



Tompkins Financial Corporation

2024 Sustainability Accounting Standards Board (“SASB”) Disclosures

At Tompkins Financial Corporation (“Tompkins”), we are committed to understanding and addressing the relevant Environmental, Social and Governance (“ESG”) risks and opportunities that can impact our employees, customers and investors. We believe a strong focus in these key areas can help strengthen Tompkins’ relationship and support of the communities we serve. We have referenced the Sustainability Accounting Standards Board (“SASB”) Commercial Bank framework to identify specific areas of focus.

All information below is provided as of December 31, 2023. We expect that our ESG efforts and reporting will continue to evolve over time. In some cases, complete information may not be disclosed within the table below if it is considered confidential, immaterial, inapplicable or is not yet collected by the Company according to SASB standards. Some of the information provided below is unaudited and is based on management’s good faith estimates and assumptions.

SASB Commercial Bank Standard Disclosures by Topic		
SASB Code	Accounting Metric	Response
Topic 1 – Data Security		
FN-CB-230a.1	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of account holders affected	<p>The Company is not aware of any cybersecurity incidents that have materially affected the Company, including its business strategy, results of operations or financial condition.</p> <p>If material breaches occur, they would be reported in a current report on Form 8-K filed with the Securities and Exchange Commission</p>
FN-CB-230a.2	Description of approach to identifying and addressing data security risks	<p>The Company takes very seriously the responsibilities to protect sensitive information, technology resources, and shareholder value from the risk of cyber threats and incidents.</p> <p>Please see Item 1C – Cyber Security in the Company’s Annual Report on Form 10-K.</p> <p>The Company maintains an enterprise-wide and Board-approved Information and Cyber Security Program (the “Program”), which includes strategy, written policies, procedures, guidelines and standards to address the assessment, identification and management of cybersecurity risks. The</p>

