



BANK OF HAWAI'I CODE OF BUSINESS CONDUCT & ETHICS

Upholding Our Integrity

June 1, 2024

 **Bank of Hawai'i**

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MESSAGE FROM OUR CEO

Bank of Hawai'i has been serving the community for over 125 years with outstanding achievements. We continue to move forward because of our dedication to our vision and core values of excellence, integrity, respect, innovation, commitment and teamwork.

Our integrity has always been one of our most valuable assets and it begins with each one of us. No matter what title we've earned or how many years of service we've devoted here, as employees and representatives of Bank of Hawai'i we all share the responsibility to ensure that our decisions are in the best interests of our customers, create value for our shareholders and our community, and protect our reputation for integrity.

Each of us is personally responsible for following all applicable laws and regulations that govern our business. Our Bank of Hawai'i Code of Business Conduct & Ethics ("Code") is intended to help guide the actions of our employees and directors in meeting those responsibilities. Please read through it carefully and refer to it whenever you have a question.

This Code cannot possibly cover every circumstance in the workplace. Any time you are unsure about what actions to take, I encourage you to ask for guidance, and to speak up if you have a concern. I value your attention in bringing possible problems to light.

Never underestimate the importance of your own commitment to doing the right thing. I am proud of what we have accomplished together in creating a workplace of excellence, and I know that your continued focus on integrity helps to not only serve our clients, but also protects the reputation of the bank so we can better serve our customers, coworkers, communities and shareholders now and into the future.

Mahalo nui loa,

A handwritten signature in black ink that reads "Peter S. Ho". The signature is written in a cursive, flowing style.

PETER S. HO

Chairman, President and Chief Executive Officer

The background of the entire page is a high-resolution, close-up photograph of ocean waves. The water is a vibrant turquoise color, and the white foam of the waves is prominent, creating a textured, dynamic pattern. The lighting is bright, suggesting a sunny day.

What We Stand For

BANK OF HAWAI'I'S VISION AND VALUES

Bank of Hawai'i's vision and core values are the guiding principles underlying the way we do business and the ways we relate to our coworkers, customers, communities and shareholders. Conducting business in an ethical, responsible and professional way is how we continue our legacy as a respected leader in the communities we serve and in the financial services industry.

VISION

Exceptional people working together are the foundation for our success and enable us to build exceptional value for our customers, communities, shareholders and each other.

CORE VALUES

EXCELLENCE

Attract, develop and retain exceptional people.

Deliver extraordinary service to our customers and each other.

Achieve consistently superior financial results to build exceptional value.

INNOVATION

Constantly improve what we do and how we do it.

Proactively find more efficient and effective ways to ensure the long-term success of the organization.

Embrace change and question the status quo. Encourage and implement new ideas to make banking easier.

INTEGRITY

Live to the highest standards of professional and personal behavior.

Be honest and ethical in all our relationships and actions.

Do the right thing for the right reasons.

COMMITMENT

Take personal ownership and responsibility for what we do.

Actively engage our customers and our coworkers to build lasting relationships.

Proactively support each other in the execution of our responsibilities and the achievement of our goals.

RESPECT

Treat everyone with dignity and as valued members of our community.

Value people based on their character and value their contributions.

Treat everyone as we would want to be treated ourselves.

TEAMWORK

Work effectively in teams; together we are stronger than any of us as individuals.

Partner with our customers to help them achieve their goals and objectives - adding value by providing solutions.

Collaborate. Share responsibility for outcomes and act accountably as a team member.

Taking Action with Integrity



FOLLOWING OUR CODE

At Bank of Hawai'i, living our vision and values is a top priority. As members of one *'ohana* (family), we count on each other to build on our tradition of exceptional service and live our core values of excellence, integrity, respect, innovation, commitment and teamwork.

Throughout this Code, we often refer to Bank of Hawai'i Corporation, Bank of Hawai'i, our affiliates and subsidiaries, including Bankoh Investment Services, Inc. (BISI) and our Bank of Hawai'i Foundation, simply as "Bank of Hawai'i" or "bank." Our Bank of Hawai'i Code of Business Conduct & Ethics ("Code") applies to all employees and directors of all these entities.

A SHARED RESPONSIBILITY

The Code is our *shared* commitment to operate with the highest level of integrity and ethical conduct. It applies to everyone at Bank of Hawai'i and our directors. We are expected to follow the letter, spirit, and intent of the Code and the law.

Our Code is not intended to address every possible ethical issue. It is a set of standards that guides our conduct. Our policies inform and provide further guidance regarding many of the standards in our Code. Some of these policies are referenced throughout the Code. You are responsible for reading, understanding, and abiding by our Code, as well as the bank policies and procedures that inform our Code, and for carefully considering them as they apply to all of your business and personal activities.

AT-WILL EMPLOYMENT

Bank of Hawai'i is an "at-will" employer. This means that your employment with the bank has no specified term or length. You may resign your employment at any time, with or without notice, and with or without cause. Conversely, we may terminate your employment at any time, with or without notice, and with or without cause.

This Code is not a contract of employment. Only Bank of Hawai'i's Chief Executive Officer or Chief People Officer has the authority to enter into any agreement on behalf of the Bank that constitutes a contract or promise of employment.

ADDITIONAL RULES OF CONDUCT AND ETHICS

In addition to this Code, certain employees are subject to other codes of conduct and ethics unique to their positions, such as senior financial officers, or to professional licensing requirements in areas such as Portfolio Management and BISI.

If there are any inconsistencies between this Code and any other applicable requirements, the more stringent conduct provisions always apply.

If any applicable codes of conduct and ethics, regulatory rules, or professional licensure requirements restrict the receipt of gifts even more than our bank policies, those restrictions must be followed.

If you work in certain business units, you may be required to sign an individual non-solicitation agreement as an additional condition of employment with the bank.

HERE'S HOW YOU CAN DO YOUR PART:

- **REVIEW OUR CODE.** Consult our Code in your work and use it to help make ethical decisions. If you need more information about a specific policy, ask your supervisor, review the detailed policy or contact the People Service Center.
- **UNDERSTAND OUR CODE.** Laws and regulations can change. Complete annual training on the Bank of Hawai'i Code of Business Conduct & Ethics, and learn the rules that apply to your work so you can address issues, and recognize when to ask for guidance. If you have a question about the Code and how it applies to your line of work, start with your supervisor first as they will be able to offer guidance and answer any questions.
- **CONDUCT OUTSIDE OF WORK.** The expected behaviors discussed in this Code apply not only to our bank locations, but also to bank events, customer locations and any other location where you are conducting bank business or representing the bank, whether during or outside normal work hours. All employees are expected to adhere to the standards outlined in this Code at all times.
- **ACT WITH INTEGRITY.** Always use good judgment and comply with the law, regulations, our Code and policies that apply. Carry out and complete your supervisor's lawful and reasonable directives. Listen and respond to the concerns of customers, coworkers and suppliers. Honor our commitment to integrity in everything you do.

- **SEE SOMETHING, SAY SOMETHING.** If you have questions, need advice or have a concern, contact the People Service Center, your supervisor, or any other supervisor, or seek guidance from another internal resource listed in “Report Concerns.” You may also choose to report any suspected violations of our Code, bank policy, law or regulation through the Anonymous AlertLine. You can report any suspected or actual Code violations (including applicable policies, laws and/or regulations) in any way you feel comfortable.
- **COOPERATE FULLY AND TRANSPARENTLY** in any internal investigation.



REMEMBER

Take Action
if you see an issue.

Ask if you are not sure.

Related References

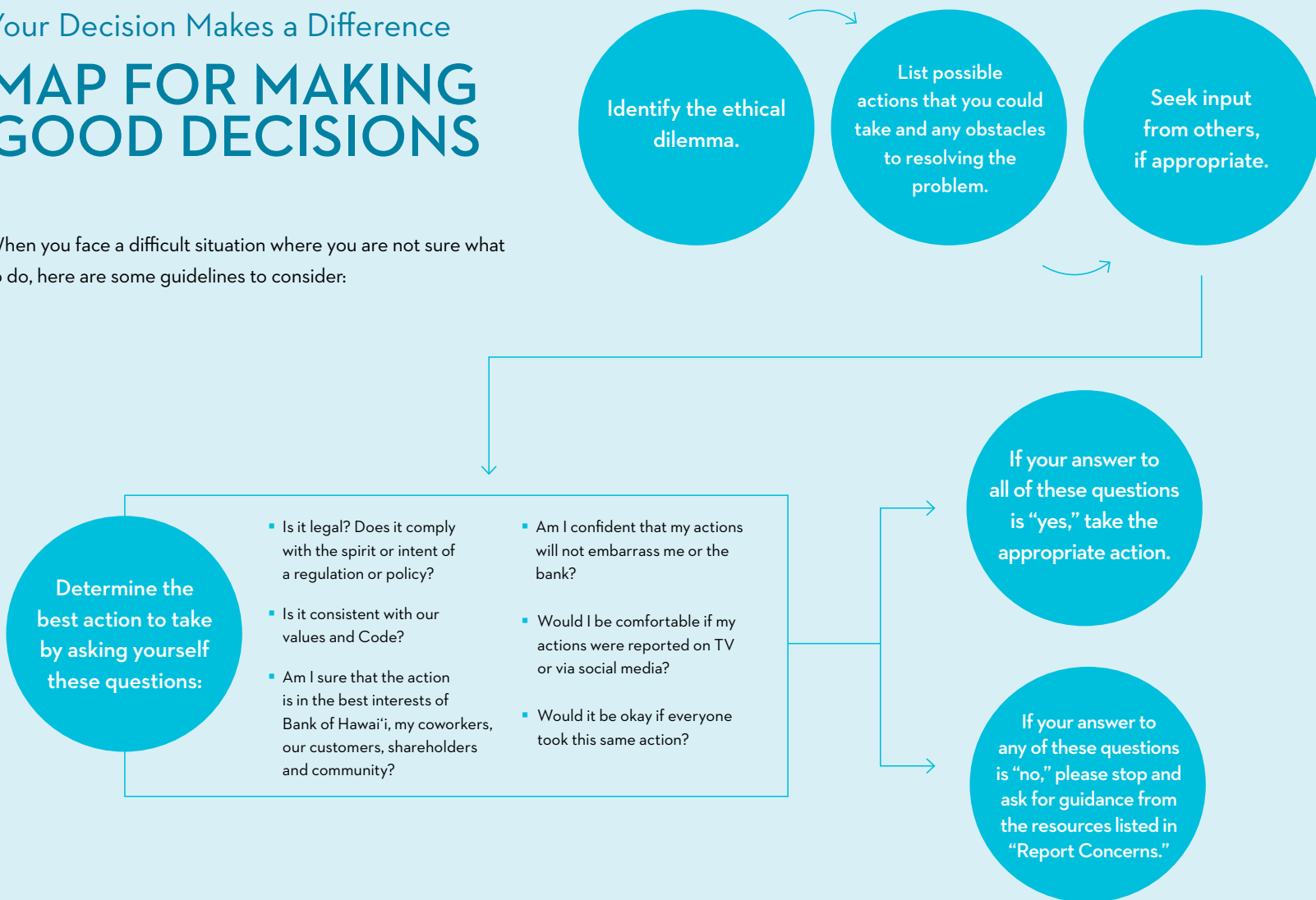
For more detailed information, please refer to the appropriate policies referenced at the end of each section. As a reminder, you are responsible for being aware of and complying with these policies and any additional rules and business unit or corporate policies that apply.

