

# **Bank of Hawai'i Corporation Audit & Risk Committee**

## **Complaints and Concerns Procedures for Accounting and Internal Control Matters**

April 26, 2024

Any employee of Bank of Hawai'i Corporation, Bank of Hawai'i, and their subsidiaries (collectively referred to as the "Company") may submit a good faith complaint or concern regarding accounting, auditing, or internal control matters to the Company without fear of dismissal or retaliation of any kind. Internal controls are processes reasonably assuring that the Company is achieving its objectives in: a) the reliability of its financial reporting, b) the effectiveness and efficiency of its operations, and c) its compliance with applicable laws and regulations.

The Company is committed to achieving compliance with all applicable securities laws and regulations, accounting standards, accounting and risk controls, audit practices, and other regulatory requirements. The Audit and Risk Committee will oversee the receipt, retention and treatment of complaints and concerns received by the Company about accounting, auditing or internal accounting and risk controls, compliance with applicable laws, and any impediment to or retaliation related to reporting of such matters (collectively, "Accounting or Internal Control Matters").

### **SCOPE OF MATTERS COVERED BY THESE PROCEDURES**

These procedures relate to complaints and concerns expressed by employees and others regarding any Accounting or Internal Control Matter including, without limitation:

- Fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
- Fraud or deliberate error in the recording and maintaining of financial records of the Company;
- Misrepresentation or false statement to or by an accountant or other employee regarding a matter contained in the financial records, financial reports, or audit reports of the Company;
- Deviation from full and fair reporting of the Company's financial condition;
- Deficiencies in or noncompliance with the Company's internal accounting and risk management controls;
- Actual or perceived attempts to prevent the reporting of any Accounting or Internal Control Matter or regulatory violation; or
- Actual or perceived retaliation for reporting of an Accounting or Internal Control Matter or regulatory violation.

## **RECEIPT OF COMPLAINTS AND CONCERNS**

Employees and others with concerns regarding Accounting or Internal Control Matters may report their concerns and complaints to the Company's Anonymous AlertLine, Audit & Risk Committee Chair, Chief Auditor, or management at the telephone numbers set forth below. The toll-free AlertLine is available 24 hours a day, every day of the week.

Anonymous AlertLine	(866) 347-5470
Palau employees should call:	011-1-883-347-5470
Audit and Risk Committee Chair, John Erickson	(213) 259-5902
Chief Audit Executive, Lacey Nakaguma	(808) 694-4058
Director of Corporate Security, Brian Ishikawa	(808) 694-8593
Chief Information Security Officer, Ryan Field	(808) 694-5661
Legal Division Manager, Russell Lum	(808) 694-8879
Chief General Counsel and Chief Ethics Officer, Patrick McGuirk	(808) 694-7124
Chief Financial Officer, Dean Shigemura	(808) 694-8976
Chief Operational Risk Officer, S. Bradley Shairson	(808) 694-8126
People Services Center	(877) 277-2898

Letters and written materials related to Accounting or Internal Control Matters may be sent to management, the Audit & Risk Committee Chair, or the Chief Audit Executive listed above at 130 Merchant Street, Honolulu, Hawaii 96813. The person making the complaint or raising the concern shall not be required to provide their name or other identifying information.

## **TREATMENT OF COMPLAINTS AND CONCERNS**

The individual receiving a complaint or concern shall make a good faith determination of whether it relates to an Accounting or Internal Control Matter. Where it is determined that Accounting or Internal Control Matters are involved, the individual shall promptly report the complaint or concern to both the Chief General Counsel and the Audit & Risk Committee Chair, and turn over any materials received. All other matters should be promptly reported to Corporate Security, People Services, or other applicable area for follow-up.

The Audit & Risk Committee Chair and/or the Chief General Counsel will (i) determine whether the complaint or concern actually pertains to Accounting or Internal Control Matters; (ii) when possible, acknowledge receipt of the complaint or concern to the sender; and (iii) if appropriate, advise management of the nature of the complaint or concern. If the complaint or concern received does not substantially pertain to Accounting or Internal Control Matters, the complaint will be referred to the appropriate person or department for handling.

Complaints relating to Accounting or Internal Control Matters will be reviewed under Audit & Risk Committee direction and oversight by the Chief General Counsel, Internal Audit, or such other persons as the Audit & Risk Committee determines to be appropriate. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review.

Prompt and appropriate corrective action will be taken when and as warranted in the judgment of the Audit & Risk Committee.

The Company will not discharge, demote, suspend, threaten, harass, or in any way discriminate against any employee in the terms and conditions of employment based upon any lawful actions of such employee with respect to good faith reporting of complaints regarding Accounting or Internal Control Matters or otherwise as specified in Section 806 of the Sarbanes-Oxley Act of 2002.

## **REPORTING AND RETENTION OF COMPLAINTS AND INVESTIGATIONS**

The Chief General Counsel will maintain a log of all complaints and concerns referred to him or her as potential Accounting or Internal Control Matters. The log will reflect receipt, referral, investigation and resolution

of such matters. The Chief General Counsel shall prepare a summary of all such complaints and concerns received, and report same to the Audit & Risk Committee and management at the next regularly scheduled meeting, or if deemed significant, at a special meeting of the Committee. Copies of the complaints and concerns, the results of any investigation, as well as the Chief General Counsel's log, will be maintained in accordance with the Company's document retention policy.

On at least an annual basis, People Services will report on the number and categories of AlertLine calls received, and any trends detected or internal control issues identified through review of that data.