

Camden National Corporation

Code of Business Conduct and Ethics

Introduction

Purpose and Scope

The Board of Directors of Camden National Corporation (together with its subsidiaries, the “Company”) has established this Code of Business Conduct and Ethics (“Code”) to aid our directors, officers, and employees in making ethical and legal decisions when conducting Company business and performing their day-to-day duties.

The Company’s Board of Directors is responsible for administering the Code. The Board of Directors has delegated day-to-day responsibility for administering and interpreting the Code to a Business Ethics Officer. Brandon Boey has been appointed the Company’s Business Ethics Officer under this Code. The Code is reviewed annually for changes, and all changes are approved by the Board.

The Company expects its directors, officers, and employees to exercise reasonable judgment when conducting business, and all directors, officers, and employees are expected to comply with both the letter and the spirit of the Code. All employees must annually certify their acknowledgment of the Code. The Company encourages its directors, officers, and employees to frequently refer to this Code. The Company also understands that this Code will not contain the answer to every situation a director, officer, or employee may encounter or every concern a director, officer, or employee may have about conducting business ethically and legally. In these situations, or if a director, officer, or employee otherwise has questions or concerns about this Code, the Company encourages each director, officer, and employee to speak with their supervisor (if applicable) or with Brandon Boey, who serves as the Company’s Business Ethics Officer under this Code.

Contents of this Code

This Code has two sections that follow this Introduction. The first section, “***Standards of Conduct***,” contains the actual guidelines that our directors, officers, and employees are expected to adhere to in the conduct of Company business. The second section, “***Compliance Procedures***,” contains specific information about how this Code functions, including who administers the Code, who can provide guidance under the Code, and how violations may be reported, investigated, and punished. This section also contains a discussion about waivers of and amendments to this Code.

A Note About Other Obligations

Camden National Corporation’s directors, officers, and employees generally have other legal and contractual obligations to the Company. This Code is not intended to reduce or limit the other obligations that directors, officers, and employees may have to the Company. Instead, the standards in this Code should be viewed as the *minimum standards* that the Company expects from its directors, officers, and employees in the conducting of Camden National Corporation’s business.

Standards of Conduct

Conflicts of Interest

Camden National Corporation recognizes and respects the right of its directors, officers, and employees to engage in outside activities that they may deem proper and desirable, provided that these activities do not impair or interfere with the performance of their duties to the Company or their ability to act in the Company's best interests. In most, if not all, cases, this will mean that directors, officers, employees, and their families must avoid any situations that may create or appear to create a potential or actual conflict between their personal interests and the Company's interests.

A "conflict of interest" occurs when a director's, officer's, or employee's personal interest interferes or could have the appearance of interfering with the Company's interests. Conflicts of interest may arise in many situations. For example, conflicts of interest can arise when a director, officer, or employee takes an action or has an outside interest, responsibility, or obligation, including an investment in a customer, supplier, or competitor that may make it difficult for the director, officer, or employee to perform the responsibilities of their position objectively and/or effectively in the Company's best interests. Conflicts of interest may also occur when a director, officer, or employee or their immediate family member receives some personal benefit (whether improper or not) as a result of the director's, officer's, or employee's position with the Company. Each individual's situation is different, and when evaluating their own situation, a director, officer, or employee will have to consider many factors. It is important that each director, officer, and employee consider whether any of their activities or relationships could cause a conflict (or the appearance of a conflict) with the Company's interests.

Personal financial or other gain should never take precedence over obligations to the Company. Directors, officers, and employees must never use or attempt to use their position at the Company for any improper personal benefit (including loans or guarantees of obligations or gifts from any person or entity) for themselves, family members, or any other person.

If a director, officer, or employee is ever in doubt about whether a transaction, activity, or relationship could give rise to a conflict of interest, they should discuss the matter promptly with their supervisor and/or, if appropriate, the Business Ethics Officer. Any material transaction, activity, or relationship that reasonably could be expected to give rise to a conflict of interest should be reported promptly to the Business Ethics Officer. The Business Ethics Officer may notify the Board of Directors as appropriate. Actual or potential conflicts of interest involving a director, officer, or our Business Ethics Officer should be disclosed directly to the Chairman of the Board of Directors.

