BANK OF HAWAII CORPORATION
SECURITIES TRADING POLICY
Effective 4/29/2005

Who is subject to this policy?

This policy applies to you if you are a director, officer, employee or consultant of Bank of Hawaii Corporation (the "Company") or one of its subsidiaries. It also applies to your family members and to others living in your household. You are expected to be responsible for compliance with this policy by your family and household members.

Why do we have this policy?

As a director, officer, employee or consultant of the Company or one of its subsidiaries, your transactions in Company securities -- and those of your family and household members -- are subject to securities laws and regulations that have serious ramifications. The Company has adopted this policy to address issues raised when you, or your family or household members, trade in the Company's securities (or in the securities of another company), while in the possession of material nonpublic information about the Company (or about the other company, if received in the course of your duties with the Company). The Company has adopted this policy in an effort to guide your compliance with the law, and to avoid the appearance of improper conduct.

What is the law on insider trading?

The purchase or sale of securities while in the possession of material, nonpublic information about a company, and the selective disclosure of such information to others who may trade (commonly known as "tipping"), are prohibited by Federal and state securities laws, including Rule 10b-5 under the Securities Exchange Act of 1934. The purpose of the rule is to put company insiders and those with whom they may communicate material, nonpublic information, on an equal footing with the public at large when making stock trades. After the information is disclosed to the public by company press releases, releases of quarterly financial results, or by other public dissemination, then (subject to compliance with this policy) it may be permissible to trade.

In other words, if you know something that would likely be considered relevant by an investor in determining whether to buy or sell a company's stock, **you may not trade or tip anyone else as to that information until the information has been fully disclosed to the public.**

What are the possible consequences of insider trading?

The potential consequences of insider trading violations are:

- For individuals who trade on material, nonpublic information (or tip such information to others):
  - Disgorgement of the profit gained or loss avoided;
  - A civil penalty of up to three times the profit gained or loss avoided;
  - A criminal fine (no matter how small the profit) of up to $5 million;
  - A jail term of up to twenty years; and
  - An order enjoining the individual from further violations of the securities laws.
- For a company (and possibly an individual supervisor, as a "controlling person") that fails to take appropriate steps to prevent illegal trading by its insiders:
  - A civil penalty of up to the greater of $1 million or three times the profit gained or loss avoided as a result of the employee's violation; and
  - A criminal penalty of up to $2.5 million.

The Company also may impose other sanctions (including loss of benefits, or even dismissal) if you fail to comply with this policy.

What is the Company's general policy on trading in securities?

The Company's policy is that neither you, nor your family or household members, may, while in the possession of material nonpublic information relating to the Company, directly or indirectly trade in securities of the Company, "tip" others as to that information, recommend that anyone trade securities on the basis of that information, or engage in any other action to take personal advantage of that information. Such information may not be disclosed to others (including spouses, relatives, and business or social acquaintances) unless there is a legitimate business need to do so on behalf of the Company.

This policy also applies to material nonpublic information regarding another company that you may receive in the course of performing your duties to the Company, and trading in the securities of that other company.

What is "material information"?

"Material information" is any information that a reasonable investor would consider important in a decision to buy, hold or sell securities. In short, any information which could reasonably affect the price of the securities is material. Both positive and negative information can be material. Examples of information that could be material, depending on the magnitude and certainty of the event, are:

- Projections of future earnings or losses or changes in such projections;
- Changes in earnings or loan loss provisions, or financial liquidity problems;
- A pending or prospective joint venture, merger, acquisition, tender offer or financing;
- A significant sale of assets or disposition of a subsidiary;
- The gain or loss of a material contract, customer or supplier or material changes in the profitability status of a current contract;
- The development or release of a new product or service;
- Changes in a previously announced schedule for the development or release of a new product or service;
- Changes in management, other major personnel changes or labor negotiations;
- Imposition or modification of regulatory restrictions not applicable to bank holding companies generally; and
- Significant increases or decreases in dividends or the declaration of a stock split or the offering of additional securities.

Remember that such information may also be material with regard to another company. You should be particularly aware of information relating to, or arising from a planned significant transaction, relationship, or change in an existing relationship between any other company and the Company.

