

Bar Harbor Bankshares

Code of Ethics for Senior Financial Officers (this “Code”)

In order to ensure the proper and ethical performance of our business and to maintain the confidence of the public, our customers and our shareholders, all Directors, Officers and Employees of Bar Harbor Bankshares (the “**Company**”) and its subsidiaries are expected to maintain high standards of honesty, integrity, confidentiality, impartiality, and conduct, and to avoid misconduct and conflicts of interest, or the appearance of conflicts of interest.

To promote these standards and values, the Company’s Board of Directors (the “**Board**”) has established and adopted a Code of Conduct and Business Ethics to provide guidance concerning the standards of ethical conduct by and responsibilities of all directors, officers and employees of the Company and its subsidiaries. While these individuals bear responsibility for promoting integrity throughout the Company, the Company’s Chief Executive Officer, Chief Financial Officer, Controller, Treasurer and persons performing similar functions and so designated from time to time by the Company’s Chief Executive Officer or the Audit Committee of the Board (the “**Senior Financial Officers**”) have a special role both to adhere to these principles and also to ensure that the Company’s corporate culture ensures the fair and timely reporting of the Company’s financial results and condition.

Because of their special role, the Senior Financial Officers are additionally bound by the following Financial Officer Code of Ethics, and by signing a Certificate of Compliance each has agreed that he or she will:

1. Act with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships. A “conflict of interest” exists when an individual’s private interests interfere or conflict (or even appear to interfere or conflict) with the interests of the Company.
2. Take reasonable steps to cause the Company to provide fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the U.S. Securities and Exchange Commission (the “**SEC**”), government agencies, regulators, constituents and in other public communications, including taking reasonable steps to cause the employees providing services to the Company to follow its internal accounting controls at all times.
3. Carefully review a draft of each periodic report for accuracy and completeness before it is filed with the SEC, with particular focus on disclosures the Senior Financial Officer does not understand or agree with, and on information known to the Senior Financial Officer not to be reflected in the report.
4. Comply with all applicable laws, rules and regulations of federal, state and local governments, and other appropriate private and public regulatory agencies. Although no single individual is expected to know the details of all laws, rules and regulations, it is important to take reasonable steps to ensure familiarity with all such laws, rules and regulations and to know enough to determine when to seek advice or guidance through the retention of qualified legal, financial and accounting experts or other means.
5. Act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing the Senior Financial Officer’s independent judgment to be subordinated.
6. Respect the confidentiality of information acquired in the course of business except when authorized or otherwise legally obligated to disclose the information.
7. Not use confidential information acquired in the course of the Senior Financial Officer’s work for personal advantage.
8. Proactively promote ethical behavior among employees in the Company and as a responsible partner with

industry peers and associates.

9. Maintain control over and responsibly manage all assets and resources employed or entrusted to the Senior Financial Officer by the Company.
10. Bring to the attention of the Audit Committee of the Board matters that could compromise the integrity of the Company's public filings and communications, disagreements on accounting matters, and violations of any part of this Code.
11. Report illegal or unethical conduct by any Company director, officer, employee or contractor that has occurred, is occurring or may occur, including any potential violations of this Code or the Code of Conduct and Business Ethics, to the Nominating and Corporate Governance Committee of the Board.
12. Comply with this Code and the Code of Conduct and Business Ethics.

The Nominating and Corporate Governance Committee of the Board (the "Committee") will assess compliance with this Code, report violations of this Code to the Board, and, based upon the relevant facts and circumstances, recommend to the Board appropriate action. The Committee shall approve any waiver or amendment of this Code, and any such waiver or amendment shall be disclosed promptly, as required by law, rule or regulation. A violation of this Code may result in disciplinary action, including termination of employment.