

HUMAN RIGHTS POLICY



Bar Harbor Bank & Trust's Commitment to Human Rights

At Bar Harbor Bank & Trust (the “**Bank**” or the “**Company**”) we're known for our exceptional support of the people, businesses and communities in the unique places we call home. Through our interactions with our colleagues, customers, and our communities the Company has an impact on human rights. We recognize the importance of supporting fundamental human rights across all of our business activities and we are committed to conducting business in a manner that demonstrates responsibility for this impact.

Commitment to Our Colleagues

The Company is committed to providing a safe and healthy work environment for all colleagues. We seek to foster a diverse and inclusive workplace where each colleague feels valued and respected. We recognize and appreciate the unique perspectives and ideas our colleagues possess and the power this has in driving creativity and innovation.

We abide by the laws in the markets where we operate and serve. We strictly prohibit practices that disregard fundamental human rights or violate workplace laws and regulations, such as discrimination, harassment, and modern slavery (e.g., forced labor, unlawful child labor, and human trafficking). Our Employment Policies and Code of Conduct and Business Ethics further reinforces and clarifies this commitment. We regularly review and refine our workplace policies and practices to ensure we are upholding these principles.

To ensure colleague engagement in the protection of human rights we have required annual training and policy review related to human rights issues such as diversity, sexual harassment, discrimination, and employment policies. The Company also has a safety committee comprised of members throughout our organization. This committee meets quarterly to discuss a variety of safety related topics and to seek feedback from members on safety-related topics.

Commitment to Our Customers

Commitment to honest service and belief in our customers is fundamental to our business. As such, our commitment to human rights is also reflected in our relationships with our customers. Bar Harbor Bank & Trust has adopted policies, procedures, and training designed to ensure behavioral compliance with legal requirements and to prevent our products and services from being used for improper purposes, including human rights-related illicit activities such as human trafficking. We comply with both the letter and the spirit of anti-money laundering laws by establishing and adhering to the highest and strictest legal and ethical standards. Therefore, we have implemented controls to prevent money laundering and to report suspected criminal activity to the appropriate authorities. Policies and procedures enforcing these controls include: Code of Conduct and Business Ethics; Know your Customer Requirements; Anti-Bribery; Bank Secrecy Act, Anti-Money Laundering, and Countering the Financing of Terrorism; and, OFAC Policies.

Commitment to Our Communities

We also respect human rights by using our financial and human capital to support and improve the quality of life in the communities in which we operate. We endeavor to provide resources and products for underserved communities in the areas in which we do business pursuant to our Community Reinvestment Act strategy and

HUMAN RIGHTS POLICY

diversity and inclusion efforts. To engage our colleagues in these efforts we provide paid Community Volunteer time and engage colleagues in providing financial support to various non-profit programs through our *Casual for a Cause* campaign.

More detailed information about our current programs in place to support Human Rights commitment related to colleagues, customers, and our communities can be found in the social section of our annual ESG Report.