Compliance with Laws, Rules, and Regulations

Camden National Corporation seeks to conduct its business in compliance with all applicable laws, rules, and regulations, including those related to insider trading. No director, officer, or employee shall engage in any unlawful activity in conducting the Company's business or in performing their day-to-day Company duties, nor shall any director, officer, or employee instruct others to do so.

Any purchase or sale of the Company's securities or the securities of any company with which the Company does business or that is a competitor of the Company must be carried out in accordance with the Company's Insider Trading Policy.

Protection and Proper Use of Camden National Corporation's Assets

Loss, theft, or misuse of the Company's assets have a direct impact on the Company's business and profitability. Employees, officers, and directors are expected to protect the Company's assets that are entrusted to them and to protect the Company's assets in general. Employees, officers, and directors are also expected to take steps to ensure that the Company's assets are used only for legitimate business purposes.

Corporate Opportunities

Employees, officers, and directors owe a duty to the Company to advance the Company's legitimate business interests when the opportunity to do so arises. Employees, officers, and directors are prohibited from:

- diverting to themselves or to others any opportunities that are discovered through the use of the Company's property or information or as a result of the employee's, officer's, or director's position with the Company,
- using the Company's property or information or employee's, officer's, or director's position for improper personal gain or
- competing with the Company.

It can be difficult at times to distinguish between personal benefits and Company benefits. Any director, officer, or employee who uses any of the Company's property or services where such use is not solely for the benefit of the Company should first consult with their supervisor and/or, if appropriate, the Business Ethics Officer to determine whether such use would be in violation of this Code.

Confidentiality

Confidential information generated and gathered in the Company's business plays a crucial role in the Company's business activities, prospects, and ability to compete. Protection of such information is vital to the Company's business and reputation, and failure to protect such information may subject the Company to fines and penalties. "Confidential Information" includes any non-public information concerning the Company (including its businesses, financial performance, results, or prospects), information relating to all relationships between the Company and its customers and all other non-public information that might be of use to competitors or harmful to the Company or its customers if disclosed. All customer information obtained by any Company Representative (defined as a person who is employed by the Company or authorized to act on behalf of the Company) in the course of the Company Representative's duties shall be treated as confidential. *Even the fact that a person or business is a Company customer is confidential and shall be treated as such.* Directors, officers, and employees may not disclose or distribute the Company's Confidential Information except when disclosure is authorized by the Company, permitted by the Company's applicable policies, or required by applicable law, rule, or regulation or pursuant to an applicable legal proceeding. Directors, officers, and employees shall use Confidential Information solely for legitimate Company purposes. Directors, officers, and employees must return all the Company's confidential and/or proprietary information in their possession to the Company when they cease to be employed by or otherwise cease to serve the Company.

In addition, the Company and its banking subsidiary receive reports of examinations and other communications from bank regulators and prepare communications and other materials for regulators. Generally, such communications are considered "confidential supervisory information," or "CSI." CSI is strictly confidential, and disclosure is prohibited by law. Disclosure of CSI, even if inadvertent, can have significant legal and reputational consequences for the Company, including potential criminal liability, fines, penalties, and damaged relationships with the Company's regulators. Even within the Company, CSI should be shared with an employee only where the employee needs the information in the normal exercise of their employment or duties.

Nothing in this Code shall restrict or prohibit Company Representatives (or their attorneys) from initiating communications directly with, responding to any inquiries from, providing truthful testimony before, providing confidential information to, reporting possible violations of law or regulation to, or from filing a claim or assisting with an investigation directly with, your attorney, law enforcement, a self-regulatory authority, or any other governmental agency or entity. Company Representatives do not require the prior authorization of the Company to engage in activity protected by this paragraph and do not need to notify the Company that they have engaged in such activity. Despite the

foregoing, Company Representatives are not permitted to reveal to any third-party, including any governmental or self-regulatory authority, information they came to learn during their service to the Company that is protected from disclosure by any applicable privilege, including but not limited to the attorney-client privilege or attorney work product doctrine.

Anyone at the Company who becomes aware of any improper disclosure, whether or not inadvertent, shall immediately bring the circumstances to the attention of the Company's Business Ethics Officer.