- BOHC Audit & Risk Committee Complaints & Concerns Procedures for Accounting and Internal Control Matters
- PS10-10 Policy for Potential Code Violations and High Risk Situations
- PS80-35 Workplace Conduct Policy
- PS80-30 Employee Concerns

Your Decision Makes a Difference

MAP FOR MAKING GOOD DECISIONS

When you face a difficult situation where you are not sure what to do, here are some guidelines to consider:





Your Decision Makes a Difference

You play a critical role in ensuring that Bank of Hawai'i continues to be a great place to work.

If you hear comments like these, take a step back and reevaluate the situation:

“Don't worry about it; who's going to know?”

“Our competition does it, so it must be okay.”

“We need to do whatever it takes.”

“That's just the way they do business here.”

SUPERVISOR'S RESPONSIBILITIES

As a supervisor, you have a special responsibility to demonstrate the core values within your team, and promote a culture of ethics and compliance. You need to act with integrity yourself, and to inspire others to follow your lead. The way you make decisions and handle concerns will set the foundation for building successful relationships with your team and customers.

HERE'S HOW TO CREATE A CULTURE OF INTEGRITY ON YOUR TEAM:

- **LEAD BY EXAMPLE.** Be a role model for your team, and demonstrate our values through your words and actions.
- **BUILD INTEGRITY INTO YOUR TEAMWORK.** Encourage employees to review our Code and help them understand their responsibilities. Ensure that employees abide by the Code, policies, legal and regulatory requirements.
- **RESPOND TO QUESTIONS AND OFFER GUIDANCE.** Make sure your team knows you are available to listen to their questions and concerns, even if they have something difficult to say. Discuss issues with them, and assist them in making ethical decisions.
- **SPEAK UP.** If you suspect behavior that is unethical or violates a law, regulation, bank policy or our Code, report it immediately and encourage your employees to do the same.
- **PREVENT RETALIATION.** Take action to prevent retaliation against any employee who makes a report in good faith of a concern or suspected violation of a law, regulation, bank policy or our Code.
- **SEEK ADVICE.** If you learn of or encounter a situation where you are unsure of the proper action to take, seek guidance from your manager or any of the resources listed in Report Concerns.

Related References

- PS10-10 Policy for Potential Code Violations and High Risk Situations
- PS80-35 Workplace Conduct Policy

REPORT CONCERNS

Never underestimate the significance of your personal conduct.

If you suspect or see any violations of the Code, it's your responsibility to report them.

REPORT SUSPECTED OR ACTUAL CODE VIOLATIONS

You can report any suspected or actual Code violations (including applicable policies, laws and/or regulations) or raise any questions about the Code and how it applies to your line of work in any way you feel comfortable. You can contact the People Service Center, your supervisor, any other supervisor, the resources listed on the right or you can report anonymously through the Anonymous AlertLine, 24/7. The Anonymous AlertLine is operated by an independent third party, and all information collected is treated in a discreet manner.

People Service Center	(877) 277-2898
Corporate Security	(808) 694-8801
Legal Division	(808) 694-8875
Chief Ethics Officer	(808) 694-7124

You can also report your concerns to the following:

Audit & Risk Committee Chairman.....	(213) 259-5902
Chief Audit Executive.....	(808) 694-4058
Chief General Counsel.....	(808) 694-7124
Chief Financial Officer	(808) 694-8976

Contact the Anonymous AlertLine

Anonymous AlertLine.....	(866) 347-5470
.....	(Palau employees call 011-1-883-347-5470)

Related References

- BOHC Audit & Risk Committee Complaints & Concerns Procedures for Accounting and Internal Control Matters
- PS80-30 Employee Concerns

ONCE WE RECEIVE A REPORT, YOUR CONCERNS

WILL BE TAKEN SERIOUSLY. All reports of suspected or actual Code violations will be reviewed, investigated and responded to appropriately.

INVESTIGATIONS, EXAMINATIONS AND AUDITS

As part of our commitment to integrity, it is your responsibility to fully cooperate with all internal bank investigations, authorized governmental investigations, regulatory examinations and audits. You must answer questions completely and truthfully, and withhold no adverse or relevant information.

If you have questions regarding such requests, you may speak with your supervisor or contact the People Service Center, Corporate Security, Legal Division or the Chief Ethics Officer.

DISCIPLINARY ACTIONS

The set of standards set forth in this Code are important to us, and all directors and employees are responsible for complying with them. Those who violate the law, our Code or our policies may be subject to disciplinary action, up to and including termination of employment or termination of service as a director, as the case may be. Certain violations may have additional consequences, such as fines, criminal prosecution and prison time. We expect everyone to do their part to conduct themselves in a manner that does not violate our Code, policies and procedures, and the law.

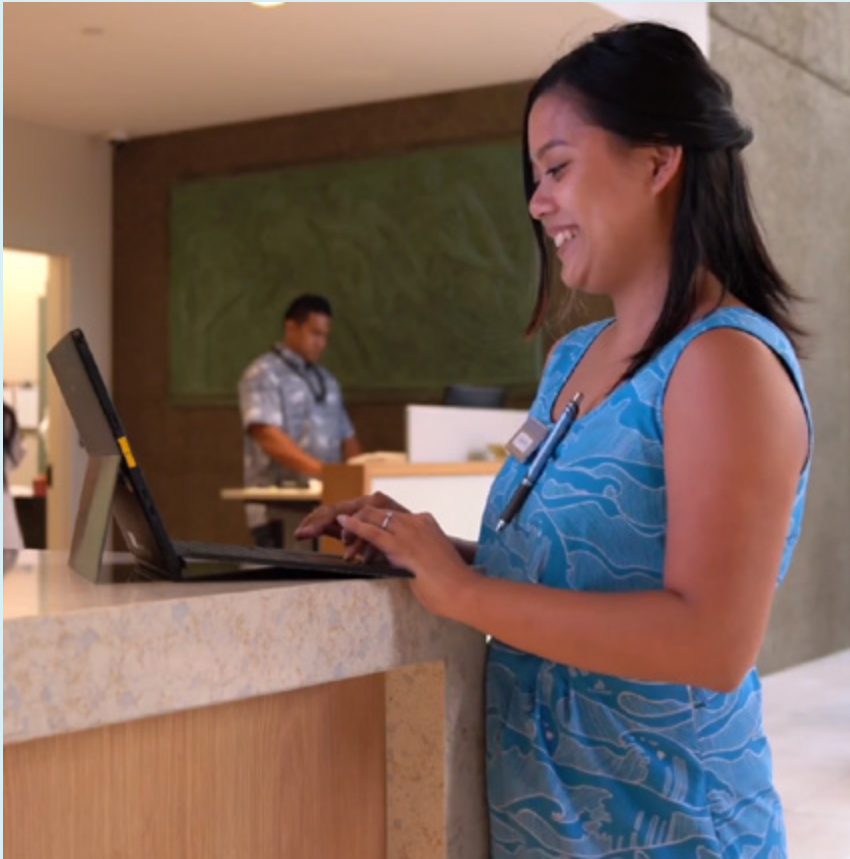
WE NEVER TOLERATE RETALIATION

We are committed to maintaining a workplace where employees feel comfortable raising concerns, which is why we never tolerate retaliation against anyone for making a good-faith report. If you feel you have been retaliated against or suspect retaliation against someone else, report it through one of the internal channels listed in the “Report Concerns” section immediately. We will investigate the matter promptly and take corrective action, which may include disciplinary action, up to and including termination of employment.

You also have the right to report concerns to external regulatory, oversight or judicial bodies.

Related References

- [PS10-10 Policy for Potential Code Violations and High Risk Situations](#)
- [PS80-35 Workplace Conduct Policy](#)



Report Concerns

Q: *I've seen a colleague do something that I think may be a violation of our Code, but I'm not sure and it doesn't directly affect me. Should I say anything?*

A: We rely on all our employees to report misconduct and unethical behavior even if it doesn't personally affect the person making the report. A violation, left unreported, can cause damage to the bank's reputation and put your coworkers, customers and the bank at risk. It can also result in regulatory and legal consequences.

Even if you're not sure, we want to hear from you. You may raise or report the situation in any way you feel comfortable. Please contact the People Service Center, your supervisor, any other supervisor, any of the resources noted on page 13, or call the Anonymous AlertLine.

Maintaining Integrity in the Bank



HONESTY AND TRUST

Our people, services, and commitment to our core values are what set us apart from other financial institutions. As Bank of Hawai'i employees, we are all expected to demonstrate the highest standards of professional and personal integrity to help us maintain our reputation for honorably meeting our obligations to our customers and as a federally insured institution. We will not hire or continue to employ anyone who fails to meet our high standards of honesty and trust.

This commitment includes a responsibility to deal fairly and honestly with bank customers and to engage in responsible sales practices that are consistent with bank policies and the law. Among other things, this means conducting business in accordance with policy, making proper disclosures, avoiding high pressure sales tactics or steering a customer toward a particular product or service, obtaining informed consent to transactions, and keeping the customer's best interests in mind.

Engaging in certain criminal acts compromises your integrity and places the bank at risk for reputational and financial loss. Examples of such criminal acts are crimes of dishonesty or breach of trust, such as theft, robbery, embezzlement, forgery, tax evasion, shoplifting and the manufacture, sale or distribution of controlled substances such as narcotics.

