



Code of Ethics for Chief Executive Officer and Senior Financial Officers

It is the policy of Beacon Financial Corporation that the Chief Executive Officer (“CEO”), Chief Financial Officer (“CFO”) and the Controller (“Controller”) of Beacon Financial Corporation (the “Company”) adhere to and advocate the following principles governing their professional and ethical conduct in the fulfillment of their responsibilities:

1. Act with honesty and integrity, avoiding actual or apparent conflicts between his or her personal, private interests and the interests of the Company, including receiving improper personal benefits as a result of his or her position.
2. Perform his or her responsibilities in such a way as to ensure periodic reports and other documents filed with the Securities Exchange and Commission (hereafter the “SEC”) contain information that is accurate, complete, fair and understandable.
3. Comply with laws of federal, state, and local governments applicable to the Company, and the rules and regulations of private and public regulatory agencies having jurisdiction over the Company.
4. Act in good faith, responsibly, with due care, and diligence, without misrepresenting or omitting material facts or allowing his or her independent judgment to be compromised.
5. Respect the confidentiality of information acquired in the course of the performance of his or her responsibilities except when authorized or otherwise legally obligated to disclose such information. Confidential information acquired in the course of the performance of his or her responsibilities shall not be used for personal advantage.
6. Proactively promote ethical behavior among subordinates and peers.
7. Use corporate assets and resources employed or entrusted in a responsible manner.
8. Act with integrity and do not use corporate information, corporate assets, corporate opportunities or position with the Company for personal gain or compete directly or indirectly with the Company.
9. Comply in all respects with the Company’s Code of Business Conduct and Ethics, and the Company’s Policy on Insider Trading.
10. Advance the Company’s legitimate interests when the opportunity arises.

It is also the Policy of Beacon Financial Corporation that the CEO, CFO and Controller of the Company acknowledge and certify to the foregoing annually and file a copy of such certificate with the Audit Committee of the Board.

The Audit Committee of the Board shall have the power to monitor, make determinations, and recommend actions to the Board with respect to violations of this Policy.

Signed: _____ Date: _____
Print: _____

Effective January 28, 2026