Bribery and Corruption

Camden National Corporation's Code of Business Conduct and Ethics mandates that all Company business activity be conducted honestly and ethically. The Company maintains a zero-tolerance policy on bribery and corruption. In pursuing this commitment, the Company will ensure that it complies with the Bank Bribery Act (BBA) and such other laws, rules, and regulations as may be applicable. Directors, officers, and employees are required to comply with the Company's current Bank Bribery Act (BBA) Policy and should refer to the Company's BBA Policy for terms and requirements regarding the acceptance and amounts of any gifts. Directors, officers, and employees shall not solicit, demand, or accept anything of value from any person with the intention of being influenced or rewarded in connection with any business or transaction of the Company. Nothing of value may be provided to government personnel unless clearly permitted by law, any applicable regulations, and the Company's BBA Policy. Violation of anti-bribery and anti-corruption regulations may result in strict punishment, including but not limited to civil and criminal penalties, for all those involved, including the Company and associated directors, officers, and/or employees.

Political Involvement

The Company respects the rights of its directors, officers, and employees to engage in personal political activities, so long as the personal political activities are legal and appropriate for the director, officer, or employee within the Company and the activities do not involve the Company's time and do not involve use of any assets of the Company (including but not limited to email, phone, or fax communication, office supplies, confidential information or vendors). Directors, officers, and employees must ensure that they present themselves as individuals and not as representatives of the when engaging with any political campaign through volunteerism, private financial campaign contributions or any activity similar in nature. Officers and employees must receive approval from the Business Ethics Officer or Chief Executive Officer before becoming a candidate or appointee to a public office. Activities of political involvement should comply with both the current Stakeholder Handbook and the Company's Bank Bribery Act Policy.

Anti-Money Laundering

Money laundering is the process of moving illegally obtained funds through various financial transactions with the goals of making the funds appear as though they were obtained through legitimate business activity, and concealing the source of the illegally obtained funds. Per the Company's Anti-Money Laundering, Bank Secrecy Act, and Office of Foreign Assets Control Policy, the Company complies with all relevant laws and regulations, including the Bank Secrecy Act (BSA) and economic sanctions. The Company requires all directors, officers, and employees to know the BSA and anti-money laundering (AML) laws that apply to the Company. Directors, officers, and employees must never assist a customer in evading reporting requirements, and any unusual or suspicious activity is required to be reported to the officer's or employee's supervisor or the BSA Officer in accordance with applicable procedures in the Company's Anti-Money Laundering, Bank Secrecy Act and Office of Foreign Assets Control Policy.

Fair and Ethical Competition/Antitrust

Antitrust laws are intended to promote competition and protect customers from anticompetitive conduct and practices. It is vital that the Company abide by not only the letter, but also the spirit of the law. Competing vigorously, yet lawfully and ethically, with competitors and establishing advantageous, but fair, business relationships with customers and

suppliers is a part of the foundation for long-term success. However, unlawful and unethical conduct, which may lead to short-term gains, may damage the Company's reputation and long-term business prospects, and subject the Company to legal liability. Accordingly, it is the Company's policy that directors, officers, and employees must deal ethically, honestly, and lawfully with the Company's customers, suppliers, competitors, and employees in all business dealings on the Company's behalf. No director, officer, or employee shall take unfair advantage of another person in business dealings on the Company's behalf, including through the abuse of privileged or confidential information or through improper manipulation, concealment, or misrepresentation of material facts, or otherwise engage in any unfair dealing practice. Antitrust laws do not allow for communication between competitors pertaining to competitively sensitive information or subjects. The gravest violations of antitrust laws are agreements between competitors that hinder competition between them. These include agreements to manipulate prices, to agree upon the areas in which competitors will or will not conduct business, or to agree upon the customers or suppliers with whom competitors will or will not engage. Employees, officers, and directors are required to exercise diligence when engaging in any discussions in social or business settings.

Insider Dealings

Camden National Corporation maintains a separate insider trading policy (the "Insider Trading Policy") that sets forth the policy of Camden National Corporation and its subsidiaries regarding insider trading or tipping, as well as procedures with which directors and employees of the Company must comply with respect to certain transactions in the Company's securities. The Insider Trading Policy is applicable to all directors, officers, and employees of the Company, and at least annually, all directors, officers, and employees must acknowledge that they have read and understand the policy.

