

CHEMUNG FINANCIAL CORPORATION
CODE OF ETHICS FOR SENIOR FINANCIAL OFFICERS
(Board Approved 1/17/2024)

Philosophy

The chief executive officer, the chief financial officer, and other senior financial officers performing accounting, auditing, financial management or similar functions (collectively called “Senior Financial Officers”) shall be committed to the highest standards of integrity in all aspects of financial reporting and systems of internal controls. The professional and ethical conduct of Senior Financial Officers is fundamental to the reputation and success of Chemung Financial Corporation as a leading financial services provider. This Code is supplemental to Chemung Financial Corporation’s “Code of Conduct” that applies to officers and employees of the Corporation.

Standards of Conduct

Each Senior Financial Officer of Chemung Financial Corporation must:

Act with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships.

Full, fair, accurate, timely and understandable disclosure in reports and documents that the Corporation files with, or submits to, the Securities and Exchange Commission and in all public communications made by the Corporation or its subsidiaries.

Comply with applicable laws, rules and regulations of federal, state and local governments and other appropriate regulatory agencies.

Act in good faith, with due care, competence and diligence, without misrepresenting material facts or allowing independent judgment to be subordinated.

Assure responsible use of and control of all assets, resources and information of Chemung Financial Corporation, while respecting confidentiality of such information.

Prompt internal reporting of violations of this Code to the individuals identified in the Code of Conduct.

Amendments or Waivers and Accountability for Adherence to the Code

The Board of Directors will have the sole and absolute duty and authority to enforce adherence to this Code and to approve any deviation or waiver from the Code. Any waiver and the grounds for such waiver will be disclosed on the Corporation’s website www.chemungcanal.com. Any change in this Code will be promptly disclosed to shareholders.

Board Reviewed – February 15, 2023

Board Approved – January 17, 2024

Board Reviewed – February 19, 2025

Legend for Code of Ethics for Senior Financial Officers

Date	Change
January 17, 2024	Removed Chief Auditor