If you are convicted of a crime, you are required to notify the People Service Center. If you are convicted of a crime of dishonesty, breach of trust or money laundering while employed at the bank you must notify the People Service Center no later than five (5) business days after the conviction, regardless of whether you have appealed or intend to appeal the conviction. This notification requirement applies to criminal charges where the court has deferred acceptance of a guilty or no contest plea in accordance with the law.

Related References

- GS80-75 Conflict of Interest Policy
- PS30-28 Drug-Free and Smoke-Free Workplace Policy
- GS70-20 Forgeries, Embezzlement, Etc.
- PS60-60 Responsible Sales Practices Policy
- PS80-35 Workplace Conduct Policy

FORGERY, FALSIFYING ACCOUNTS AND ACCURATE RECORDKEEPING

Recordkeeping policies and controls are essential to the successful operation of our bank, and our ability to meet our legal and business requirements. Each of us is responsible for being accurate, complete and honest in bank records, as well as in disclosures and in providing information. Improperly using or reproducing, or falsifying a signature or initial, or otherwise creating a false document is not allowed.

- You are expected to protect the integrity of our records to the best of your ability. This includes making sure that internal and customer transactions are properly verified to withstand lawful scrutiny.
- If you are responsible for preparing public financial disclosures (including marketing and customer presentation materials), be sure that the information we report is clear, complete, accurate and timely.
- Maintain all records needed to support our tax, financial and legal obligations. Always follow our business unit document retention guidelines, and securely dispose of records that are no longer needed.
- Never dispose of any information that may be relevant to an investigation.

Under no circumstances should an employee forge or falsify signatures, initials or documents. Watch for and report any signs of potential fraud, forgery, bribery or money laundering activity.

Never falsify any book, record, document or account that relates to the business of our customers, employees (including yourself) or vendors or the disposition of our assets. This means being honest and accurate in all aspects of your job, including, but not limited to, entries you make on expense reports, timekeeping records, results you record on sales incentive plans and claims you make under our employee benefit plans.

Related References

- GS70-20 Forgeries, Embezzlement, Etc.
- PS80-35 Workplace Conduct Policy

PROTECTING THE BANK'S ASSETS

Our assets include our reputation and the tools and information we use in our work each day, which contribute to our ability to effectively grow and reach our business goals. You are expected to act in the best interests of Bank of Hawai'i, and use bank property and resources exclusively to benefit the bank.

Our assets include:

- physical assets, such as buildings and office furnishings;
- technology assets, such as computer hardware, software and information systems;
- financial assets, such as cash, securities, and credit cards;
- our company name, our brand and our customer relationships; and
- information assets, such as intellectual property relating to products, services and systems, and confidential data.

You are responsible for handling our assets with care while using them for legitimate business purposes. You are responsible for protecting them from loss, theft, fraud, and misuse. You must also respect the intellectual property of others, and must not knowingly violate the rights of third parties. We expect the same consideration from our competitors and our customers.

How you can help protect our assets:

- Keep valuable assets, such as laptops and mobile devices physically and electronically secure.
- When using social media, share responsibly and respectfully and refrain from posting personal views as though they are views of the bank. Remember that you still represent the bank as an employee and should never speak on behalf of the bank in your personal social media account.
- Let your supervisor know if any of our assets are missing, damaged or in need of repair.

Theft of bank assets, in any form, or through embezzlement or intentional misreporting will not be tolerated. The bank treats workplace theft of assets belonging to other employees the same way it treats theft of the bank's assets.

Protecting the Bank's Assets

Q: *Is my Bank of Hawai'i email a bank asset?*

A: Yes, your Bank of Hawai'i email is a bank asset and should only be used for business purposes. For example, you should not use your bank email address as a registered contact for new personal website accounts, and should remove it from any existing personal accounts.

Related References

- IS70-10 Corporate Email Policy
- GS11-70 Corporate Instant Messaging Policy
- GS11-01 Corporate Technology Policy
- IS20-10P Information Security Policy
- GS25-80 Premises and Equipment Policy
- Security Program, Section XI, Asset Control
- GS50-51 Social Media Policy

PERSONAL AND BANK PROPERTY

Related References

- IS20-10P Information Security Policy
- IS10-10P Information Security Program
- Security Program, Section XI, Asset Control
- GS50-51 Social Media Policy
- PS80-35 Workplace Conduct Policy

The desk, workspace, lockers and equipment that you use at work are the property of the bank, and there may be times when it is necessary for someone else to access the property or the contents in it. Be aware that other bank employees with a reasonable need for such access have a right to gain access and review the property's contents as needed.

Any bank resources, equipment or property may be monitored in order to maintain safety and security. You should not have any expectation of privacy in connection with your access or use of any bank resources, equipment or property. Personal belongings (including purses, packages and backpacks) brought onto bank premises may also be monitored for safety or security reasons. Further, the bank monitors certain information on social media sites related to our business and brand.

USING TECHNOLOGY RESPONSIBLY

Use technology in accordance with our policies. Keep in mind that anything you create, store, download, send or receive using our systems is bank property and can be reviewed at any time, as permitted by law. To protect confidentiality and respect the privacy of coworkers, customers and guests within bank facilities, cameras (bank and personal devices) may only be used for approved business purposes.

When using our technology:

- Never access, store or transmit anything that is intimidating, obscene or discriminatory.
- Use strong passwords and keep passwords safe.
- Use device protections including screen savers, and email encryptions.
- Lock your device when stepping away.
- Protect our network from viruses and downtime by only installing approved updates as directed by our Information Technology Division.

Related References

- IS20-10P Information Security Policy
- IS70-20 Mobile Devices Policy
- PS80-35 Workplace Conduct Policy

INTERNET ACCESS

Internet resources are made available to you to provide information and research resources for legitimate business purposes. Safeguards are in place to support our information security policies, and these controls must not be disabled or circumvented in any way.

COMMUNICATION TOOLS

Communication tools are provided for business purposes, and we expect you to limit your personal phone calls and emails at work. Bank and/or customer confidential information that is transmitted over the internet in a file transfer or email must be protected via a secured link or data encryption. Accessing personal email accounts and the use of unapproved online chat/messaging services on bank devices are not permitted.

SOFTWARE AND HARDWARE

All bank owned and managed devices include a standard set of software applications. The operating system and preinstalled software on bank equipment, including bank applications and other supporting applications for business use, must not be modified or altered. Only bank-approved software is permitted to be installed, even if the software is freeware, open source or shareware.

Using Technology Responsibly

Q: *Do I need to protect my bank device? If so, what precautions should I take?*

A: Yes, since confidential customer, employee or bank information may be stored on bank devices, you must protect equipment from theft, destruction and unauthorized use. Wireless access points or other networking equipment (e.g., routers, switches, hubs) must not be connected to any part of the bank network.

Related References

- IS20-10P Information Security Policy
- IS70-20 Mobile Devices Policy
- PS80-35 Workplace Conduct Policy

CONFIDENTIAL BANK INFORMATION

Related References

- *GS11-01 Corporate Technology Policy*
- *IS20-10P Information Security Policy*

Bank information that is not available to the general public is considered to be confidential and proprietary. Such information is to be used solely for bank purposes (not for personal gain), and must be protected.

Here are some examples of confidential bank information that you are responsible for protecting:

- Intellectual property, such as trademarks and copyrights;
- Unpublished financial data, business and marketing plans, strategic planning, sales figures, plans for new products and services, lists of employees, vendors or customers, projected earnings, changes in management or policies;
- Information relating to customers and customer relationships; and
- Information about boardroom discussions and deliberations relating to business decisions.

CONFIDENTIAL EMPLOYEE INFORMATION

Related References

- *GS11-01 Corporate Technology Policy*
- *IS20-10P Information Security Policy*
- *PS80-10 Employee Records*

The bank is committed to protecting the confidential aspects of our relationships with present and former employees, and to satisfying the requirements of all applicable employment laws.

To ensure consistency in our response, any requests for information about present or former employees must be referred to the People Service Center. This includes verification of employment history with the bank.

Unauthorized use or distribution of confidential applicant or employee information (including but not limited to Criminal Justice Information as provided by IS20-10P Information Security Policy) is a violation of bank policy.

Note that nothing in the Code should be interpreted to prevent you from engaging in activities that are protected under laws and regulations that allow employees to discuss or disclose compensation information. Specific information about you as an employee may be released for the purpose of recognizing your years of service or your accomplishments at the bank, and is not considered a breach of confidential information.



Each of us has a special responsibility to protect the privacy of our customers, prospective customers, employees and vendors, and the physical and digital confidentiality of their information.

PROTECTING CONFIDENTIAL INFORMATION

Confidential information can be written, oral, telephonic or electronic, and includes a wide variety of non-public data or personal information of coworkers, customers and prospective customers.

Each of us has a special responsibility to protect the privacy of our customers, prospective customers, employees and vendors, and the physical and digital confidentiality of their information. Unless approved for public distribution, this type of information is considered to be confidential, and we all have a responsibility for keeping it safe and secure.

Disclose confidential information only on a need-to-know basis.

- Ensure that confidential information is maintained only on bank equipment, in bank files and on bank premises or use extra precautions, such as encryption, if business necessity requires information to be transported outside of bank premises.
- If you must print a document, use the secure print feature.
- Exercise good judgment by avoiding displays of confidential information in any form (documents, laptop screens, etc.) in a careless manner or engaging in conversations mentioning confidential information in public places, such as elevators, hallways, restrooms, restaurants and public transportation.

What should you do if you accidentally misplace some confidential business, customer, applicant, or employee information (including but not limited to Criminal Justice Information) or if you think it might have been shared inappropriately?

Immediately notify the Service Desk at (808) 694-HELP (4357) if you suspect a compromise or loss of such information, as well as your supervisor.

You must continue to maintain and protect the privacy of bank confidential and proprietary information after your employment ends.

Failure to do so may result in legal consequences for you and/or any future employer to whom you make unauthorized disclosures.

Related Reference

- IS20-10P Information Security Policy
- GS11-01 Corporate Technology Policy

Protecting Confidential Information

Q: I received an internal email with confidential business information. I know I can't share it with anyone outside the bank who isn't authorized to see it, but can I share it with a coworker?

A: You should only share confidential business information with employees who are authorized to see it and have a business need to know the information as part of their job duties.



Protecting Confidential Information

Q: *My coworker often leaves his device unlocked when going out for lunch. Sometimes people from other areas come to our floor for meetings and pass by our workstations. Should I tell someone about this, or just let it go since it will time out anyway?*

A: You may remind your coworker to lock his workstation every time he leaves his desk. If you are uncomfortable speaking directly with your coworker, ask your supervisor to address the issue. Even if you're not sure, it's always important to report your concerns.