		<p>Company designed the Program to be consistent with industry standards and in compliance with applicable federal and New York state laws, regulations and guidelines.</p> <p>The Company has adopted the Factor Analysis for Information Risk (FAIR) assessment approach, an industry standard risk assessment methodology. Under the FAIR approach, the Company identifies, catalogs, assesses and manages material cyber risks by: (a) documenting threat actors and organizations (i.e., cybercriminals, nation state actors, hackers, company insiders),</p> <p>(b) analyzing their likelihood of attack, their motives, capabilities and tactics; (c) assessing the potential impacts of such threat actor attacks against company assets, and documented vulnerabilities (or cyber exposures), both internally and externally of the organization; and (d) evaluating the implemented security controls and effectiveness of those controls against defined risk scenarios. The Company rates vulnerabilities based on the criticality of a vulnerability and/or the value of the asset associated with the vulnerability (people, systems, customer data, money). When a residual risk exceeds the desired threshold set by the Board-defined risk appetite of the organization, additional controls are recommended and implemented to reduce the potential risk to an acceptable level and provide appropriate management of the cyber risk exposure.</p> <p>In conjunction with the FAIR assessment, the Company uses the MITRE Attack framework to identify the various exploitation techniques and tactics used by the most likely threat actors. This framework informs the risk management process with valuable insight into some of the most common, or likely, cyberattacks the Company should address.</p> <p>Additionally, the Company leverages insights from independently-conducted penetration testing provided by external third- party assessors, as required by NY Department of Financial Services (DFS) cybersecurity regulations, to discover and evaluate potential vulnerabilities across the</p>
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		<p>enterprise that should be contemplated within the overall cyber risk program. The Company also engages independent third-party auditors to provide additional subject matter expertise, as well as to perform comprehensive independent audits of the Program. Audits are conducted no less than annually to evaluate the effectiveness and maturity of the Program. Audits include a review of the cyber risk assessment process, security control effectiveness, and compliance with regulatory requirements.</p> <p>To manage the risks identified, the company implements controls and tests those controls for effectiveness. The Company uses the Federal Financial Institutions Examination Council Cyber Assessment Tool (CAT), the National Institute of Standards and Technology (NIST) Cybersecurity Framework (CSF), the NYS DFS cybersecurity requirements and the Center for Internet Security (CIS) Critical Controls to help inform the Company of best practices for control implementation and potential risk mitigation opportunities that align with defined risk scenarios, and generally as a baseline for best practice control implementation.</p> <p>As part of the Program, the Company has established policies and procedures to oversee, identify and mitigate material cybersecurity risks associated with the use of any third-party service providers. The Company evaluates and risk rates third-party relationships against a defined set of minimum-security requirements under its enterprise-wide Third-Party Risk Management program. Higher risk third party service providers are reviewed in more detail and as part of the continual due diligence process to ensure changes to the relationship and/or risk posture are identified and managed appropriately.</p> <p>The Company is not aware of any cybersecurity incidents that have materially affected the Company, including its business strategy, results of operations or financial condition. For a discussion of cybersecurity threats that could materially affect the Company's business strategy, results of operations or financial condition, please see Item</p>
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		<p>1A – Risk Factors in the Company’s Annual Report on Form 10-K.</p> <p>The Program is governed by the Board of Directors and specifically, the Audit and Risk Committee, as well as two management committees, the Enterprise Risk Management Committee (“ERMC”) and the Technology and Information Security Committee (“TISC”).</p> <p>Annually, the Audit and Risk Committee reviews and recommends for approval to the Board the Information Security Policy, which outlines the roles, responsibilities, and objectives for the Program. On a quarterly basis, the Company’s Information Security Officer presents the Company’s cybersecurity report and related material for review by the Audit and Risk Committee and the Board. This report includes emerging risks, overall program effectiveness/status, cybersecurity incidents, staffing, risk exceptions, and recommended enhancements to the program, as applicable. Annually, the Information Security Officer provides security related education to the Board and Audit and Risk Committee.</p> <p>The Company’s Technology and Information Security Committee (“TISC”) oversees the governance of the Company’s enterprise technology and information security programs, including strategy, management principals, risk and compliance. The TISC reviews the policies, strategy, emerging topics, risks and general compliance of the programs to ensure they are adequate and sufficient to govern and manage the associated risk of the Company. The TISC coordinates and communicates with the Audit and Risk Committee on risk-related items through Company’s Enterprise Risk Management Committee. The TISC provides a forum for advising and sharing information among members of the Company’s senior leadership team and is comprised of Company risk owners with expertise across a wide range of financial, technical, operational, strategic, and cybersecurity skill sets. The TISC is co-chaired by the Chief Technology Officer, who is responsible for the enterprise-wide information technology program</p>
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<p>Topic 2 – Financial Inclusion and Capacity Building</p>		
<p>FN-CB-240a.1</p>	<p>Number and amount of loans outstanding qualified to programs designed to</p>	<p>Tompkins is committed to meeting the financial services needs of borrowers in all segments of our communities, including those living in low- and</p>

	<p>promote small business and community development</p>	<p>moderate-income neighborhoods. We have funded various community development loans in order to meet the needs of the areas we serve. These include loans for affordable housing, agencies dedicated to disadvantaged youth, affordable childcare institutions, agencies dedicated to enhancing the lives of people with disabilities, downtown revitalization projects, children’s centers, healthcare facilities, and more.</p> <p>As of December 31, 2023, Tompkins has an aggregate outstanding loan balance of \$224,451,655, across 74 loans, pursuant to qualified programs that are designed to promote small business and community development.</p> <p>For measuring purposes, we define “small business” as those commercial customers with Tompkins who have a total relationship of \$750,000 or less; and “community development” as defined by the U.S. Federal Financial Institutions Examination Council, pursuant to the Community Reinvestment Act of 1977 (CRA). As defined by the regulations, community development includes, but is not limited to, affordable housing for and community services targeted to low- or moderate-income individuals, economic development through financing small businesses or farms, and revitalization of low- or moderate-income geographies.</p>
<p>FN-CB-240a.2</p>	<p>Number and amount of past due and nonaccrual loans qualified to programs designed to promote small business and community development</p>	<p>Past Due and Nonaccrual Small Business Loans: 22 loans, total amount \$2,288,183.32</p> <p>Past Due and Nonaccrual Community Development Loans: 3 loans, total amount \$8,088,756.00</p> <p>For measuring purposes, we define “small business” as those commercial customers with Tompkins who have a total relationship of \$750,000 or less; and “community development” as defined by the U.S. Federal Financial Institutions Examination Council, pursuant to the Community Reinvestment Act of 1977 (CRA). As defined by the regulations, community development includes, but is not limited to, affordable housing for and community services targeted to low- or moderate-income individuals, economic</p>