Accuracy of Records

The integrity, reliability, and accuracy in all material respects of the Company's books, records, and financial statements are fundamental to the Company's continued and future business success. No director, officer, or employee shall cause the Company to enter into a transaction with the intent to document or record it in a deceptive or unlawful manner. Nor shall any director, officer, or employee falsify information regarding deposit and loan agreements or credit analyses. In addition, no director, officer, or employee shall create any false or artificial documentation or book entry for any transaction entered into by the Company. Similarly, officers and employees who have responsibility for accounting and financial reporting (including operation areas such as Deposit Services, Loan Services, and Electronic Banking) matters have a responsibility to record accurately all funds, assets, and transactions on the Company's books and records.

Quality of Public Disclosures

The Company is committed to providing its shareholders with complete and accurate information about the Company's financial condition and results of operations in accordance with the securities laws of the United States. It is the Company's policy that the reports and documents it files with or submits to the Securities and Exchange Commission, and its earnings releases and similar public communications made by the Company, include fair, accurate, timely, and understandable disclosure. Officers and employees who are responsible for these filings and disclosures, including the Company's principal executive, financial, and accounting officers, must use reasonable judgment and perform their responsibilities honestly, ethically, and objectively to ensure that this disclosure policy is fulfilled. Subsidiary executive managers are responsible for ensuring all information provided to the Company meets all disclosure and reporting guidelines outlined in the Code. All individuals who are involved in the disclosure process are prohibited from knowingly misrepresenting, omitting, or causing others to misrepresent or omit material facts about the Company to others, including the Company's independent auditors. The Company's senior management, including subsidiary management, is primarily responsible for monitoring the Company's public disclosure.

Compliance Procedures

Communication of Code

All directors, officers, and employees will be supplied with a copy of the Code upon beginning service at the Company or a subsidiary of the Company. Updates of the Code will be provided from time to time. A copy of the Code is also available to all directors, officers, and employees by requesting one from the human resources department or by accessing the Company's intranet.

Monitoring Compliance and Disciplinary Action

Camden National Corporation's management, under the supervision of its Board of Directors or a committee thereof or, in the case of accounting, internal accounting controls, or auditing matters, the Audit Committee, shall take reasonable steps from time to time to (i) monitor compliance with the Code, including the establishment of monitoring systems that are reasonably designed to investigate and detect conduct in violation of the Code, and (ii) when appropriate, impose, and enforce appropriate disciplinary measures for violations of the Code.

Disciplinary measures for violations of the Code may include but are not limited to, counseling, oral or written reprimands, warnings, probation, or suspension with or without pay, demotions, reductions in salary, termination of employment or service, and restitution. Violations of the Code may also constitute violations of law, which may result in criminal and/or civil penalties for the individual who violated the Code as well as the Company. If a violation of the Code also constitutes a violation of law, the Company may also report such violation to applicable law enforcement or other agencies.

The Company's management shall periodically report to the Board of Directors or a committee thereof on these compliance efforts, including, without limitation, periodic reporting of alleged violations of the Code and the actions taken with respect to any such violation.

Reporting Concerns/Receiving Advice

Communication Channels

Be Proactive. Every director, officer, and employee is required to act proactively by asking questions, seeking guidance, and reporting suspected violations of the Code and other policies and procedures of the Company, as well as any violation or suspected violation of applicable law, rule, or regulation arising in the conduct of the Company's business or occurring on the Company's property. **If any director, officer, or employee believes that actions have taken place, may be taking place, or may be about to take place that violate or would violate the Code, they are obligated to bring the matter to the attention of Camden National Corporation's Business Ethics Officer or the Chairman of the Audit Committee.**

Seeking Guidance. The best starting point for an officer or employee seeking advice on ethics-related issues or reporting potential violations of the Code will usually be their manager. However, if the conduct in question involves their supervisor, if the employee or officer has reported the conduct in question to their supervisor and does not believe that their supervisor has dealt with the matter properly, or if the officer or employee does not feel that they can discuss the matter with their supervisor, the employee or officer may raise the matter with the Business Ethics Officer.