Q: *Sometimes when I'm picking up a coffee at my local coffee shop, a customer will call me with important questions. How should I handle these situations?*

A: You need to protect any confidential information you may discuss during your call, and you can't do that in a public coffee shop. You can take the call, but let the customer know that you'll need to call them back with answers or for further discussion once you return to your office.

Related Reference

- IS20-10P Information Security Policy

AVOIDING CONFLICTS OF INTEREST

Conflicts of interest can occur when our personal relationships or interests overlap with or potentially affect our responsibilities at the bank. Conflicts of interest can cause people to question our integrity if they are not promptly disclosed and managed.

We work to avoid even the appearance or the perception of a conflict. Please contact your supervisor or the People Service Center if you have questions or experience a conflict of interest.

You are expected to do your part to conduct yourself in a manner that doesn't violate our Code, policies and procedures, and the law, and to avoid the appearance or perception of a conflict. Examples here include, but are not limited to:

- You need to avoid situations where a personal relationship or financial interest in another company might influence how you make a decision. This includes avoiding using your position at the bank to obtain improper personal benefits for yourself or your family members, household members, significant others or partners in a dating or intimate relationship.
 - **“Family members”** means your spouse, parents, children, siblings, grandparents, grandchildren, in-laws, aunts, uncles, nieces, nephews, cousins, and any of these in a step relationship; and any legal guardian, legal ward, or an estate or trust of which you or one of the foregoing is a beneficiary, representative or trustee. It also includes persons in “hanai” relationships, domestic partners, civil union partners and reciprocal beneficiaries.
 - **“Household members”** means relatives or non-relatives residing in the same dwelling as you.
- You must promptly disclose to your supervisor any situations that might make it difficult for you to be objective in effectively performing your work at the bank or that may create an appearance of impropriety.
- You are responsible for selecting the best vendors for the job by carefully considering their proven track record, reputation for integrity, and other merits—not based on favoritism.
- You may not purchase bank property (including, but not limited to, real property acquired through repossession or in settlement of a debt) unless, in the case of real property, the purchase is court-approved. You may also purchase other bank property if the purchase is through a bank-sanctioned sale for charitable fundraising purchases.

Related References

- GS80-75 Conflict of Interest Policy
- PS20-80 Outside Employment
- GS50-51 Social Media Policy

- You are not allowed to purchase or borrow any assets from, or sell any assets to, any estate, trust or other fiduciary account administered by the bank.
- You must refrain from posting personal views on social media as though they are the views of the bank.

Avoiding Conflicts of Interest

Q: *In the past, I worked for a company that I would like to now hire to work on a special project for the bank. Since it's a legitimate project and this vendor is skilled at this type of work, is it okay if I hire the vendor?*

A: Although the work is legitimate, this situation could create the appearance of a conflict of interest. The circumstances of this situation should be reported to our People Service Center. You will be asked to schedule an independent evaluation prior to drawing up a contract. This will help protect you, the vendor and the bank if the relationship is ever questioned.

Related References

- GS80-75 Conflict of Interest Policy
- PS20-80 Outside Employment
- GS50-51 Social Media Policy

PERSONAL FINANCIAL RESPONSIBILITIES

Because of the nature of our business, any improper handling of your personal finances could undermine your credibility and the bank's. It could also cause others to question your decision-making on the job.

Handle your personal finances responsibly, with integrity, and in compliance with the law, particularly the intelligent use of credit. In every case, use good judgment.

Related Reference

- GS80-75 Conflict of Interest Policy



PROCESSING PERSONAL TRANSACTIONS

You must always follow the same procedures that are used by customers—and from the customer side of the window or desk—when transacting personal financial business with the bank. You are not allowed to handle or approve your own transactions, or transactions for family members, household members, significant others or partners in a dating or intimate relationship, or transactions on accounts over which you have ownership interest, control or signing authority. These transactions must be handled by other employees. If you are found processing or approving your own personal transactions or those of your family members, household members, significant others or partners in a dating or intimate relationship, it will be assumed you are in violation of this Code and the bank’s policies and procedures.

Personal accounts include, but are not limited to, business accounts, personal checking and saving accounts, loans, credit cards and trust accounts.

Any coercion of other employees in order to circumvent this rule is also a violation of our Code.

Processing Personal Transactions

Q: *My sister has a Bank of Hawai‘i account, and I work as a relationship service representative. Can I cash her check for her?*

A: No, because she is a “family member” you cannot cash your sister’s check. You cannot be involved in the bank’s business dealings with your sister. Let another qualified employee handle her business.

Related Reference

- GS80-75 Conflict of Interest Policy

PERSONAL BORROWING AND LENDING

Related References

- CP40-105 Employee Loans
- CP40-140P Insider Loans

We encourage you to meet your borrowing needs by applying for a loan through the bank and taking advantage of special employee loan programs.

- You may not personally lend to, or borrow from, other employees or customers. However, you may borrow from or lend to family members, household members, significant others or partners in a dating or intimate relationship, or friends (or act as guarantor or loan co-signer) where the relationship is independent from the bank, and the borrowing/lending is solely based on that personal relationship.
- You may not borrow from a vendor or customer, except through the use of a customary retail charge account.
- If you borrow from another financial institution, make sure it's a reputable organization. Additionally, if you borrow from another financial institution, you may not accept preferential treatment or terms that are not extended to other customers.

EXTENDING CREDIT

To avoid possible conflicts of interest, you are prohibited from negotiating or approving any loan or other transaction between the bank and yourself, your family members, household members, significant others, or partners in a dating or intimate relationship or any company in which you or a family member, household member, significant other, or partner in a dating or intimate relationship have any interest or association.

You may not extend bank credit if the proceeds of the loan will directly or indirectly benefit you, a family member, household member, significant other, or partner in a dating or intimate relationship or any company in which you or a family member, household member, significant other, or partner in a dating or intimate relationship have an interest or association.

Regulation O governs extension of credit that the bank makes to its insiders and their related interests. Insiders are directors, principal shareholders, and those executive officers designated by the Board of Directors (executive officers or senior executive vice presidents and above, and the controller). Insiders must be familiar with and abide by Regulation O and its requirements regarding extensions of credit to insiders or to their related interests.

Related References

- CP40-10P Commercial Credit Authority
- GS80-75 Conflict of Interest Policy
- CP40-20P Retail Credit and Collections Authority

SIGNING ON TO CUSTOMER ACCOUNTS

Related Reference

- GS45-78 Signing Authority of Employees Policy

Sometimes you may receive special requests from customers asking you to help represent them as an agent or co-lessee of safe deposit boxes or other accounts. This is not allowed unless permitted by law or by written agreement, such as a bank trust officer signing on to a customer's account in the course of providing fiduciary services.

COMMUNITY INVOLVEMENT AND CORPORATE CITIZENSHIP

Related Reference

- GS50-30 Community Engagement and Events

Bank of Hawai'i is committed to making a difference in the neighborhoods where we live and work. The bank is a caring community partner that supports initiatives to strengthen communities and we encourage you to get involved.

As a company, we support a variety of charitable programs in accordance with our corporate giving priorities, especially through our Bank of Hawai'i Foundation. We support initiatives that help to better conditions for people in Hawai'i and the West Pacific. We are proud of the generosity of our Bankoh Blue Crew volunteers, who donate their free time in numerous community service projects to support our local communities.

If you choose to volunteer in charitable activities outside of work, avoid conflicts of interest and never use bank time or resources unless you have permission to do so.



Community Involvement and Corporate Citizenship

Q: I am involved in a personal charitable activity in my community. May I obtain a list of bank suppliers that I work with and use Bank of Hawai'i letterhead to solicit them to contribute to my personal charitable activity?

A: No, soliciting bank suppliers for personal charitable activities may create the appearance of impropriety or a conflict of interest. Relationships with suppliers and the procurement process should be based solely on legitimate business concerns.

Q: Is it appropriate to ask one of our vendors to provide a donation and door prizes to our internal charitable fundraising?

A: No. This creates a conflict of interest along with a false sense of obligation on the part of our vendor.

Related Reference

- GS50-30 Community Engagement and Events

POLITICAL ACTIVITIES AND CONTRIBUTIONS

Being involved in the political process is an important part of being a good citizen. We respect the rights of all our employees to engage in the political process and encourage your political participation.

Although we respect your right to engage in personal political activity, be sure your activities are lawful and appropriate. Make sure they remain separate from your work at the bank. Know that your job will not be affected by your personal political views or contributions.

Here are a few guidelines for being politically active:

- Engage in political activities on your own time and as an individual (not representing the bank). If you wish to take time away from work for political activities, you need to get written approval from your supervisor.
- Use your own resources to support political causes, candidates or campaigns. You are not allowed to use bank resources, including facilities, equipment, stationery, email, phones or mailing lists.
- Avoid contacting other employees during work hours or on bank premises to solicit political contributions or participation in any political activity.
- If you wish to support political activities that benefit the interests of the bank and other financial institutions, learn more about voluntary participation in the bank's Special Political Education Committee (SPEC).
- Due to potential conflicts of interest, employees may not seek election to public office or accept an appointment to a public commission or board without prior written approval from the Executive Committee and concurrence of their supervisor.
- Unless authorized, no employee is permitted to provide testimony or advocate a position of the bank, directly or through an agent, to any official in the legislative or executive branch of government for the purpose of influencing legislative or administrative action.
- As a general rule, Bank of Hawai'i does not endorse broad-based social, political, or economic initiatives unless such support is clearly in the best interests of the bank from a business perspective, and then only with the concurrence of the Board of Directors.

Related References

- GS80-75 Conflict of Interest Policy
- GS50-65 Government Relations Policy
- GS50-65A Special Political Education Committee (SPEC)

Because our bank has government entities as customers, certain employees may be subject to special additional limitations on their personal political contributions. Follow applicable laws and regulations, including any special rules that may apply to your department or your specific position within the bank.

Political Activities and Contributions

Q: *Can I use our copiers to print promotional materials for a political candidate I support—if I use it after hours?*

A: No. You must not use bank resources to support your personal political activities—even if you plan to use them after hours.

Related References

- GS80-75 Conflict of Interest Policy
- GS50-65 Government Relations Policy
- GS50-65A Special Political Education Committee (SPEC)

OUTSIDE EMPLOYMENT

Before taking a job outside the bank, you are expected to make sure that it is not for one of our competitors, and to remember that you still represent the bank as an employee. Discuss any potential outside jobs with your supervisor, who will also help you determine if your time spent at an outside job might interfere with your regular job responsibilities at the bank.