Because trading that receives scrutiny will be evaluated after the fact with the benefit of hindsight, questions concerning the materiality of particular information should be resolved in favor of materiality.

What is "nonpublic information"?

"Nonpublic information" is information that is not generally known or available to the public. Information is considered to be available to the public only when it has been released to the public through appropriate channels (e.g., by means of a press release or a public statement from one of the Company's senior officers), and enough time has elapsed to permit the investment market to absorb and evaluate the information. To allow enough time for the market to absorb the information, you should generally not trade until the second business day after public disclosure. For example, if the information is announced on Monday, the Company recommends that you not trade until Wednesday, and if announced on a Friday, you should not trade until Tuesday.

The circulation of rumors or "talk on the street," even if accurate, widespread and reported in the media, does not constitute public disclosure. Also, you may not take it upon yourself to publicly announce what you believe to be material, nonpublic information in order to trade. Only the appropriate designated officers of the Company can make the decision to disclose.

What is "trading"?

"Trading" includes purchases and sales of stocks, bonds, debentures, options, puts, calls and other similar securities. It also includes trades made pursuant to any investment direction under employee benefit plans as well as trades in the open market. For example, sales of stock acquired through the Dividend Reinvestment Plan or transactions in the self-directed portion of the 401(k) plan are covered by this policy. The policy also applies to the exercise of options with an immediate sale of some or all of the securities through a broker.

Are there any special considerations applicable to trading around the time of earnings announcements?

Yes. As each fiscal quarter draws to a close, you are more likely to be assumed to have knowledge of the Company's earnings for that quarter, even if you actually have no such knowledge. Therefore, in order to avoid the appearance of impropriety in trades around the time of announcements of annual and quarterly financial results, the Company recommends that you and your family and household members do not make any trades in the Company's securities during the period beginning 14 calendar days before the end of each fiscal quarter, and ending after the second business day after earnings have been publicly announced. Of course, if you are actually aware of the Company's earnings prior to the time of their public announcement, or of any other material nonpublic information, you may not trade even if you are outside this period.

May the Company impose a temporary blackout on trading?

Yes. In order to avoid the appearance of impropriety in trades during especially sensitive periods, the Corporate Secretary or Chief Legal Officer may from time to time temporarily prohibit all or a group of the Company's employees, consultants, officers or directors, those of its subsidiaries, and their family and household members, from trading in the Company's securities. If the Company imposes such a blackout and it applies to you, then you may not trade until the blackout is lifted. You may not disclose to anyone the fact that the Company has imposed a trading blackout.

May I buy or sell put or call options on Company securities?

No. The Company, as a matter of policy, prohibits you and your family and household members from buying or selling put or call options on Company securities.

Does it matter if I don't profit from "tipping"?

No. "Tipping" is subject to the same civil and criminal penalties that apply to other types of insider trading, regardless of whether you or your "tippee" benefited or profited.

Is there an exception for emergency situations?

No. Transactions that may be necessary or justifiable for independent reasons (such as the need to raise money for an emergency expenditure) are no exception. Remember that your trades will be analyzed after the fact with the benefit of hindsight. Therefore, even the appearance of an improper transaction must be avoided, both to make sure that you comply with the law and to preserve the Company's reputation for adhering to the highest standards of conduct.

May the Company modify this policy?

Yes. The Company may modify this policy at any time.

Who do I call if I have questions?

Please remember that the ultimate responsibility for adhering to this policy and avoiding improper trading rests with you. If you have any questions concerning this policy or your obligations, please call the Corporate Secretary, Cynthia Wyrick at 537-8430, cwyrick@boh.com or, the Chief Legal Officer, Nathan Sult, nsult@boh.com.

Special Rules for Directors and Certain Officers of the Company and Directors of Bank of Hawaii

Who is subject to these special rules?

These special rules apply to all directors of the Company and of Bank of Hawaii. They also apply to the designated Section 16 officers of the Company and Bank of Hawaii.

What must I do before I make any trade in Company securities?