Communication Alternatives. Any officer or employee may communicate with the Business Ethics Officer or the Chairman of the Audit Committee by the following methods:

In writing (which may be done anonymously as set forth below under "Reporting; Anonymity; Retaliation"), addressed to the Business Ethics Officer either by facsimile to (207) 518-5653 or by U.S. mail to Camden National Corporation, 3 Canal Plaza, 5th Floor, Portland, Maine 04101;

- By e-mail to bboey@CamdenNational.bank (anonymity may not be maintained)
- By phoning the employee feedback line (the “Hotline”) which we have established for receipt of questions and reports of potential violations of the Code. The Hotline may be reached at (207) 236-9064, and calls may be made anonymously as set forth below under “Reporting; Anonymity; Retaliation”.
- By phoning the Chairman of the Audit Committee, S. Catherine “Katy” Longley, at (207) 288-6108.

Reporting Accounting and Similar Concerns. Any concerns or questions regarding potential violations of the Code, any other Company policy or procedure, or applicable law, rules, or regulations involving accounting, internal accounting controls, or auditing matters should be directed to the Audit Committee or a designee of the Audit Committee. Officers and employees may communicate with the Audit Committee or its designee:

- In writing to: Brandon Boey, Business Ethics Officer, Camden National Corporation, 3 Canal Plaza, 5th Floor, Portland, ME 04101, or
- By phoning the Hotline at (207) 236-9064, or
- By phoning the Chairman of the Audit Committee, S. Catherine “Katy” Longley, at (207) 288-6108.

Officers and employees may use either of these methods to communicate anonymously with the Audit Committee.

Misuse of Reporting Channels. Officers and employees must not use these reporting channels in bad faith or in a false or frivolous manner. Further, officers and employees should not use the Reporting Line to report grievances that do not involve the Code or other ethics-related issues.

Reporting; Anonymity

When reporting suspected violations of the Code, the Company prefers that officers and employees identify themselves in order to facilitate the Company’s ability to take appropriate steps to address the report, including conducting any appropriate investigation. However, the Company also recognizes that some people may feel more comfortable reporting a suspected violation anonymously.

If an officer or employee wishes to remain anonymous, the Company will use reasonable efforts to protect the confidentiality of the reporting person subject to applicable law, rule, or regulation or to any applicable legal proceedings but cannot guarantee anonymity. In the event the report is made anonymously, however, the Company may not have sufficient information to look into or otherwise investigate or evaluate the allegations. Accordingly, persons who attempt to make reports anonymously should provide as much detail as is reasonably necessary to permit the Company to evaluate the matter(s) set forth in the anonymous report and, if appropriate, commence and conduct an appropriate investigation.

No Retaliation

Camden National Corporation expressly forbids any retaliation against any officer or employee who, acting in good faith, reports suspected misconduct. Any person who participates in any such retaliation is subject to disciplinary action, including termination.

In addition, officers and employees may have certain rights in connection with reporting legal, ethical, or other issues to regulatory or other governmental or self-regulatory agencies. Nothing in this Code is intended to limit those rights or any related protections that may be applicable.

Waivers and Amendments

No waiver of any provisions of the Code for the benefit of a director or an officer (which includes, without limitation, for purposes of this Code, the Company's principal executive, financial, and accounting officers) shall be effective unless (i) approved by the Board or if permitted, a committee thereof, and (ii) if applicable, such waiver is promptly disclosed to the Company's shareholders in accordance with applicable United States securities laws and/or the rules and regulations of the exchange or system on which the Company's shares are traded or quoted, as the case may be.

Any waivers of the Code for other employees may be made by the Business Ethics Officer, the Board of Directors, or, if permitted, a committee thereof. Any waiver shall be reported to the Company's Board of Directors at their next scheduled meeting.

All amendments to the Code must be approved by the Board of Directors or a committee thereof and, if applicable, must be promptly disclosed to the Company's shareholders in accordance with applicable United States securities laws and/or the rules and regulations of the exchange or system on which the Company's shares are traded or quoted, as the case may be.

Last Amended & Approved by Board: March 25, 2025