Here are some examples of outside employment to avoid because they may involve a conflict of interest:

- Working for a bank competitor;
- Working for an insurance, real estate or securities brokerage firm (including self-employment), in which referrals are made for a fee;
- Preparing, auditing, or certifying statements or outside documents upon which the bank may rely for lending or other purposes;
- Preparing tax returns for customers or prospective customers, vendors or employees;
- Rendering investment, legal, or other advice, or exercising judgment, which is predicated upon information, reports or analysis that are accessible primarily from or through employment with the bank;
- Taking outside employment that may not accurately or appropriately represent your employment at the bank; or
- Taking outside employment that infers sponsorship or support of the bank to the outside employer or an outside organization.

What do you need to do before taking an outside job?

You must get prior documented approval before accepting any employment outside the bank, and annually thereafter, from your supervisor and from the People Service Center.

This provision is not intended to restrict the outside activities of the bank's Board of Directors, which do not raise conflict of interest concerns.

Related References

- GS80-75 Conflict of Interest Policy
- PS20-80 Outside Employment

OUTSIDE DIRECTORSHIPS

Related Reference

- GS80-75
Conflict of
Interest Policy

In order to serve as a director, trustee, or officer of a profit-making entity or venture, or a nonprofit entity for which you, as a bank employee, receive compensation, you must give advance written notification to Corporate Insurance for approval of that service. Corporate Insurance will notify you once a decision is reached by the Executive Committee. The Executive Committee will consider your time commitment required by the outside directorship and determine if a conflict of interest exists. You may begin to serve only when deemed permissible by the Executive Committee.

Directors should notify the bank of any new directorship through the annual Regulation O questionnaire.



PARTICIPATION IN FOR-PROFIT AND NONPROFIT ORGANIZATIONS, SERVICE CLUBS AND ASSOCIATIONS

Bank of Hawai'i is proud of our employee tradition of giving back to communities through volunteerism. We encourage you to take an active part in nonprofit organizations, such as improvement associations, service clubs and religious organizations. Prior approval is not required for volunteer work or non-paying positions held in nonprofit organizations. However, you need to be mindful that the time you spend pursuing these interests cannot interfere with your ability to satisfactorily do your job at the bank.

When acting in a private capacity, you should clearly distinguish your personal views from the bank's views and avoid taking controversial positions that may be incorrectly or inadvertently attributed to the bank.

If you are a director, officer or an authorized signer for a profit-making entity, or a nonprofit organization, service club or association that has an account with the bank, here are some guidelines to follow to avoid conflicts of interest:

- You must conduct all transactions on behalf of the entity or organization as an individual, not as a bank employee, and from the customer side of the window or desk.
- You must disclose the potential for a conflict of interest to the organization or club, and recuse yourself from voting on any matters regarding banking services or credit services.
- You must not participate in the underwriting or approval process for any credit facility, credit line, loan or lease, requested by the organization or service club.
- You must not process or authorize the processing of a "draw" or advance from a credit facility in the name of the organization for which you are a director, officer or authorized signer.

Related Reference

- GS80-75 Conflict of Interest Policy

- You must not be the assigned relationship officer for the organization's account;
 - must not have control over the customer's records of that account (such as deposit account or loan statements);
 - must not authorize or approve any overdrafts incurred by the organization;
 - must not process or authorize the reversal or waiver of fees or service charges to any account over which you have signing authority; and
 - must not request approval of any exceptions to transactions being conducted on behalf of the organization by a coworker or anyone you supervise.

CORPORATE OPPORTUNITIES

Each of us has a duty to advance the bank's business interests when opportunities present themselves. When a business or personal opportunity is discovered through the bank's information, operations or connections, you must not take or direct this opportunity to a third party unless the bank has already been offered the opportunity and turned it down. You may not use bank property, information or position for personal gain or to compete with the bank.

Related Reference

- GS80-75 Conflict of Interest Policy

GIVING LEGAL, TAX AND OTHER ADVICE TO CUSTOMERS

Because we encourage our customers to talk with us about their financial goals and life events, they may ask questions of a legal nature about such things as taxes, estate planning, contracts and the ownership of assets. Unless you have been authorized to provide tax advising services, a customer seeking tax or legal advice must be politely told that they need to consult with their own attorney or tax advisor.

It is against the law for the bank to provide legal services to customers and third parties. This includes licensed attorneys employed by the bank either as in-house counsel or in non-attorney positions.

Tax advice may only be provided by trust officers providing tax planning and preparation services incidental to fiduciary services, or Bankoh Investment Services, Inc. employees providing tax advice incidental to investment or brokerage services.

You may not give legal advice to customers under any circumstances, and should avoid making any statements that could be interpreted as giving legal advice. You cannot participate in the drafting of wills, trusts, deeds, contracts and other legal documents on behalf of a customer.

Please ask the Legal Division if you have questions about the types of advice that are considered impermissible legal services.

Related Reference

- GS45-64 Legal Services

We Are All Responsible for Maintaining Our Integrity by Reporting Concerns:

If you have an issue or concern, we want to hear from you. Please refer to the resources indicated in the “Report Concerns” section on page 13 of this Code of Business Conduct & Ethics.

Maintaining Integrity with Investors and with the Public



MAINTAINING INTEGRITY WITH INVESTORS AND WITH THE PUBLIC

The financial services industry is highly regulated to help protect the interests of customers and shareholders. Bank of Hawai'i is dedicated to complying with the letter and spirit of all applicable laws, rules and regulations that apply to our business to maintain the trust our customers, communities and shareholders have placed in us, and to continue our success into the future. It is your responsibility to be aware of and to adhere to the standards and restrictions imposed, including the laws and policies outlined in this Code, as well as any additional rules and business unit or corporate policies that apply.

SECURITIES TRADING POLICY

Under U.S. securities and other trading laws, we may not trade securities based on inside information about a company or share that information with anyone else.

What is inside information?

Through your work, you may have access to significant and confidential information about the bank or a customer, competitor or third party. Also known as material, nonpublic information, this is considered “inside” information. Trading company, competitor or third-party securities while in possession of inside information is considered “insider trading” and is illegal.

Inside information can include:

- financial information
- the development of new products or services
- potentially significant business deals
- changes in key personnel
- government investigations
- a breach or unauthorized access of the bank’s property or information technology infrastructure

We are not permitted to share nonpublic or inside information, or make any trades until the information is publicly announced.

If you have access to material, nonpublic information, you may not trade on it or share it with others until after it has been released to the public. Generally, you must wait to make a trade until after the second full trading day following public disclosure.

Passing inside information to anyone who may use it in a decision to invest—including family, friends or third parties—is also a form of insider trading known as “tipping.”

In order to avoid the appearance of impropriety in trades around the time of announcements of annual and quarterly financial results, the bank recommends that you and your immediate family and household members not make any trades in bank stock during the period beginning 14 calendar days before the end of each fiscal quarter, and ending after the second full trading day following the earnings announcement.

Related Reference

- Securities Trading Policy

Employees who are actually aware of the bank's earnings prior to their public announcement, or of any other material non-public information, may not trade even if it is outside this window of time. In other words, it is never permissible to trade if you are in possession of material non-public information. You must wait until that information becomes public.

Bank policy further prohibits you or your immediate family and household members from:

- 1) pledging bank stock as collateral for a loan (including the use of a traditional margin account with a broker-dealer), and
- 2) hedging the risk in bank stock by buying or selling publicly traded options, puts, calls or other derivative instruments related to bank stock.

Employees must always be mindful when trading in company stock to protect Bank of Hawai'i's reputation and brand. Consequences of noncompliance of insider trading are severe. Violators, both individuals and the bank, are subject to civil and criminal penalties. For potential consequences of insider trading violations, including fines, penalties and prison time, you may access the Securities Trading Policy at <http://ir.boh.com/corporate-governance/highlights>.

Securities Trading Policy

Q: *My family and friends often ask me about Bank of Hawai'i, and whether they should buy stock. Usually I tell them what I know about our business and suggest they buy stock. Is this a problem?*

A: The same rules about inside information apply whether you buy or sell stock yourself or if you give the information to someone else, which is known as "tipping." If a relative or friend buys or sells stock based on non-public information that you give them, both of you could be liable for violation of securities laws. In addition, you could be in violation simply for sharing material non-public information, regardless of whether or not your family or friends use it or benefit from it.

Related Reference

- Securities Trading Policy

EXECUTIVE COMPENSATION CLAWBACK POLICY

To the extent permitted by law, this policy requires the company to reasonably promptly recover incentive-based compensation if the Human Resources and Compensation Committee (the “Committee”) determines that it was erroneously awarded or received by an executive officer based on any Accounting Restatement. If this policy is triggered, in determining whether to recover such payment, the Committee will take into account whatever it considers appropriate, including whether the expense of recovering the recoverable amount would exceed the amount to be recovered after making a reasonable attempt of recovery or the assertion of a claim may violate applicable law. If the Committee determines either of these situations is present documentation must be provided to the New York Stock Exchange.

Further, following a restatement of the bank’s financial statements, the Committee shall instigate recovery of any compensation that is required to be recovered by Section 10D-1 of the Securities Exchange Act of 1934.

Related Reference

- PS60-70 Executive Compensation Clawback Policy

GIFTS, THE BANK BRIBERY ACT, AND THE FOREIGN CORRUPT PRACTICES ACT

Our reputation for integrity is central to the success of our business. We must never compromise our reputation by engaging in, or appearing to engage in, bribery or any other form of improper influence. We must never accept or provide anything of value that may suggest something improper, creates an obligation, or appears extravagant. Employees or agents of any company controlled directly or indirectly by the bank are subject to limits on the gifts, entertainment and travel that they can accept from people doing business with the bank.

RECEIVING GIFTS FROM OTHERS

Except as expressly allowed by bank policy, directors and employees must never seek or accept gifts from third parties in connection with any transaction or business of the bank, or for providing information about the bank or its clients that is confidential. A “gift” is broadly defined, and includes substantial favors, money, gift cards, special discounts on goods and services, free services, donations, transportation tickets, reimbursement for travel, loans of goods or money, tickets to entertainment or sporting events, hotel expenses, or entertainment.

Gifts to directors and employees of cash or gift cards that can be converted to cash are strictly prohibited and must be promptly and politely, yet firmly, returned to the donor. Generally, employees may not accept a bequest, legacy, benefit or interest in property under a trust from a customer or vendor (other than a member of their family).

