

## CODE OF BUSINESS CONDUCT AND ETHICS

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Hanmi Financial Corporation, Hanmi Bank and their subsidiaries (collectively, the “Company”) are committed to maintaining the highest standards of ethics, integrity, honesty and sound judgment in their business practices. This Code of Business Conduct and Ethics (the “Code”) is designed to serve as a general guide to inform Directors and employees of the Company of significant legal and ethical issues that may arise in the workplace, to promote standards of appropriate conduct, and to encourage reporting of illegal or unethical conduct.

The Code provides a framework for ethical business conduct and is not intended to establish rules governing every possible instance that could arise. The Code can only set forth general legal and ethical principles, and Directors and employees must use good judgment and common sense in applying them, and in deciding when to seek guidance from others as to the appropriate course of conduct. Other Company policies and procedures provide details pertinent to many of the provisions of the Code and thus you are expected to be aware of, and to act in accordance with, both the Code and such other policies and procedures at all times.

In particular, Directors and employees must at all times observe the provisions of the Company’s Insider Trading Policy, Information Technology Policy, Information Security Policy, Employee Handbook (employees only) and the Confidentiality Agreement each signed. If any individual has questions about the Code, or about the appropriate course of conduct under the Code, he or she should contact his or her supervisor, the Human Resources Department or the Company’s General Counsel.

### **I. Honest and Ethical Conduct**

Each Director and employee must demonstrate honest and ethical conduct in fulfilling his or her duties, including the ethical handling of actual or apparent conflicts of interest.

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

It is the Company’s policy to comply with all applicable laws, rules and regulations. It is the responsibility of each Director and employee to adhere to the standards and restrictions imposed by those laws, rules and regulations.

It is against the Company’s Insider Trading Policy and a violation of federal securities laws for a Director or employee to trade in the Company’s securities (or to advise others to trade) while in possession of material non-public information (“Inside Information”) about the Company. Inside Information is any information (either positive or negative) (1) which a reasonable investor would likely consider important in deciding whether to buy or sell the Company’s securities or (2) that if disclosed could reasonably be expected to affect the price of the Company’s securities, in either case, that has not been publicly disclosed. The Insider Trading Policy also applies to trading in securities of any companies, while in possession of inside information concerning such companies, when such information is obtained in the course of employment with or other services performed on behalf of the Company. Directors and employees are expected to review the Insider Trading Policy carefully to ensure compliance, and should be aware that even the appearance of

inappropriate insider trading should be avoided. Any questions regarding the propriety of a stock or other security transaction should be directed to the Company's General Counsel.

### III. Conflicts of Interest

A "conflict of interest" occurs when an individual's personal interest interferes or appears to interfere with the interests of the Company. A conflict of interest can arise when a Director or employee takes actions or has interests that may make it difficult to perform his or her Company work objectively and effectively. For example, a conflict of interest may arise if a Director or employee, or a member or his or her family, receives improper personal benefits as a result of his or her position in the Company. Conflicts of interest must, whenever possible, be avoided. We should always strive to avoid even the appearance of impropriety.

(i) **Employment/Outside Employment.** In consideration of your employment with the Company, you are expected to devote your full attention to the business interests of the Company. You are prohibited from engaging in any activity that interferes with your performance or responsibilities to the Company or is otherwise in conflict with or prejudicial to the Company. Our policies prohibit any employee from accepting simultaneous employment with a company supplier, customer, or competitor, or from taking part in any activity that enhances or supports a competitor's position. The two exceptions to this policy are: (a) you may assist in a family owned sole proprietorship business, as long as your efforts do not otherwise interfere with your work for the Company and there is no actual or apparent conflict of interest with the business of the Company, and (b) if you are a part time employee, you may seek a waiver to allow for additional part time employment with another company, outside of the financial services field, with the permission of your direct supervisor and the General Counsel.

Additionally, you must disclose to the Company any interest that you have that may conflict with the business of the Company. If you have any questions on this requirement, you should contact your supervisor, the Chief People Officer or the Company's General Counsel.

(ii) **Outside Directorships.** It is a conflict of interest to serve as a director of any company that competes with the Company. In addition, you are prohibited from serving as a director of a Company that acts as a supplier, customer, or other business partner of the Company because there could be an actual or apparent conflict of interest. Directors and members of Senior Management must obtain the approval of the Audit Committee of the Company's Board of Directors (the "Audit Committee") before accepting any for-profit Board positions. Any compensation you receive should be commensurate to your responsibilities. Such approval may be conditioned upon the completion of specified actions. Serving as a director of a non-profit organization, charity or similar entity does not violate this policy and does not require approval.

