



2024 Procedures for Reporting Complaints or Concerns Regarding Accounting, Internal Accounting Controls or Auditing Matters to the Audit/Examining Committee of the Board of Directors

Employees or others who have a concern or complaint concerning Tompkins Financial's accounting, internal accounting controls, or auditing matters, may submit their concern or complaint to Paul Battaglia, Audit and Risk Committee Chairman, via mailbox address:

Paul J. Battaglia, CPA
Chair, Audit and Risk Committee
Tompkins Financial Corporation
P.O. Box 460
Ithaca, NY 14851

The Chair will determine the appropriate method to investigate a complaint. An employee or other complainant may remain anonymous. If an employee or other complainant wishes their complaint to be kept confidential, any information they provide will be investigated on a confidential basis to the extent it is feasible to do so. There will be no retaliation against a person making good faith reports or complaints.

The results of all investigations will be reported to the Audit and Risk Committee.

All documentation will be maintained by the Tompkins Financial Corporation Board of Directors indefinitely.