A director or employee need not personally benefit from the gift for it to be prohibited. Accepting items of value that benefit a third person or party, including family members, that are intended to influence a company transaction are also prohibited.

Because you cannot be certain of another’s intention in offering or making a gift, you must exercise great caution in accepting any gift. In addition to violating the trust of our customers and vendors, “corruptly” soliciting or accepting anything of value in connection with the bank’s business is a crime. Depending on the amount of the gift involved, there can be substantial penalties and potential prison time.

Of course, you may accept bona fide salary, wages, fees or other compensation or expenses, paid or reimbursed, in the usual course of your business with the bank. You may also negotiate with third parties for the payment of fees, the offering of incentives and discounts, and other transaction terms that solely benefit the bank.

Related References

- GS70-23 Bank Bribery Act and Gifts Policy
- GS80-75 Conflict of Interest Policy
- GS70-25 Foreign Corrupt Practices Act Policy

EXAMPLES OF PERMITTED GIFTS

Certain gifts of reasonable value may be accepted as long as it is clear from the circumstances that the giver is not trying to corruptly influence or reward a bank transaction or the improper sharing of confidential information.

Gifts, the Bank Bribery Act, and the Foreign Corrupt Practices Act

Q: *A customer handed me a note and told me not to open it until later. When I did, I discovered a \$20 bill inside. What should I do with the money?*

A: Cash gifts may not be accepted under any circumstances. You must politely, yet firmly, return any cash gifts that are offered to you.

The types of gifts you are allowed to accept are:

- Meals, refreshments, entertainment, accommodations or travel arrangements (each of reasonable value) in the course of a business meeting or other occasion to foster better business relations, provided that the bank would have usually paid the expense as a reasonable business expense. The reasonable value of these items may not exceed \$500 per occasion or event.
- Advertising or promotional material, such as pens, pencils, note pads, key chains, calendars and similar items. The reasonable value of this type of gift may not exceed \$100 per item.
- Discounts or rebates on merchandise or services that do not exceed those available to other customers of that business.
- Gifts related to commonly recognized events or occasions such as a promotion, new job, wedding, retirement, holiday or birthday. The reasonable value of this type of gift may not exceed \$500.
- Charitable, educational or religious organization awards for recognition of service and accomplishment. The reasonable value of this type of gift may not exceed \$500.

You may accept a gift certificate or gift card that cannot be redeemed for cash if it falls into one of the above exceptions.

Related References

- GS70-23 Bank Bribery Act and Gifts Policy
- GS80-75 Conflict of Interest Policy
- GS70-25 Foreign Corrupt Practices Act Policy

APPLICATION OF OTHER ETHICS RULES

If any applicable codes of conduct and ethics, regulatory rules, or professional licensure requirements restrict the receipt of gifts even more than our bank policies, those restrictions must be followed.

CASE-BY-CASE EXCEPTIONS

If you wish to solicit or receive anything of value not explicitly authorized by this Code, you must first obtain written approval from your supervisor, with concurrence by the Chief Ethics Officer or their designee.

GIVING GIFTS TO OTHERS

You need to be careful when giving gifts to customers and vendors to avoid the appearance of undue favoritism or improper motives. The bank purchases entertainment opportunities, logo items and other gifts that may be provided to current or prospective customers and current or prospective vendor personnel. You should follow any limits the company places on the use of entertainment and gifts it pays for. Gifts you offer to third parties should always consider any gift or entertainment policy that may apply to them, to avoid embarrassment or problems for the recipient.

GIFTS TO SUPERVISORS

Bank policy discourages gift giving to another team member or to a supervisor by employees they directly or indirectly supervise. To avoid any perception of a conflict of interest or appearance of favoritism, supervisors are prohibited from accepting gifts that exceed \$100 in value from anyone they directly or indirectly supervise. Employees must also adhere to this limitation.

GIVING GIFTS TO FOREIGN OFFICIALS

Great care should be taken in giving gifts to persons in positions of authority from other countries. The federal Foreign Corrupt Practices Act (FCPA) prohibits offering to pay, paying, promising, or authorizing the payment of money or anything of value to a foreign official in order to influence any act or decision of the foreign official in their official capacity, or to secure any other improper advantage in order to obtain or retain business.

The definition of “foreign official” includes any foreign government official, political party, candidate, employee or agent. A bribe prohibited by the FCPA does not have to originate from the United States, and payments made to intermediaries who then pass a bribe to a foreign official are covered. Substantial criminal penalties to both the giver and the bank can result from non-compliance.

Related References

- GS70-23 Bank Bribery Act and Gifts Policy
- GS80-75 Conflict of Interest Policy
- GS70-25 Foreign Corrupt Practices Act Policy

FURTHER RESOURCES

If you have any questions regarding the appropriateness of a gift or proposed gift, or the legality of any proposed payment or business arrangement, please discuss it with your supervisor, the Chief Ethics Officer or an attorney in our Legal Division.

REPORTING OF VIOLATIONS

Any suspected bribe or other illegal arrangement should be reported immediately using the “Report Concerns” resources on page 13 of this Code of Business Conduct & Ethics.

Gifts, the Bank Bribery Act, and the Foreign Corrupt Practices Act

Q: *A vendor I work with just finished an important project for me on time and under budget. I would like to show my appreciation with a gift. What is appropriate?*

A: As a general rule, we avoid giving gifts to vendors to set the tone for how we conduct business—purely on business considerations. Another thing to consider is the vendor’s own policy for gifts and entertainment. Just as we want others to respect our policies, we want to be respectful of theirs.

Related References

- GS70-23 Bank Bribery Act and Gifts Policy
- GS80-75 Conflict of Interest Policy
- GS70-25 Foreign Corrupt Practices Act Policy

In order to avoid any potential or perceived conflicts of interest that may arise from receiving gifts, it is the bank’s policy to avoid activities that even suggest something improper. In addition, violating these laws can have serious consequences for you and our bank. If you are unsure of what to do with a gift from a customer, report it to your supervisor or any of the resources listed in “Report Concerns” on page 13.

MONEY LAUNDERING ACTIVITIES/ BANK SECRECY ACT

The bank is committed to full compliance with all regulatory requirements and provisions of the Bank Secrecy Act (BSA), the USA PATRIOT Act, other anti-money laundering laws, and the Office of Foreign Assets Control.

Money laundering is the process of taking the proceeds of criminal activity and making them appear legitimate. Money laundering is generally accomplished in three steps: placement of cash or other assets into the financial systems; layering, by moving these assets around multiple accounts or institutions; and integrating the assets back into the mainstream economy. Money laundering can result from almost any crime, including fraud, tax evasion, drug trafficking and terrorism.

Our Anti-Money Laundering Policy and related procedures are designed to comply with all applicable federal and state laws and regulations related to money laundering, terrorist financing and economic sanctions. You are required to comply with these policies, procedures and controls.

- Be sure to accurately complete all customer identification and customer due diligence requirements.
- Be alert to and report any unusual or suspicious activity, such as the laundering of monetary instruments or the structuring of transactions to evade Bank Secrecy Act reporting requirements.
- Complete all required compliance training on a timely basis.

Money Laundering Activities / Bank Secrecy Act

Q: *My coworker and I disagree on whether to report an unusual customer transaction through our normal procedures. What should I do?*

A: If you need special guidance contact your compliance officer and file an eIR. Remember, everyone is responsible for identifying and escalating potentially unusual or suspicious transactions or activities. Doing so will facilitate further review of the transaction, and can help protect you and the company from any involvement in questionable or illegal activities.

Related Reference

- GS45-23P Entity-Wide Bank Secrecy Act, Anti-Money Laundering, USA PATRIOT Act and Office of Foreign Assets Control Compliance Program

Immediately report any customer or transaction that appears suspicious:

Every one of us is responsible for reporting suspicious activities.

- File your Electronic Incident Report (eIR) on the Corporate Security website *immediately* so that your concerns can be properly investigated.

OFFICE OF FOREIGN ASSETS CONTROL (OFAC) REGULATIONS

Federal laws prohibit the bank from engaging in any transaction or maintaining any account involving individuals, businesses, entities, or countries named on the OFAC Specially Designated Nationals (SDN) list, or who is otherwise the subject of sanctions by the U.S. government. You are responsible for immediately reporting any transaction, loan application, letter of credit application, or other bank account, service or document which may involve or a make reference to an SDN to your business unit's compliance officer and the OFAC officer in Corporate Compliance.

Related Reference

- BR42-50 Office of Foreign Assets Control (OFAC) Regulations Policy

“FAIR DEALING”

Relationships with Competitors and Vendors

Our reputation for integrity extends to the ways we behave with our competitors and vendors. We have a history of succeeding through honest and respectful business competition.

- You are responsible for dealing fairly with our competitors, service providers and vendors in addition to our customers, shareholders and coworkers. We do not seek competitive advantages through illegal or unethical business practices. This means we will never manipulate, conceal, or abuse privileged information, misrepresent material facts or engage in activities like making disparaging comments or spreading false rumors concerning a competitor.
- You must avoid potential conflicts of interest when selecting a vendor, and never accept improper gifts or other items of value.
- Follow fair and legal practices when looking for vendors. Select vendors that uphold the bank’s values and high standards for integrity.
- You must protect the bank’s confidential and proprietary information, including, where appropriate, with a confidentiality agreement. Also safeguard any confidential information or personal data that a vendor provides to the bank.

Related References

- GS25-20 Enterprise Procurement and Purchasing (EPP) Policy
- PS80-35 Workplace Conduct Policy

“FAIR TREATMENT”

Relationships with Customers

Related Reference

- GS45-29P Fair Lending and Fair and Responsible Banking Risk Management Program

Our core values include treating all individuals in the communities we serve with fairness and respect. As part of that fair treatment, we are committed to providing all customers and prospective customers with fair and equitable access to financial products and services, to being clear and transparent in all of our communications, and to acting fairly in all circumstances. We do not discriminate against any person on the basis of race, color, religion, national origin, sex (including gender identity and expression), marital and/or familial status, receipt of public assistance, handicap, age, or good faith exercise of rights. While we may offer different products across the markets we serve, our goal is to provide consistent treatment for all of our customers and prospective customers within the markets we serve.

“ANTITRUST AND ANTI-TYING”

Tie-ins and Exclusive Dealings

Related Reference

- GS45-07 Anti-Tying Compliance Policy

Agreements with customers that make purchasing certain goods or services a condition for purchasing other goods or services from the same vendor, or prohibit the customer from dealing with other vendors, may violate antitrust and anti-tying laws.

