

COMMUNITY FINANCIAL SYSTEM, INC.
CODE OF ETHICS FOR SENIOR EXECUTIVE OFFICERS

This Code of Ethics for Senior Executive Officers applies to the Chief Executive Officer, Chief Financial Officer, Chief Accounting Officer, and other senior executive officers serving in a finance, accounting, treasury, tax or investor relations role with Community Financial System, Inc. (“CFSI”). CFSI expects all of its employees to act in accordance with the highest standards of personal and professional integrity in all aspects of their activities, to comply with all applicable laws, rules and regulations, to deter wrongdoing and abide by the CFSI Code of Business Conduct and Ethics and other policies and procedures adopted by CFSI and its subsidiaries that govern the conduct of employees. This Code of Ethics is intended to supplement the CFSI Code of Business Conduct and Ethics applicable to all employees of CFSI and its subsidiaries.

You agree to:

- (a) Engage in and promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- (b) Avoid conflicts of interest and to disclose to the Chair of the Audit Committee through the Chief Risk Officer any material transaction or relationship that reasonably could be expected to give rise to such a conflict;
- (c) Take all reasonable measures to protect the confidentiality of non-public information about CFSI or its subsidiaries and their customers obtained or created in connection with your activities and to prevent the unauthorized disclosure of such information unless required by applicable law or regulation or legal or regulatory process;
- (d) Produce full, fair, accurate, timely, and understandable disclosure in reports and documents that CFSI or its subsidiaries files with, or submits to, the Securities and Exchange Commission (“SEC”) and other regulators and in other public communications made by CFSI or its subsidiaries;
- (e) Comply with applicable laws, rules and regulations of federal, state, and local governments, as well as the rules and regulations of other appropriate private and public regulatory agencies; and
- (f) Promptly report illegal or unethical conduct by any director, officer or employee that has occurred, is occurring or may occur, including any possible violations of this Code of Ethics to the Chair of the Audit Committee through the Chief Risk Officer or any of the parties or channels listed in the CFSI Code of Business Conduct and Ethics.

You are prohibited from directly or indirectly taking any action to fraudulently influence, coerce, manipulate or mislead CFSI or its subsidiaries’ independent public auditors for the

purpose of rendering the financial statements of CFSI or its subsidiaries misleading.

You understand that you will be held accountable for your adherence to this Code of Ethics. Your failure to observe the terms of this Code of Ethics may result in disciplinary action, up to and including the possible termination of employment. Violations of this Code of Ethics may also constitute violations of law and may result in civil and criminal penalties for you, your supervisors and/or CFSI and its subsidiaries.

If you have any questions regarding the best course of action in a particular situation, you should promptly contact CFSI's General Counsel.

You understand that CFSI's Board of Directors shall have sole and absolute authority to approve any deviation or waiver from this Code of Ethics. Any waiver and the grounds for such waiver for a senior executive officer shall be promptly disclosed in accordance with SEC regulations and applicable law.

Your Personal Commitment to the CFSI Code of Ethics for Senior Executive Officers

I acknowledge that I have received and read the CFSI Code of Ethics for Senior Executive Officers, and understand my obligations as an employee to comply with the Code of Ethics.

Please sign here: _____ Date: _____

Please print your name: _____

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