(iii) **Business Interests.** While the Company does not wish to unreasonably limit Directors and employees in their personal investment activities, it is the Company's policy that no Director or employee shall, at any time during their employment with the Company, have any "significant" direct or indirect investment interest in or business relationship with (whether as a partner, stockholder, employee, independent contractor or otherwise) a competitor, supplier or customer of the Company or with any person or firm with whom the Company has any business relationship, without prior written approval. For purposes of this provision, any investment of less than 1% of the outstanding securities of a company shall not be deemed significant. Furthermore, all employees must devote substantially all of their time and effort during normal business hours to the business of the Company. They must not become involved in any off-duty business which will interfere with the performance of their work. In addition, Directors and employees may not enter

into any investment transaction which might create, or give the appearance of creating, a conflict of interest between the Directors and employees and the Company or between the Company and any customer or other individual or entity with whom the Company has a business relationship.

While an exhaustive list of the types of impermissible investments is not practical, all Directors and employees must refrain from directly or indirectly owning or purchasing any of the following:

- (a) Real or personal property in which the Company intends to obtain an ownership interest (i.e. through purchase, foreclosure or repossession, or in a fiduciary capacity), unless offered through a third party to the general public, and such purchase is judged to be at an arm's length.
- (b) Stocks, bonds or other securities which have either been pledged to the Company as collateral, sold by the Company in a fiduciary capacity or issued by any entity indebted to the Company (except publicly traded securities).
- (c) Stock of any business or financial institution, in anticipation of its merger with or acquisition by the Company.
- (d) A significant investment in the stock of any competing financial institution, even though made in good faith and without prior inside knowledge.
- (e) Trust deeds, mortgages or any other liens against property in which the Company also has a security interest.
- (f) Any other investments paralleling or anticipating investment action by the Company.

In addition, Directors and employees should not allow a customer to arrange investments for the account of a Director or employee or his or her immediate family, nor should the Director or employee become involved in investments sponsored by a customer, in each case under circumstances which might create either a conflict of interest or the appearance of such a conflict. Any Director or employee who has any question about whether a particular investment falls within the prohibitions of this policy must contact the Company's General Counsel before becoming involved in the investment.

(iv) **Related Parties.** Conducting Company business with a relative or significant other, or with a business in which a relative or significant other is associated in any significant role requires extra caution and disclosure. Relatives include spouse, sister, brother, daughter, son, mother, father, grandparents, aunts, uncles, nieces, nephews, cousins, step relationships and in-laws. Significant others include persons living in a spousal or familial fashion with an employee. Assuming that the relationship starts after the business relationship, it is imperative that you fully disclose to the General Counsel the existence of any actual or potential conflict of interest as soon as possible, so that safeguards can be established to protect all parties. If the Company is considering entering into a new relationship with a company where a related party is associated, such relationship should be disclosed during the vetting process to determine if the relationship should go forward. All related party transactions must be approved by the Chief Executive Officer ("CEO") or Chief Financial Officer ("CFO"), in collaboration with the General Counsel. For all related party transactions involving Directors, the CEO or CFO must receive written approval from the Audit Committee.

If determined to be material to the Company by the General Counsel, the Audit Committee must review and approve in writing such employee related party transactions in advance. The Company must report all such material related party transactions under applicable accounting rules, federal securities laws, Securities and Exchange Commission rules and regulations, federal and state banking rules and regulations and securities market rules. Any dealings with a related party must be conducted in such a way that no preferential treatment is given to their business.

Employment of related individuals is not prohibited, but not encouraged. However, an applicant for employment must disclose any relationship with a current Director or employee at the beginning of the application process. It is then, in the discretion of the Chief People Officer, the General Counsel, the executive officer in charge of that business line, (and the CEO or Audit Committee, if appropriate), to determine if the relationship between employees or potential employees, including those not related by blood, creates potential for conflict of interest or a disruption in the workplace. If there is a potential for conflict found, the Company may transfer one of the employees or potential employees, or determine that it is not appropriate to hire the applicant due to the conflict. Supervisors should contact the Chief People Officer or the General Counsel to review the circumstances prior to acting.