		development through financing small businesses or farms, and revitalization of low- or moderate-income geographies.
FN-CB-240a.3	Number of no-cost retail checking accounts provided to previously unbanked or underbanked customers	<p>Tompkins is proud to offer a BankOn® certified deposit account, to provide access to safe, affordable transactional bank accounts. Our account is called “Smart Spend,” and we have 817 deposit/transactional accounts, and 22 savings accounts within this certified product type.</p> <p>Tompkins is not able to track whether customers using this product type were previously unbanked or underbanked.</p>
FN-CB-240a.4	Number of participants in financial literacy initiatives for unbanked, underbanked, or underserved customers	<p>Tompkins recognizes the critical need for financial education in the communities we serve. We’re proud to offer many opportunities to help people thrive and grow in their financial journey. Each of our markets offer various educational opportunities, including complementary home-buyer seminars, fraud prevention classes, investment education, and more. In 2023, we provided 93 financial literacy seminars and workshops, with 34 of our employees leading or facilitating these community-based programs.</p> <p>Tompkins did not track the number of participants in these programs.</p>
Topic 3 – Incorporation of ESG Factors in Credit Analysis		
FN-CB-410a.2	Description of approach to incorporation of environmental, social and governance (ESG) factors in credit analysis	<p>Tompkins Community Bank incorporates ESG factors into credit analysis in a variety of ways. The Bank’s Commercial Loan Policy along with certain underwriting and administrative procedures guide Credit Analysis practices at Tompkins including the incorporation of these factors. Loan Policy requires environmental due diligence on all commercial real estate (CRE) transactions and escalates the level of required environmental due diligence where prospective borrowers or properties may have any exposure to hazardous or toxic materials. Our physical climate risk assessment typically focuses on flood risk, which is the most pertinent physical climate risk within the geographic areas served. For industries which are sensitive to changes in climate regulation/policy, we also consider</p>

		<p>transition risk when evaluating the credit. Tompkins also recognizes opportunities associated with deploying capital to help transition our communities to cleaner energy, and we developed a targeted loan program to promote installation of geothermal HVAC systems in our upstate New York market.</p> <p>Our allowance for credit losses model includes macroeconomic factors and the economic outlook as inputs that can impact historical and expected loss rates. Where appropriate, individual loans are reviewed and reserves may be specifically assigned. These reserves reflect climate or transition risk factors where relevant and material to the loan.</p> <p>We incorporate community development/reinvestment, fair lending, and climate risk/opportunity factors in our credit analysis framework both from an individual credit level analysis as well as a portfolio level review. Credit Analysts, Relationship Managers, and Credit Officers are all closely involved in the Bank's credit decision making process and provide input on credit requests that reflects the Bank's practices in these areas. Our Director of Bank Compliance oversees our portfolio analysis with respect to CRA and fair lending compliance. The Bank has a Credit Risk Oversight Officer who also conducts research on relevant climate risk/opportunity to incorporate into the overall credit analysis, as appropriate.</p> <p>The Bank has a Credit Oversight Committee. Bank management provides quarterly reports to this entity on the lending portfolio, and these reports include any updates relevant to Environmental risk factors. The Bank also developed a Climate Risk Working Group that includes surveillance of ongoing Climate related initiatives from multiple departments. The Bank has reviewed its portfolio to identify segments at risk to ESG factors. These portfolio level reviews include assessments of ESG factors associated to physical and transition risks stemming from Climate change. The Bank reviews its portfolio for several factors under the physical risk category including but not limited to flood, heat, and storm risk. Accordingly, the Bank closely follows changes in flood maps and the associated</p>
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<p>Topic 4 – Business Ethics</p>		
<p>FN-CB-510a.1</p>	<p>Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations</p>	<p>None currently disclosed. If material losses occur, disclosure would be provided in the Company's Form 10-K, as filed with the US Securities and Exchange Commission.</p>