Pre-clearance Requirement and Exception for Rule 10b5-1 Plans

As a director or Section 16 officer of the Company or Bank of Hawaii, you (and by implication, your family and household members) are most likely to be aware of any material, nonpublic information. With the benefit of hindsight, you are also most likely to be assumed to have knowledge of such information, even if you are not actually aware of it. Therefore, in an effort to better assure that your trading complies with all of the rules on trading in Company securities, **all of your transactions in Company stock, and those of your family and household members, must be pre-cleared by the Corporate Secretary or Chief Legal Officer.**

Is there an exception for Rule 10b5-1 plans?

Rule 10b5-1 provides a limited safe harbor from insider trading liability for certain purchases or sales in accordance with plans that are adopted when an individual is not in possession of material nonpublic information. Therefore, if you have implemented such a plan in accordance with the rule and this policy, then you may trade in strict compliance with the plan without pre-clearing the particular trade, even if you are in possession of material nonpublic information. The rule imposes a variety of strict requirements for such plans.

First, the preexisting plan must take the form of a binding contract for purchase or sale, an instruction to a third party to buy or sell, or a written plan for trading.

Second, the plan must either specify the amount of securities to be traded, the trade price and the date of trade, set forth a formula for determining those items, or fully delegate the decisions on those items to a third party who is not in possession of material nonpublic information.

Third, the transaction must occur strictly in compliance with the plan.

If you, or one of your family or household members, wish to set up a Rule 10b5-1 plan, independent counsel must provide the Company with a written plan. Sales and purchases will only be allowed pursuant to a Rule 10b5-1 plan as an exemption from this policy if the plan is pre-approved by the Corporate Secretary or Chief Legal Officer. As a condition of approval, the Company may require an opinion of your counsel regarding compliance of the plan with Rule 10b5-1. Furthermore, the Company may revoke its approval of the plan, and the exemption from this policy of trades made under the plan, at any time.

While pre-clearance of trades under an approved Rule 10b5-1 plan is not required, please remember that these trades must still be reported timely under Section 16, usually within two business days of the trade.

Registration Requirements

When must offers and sales of securities be registered?

The Securities Act of 1933 generally requires that offers and sales of securities be registered, but then exempts most securities transactions subsequent to the initial offering by persons other than the issuer. However, any person directly or indirectly controlling or controlled by the issuer, or any person under direct or indirect common control with the issuer (commonly known as an "affiliate"), is not covered by this exemption. Therefore, an affiliate must always register any sale of his or her shares or find another applicable exemption, such as Rule 144 or the "private sale" exemption.

Who is an "affiliate" subject to registration requirements?

In general, an affiliate includes directors of the Company and Bank of Hawaii and all Section 16 officers as determined by the Company. If you have questions as to whether you are an "affiliate", contact the Corporate Secretary or Chief Legal Officer.

When does Rule 144 provide an exemption from registration requirements?

Rule 144 under the Securities Act provides an exemption from registration for affiliates in very limited factual circumstances.

If the securities are "restricted" (in other words, originally issued in a private placement), the executive officer or director must have owned them and they must have been fully paid for at least one year. This holding period does not apply to securities acquired under the Company's stock option, profit sharing, or dividend reinvestment plans; the Company has registered the issuance of those securities, so they are not "restricted."

Sales within the preceding three months are aggregated and generally cannot exceed one percent of the Company's issued and outstanding stock, or the average weekly reporting trading volume for the four weeks preceding the filing of the required notice of sale with the SEC, whichever is greater. There are specific rules for calculating the number of shares deemed to have been sold by the reporting person, which may attribute to the individual certain sales of shares by others, such as his or her family members and trusts and corporations in which he or she has a significant interest or acts as trustee.

Rule 144 sales generally must be effected in "'brokers' transactions" or in transaction directly with a "market maker", and the seller may not solicit orders or make a payment other than to the broker executing the sell order.

If the relevant sales exceed 500 shares or $10,000 in any three-month period, the seller also must file a Notice of Proposed Sale on Form 144 with the SEC concurrently with or prior to the sale.

If you are contemplating a sale of Company securities, you should first contact the Corporate Secretary and instruct your broker to do the same.

Section 16 "Short Swing" Trading and Reporting Requirements

Who is covered by Section 16?