An employee should not be placed under the immediate supervision of a related individual. In addition, an employee should not be placed in a position in which a related individual is otherwise responsible for processing, reviewing, or approving the employee's transactions, recommendations, or performance. This policy is not limited solely to relatives and applies to other covered situations involving actual and potential conflicts of interest, such as a dating relationship.

(v) **Company Products and Services.** All utilization of the Company's products and services by Directors and employees should be done in accordance with specific Company policies and procedures as well as applicable laws, rules and regulations, particularly with respect to loans and extensions of credit. The Company strictly follows the laws and regulations related to Regulation O and such matters are tracked by the Compliance Department and reported to regulatory agencies as requested. Questions or guidance about actual or potential conflicts of interest situations, and disclosure of these situations as they arise, should be addressed and reported to the Company's General Counsel.

(vi) **Other Situations.** Because other conflicts of interest may arise, it would be impractical to attempt to list all possible situations. If a proposed transaction or situation raises any questions or doubts, you should consult the Company's General Counsel.

#### **IV. Other Directors and Employees Activities**

(i) **Personal Finances.** All Directors and employees are expected to demonstrate an ability to manage their personal finances in a responsible manner, particularly in the intelligent use of credit. Imprudent personal financial management may adversely affect the Directors and employees performance. Directors and employees may not borrow money from other Directors or employees, but should discuss any financial emergency with their supervisor. The Company has an Employee Loan Program run out of the Wilshire-Hobart branch. See the intranet for more details.

(ii) **Lending Practices.** The Company's policy is to maintain prudent lending practices in satisfying the credit needs of its customers. Any rate decisions shall be primarily based upon borrowers' creditworthiness and overall relationships with the Company (including related deposits of guarantors, etc.), as well as competitor bank offers. Directors and employees are not

in any way to represent or exercise authority on behalf of the Company, grant direct or indirect accommodations to or make credit recommendations with respect to: members of their families; any individual or organization with which the Directors and employees, or his or her immediate family, is associated or in which the Directors and employees hold any financial interest.

Federal law prohibits any Director or employee of the Company from granting any loan or gratuity to any Bank or Company regulatory examiner. All Directors and executive officers are required to comply with federal and state insider lending laws and regulations, including Federal Reserve Regulation O. Detailed requirements concerning loans to insiders are addressed in a separate policy. Any Director or employee with a question regarding the propriety of a loan involving an executive officer or Director should contact the Chief Credit Officer or the General Counsel.

(iii) **Accurate and Complete Information about Products and Services.** Honesty and fairness require that Directors and employees provide accurate and complete information in dealings with customers and others. The products and services of the Company should be presented accurately and fairly. Any practice to the contrary is not acceptable, including mis-selling and misrepresentation. Mis-selling is the sale of a product or service to a customer without regard to the customer's interests, and is prohibited. Misrepresentation is providing inaccurate or misleading information about the Company or its products or services that will prevent our customers and stockholders from making an informed decision.

Before any new product is rolled out to the public, the assigned manager must follow the requirements of the New Products and Services Committee, and receive approval from any required Board or Management committee. In addition, employees must provide relevant and complete information to customers to ensure that they have the best choice of product options; not sell products or services to customers that do not meet their needs; make every effort to ensure that the customer understands the product and its risks; comply with the Company's advertising standards and ensure all advertisements are reviewed by the Legal and Compliance departments before they are launched; and explain the features of each product orally and in writing.

## **V. Sales Incentive / Referral Programs**

The Company has various incentive programs to reward employees who bring in new business. This section provides guidance for specific situations involving incentive programs. If any business practice being followed in your area does not meet these guidelines, you should refuse to participate and should report the inappropriate behavior immediately.

- (i) **Sales to Relatives and Friends** – The Company recognizes that relatives and friends are one source of new business. Within these guidelines, incentive programs generally allow employees to receive credit and any related compensation for legitimate sales to, or referrals of, relatives or friends. However, relatives and friends must be given the same rate and terms as any other similarly situated, non-related person.
- (ii) **Inappropriate Sales** – Steering a customer to an inappropriate or unnecessary product to receive sales credit harms the customer and is an unacceptable practice which violates both the spirit and the letter of our incentive programs.
- (iii) **Gaming** – Gaming is defined as the manipulation and/or misrepresentation of sales or sales reporting in an attempt to receive compensation or to meet sales

goals. Any form of “gaming” to receive compensation or to meet sales goals is in direct violation of Company policy and will result in corrective action, which may include termination.

