

## **EAST WEST BANCORP, INC.**

### **CODE OF ETHICAL CONDUCT**

#### **PREFACE**

The honesty, integrity, and sound judgment of all directors and employees is fundamental to the reputation and success of East West Bancorp as a leading financial services provider. East West has adopted this Code of Ethical Conduct to help ensure that it retains its integrity and is intended to qualify as a “code of ethics” within the meaning of Section 406 of the Sarbanes-Oxley Act of 2002 and the rules promulgated thereunder. .

#### **CODE OF ETHICAL CONDUCT FOR ALL DIRECTORS, OFFICERS, AND EMPLOYEES**

All directors, officers, and employees must:

- Act with honesty and integrity, avoiding actual conflicts of interest in personal and professional relationships and disclosing to the General Counsel of the Company any apparent conflicts of interest or any material transaction or relationship that reasonably could be expected to give rise to such a conflict.
- Provide colleagues with information that is full, fair, accurate, timely, and understandable.
- Comply with applicable laws, rules, and regulations of federal, state, and local governments (both United States and foreign) and applicable public regulatory agencies.
- Act in good faith, with due care, competence, and diligence, without misrepresenting material facts or allowing independent judgment to be subordinated.
- Respect the confidentiality of information acquired in the course of employment.
- Share knowledge and maintain skills necessary and relevant to East West's needs.
- Proactively promote ethical and honest behavior within the workplace.
- Assure responsible use of and control of all assets, resources, and information in possession of East West.

All directors, officers, and employees are expected to adhere to both this Code of Ethical Conduct and to all other codes of conduct applicable generally to directors, officers, and

employees of East West. The Board of Directors shall be responsible for determining appropriate disciplinary measures should any person not adhere to this Code. The Board of Directors shall have the sole and absolute discretionary authority to approve any deviation or waiver from the Code of Ethical Conduct for directors, executive officers and senior financial officers. Any waiver and the grounds for such waiver for a director, executive officer or senior financial officer shall be promptly disclosed to shareholders. Additionally, any change of this Code of Ethical Conduct shall be promptly disclosed.

### **Compliance and Reporting**

Employees and directors should strive to identify and raise potential issues before they lead to problems, and should promptly address any questions regarding the application of this Code. Any employee or director who becomes aware of any existing or potential violation of this Code should promptly notify the General Counsel of the Company. Any questions relating to how these policies should be interpreted should be addressed to the General Counsel of the Company.

### **Personal Conflicts of Interest**

Service to the firm should never be secondary to personal gain and advantage. Employees and directors are expected to avoid all situations that might lead to a material conflict between their self-interest and their duties and responsibilities as an employee, officer or director. Any position or interest, financial or otherwise, which could materially conflict with their performance or which affects their independence or judgment concerning transactions between the firm, its customer, suppliers or competitors or otherwise reflects negatively on the firm, would be considered a conflict of interest. An employee or director must never use or attempt to use his or her position at the firm to obtain any improper personal benefit.

### **Public Disclosure**

All employees and directors who are involved in the company's disclosure process are required to maintain familiarity with the disclosure requirements applicable to the firm and are prohibited from knowingly misrepresenting, omitting, or causing others to misrepresent or omit, material facts about the firm to others, whether within or outside the firm, including the firm's independent auditors.

## **Compliance with Laws, Rules and Regulations**

Employees and directors must comply with all applicable laws, rules and regulations. It is the personal responsibility of each employee and director to adhere to the standards and restrictions imposed by those laws, rules and regulations.

## **Corporate Opportunities**

Employees and directors owe a duty to the firm to advance the firm's legitimate business interests when the opportunity to do so arises. Employees and directors are prohibited from taking a business opportunity that is discovered through the use of corporate property, information or position, unless the firm has already been offered the opportunity and turned it down. More generally, employees and directors are prohibited from using corporate property, information or position for personal gain or competing with the firm.

## **Employment**

Full-time employees should not engage in employment outside the Bank without consent by the Bank. East West reserves the right to prohibit full or part-time employees from engaging in outside employment where it might subject East West to criticism or might interfere with the employee's employment.

## **Confidentiality**

Nonpublic information regarding East West Bank or its businesses, employees, customers and suppliers are confidential. Employees are to use confidential information for business purposes only.

## **Equal Employment Opportunity and Harassment**

The firm is committed to providing equal employment opportunities to all qualified persons without regard to any impermissible criterion or circumstance. The firm does not tolerate or condone any type of discrimination prohibited by law, including harassment.

## **Protection and Proper Use of Firm Assets and Property**

All employees should protect the firm's assets and ensure their efficient use. All firm assets should be used for legitimate business purposes only.

## **Gifts or Bequests**

Federal Law makes it a criminal offense for employees to solicit anything of value from anyone in return for any business, service or confidential information from East West or its customers. Unsolicited gifts over \$100 USD value other than authorized compensation, from anyone in connection with the business of East West, either before or after a transaction is discussed or consummated should be reported to the General Counsel of the Company before acceptance.

## **Questionable or Improper Payments**

The use of any East West assets for any unlawful or improper gifts, payments to customers, government employees or other third parties is strictly prohibited.

The Foreign Corrupt Practices Act ("FCPA") broadly prohibits U.S. firms and persons from offering money or "anything of value" to any foreign government official for the purpose of influencing such official. In the United States, nothing of value may be provided to government personnel unless permitted by law and any applicable regulation. Therefore, no payment from East West funds or assets shall be made to or for the benefit of a representative of any domestic or foreign government, labor union, or any current or prospective customer or supplier for the purpose of improperly obtaining a desired government action, or any sale, purchase, contract or other commercial benefit. This prohibition applies to direct or indirect payments made through third parties and employees as well as intended to prevent bribes, kickbacks, or any other form of payoff.