

**Central Pacific Financial Corp.
&
Central Pacific Bank**

Human Rights Policy

Overview

Central Pacific Financial Corp. and its bank subsidiary, Central Pacific Bank, and each of their respective subsidiaries and affiliates (collectively referred to herein as the “Company”, “we,” “our”), are committed to this Human Rights Policy (“Policy”) and the protection and preservation of human rights. We are located in the State of Hawaii and our primary business is Central Pacific Bank, a community bank which principally provides banking and financial products and services to people, consumers and businesses in Hawaii. Our employees principally reside and live within Hawaii. We adhere to all U.S. government and Hawaii employment and labor laws and regulations. Human rights are embedded throughout our policies and procedures, to include our: Employment Manual; Code of Conduct & Ethics [posted at www.cpb.bank – investor relations – corporate governance – code of conduct & ethics]; and, Complaint (whistleblower) Policy [posted at www.cpb.bank – investor relations – corporate governance – complaint policy]. We do not have any employees located in foreign countries but recognize the importance of international and widely accepted pronouncements on human rights, much of which aligns with and conforms to U.S. and Hawaii law, to include the following: United Nations Universal Declaration of Human Rights; United Nations Guiding Principles on Business and Human Rights; International Labor Organization’s Fundamental Conventions. This policy is intended to supplement and support our existing policies and procedures respecting human rights and should not be read or interpreted in a manner inconsistent with such policies and procedures.

Commitment

We are committed to treating every employee with respect and dignity and protecting, recognizing and respecting their human rights. We adhere to all applicable labor and employment laws and regulations. We do not tolerate corruption, discrimination, harassment, abuse, intimidation, violence, child labor, or forced labor in any form. We value an open dialogue with our employees so we may continue to improve their work environment as well as the service we provide our customers. We are committed to paying our employees a fair, living wage, and remunerating employees based on their training, experience, responsibilities, functions, and performance. We are committed to the protection of women’s rights. We respect and recognize workers’ fundamental rights to choose to form and associate with unions or representative bodies or to refrain from doing so. Our workers’ health and safety is paramount, and we comply with all applicable health and safety laws and take appropriate measures to ensure safety and health in the workplace. We respect and recognize our employees’ right to personal data and privacy protection. We require all our employees at hire and regularly thereafter to take training respecting our Code of Conduct & Ethics and human rights to ensure our employees understand their rights as well as their responsibility to adhere to and enforce human rights throughout their employment and throughout our Company. We have programs, policies, procedures and processes to prevent the illegal use of our products and services, including abuse that may result in human rights violations. Processes include customer identification, due diligence, and monitoring processes, as well as reporting processes to federal law enforcement agencies and bank regulatory agencies.

Violations

Any violation or suspected violation of human rights and this Policy should be reported and investigated in accordance with our Complaint Policy; subject, however, to a person’s right to report any actual or suspected violation of law, rule or regulation directly to a governmental or regulatory agency or other party. Inquiries about this Policy may be directed to our Human Resources Department or Legal Department. A violation of this Policy by any employee may result in disciplinary action up to termination and/or civil and criminal liability. Employees are required and other parties are expected to cooperate with any investigation. There shall be no retaliation whatsoever against any employee or other party, who in good faith, reports an actual or suspected violation of this Policy. The Company will not discharge, demote, suspend, threaten, harass, or in any other manner discriminate against any employee in the terms or conditions of their employment due to an employee providing information or assisting in an investigation regarding any conduct which such employee reasonably believes constitutes a violation this Policy. Any employee or other party who engages in any prohibited retaliation or refuses or fail to cooperate in any investigation shall be subject to disciplinary action up to termination and/or civil and criminal liability.

Vendors

We principally engage and do business with vendors in the U.S. and Hawaii. We expect our vendors to adhere to all human rights, employment, and labor laws and regulations respecting their employees and applicable to their business.

Exceptions

This Policy shall be jointly maintained by the Company’s Human Resources Department and Company’s Legal Department. Exceptions to this Policy may be granted by any manager in the Human Resources Department or any attorney in the Legal Department.