- (iv) **Payment Errors** – Directors and employees are expected to check their paychecks for accuracy, and are required to report any overpayment to their supervisor immediately—including, but not limited to, fees, wages, salary, incentive pay, bonuses or any other form of payment. Directors should report any discrepancies to the General Counsel. The Company will work with the Director or employee to make appropriate arrangements to reimburse the Company for any overpayment. Failure to report discrepancies or to make appropriate repayment arrangements may result in corrective action, which may, depending on the circumstances, include termination of employment or engagement.

## **VI. Personal Transactions**

Directors and employees must transact all personal financial business with the Company by following the same procedures that are used by customers. Directors and employees are not allowed to process or approve their own transactions, or transactions on accounts over which they have any ownership interest, control or signing authority. This includes transactions for a business if the Director or employee owns that business. These transactions must be processed by personnel other than the Director or employee for whom the transaction is conducted. A person’s direct report cannot process such transactions. Any employee found transacting personal business for both him or herself and the Company will be assumed to be in violation of the Code and internal operating policy and procedures. Monetary **and** non-monetary transactions must be processed by an unrelated employee. This includes but is not limited to transactions such as: loans or any form of credit extension; checks and withdrawals; deposits; changes of address; or changing overdraft limit codes.

If the transaction requires approval, the approval must come from the next **higher** level of authority. The Directors and employees may not request approval of personal transactions by a co-worker or by anyone they directly or indirectly supervise. Directors and employees may not directly or indirectly purchase from the Company any, notes or property (real or personal) that has been repossessed by the Company, unless authorized by the Chief Credit Officer and the General Counsel pursuant to applicable banking regulations, or the Audit Committee in the case of Directors.

## **VII. Overdrafts, Fees and Service Charges**

Directors and employees may not approve overdrafts or reverse or waive fees or service charges for:

- Director’s or employee’s own accounts;
- Accounts in which Director or employee has an interest;
- Accounts of family members, other relatives and close friends (more than an acquaintance);
- Accounts of members of a Director’s or employee’s household, including roommates and unrelated individuals, or
- Accounts of companies controlled by a Director or employee, and any family members, other relatives and close friends.

In addition, the decision to pay or waive charges for an employee's own overdraft must not be made by another employee that the Director or employee directly or indirectly supervises. This policy is intended to prevent situations where one employee could exert either intentional or inadvertent pressure on another employee to pay an overdraft or waive or reduce charges merely because of their job relationship.

### **VIII. Acting on Behalf of Customers**

Directors and employees are not permitted to act, without prior written approval, as an executor, administrator, trustee, guardian or conservator, or in any other fiduciary capacity, for a customer of the Company. An exception to this policy may be made if the Director or employee acts as a fiduciary for a family member.

Directors and employees must not sign on customers' accounts, act as co-renters of customers' safe boxes, or otherwise represent customers, other than customers related to the Director or employee by blood or marriage. With respect to accounts of such relatives, Directors and employees should make no decisions outside of normal deposit and check writing activities, *i.e.*, they should not approve overdrafts, waive service charges, etc.

### **IX. Corporate Opportunity**

Directors and employees are prohibited from (a) taking for themselves or diverting to others any opportunities that properly belong to the Company or are discovered through the use of corporate property, information or positions; (b) using corporate property, information or position for improper personal gain; and (c) competing with the Company. Directors and employees owe a duty of loyalty to the Company to advance its legitimate interests when the opportunity to do so arises.

### **X. Confidentiality**

Directors and employees must maintain the confidentiality of confidential information entrusted to them by the Company and its customers and suppliers, except when disclosure is authorized by the Company or legally mandated. Under the Gramm-Leach-Bliley Act, all Directors and employees have a special duty to protect customer confidential information. Confidential information includes all non-public information that might be of use to the Company's competitors, or that could be harmful to the Company, its customers or suppliers, if disclosed. Any breach of this provision will subject you to immediate disciplinary action, up to and including termination.

**Confidential customer information should never be discussed with anyone outside the Company, and only with those within the Company who have a legitimate business need to know. Such information should never be discussed in public places, even within the Company's offices. Directors and employees should be sensitive to the risk of inadvertent disclosure resulting from open doors, speakerphones, cellular phones, and when transmitting confidential information by fax or other electronic media.**

### **XI. Fair Dealing**

Each Director and employee should endeavor to deal fairly with the Company's customers, suppliers, competitors and employees. No one should take unlawful or unfair advantage of the Company's customers, suppliers, competitors and employees through manipulation,

concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice. One should avoid any actual or apparent conflicts of interest.

