee to comply with this Code, any other applicable Company policy, or any laws

or governmental regulations, may result in appropriate, case specific disciplinary action, which may include disciplinary documentation, unpaid suspension, demotion, or termination of employment, and may also impact performance ratings and incentive pay. Failure of a director to comply with this Code will be dealt with in accordance with the policies and procedures of the Board of Directors of the Company.

Nothing contained in this Code or any Company policy prohibits or is intended to prohibit employees from exercising their legal right to report concerns, make lawful disclosures or communicates with any governmental entity or regulatory authorities (e.g., the U.S. Securities and Exchange Commission) about conduct believed to violate laws or regulations, nor does it require disclosures interfering with those rights. If circumstances exist where reporting a matter internally would impede an employee's or the Company's ability to report the matter to or communicate with an appropriate government authority, then employees are not obligated to report the matter internally. The Company prohibits retaliation against employees because they exercise their right to report internally or to report to or communicate with an appropriate government authority.

XVIII. Retaliation Prohibited

Any director, officer, or employee may raise concerns of unethical or otherwise inappropriate activity without fear of retribution, reprisal or retaliation. The Company prohibits and will not tolerate retribution, reprisal or retaliation of any kind because an employee, customer or independent contractor in good faith raises a concern or reports conduct that they reasonably believe constitutes a violation or suspected violation of our Code or of a Company policy or practice through any internal channels, or otherwise exercises any lawful right to communicate with a government authority or cooperate with or participate in any investigation or proceeding conducted by the Company or any government authority.

Retaliation is any conduct that could reasonably dissuade an employee or other individual from raising or reporting good faith concerns through our internal reporting channels or with any governmental authority, or from participating or cooperating with an investigation or legal proceeding raising such concerns. It includes conduct that could reasonably dissuade an employee from filing, testifying, or participating in a legal proceeding relating to a violation of law, or from providing information to or otherwise assisting a government or law enforcement agency pursuing a violation of law. Retaliation may occur through conduct or written communication and may take many forms, including actual or implied threats, verbal or nonverbal behaviors, changes to the terms or conditions of employment, harassment, bullying, intimidation, or deliberate exclusionary behaviors.

If you feel you have been subjected to retaliation, please raise your concerns through the channels set forth in this Code, the Employee Handbook, and the Employment Policies as soon as reasonably possible so that the Company may promptly and properly address such concerns. Any employee, officer, or director who unlawfully retaliates or attempts to retaliate (directly or indirectly) against another employee, officer, director or other individual as a result of the individual's protected actions as described in this Code will be subject to appropriate corrective action, up to and including termination.

XVII. Waiver of this Code

Although the Company generally disfavors any waiver of the provisions of this Code, from time to time, in certain limited circumstances, the Company reserves the right to waive the application of one or more provisions of this Code. Only the Board of Directors may authorize a waiver of a provision of this Code to benefit an executive officer or director of the Company. The Company will publicly disclose any such waiver granted to an executive officer or director of the Company, as may be required by applicable law. Only the CEO and the CHRO can authorize a waiver of a provision of this Code for other employees or officers of the Company.

XVIII. Annual reaffirmation of this Code

The Company will ensure that information in the Code is relayed to officers and employees in annual training, including thorough anti-corruption training. As a condition of employment, appointment or engagement, and

continued employment, appointment or engagement, every director, officer, and employee must confirm or reconfirm the individual's understanding and adherence to this Code in writing once each year. This confirmation will represent that each such bank director, officer, and employee: has read this Code; fully understands this Code; has complied and will comply with the requirements of this Code; and is not aware of any violation of the Code by or on the part of any other person or party which has not been properly disclosed pursuant to the terms of this Code.

All managers and supervisors are responsible for reviewing this Code with their staff each time a new edition of this Code is published.

Compliance with this Code is a condition of employment, appointment or engagement, and continued employment, appointment or engagement. Engaging in conduct that violates this Code shall constitute grounds for disciplinary action, up to and including termination of employment, appointment or engagement.

This Code does not modify an employee's at-will employment relationship with the Company. This Code is not an employment contract nor is it intended to be an all-inclusive policy statement on the part of the Company. The Company reserves the right to provide the final interpretation of the policies and procedures contained in this Code as well as the specific policies or procedures contained in memoranda, policies, e-mail, or other guidance, which the Company may distribute from time to time. The Company also reserves the absolute right to revise the policies or procedures in this Code from time to time, as it deems necessary or appropriate.

By signing below, I acknowledge that I have read and understand this Code of Conduct and Business Ethics (a copy of which has been supplied to me and which I will retain for future reference) and agree to comply in all respects with the terms and provisions hereof. I also understand and acknowledge that this Code of Conduct and Business Ethics may be modified or supplemented from time to time and I agree to comply with any such modification and/or supplement.

_____ _____

Printed Name Date

_____

Signature