- Antitrust laws prohibit agreements that restrict competition, such as agreements between competitors as to pricing, bidding, and production, supply and customer practices. They apply to various forms of unfair conduct that may tend to create a monopoly.
- Anti-tying laws restrict the tie-ins of certain products or services to the purchase of other, unrelated products or services.

These laws are complex; consult a manager before taking action.

Since these laws are far-reaching and very complicated, you should contact your supervisor or other appropriate manager before taking any action that may fall within the scope of these laws.

INTERNATIONAL BUSINESS

We follow the laws and regulations of the U.S. and of all the places where we do business.

Related Reference

- GS20-70 Travel Policy

You are expected to adhere to the Code when you are acting on behalf of the bank outside the United States. In addition, you are expected to observe all applicable foreign laws. This includes foreign tax laws, customs duties, regulations, licensing, currency restrictions, and manufacturing and marketing laws.

ADDRESSING SECURITY CONCERNS

All known or suspected criminal or other illegal activity or suspicious activity must be reported to Corporate Security within 24 hours of discovery. The preferred method of reporting is by way of an Electronic Incident Report (eIR) via the Corporate Security website on BlueFlash.

Related References

- GS70-46 Reporting Suspicious Activity Procedure
- Security Program Manual, Section VIII, Incident Reporting

COMMUNICATING RESPONSIBLY TO THE PUBLIC

Bank of Hawai'i takes great efforts to ensure its statements to the public are honest, consistent and clear. Everything we communicate about the bank can have an impact on our reputation, coworkers and brand. Reliable communication with investors and the public helps ensure that we maintain the trust we build with them. What we say and how we say it matters.

- In general, only media-trained employees serve as official bank spokespersons, and are authorized by the Executive Committee to speak on behalf of the bank based on their business experience. Official bank spokespersons respond to media inquiries and ensure that written and/or oral responses have been properly authorized and approved before being released.

All media inquiries should be directed to the manager of Corporate Communications at (808) 694-8384.

You may receive inquiries about the bank or its business from the news media. All media inquiries, including requests to participate in speaking engagements, should be directed to the attention of the bank's Corporate Communications manager.

For publication purposes, do not endorse the services of vendors or business partners without prior approval from Corporate Communications and our Legal Division.

Direct analyst inquiries to Investor Relations at (808) 694-8238.

Related References

- GS50-60 Media Relations Policy
- GS50-51 Social Media Policy

USING SOCIAL MEDIA

When using social media, share responsibly and respectfully. You should refrain from posting personal views as though they represent the views of the bank. Remember that you still represent the bank as an employee, but should never speak on behalf of the bank in your personal account.

Using Social Media

Q: *Am I allowed to share posts from the Bank of Hawai'i social media sites?*

A: Yes, you are permitted to repost a Bank of Hawai'i social media post, but you must not misrepresent bank products, services or employees. Be honest and accurate when posting and be sure to maintain confidentiality of bank and/or customer information. Please share responsibly and respectfully.

Q: *What are some types of posts that are considered inappropriate?*

A: Postings that include threats of violence, illegal content, harassing, discriminatory or bullying remarks, and maliciously false information about Bank of Hawai'i, our employees, and/or our customers are against policy.

Q: *Am I allowed to use my personal social media profile for authorized business use?*

A: No, you are not allowed to use your personal social media profile for authorized business use. Please refer to the Social Media Policy GS50-51 for more information.

Related References

- GS50-60 Media Relations Policy
- GS50-51 Social Media Policy

SOLICITATION AND DISTRIBUTION

To maintain a work environment free of activity and distractions that are not related to our business, we limit solicitation or distribution during work time and on bank premises.

“Solicitation” refers to requests, whether made verbally, in writing or electronically, for money or actions, such as collecting signatures or contributions for organizations or causes, or recruiting memberships. Selling Girl Scout cookies, school fundraiser candy, or tickets for charity or fundraising events are all examples of solicitations.

“Distribution” of literature includes providing, distributing or circulating any written, printed, or electronic material. Posting notices advertising a church or school fair, or distributing pamphlets for a political candidate, are examples of distributions.

“Literature” means leaflets, flyers, notices and other forms of written, printed or electronic materials, documents, forms, or records.

“Social media requests” refers to requests that the bank post solicitations or literature on its social media profiles. It does not include comments the public can post on the bank’s social media profiles. An example would be a request that the bank post a link to a charity or fundraiser on its Facebook profile.

“Legitimate bank business” means charitable and community activities supported by the bank, and bank-sponsored events related to its products and services.

Related Reference

- GS80-45 Solicitation and Distribution Policy

The solicitation or distribution of literature is allowed if it is related to legitimate bank business.

- Requests by any person or organization seeking to solicit or distribute literature on-site must be reviewed and approved in advance of such activity or event through the exception process.

Solicitation or distribution of non-electronic forms of literature is not allowed in work areas at any time.

- Non-employees (including vendors) may not solicit or distribute literature on bank premises, including parking lots.
- You may not solicit another employee while you are or should be on work time, or if it interrupts others who are or should be on work time. “Work time” includes all time when your duties require you to be engaged in work tasks. It does not include your own time such as meal periods, scheduled breaks, and time before or after work.
- Except for legitimate bank business or unless pre-approved by the bank through the exception process, you may not distribute non-electronic forms of literature in work areas at any time. Work areas are physical work sites and those areas immediately surrounding them, including but not limited to areas for employee work-related collaboration that are not open or readily available to the public for usage. Work areas do not include break rooms, restrooms, lunchrooms, and cafeterias.

Related Reference

- GS80-45 Solicitation and Distribution Policy



We Are All Responsible for Maintaining Our Integrity by Reporting Concerns:

If you have an issue or concern, we want to hear from you. Please refer to the resources indicated in the “Report Concerns” section on page 13 of this Code of Business Conduct & Ethics.

A Safe, Productive and Professional Workplace



A SAFE, PRODUCTIVE AND PROFESSIONAL WORKPLACE

Relationships are the core of our business. We treat everyone inside and outside the bank as we would want to be treated ourselves—with respect, and as valued members of our community.



FOSTERING DIVERSITY AND INCLUSION

We value the unique talents, backgrounds and perspectives of all of our team members at Bank of Hawai'i. We are focused on finding and developing the best talent available, and provide equal-employment opportunities to all qualified candidates and employees.

We are committed to fostering an accepting and inclusive work environment, and to fully complying, in letter and in spirit, with all Equal Employment Opportunity and Affirmative Action laws and regulations.

We base employment decisions only on relevant considerations such as an individual's qualifications and abilities. We do not discriminate based on race, color, religion, sex (including pregnancy, gender identity, or gender expression), sexual orientation, national origin, citizenship, ancestry, age, marital status, reproductive health decision, genetic information, arrest or court record, domestic or sexual violence victim status, disability, protected veteran status or any other status protected by federal, state or local law, except as required or permitted by law.

We are committed to hiring people with disabilities and provide reasonable accommodations to qualified employees. We are also committed to hiring protected veterans.

Bank of Hawai'i strictly prohibits discrimination. If you believe that you or other employees are being treated in a manner inconsistent with our policy, please contact the People Service Center or any of the resources identified in the "Report Concerns" section of this Code.

Related References

- PS30-32 Americans with Disabilities Act Compliance Under Title 1 (Employment) and the Pregnant Workers Fairness Act (PWFA)
- PS20-00 Equal Employment Opportunity/Affirmative Action Policy
- PS20-30 External Recruitment
- PS20-20 Internal Recruitment - Job Posting Program

HARASSMENT-FREE, VIOLENCE-FREE, DRUG-FREE AND SMOKE-FREE WORKPLACE

We foster a work environment that empowers everyone to do their best work. We believe that a safe and secure workplace and an environment free from intimidating, hostile or offensive verbal or physical conduct is fundamental to your effectiveness. Harassment undermines the dignity of the workplace, and is a form of misconduct that is prohibited. We have a zero-tolerance policy with respect to workplace violence and threats of workplace violence. A safe workplace allows us all to contribute and succeed.

- You are expected to treat others with respect; we do not tolerate harassment or discrimination.
- Sound safety practices are part of our operations, and you are expected to comply with workplace safety regulations.
- We resolve problems respectfully, and never resort to acts or threats of violence.
- Drugs or alcohol can create a safety hazard and impair your judgment. That's why we do not work under the influence of these substances.

Related References

- PS30-28 Drug-Free and Smoke-Free Workplace Policy
- PS80-40 Harassment-Free Workplace Policy
- GS80-37 Violence-Free Workplace Policy

HARASSMENT-FREE WORKPLACE

Bank of Hawai'i's policy is to provide a work environment free from all types of harassment, including, but not limited to, harassment on the basis of legally recognized "protected classifications," including race, color, religion, sex (including pregnancy, gender identity, or gender expression), sexual orientation, national origin, citizenship, ancestry, age, marital status, reproductive health decision, genetic information, arrest or court record, domestic or sexual violence victim status, disability, protected veteran status or any other status protected by federal, state or local law.

Harassment is prohibited not only at our workplace, but also anywhere the bank conducts business, including bank-related events on or off bank premises. Harassment can occur between coworkers, between managers or supervisors and subordinates, or between employees and third parties, such as vendors, suppliers and customers. The victims of harassment include anyone who has experienced offensive, unwanted or undesirable behavior, whether or not they were the intended victim.

Because people have different views of what constitutes harassment and what behaviors may be unwelcome, it's important that you avoid any conduct that might be perceived as a violation of our policy. This includes any abusive, intimidating, hostile, offensive or other unwelcome verbal, nonverbal and/or physical conduct and the displaying, sending or circulating of offensive material.

A Safe, Productive and Professional Workplace

Q: *One of my coworkers emailed an inappropriate joke to me and others in our department. I found it offensive, but I don't know if I should approach my coworker with my concern. What should I do?*

A: We each have a responsibility to ensure that Bank of Hawai'i is a great place to work for all, and offensive behavior such as this is not acceptable. If you feel uncomfortable speaking with your coworker directly, contact the People Service Center or speak with your supervisor.

Related References

- PS30-28 Drug-Free and Smoke-Free Workplace Policy
- PS80-40 Harassment-Free Workplace Policy
- GS80-37 Violence-Free Workplace Policy

The bank strictly prohibits sexual harassment. Unwelcome verbal, nonverbal, or physical conduct of a sexual nature constitute inappropriate sexual conduct that may violate our policy. Examples of inappropriate sexual conduct include, but are not limited to, remarks of a sexual nature, sexual advances or propositions, unwelcome leering, obscene gesturing and suggestive sounds, unwelcome touching, any workplace display of offensive pictures and/or conditioning employment in exchange for sexual favors.