<p>FN-CB-510a.2</p>	<p>Description of whistleblower policies and procedures</p>	<p>Tompkins strives to conduct all of its activities according to high standards of ethical and legal conduct, and is committed to maintaining compliance with all applicable laws and regulations, accounting standards, accounting controls, and audit practices.</p> <p>Tompkins established its Fraud and Whistleblower Protection Policy to facilitate the reporting of complaints regarding accounting, internal accounting controls, auditing matters, fraud or any potential violation of laws.</p> <p>Tompkins strictly prohibits discrimination, retaliation, or harassment of any kind by any Company officer, director, team member or agent against any team member who, in good faith, reports or participates in an investigation of reported complaints or questionable conduct. Any team member who believes that they have been retaliated against in violation of the Company’s policy must immediately notify the Senior Vice President for Human Resources.</p> <p>Team members may report a good faith complaint to their supervisor, Human Resources, the Chief Risk Officer, or the Chair of Tompkins’ Audit & Risk Committee (the “Committee”). The Company also maintains an ethics hotline (www.lighthouse-services.com/tompkinsfinancial), which allows team members to report complaints anonymously. All reports made to the hotline will be forwarded directly to the Chair of the Committee. The Committee will review all reported complaints, direct all investigations, and determine any appropriate response or further action as necessary and appropriate to the complaint.</p> <p>Nothing in this Policy is intended to prevent a team member from reporting information to any government agency when the team member has reasonable cause to believe that a violation of law has occurred.</p>
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Topic 5 – Systemic Risk Management

FN-CB-550a.1	Global Systemically Important Bank (G-SIB) score, by category	Not applicable.
FN-CB-550a.2	Description of approach to incorporation of results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy, and other business activities	<p>The Board of Directors recognizes that our holding company serves as a source of financial and managerial strength for our bank. Accordingly, our holding company stands ready to use available resources to provide adequate capital funds to our bank during periods of financial stress or adversity. It is the intention of the Board of Directors that the holding company maintain financial flexibility and capital raising capacity to obtain additional resources for assisting its subsidiaries in a manner consistent with provisions of this policy.</p> <p>Consistent with the Board’s expectation that the holding company and bank maintain sound overall financial condition, the capital management for each entity considers the level of risk taken in lending management, the dependence upon core funding versus borrowings, interest rate risk profiles and growth prospects. These factors are considered in setting strategic objectives and capital planning.</p> <p>Additionally, on a quarterly basis, management conducts a stress test of capital levels under various scenarios to evaluate the capital levels that may be needed under less favorable business conditions. This stress test evaluates capital levels under scenarios of increased loss experience, increased nonperforming asset levels, and reduced earnings scenarios. The results of these stress tests inform the Board’s determination of desired capital levels.</p>
Additional Activity Metrics		
FN-CB-000.A	Number and value of checking and savings accounts by segment: (a) personal and (b) small business	Tompkins knows that small businesses are an important part of the communities we serve, and we are pleased to support these customers through our Small Business Checking account. Small Business Checking is non-interest bearing, has a low monthly average daily balance requirement to avoid a monthly maintenance fee, and there are no per-item charges for the first 250 items (debits and items deposited) to post to the account each month. As of 12/31/2023, there are 135,657 open

		<p>Small Business Checking accounts with an aggregate value of \$2,541,920,971.</p> <p>Tompkins offers a wide variety of different checking accounts to our customers, many of which include a debit card and access to digital banking. As of 12/31/2023, there are 120,272 open personal checking accounts with an aggregate value of \$1,998,735,025.</p> <p>Please visit our website, https://www.tompkinsbank.com/, to learn more about the many different types of accounts available to our customers.</p>
FN-CB-000.B	Number and value of loans by segment: (a) personal, (b) small business, and (c) corporate	<p>As of 12/31/2023, the number and value of loans by segment are as follows:</p> <ul style="list-style-type: none"> • Personal Loans, excluding mortgages and revolving lines: 617 units totaling \$9,772,900; • Small Business Loans, 3,225 units totaling approximately \$256,000,000; and • Corporate Loans, 4,253 units totaling approximately \$520,000,000. <p>For measuring purposes, we define “small business” as those commercial customers with Tompkins who have a total relationship of \$750,000 or less; corporate is defined as those commercial customers with a relationship that exceeds \$750,000.</p>