## **XII. Protection and Proper Use of Company Assets/Transactions with the Company**

Directors and employees must, in all practicable ways, protect the Company's assets and ensure their efficient use. All Company assets must solely be used for legitimate business purposes. The Company maintains an extensive system of internal controls in order to provide reasonable assurance that assets are safeguarded and all transactions are properly recorded.

## **XIII. Improper Influence and/or Harassment**

As described more fully in the Company's Employee Handbook, improper influence or harassment, including sexual harassment of employees, is strictly prohibited. The Company will not tolerate any coercion or harassment of an employee, including sexual harassment, any use of influence to participate in illegal or improper activity, or any other improper acts. Any such activity will subject the offending Director or employee to immediate removal or dismissal. Conduct may be deemed offensive and improper behavior even if it does not meet the legal definition of harassment under the law. This Code augments the Employee Handbook.

## **XIV. Entertainment, Gifts, Payments**

The Company will procure, and also provide, goods and services to be used in its business based on service, quality and other relevant business considerations. Decisions relating to the procurement and provision of goods and services should always be free from even a perception that favorable treatment was sought, received or given as the result of furnishing or receiving gifts, favors, hospitality, entertainment or other similar gratuity. The giving or receiving of anything of value to induce such decisions is prohibited.

The payment of Company funds to any officer, employee or representative of any customer or supplier in order to obtain any benefit is strictly prohibited. Directors and employees shall not seek or accept any personal gifts, payments, fees, services, valuable privileges, vacations, or trips without a business purpose from any person or business organization that does or seeks to do business with the Company. Directors and employees shall not accept anything of value in exchange for referring business opportunities to another business. Gifts, meals or entertainment of nominal value (not in cash or cash equivalents) motivated by commonly accepted business courtesies may be offered or accepted, but not if such gifts or entertainment would reasonably be expected to cause favoritism or a sense of obligation to the donor. If in doubt, seek guidance from the Company's General Counsel.

Meals or entertainment provided by or to a potential customer or supplier must be reasonable, must be for a business purpose, and must not occur on an unreasonably repetitive basis. Meals or entertainment may not be supplied to a customer if it would violate a known customer policy. If an unsolicited gift of more than nominal value is received, the gift should be returned with a polite note explaining Company policy.

No Director or employee may give or receive cash or cash equivalents from any other Director, employee, customer, vendor or potential customer or vendor of the Company, unless such gift is related to a familial relationship or unrelated to the Company's business. Presents of value greater than \$250 to a customer or potential customer cannot be made without the approval of a senior management member.

## **XV. Political Contributions**

While the Company believes that it is appropriate for every citizen to take an active interest in political and governmental affairs, all participation must be done solely as a private citizen and not as a representative of the Company. Directors and employees must not make any political contribution (whether in the form of cash, goods or services) either directly or indirectly, on behalf of the Company. For these purposes, use of any of the Company's facilities, equipment, supplies or manpower for political activities will be considered to be a contribution. All political contributions shall be made solely by the individual on his or her own behalf. Under no circumstances may the Company require Directors and employees to contribute to, support or oppose any political group or candidate. The Federal Election Campaign Act 1971 (FECA) is administered by the Federal Elections Commission, and every federal banking agency treats compliance with the election campaign laws as a matter of supervisory interest.

## **XVI. Duty to Come Forward**

Directors and employees must report to the Company any actual or apparent violations of law or ethical standards so that they can be investigated and dealt with appropriately. Reports will be kept as confidential as possible under the circumstances presented and in consideration of the Company's obligations under applicable law. If confidential treatment is requested, the name of the party submitting the information will be revealed only to the recipient, the General Counsel, and, if the General Counsel deems appropriate, to the Chair of the Audit Committee (as well as to other appropriate persons if the General Counsel, or the Chair of the Audit Committee determine it advisable for proper handling of the report). Any reports involving a Director will be raised directly to the Chair of the Audit Committee.