Section 16 of the Securities Exchange Act of 1934 applies to all directors of the Company and Bank of Hawaii.

Section 16 applies to all executive officers of the Company, and to certain other officers who (by virtue of their policymaking responsibilities or access to inside information) are deemed to be corporate insiders for purposes of the Securities Exchange Act. The Board of Directors of the Company annually at its organizational meeting identifies persons it believes to be "officers" covered by Section 16.

Finally, Section 16 also applies to all persons (or groups) who beneficially own more than 10% of a class of the Company's stock. For purposes of determining whether or not one holds a 10% beneficial ownership position in Company stock, "beneficial ownership" means that an individual or entity has direct or indirect voting or investment power over any the Company stock, whether through a trust, proxy, power of attorney or any other kind of contract or arrangement. An individual or entity also is deemed to beneficially own any stock as to which he, she or it has the right to acquire beneficial ownership within 60 days, whether through exercising an option, warrant or right, or by revoking or terminating a trust or discretionary account.

All of these persons are commonly known as "Section 16 insiders." **The following rules apply only to Section 16 insiders.**

What is a short swing trade, and what restrictions does Section 16 impose on short-swing trades?

A "short swing trade" is any sale and purchase, or purchase and sale, of Company stock within a six-month period, unless there is an exemption for the purchase or sale. Any purchase and sale within the relevant time frame will be matched for purposes of this rule, regardless of whether the seller might otherwise view the purchase and sale as being of different shares. For example, suppose ten shares were purchased in January, and ten additional shares the following September. Any sale before March of the following year would be a short-swing trade, even though the shareholder would have held the original ten shares for more than six months.

Some common types of transactions are exempt from short swing trading liability, such as grants of options pursuant to qualified stock options plans, and reinvestment of dividends pursuant to qualified dividend reinvestment plans. However, the rules governing these exemptions are complex. You should not assume that a transaction will be exempt unless you have confirmed it with the Corporate Secretary and your own securities counsel.

Section 16 requires the disgorgement of all profits made on short swing trades by all Section 16 insiders. Therefore, the Company's policy is that if you are a Section 16 insider, you may not make a short swing trade if it would result in profits you would be required to disgorge.

What reporting requirements are imposed by Section 16?

Section 16 requires a Section 16 insider to report his or her beneficial ownership in Company stock on Form 3 within ten calendar days after becoming an officer, director or 10% beneficial owner.

Section 16 also requires a Section 16 insider to report almost every change in his or her beneficial ownership of Company stock, including option grants and exercises under the Company's Stock Option Plan and transactions under Rule 10b5-1 plans, on Form 4 by the second business day following the transaction.

Finally, Section 16 requires a Section 16 insider who did not report on Form 4 any change in beneficial ownership during a fiscal year, either because it was exempt or eligible for deferral or because of an oversight, to report that transaction on Form 5 within 45 days after the close of the Company's fiscal year (i.e., by February 14).

The Corporate Secretary will assist you in reporting these transactions, however the law provides that the reporting responsibility rests with the individual insider.

What possible penalties are there for failing to make the required reports?

The SEC can seek fines for failure to file a required report. For an individual, these fines range from $5,000 to $100,000.

SEC rules also require the Company to report late filings by insiders for the latest fiscal year in its proxy statement and Annual Report on Form 10-K, naming each offending Section 16 insider.

When have I acquired or disposed of "beneficial ownership" of Company stock for Section 16 reporting purposes?

For purposes of determining whether you have acquired or disposed of beneficial ownership of stock, "beneficial ownership" means that you directly or indirectly have or share a direct or indirect "pecuniary interest" in that security (i.e., the opportunity to share in any profit from a transaction in that security). For example, you will be deemed to have an indirect pecuniary interest in, among other things: securities held by members of your immediate family who reside in the same household; a proportionate interest in portfolio securities held by a general or limited partnership in which you are a general partner; a right to acquire securities through exercise or conversion of a derivative security, whether or not presently exercisable; and a proportionate interest in portfolio securities held by a corporation in which you are a controlling shareholder or as to which you have or share investment control over the portfolio.

Will the Company assist me with my Section 16 reporting requirements?