You are responsible for complying with this policy, and to cooperate in preventing harassment in our workplace. If you believe you have been harassed, or if you are aware of the harassment of others, you must report it as soon as possible using the resources identified in the “Report Concerns” section of this Code.

VIOLENCE-FREE WORKPLACE

We strive to provide a safe work environment for our employees and customers. Under no circumstances will we tolerate violent or threatening behavior in the workplace, on bank premises, or at work-related functions. Examples of violent or threatening behavior include physical violence or aggressive behavior (e.g., hitting, shoving), bullying, threats of “getting even,” profane or abusive language, intentional

or threatening destruction of property, stalking and possession of firearms on bank property.

If you believe that you have been subject to violent or threatening behavior made by another employee, customer, vendor or third party, you must report the conduct as soon as possible to the appropriate parties, including Corporate Security at (808) 694-8801, your supervisor or the resources identified in the “Report Concerns” section of this Code.

In Emergency Situations:

The safety of our employees, visitors and customers is our first priority. If emergency services are needed to address a violent situation, immediately call 911 or the appropriate local authorities. You should not take any action that would create a risk of harm to yourself or others.

Related References

- PS30-28 Drug-Free and Smoke-Free Workplace Policy
- PS80-40 Harassment-Free Workplace Policy
- GS80-37 Violence-Free Workplace Policy

DRUG-FREE WORKPLACE

Maintaining the safety, health and well-being of all employees and other individuals in our workplace is a hallmark of the Bank's philosophy. This includes requiring you to perform your job duties unimpaired by drugs, alcohol or the improper use of legal substances. You are prohibited from working or reporting to work when impaired by alcohol, drugs, including medical marijuana, or other substances.

We encourage employees to voluntarily seek help for drug and alcohol problems.

SMOKE-FREE WORKPLACE

We provide a smoke-free workplace for our employees and customers. This means you may not use cigarettes, cigars, and other tobacco product substitutes, including electronic and vaporizing devices, in any areas where business is conducted. This includes, but is not limited to, all buildings, branches/departments, private offices, restrooms and elevators. We adhere to Hawai'i's "Smoke-Free Hawai'i" law at all of our facilities, which prohibits smoking in enclosed and partially enclosed areas that are open to the public as well as within 20 feet from entrances, exits, open windows or ventilation intakes of enclosed or partially enclosed areas.

If you encounter a customer or another employee not abiding by the no-smoking policy, you should courteously inform them of our policy of prohibiting smoking or, if necessary, contact Corporate Security at (808) 694-8801.

Related References

- PS30-28 Drug-Free and Smoke-Free Workplace Policy
- PS80-40 Harassment-Free Workplace Policy
- GS80-37 Violence-Free Workplace Policy

GUIDELINES FOR PROFESSIONAL APPEARANCE & BEHAVIOR

You contribute to the corporate culture and reputation of the bank in the way you present yourself as an employee. Your appearance, in addition to your professional expertise, help set the tone and inspire confidence in customers and coworkers.

PROFESSIONAL APPEARANCE & GROOMING

A professional appearance is essential to a favorable impression with customers, coworkers, visitors and the public.

Clothing and hairstyles should be neat, clean and appropriate in a business setting. Grooming and attire should be modest, meaning that it should not distract employees from work or be offensive to others.

Our different locations or business units may have different expectations of professional appearance, depending on the amount of customer contact and type of work. Visible body art modification, including piercings and tattoos, may be addressed according to the needs of your business unit. If you have a question about what is appropriate in your area, please discuss it with your supervisor.

PERSONAL RELATIONSHIPS AT WORK & PERSONAL VISITORS

We expect you to exercise good judgment in your relationships with other employees and third parties to avoid situations that might be perceived as conflicts of interest or favoritism. If a relationship is creating an actual, potential or perceived conflict of interest, we will take appropriate action in order to eliminate the situation. Examples of such actions include transfer to another department, reassignment of duties and change in reporting structure and/or physical working location.

For more information, please contact the People Service Center or your supervisor.

Related Reference

- PS80-35 Workplace Conduct Policy

Are family members or friends permitted to visit employees in the workplace?

Personal visits by your family and friends should be kept brief and must not disrupt work operations. Because such visits are distracting, family and friends should visit only when necessary.

In secured work areas, you must follow established security procedures. In some cases, you may not receive personal visitors, including unauthorized employees, into the work area except under emergency situations.

Use good judgment in keeping personal phone calls, texts or emails to a minimum in the workplace.

GAMBLING

You may not engage in any form of gambling on bank premises, during work time or through bank resources. This can include professional or organized gambling activities, betting on professional or amateur sports, using the internet for interstate wagers or gambling, lottery pools and other games of chance, and the facilitation of any kind of game, contest, lottery or raffle where proceeds from donations are used to purchase a prize. Note that lotteries or raffles associated with any bank community service or fundraising events are allowed on a case-by-case basis, with prior approval.

Related Reference

- PS80-35 Workplace Conduct Policy

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If you have an issue or concern, we want to hear from you. Please refer to the resources indicated in the “Report Concerns” section on page 13 of this Code of Business Conduct & Ethics.

Code of Ethics for Senior Financial Officers



CODE OF ETHICS FOR SENIOR FINANCIAL OFFICERS

Our Code of Business Conduct & Ethics applies to all Bank of Hawai'i employees, but the bank's senior financial officers have additional responsibilities that govern their professional and ethical conduct. The term "senior financial officers" includes the bank's chief executive officer, chief financial officer, or controller, and employees who perform functions similar to these senior financial officers.

Senior financial officers are expected to:

- Act with honesty and integrity, avoiding actual or perceived conflicts of interest in personal and professional relationships;
- Respect the confidentiality of information acquired in the course of work performed except when authorized or otherwise legally obligated to disclose, and not use confidential information for personal advantage;
- Proactively promote and be an example of ethical behavior as a responsible partner among peers in the workplace;
- Be responsible for the appropriate use of and control over assets and resources employed by or entrusted to them;
- Act responsibly in good faith, without misrepresenting or disregarding material facts or allowing their independent judgment to be subordinated;
- Provide information that is accurate, complete, objective, relevant, timely, and understandable to ensure full, fair, accurate, and timely disclosure in reports and documents that the bank files with, or submits to, the SEC, NYSE, FRB, and other regulatory agencies, and in other public communications;
- Comply with bank policies, applicable laws, rules, and regulations of federal, state, provincial, local governments and other appropriate private and public regulatory agencies;
- Discuss concerns about the accuracy and usefulness of accounting records and financial reports with appropriate officers of the bank's Finance Department or, if necessary, the chairman of the Audit & Risk Committee;
- Discuss unresolved concerns with appropriate officers or, if necessary, the chairman of the Audit & Risk Committee; and
- Promptly report any violation of this Code of Ethics for Senior Financial Officers to the Audit & Risk Committee.

Related Reference

- GS41-00 Code of Ethics for Senior Financial Officers

ADHERE TO OUR CODE

Senior financial officers are expected to adhere to this Code of Ethics. Failure to observe the principles and responsibilities of this Code of Ethics may result in disciplinary action up to, and including, termination of employment and prosecution under the law. The bank's Board of Directors shall be the final arbiter of any actions taken to enforce this Code of Ethics for Senior Financial Officers. Waivers of or changes to this Code of Ethics shall be publicly disclosed on a timely basis as required by law.

DISCLOSURE

Each member of the board, officer or employee involved in the bank's disclosure process (including senior financial officers), are required to be familiar with and comply with the bank's disclosure controls and procedures and internal control over financial reporting, to the extent relevant to their area of responsibility. This is to ensure that the bank's public reports and documents filed with the SEC, NYSE, FRB and other regulatory agencies as required comply in all material respects with the applicable laws, rules and regulations.

In addition, employees having direct or supervisory authority regarding regulatory filings or the bank's other public communications concerning general business results, financial condition,

and prospects should, to the extent appropriate within their area of responsibility, consult with other bank employees and take other appropriate steps regarding these disclosures with the goal of making full, fair, accurate, timely, and understandable disclosures.

Employees who direct the bank's disclosure process, including senior financial officers, must:

- Familiarize themselves with the disclosure requirements applicable to the bank as well as the business and financial operations of the bank;
- Properly review and critically analyze proposed disclosure for accuracy and completeness (or, where appropriate, delegate this task to others);
- Be truthful and complete in communications with the bank's shareholders and customers, and with government agencies;
- Avoid discussing the bank's affairs with securities analysts, media representatives, government officials, pension plan or similar fund administrators and other outside persons, unless they have been specifically authorized to do so; and
- Communicate honestly about the bank if they are authorized to speak on behalf of the bank.

Related Reference

- GS41-00 Code of Ethics for Senior Financial Officers

Administration of the Code



ADMINISTRATION OF THE CODE

Our Code is a living document that should serve as your first-line resource for making ethical decisions. It may be amended from time to time, and all amendments become effective immediately once they are posted. You can access the most current version of the Code on the corporate governance section of the bank's website at <http://ir.boh.com/corporate-governance/highlights> or on BlueFlash.

RESPONSIBILITY FOR ADMINISTRATION

The Bank of Hawai'i Corporation Board of Directors (or its designated committee) provides oversight of the Code by reviewing and approving the Code and any changes to the Code.

The Audit & Risk Committee of the Board of Directors ("Audit & Risk Committee") has overall responsibility for administration of this Code. At its discretion, the Audit & Risk Committee may delegate the responsibility to determine matters of interpretation, as well as to coordinate periodic changes and grant exceptions to this Code.

All supervisors are responsible for the implementation and administration of this Code within their respective departments.

REPORTING

The Chief Ethics Officer or designee will provide reports on Code violations on a regular basis to the Audit & Risk Committee and the Executive Committee.

If a Code violation is committed by a director or an Executive Committee member, the Chief Ethics Officer shall, as soon as reasonably practicable after receiving a notification of the Code violation, inform the CEO, Audit & Risk Committee and/or the Board of Directors.

CHANGES AND WAIVERS

Any change or waiver of this Code may be made by the Audit & Risk Committee of the Board of Directors or any committee authorized by the Audit & Risk Committee for that purpose. Directors and employees will be notified of any material changes to this Code.



Bank of Hawai'i reserves the right to change or terminate this Code at any time and for any reason.