## **XVII. Reporting Illegal or Unethical Behavior and Non-Retaliation / Whistleblower Policy**

The Company's commitment to its values includes ensuring that any person with a good faith concern about potentially unethical conduct can report it in the way in which they feel most comfortable. This includes reports of conduct that violate this Code, the Company's policies and provisions, or applicable laws. **Concerns may be reported by anyone, and they may be reported to a supervisor (for employees), the Company's General Counsel, the Human Resources Department, the Audit Committee or directly to the Company's Ethics Hotline.**

The Company's Ethics Hotline is available at <http://www.ethicspoint.com>, or at **888-779-8086**. Both options allow people reporting concerns to remain anonymous, and the Company does not permit retaliation against any individual for raising a good faith concern. Retaliation is considered a violation of the Code and the Company's Whistleblower Policy and is subject to discipline.

## **XVIII. Reporting Accounting Concerns**

If you wish to register any questions, concerns, or complaints directly to the Audit Committee regarding accounting, internal accounting controls, or auditing matters, or if you wish to deliver an anonymous submission of concerns regarding questionable accounting, internal accounting controls, or auditing matters, you may either (a) contact the Ethics Hotline via email or phone, or (b) write to the Chairman of the Audit Committee at the following address: Hanmi Financial Corporation, Audit Committee Chair, 900 Wilshire Blvd., Suite 1250, Los Angeles, California, 90017.

## **XIX. Investigations**

The Company takes allegations of misconduct seriously. If Company management is informed of credible evidence of a violation of the Code, it will consult, as it deems appropriate and in the best interests of the Company, with the Company's General Counsel or other experts or advisors for the purpose of evaluating the gravity and credibility of the information and determining whether further inquiry and action regarding the possible violation is necessary or appropriate. The Company's General Counsel is responsible for overseeing the review and/or investigation of reported violations, or for referring such matters to the Audit Committee. Investigations of matters may be conducted by, or under the supervision of, the Company's General Counsel or outside attorneys, and additional expert personnel will be involved if necessary. Directors and employees must cooperate with any such investigation, including, where appropriate, providing the Company with business records, including brokerage statements and relevant phone and/or email records.

All material violations of this Code or matters involving financial or legal misconduct will be reported to the Audit Committee on at least a quarterly basis, or more frequently depending upon the level of severity of the violation.

## **XX. Accuracy of Reports, Records and Accounts/ Obstruction of Normal and Sound Banking Practice**

All Company employees are responsible for the accuracy of their respective records, documents, time sheets and reports. Company employees must not create false or misleading documents or accounting, financial or electronic records for any purpose, and no one may direct an employee to do so.

No undisclosed or unrecorded account or fund shall be established for any purpose. No disbursement of corporate funds or other corporate property shall be made without adequate supporting documentation or for any purpose other than as described in the documents and then only in accordance with the Company's disbursements and approvals policies.

Each Director and employee involved in the Company's disclosure process, including the CEO, CFO, or the accounting and financial reporting manager, is required to be familiar with and comply with the Company's disclosure controls and procedures and internal control over financial reporting, to the extent relevant to his or her area of responsibility, so that the Company's public reports and documents filed with the Securities and Exchange Commission (the "SEC") comply in all material respects with the applicable federal securities laws and SEC rules. In addition, each such person having direct or supervisory authority regarding SEC filings or the Company's other public communications concerning its general business, results, financial condition and prospects should, to the extent appropriate within his or her area of responsibility, consult with other Company officers and employees and take other appropriate steps regarding these disclosures with the goal of making full, fair, accurate, timely and understandable disclosures.

Any type of obstruction to prevent adverse reporting by Hanmi Bank to state or federal agencies will result in immediate dismissal of all involved. Pursuant to 18 USC §§ 1956 and 1957, bank officers involved in money laundering activity and/or terrorist financing are committing a crime punishable by criminal fine up to \$500,000 and incarceration up to twenty years or both. Willful blindness by a bank officer to these offense(s) is a crime under 31 USC §§ 5322 and 5324(d) with a fine up to \$500,000 or ten years imprisonment or both. Detailed information concerning the

bank's regulatory requirements on reporting and related matters is contained in Hanmi Bank's BSA Policy.

## **XXI. Disciplinary Action**

The Company shall consistently enforce the Code through appropriate means of discipline. Suspected violations of the Code involving auditing or accounting related matters shall be promptly reported to the Audit Committee. The Audit Committee shall determine, whether violations of the Code have occurred and, if so, shall determine the disciplinary measures to be taken against any Director or employee of the Company who has violated the Code. In the case of suspected violations not involving auditing or accounting related matters, similar procedures shall be used by the Company's General Counsel, in consultation with Chief Audit Executive, the Human Resources Department or outside counsel, if necessary, depending on the position or level of the individual involved. The disciplinary measures, which may be invoked, include, but are not limited to, counseling, oral or written reprimands, warnings, probation or suspension without pay, demotions, reductions in salary, termination of employment and restitution.