The Company has designated the Corporate Secretary to assist Section 16 officers and directors in preparing and/or reviewing all Form 3, Form 4 and Form 5 filings. To avoid any problems, if you are a Section 16 officer or director, you should **immediately** inform the Corporate Secretary whenever you contemplate changes in your holdings of Company securities so that the relevant forms can be timely prepared and filed.

May I sell short Company stock?

No. Section 16 insiders are prohibited from effecting "short sales" of the Company's equity securities and certain "short sales against the box." These are transactions involving securities that the seller does not own at the time of the sale, or if owned, that are not delivered within 20 days after the sale or deposited in the mail or other usual channels of transportation within five days of the sale. Any violation of this provision may result in criminal liability.

The Company's policy prohibits all Section 16 insiders from making prohibited short sales and short sales against the box.

Prohibition on Trading During Pension Fund Blackouts

Under Regulation Blackout Trading Restriction (BTR), Company directors and "executive officers" are prohibited from purchasing and selling Company stock during a "pension plan blackout period" in which plan participants may not engage in transactions in Company stock, so long as the stock was acquired in connection with the director's or executive officer's service or employment as a director or executive officer.

Who is covered by Regulation BTR?

Regulation BTR applies to all directors and "executive officers" of the Company, which is defined to include all executive and other "officers" who are subject to Section 16, as described above.

What is a "blackout period"?

A "blackout period" is any period of more than three consecutive business days during which the ability of at least 50% of the participants under all of the Company's "individual account plans" to effect transactions in Company stock is temporarily suspended. An "individual account plan" is defined in the same manner as under ERISA, and includes 401(k) plans, profit sharing and savings plans, stock bonus plans, money purchase pension plans and certain non-qualified deferred compensation arrangements. Only a plan that permits investment in Company stock is covered.

A blackout period does not include, among other things, any regularly scheduled trading suspension that is incorporated into the plan, if the employee had notice before enrolling, within 30 days after enrolling, in the plan, or within 30 days after the adoption of the amendment providing for the suspension.

What securities are covered?

Regulation BTR covers not only Company stock, but also any derivative security (such as options or warrants) relating to the Company, whether or not issued by the Company.

By its terms, Regulation BTR prohibits transactions in Company securities only if the security was acquired "in connection with service or employment as a director or executive officer." This is broadly defined, and includes securities acquired by a director or executive officer:

- Under a contract with or compensation plan of the Company or an affiliate;
- As a result of a related-party transaction required to be disclosed in the Company's SEC filings;
- As "directors' qualifying shares"; or
- Otherwise as an inducement to service or employment, or as a result of an acquisition transaction involving the Company.

You may own both securities that are covered by Regulation BTR and securities that are not. For example, you may own both shares purchased upon the exercise of employee stock options (which would be covered shares) and shares purchased in open market transactions (which would not be covered shares). Regulation BTR establishes an "irrebuttable presumption" that any equity securities sold or transferred during a blackout period were covered securities to the extent that the director or executive officer holds such securities, without regard to the actual source of the securities sold. In other words, if you hold covered securities, you cannot claim that securities sold during a blackout period were different securities that were not covered. For example, assume that you own 250 shares of covered securities and 250 shares of uncovered securities. If you sold shares during any pension fund blackout period, the first 250 shares sold would be presumed to be your covered securities.

Are any transactions exempt from this prohibition?

There are a limited number of exemptions, including the acquisition of Company stock under the Company's Dividend Reinvestment Plan, and purchases and sales under a Rule 10b5-1 plan (so long as the plan was not made or modified during the blackout period or at a time when the director or executive officer was aware of the impending blackout period).

What possible penalties are there for violating Regulation BTR?

If you violate Regulation BTR, you are subject to SEC enforcement action, both civil and criminal. Also, if you profit from the transaction, then the Company or any other Company shareholder may bring an action to recover the profit, regardless of your intention in making the trade.

How will I know if there is a pension fund blackout period in effect?

The Company normally will be required to give all of its directors and executive officers and the SEC at least 15 calendar days' notice of the start of a blackout period, although you may still be liable for violating Regulation BTR even if the Company fails to give this notice.