

**TERRITORIAL BANCORP INC.
WHISTLEBLOWER PROCEDURES FOR EMPLOYEES**

The Sarbanes-Oxley Act of 2002 requires audit committees to establish procedures for the receipt, retention and treatment of complaints regarding accounting, internal accounting controls or auditing matters, and the confidential, anonymous submission by employees of concerns regarding questionable accounting or auditing matters (“Accounting Complaints”). Accordingly, Territorial Bancorp Inc. (the “Company”) has established the following procedures:

Accounting Complaints may be made to the Chairman of the Audit Committee of the Board of Directors via regular mail to following address:

Territorial Bancorp Inc.
Attention: Chairman, Audit Committee
1132 Bishop Street
Suite 2200
Honolulu, Hawaii 96813

Employees of the Company and its direct and indirect subsidiaries, including Territorial Savings Bank, a federally chartered savings bank, are expressly authorized to make Accounting Complaints using these procedures on a confidential and anonymous basis. All Accounting Complaints received from employees will be treated confidentially and anonymously.

Consistent with our policies, neither the Audit Committee nor management will retaliate or attempt to retaliate, and will not tolerate any retaliation or attempted retaliation by any other person or group, directly or indirectly, against anyone who, in good faith, makes an Accounting Complaint or provides assistance to the Audit Committee, management or any governmental, regulatory or law enforcement body, investigating or otherwise helping to resolve an Accounting Complaint.

Adopted as of February 2009