## **XXII. Amendment, Modification, Waiver, Precedent**

This Code may be amended or modified by the Board of Directors. Any waivers of the Code for Directors or officers may only be granted by the Board of Directors and will be promptly disclosed via filing of an 8-K report with the SEC. Any waivers of this Code for other employees may only be granted, in writing, by the Company's General Counsel. In the event of any conflict or inconsistency between the Code and any Company policy, control, procedure or guideline, the Code shall govern, except in the case where the Company policy, control, procedure or guideline becomes effective after the Code.

## **XXIII. Acknowledgment and Biennial Certification**

All Directors and employees must acknowledge (a) their understanding of the Code, (b) that they have complied with all provisions of the Code, and (c) that they are not aware of any violations for the Code by any other Director or employee, by signing and dating the Statement of Personal Interest, upon their employment or appointment by the Company, and on at least a biennial basis. Whenever the Code is amended or re-represented within a biennial period and there has been no change to a Director or employee's circumstances necessitating an updated Statement of Personal Interest, only a signed and dated acknowledgement shall be required.

**HANMI FINANCIAL CORPORATION AND HANMI BANK  
CODE OF BUSINESS CONDUCT AND ETHICS**

**STATEMENT OF PERSONAL INTEREST**

**I have read and understand Company’s Code of Business Conduct and Ethics (“Code”). If I have any questions about any section of the Code of Business Conduct and Ethics, I understand that I am expected and encouraged to seek clarification from my supervisor, General Counsel, the Audit or HR Departments of the Company. In compliance with the reporting requirements of these guidelines, I complete this statement concerning my personal business interests honestly and accurately:**

**“You” means you and any member of your immediate family. Each “YES” answer must be explained at the end of this questionnaire or on an attached sheet.**

- |     |  |                        |
|-----|--|------------------------|
| 1.  | Are you a stockholder or interested financially in any way with:   |                        |
|     | • A Competing institution (e.g., bank, savings and loan, Finance company, etc.)?   | YES ( ) NO ( ) N/A ( ) |
|     | • A supplier of goods or services Landlord of the Company or other business contact with company?  | YES ( ) NO ( ) N/A ( ) |
| 2.  | Have you accepted or given any gift other than nominal in value from customers, suppliers, broker or vendor?   | YES ( ) NO ( ) N/A ( ) |
|     | If the answer to 2. Above is “YES,” have you reported the gift(s) to the General Counsel?  | YES ( ) NO ( ) N/A ( ) |
| 3.  | Have you solicited for yourself or a third party, other than Company or its agents, anything of value from anyone in return for any business, service, or confidential information of Company? | YES ( ) NO ( ) N/A ( ) |
| 4.  | Have you accepted anything of value directly or indirectly from anyone in connection with the business of Company?   | YES ( ) NO ( ) N/A ( ) |
| 5.  | Do you have other directorships which have not been previously approved as required by provisions of the code?   | YES ( ) NO ( ) N/A ( ) |
| 6.  | Have you received any compensation for acting as a director, officer, trustee, or consultant of an outside organization?   | YES ( ) NO ( ) N/A ( ) |
| 7.  | Have you borrowed money from customers or vendors of the Company, other than recognized lending institutions, in an arm’s length transaction?  | YES ( ) NO ( ) N/A ( ) |
| 8.  | Have you accepted an appointment as an executor, trustee, guardian, or conservator, for other than those of your immediate family?   | YES ( ) NO ( ) N/A ( ) |
| 9.  | Do you have any relatives who currently work for Hanmi Bank?   | YES ( ) NO ( ) N/A ( ) |
| 10. | Have you extended credit on behalf of Company or otherwise influenced the extension of credit to:  |                        |
|     | • A Customer where the proceeds were used to pay a debt owing to you or a member of your immediate family?   | YES ( ) NO ( ) N/A ( ) |
|     | • A customer who is your relative?   | YES ( ) NO ( ) N/A ( ) |
|     | • An individual to finance the purchase of real estate or personal property from you?  | YES ( ) NO ( ) N/A ( ) |
|     | • A firm in which you or a member of your immediate family has a financial interest or with which you are employed on part-time or consulting basis?   | YES ( ) NO ( ) N/A ( ) |

