



**2019 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/Examining Committee Chairman, via mailbox address:

Paul J. Battaglia, CPA  
Chair, Audit/Examining 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/Examining Committee.

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