

West Bancorporation, Inc.
West Bank

CODE OF CONDUCT

West Bancorporation, Inc. (the “Company”) has adopted a Code of Conduct (the “Code”) which applies to all directors, officers and employees of the Company and West Bank (the “Bank”).

This Code is intended to promote the following:

- a. Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- b. Compliance with applicable governmental laws, rules and regulations;
- c. The prompt internal reporting of violations of this Code to an appropriate person or persons identified in this Code; and
- d. Accountability for adherence to this Code.

Interpretation and Reporting

If you have questions about the meaning of our Code or about applying our standards to a particular situation, contact your supervisor. If you do not receive a clear explanation or believe you may not receive an adequate review of the issue by your supervisor, contact Jill Hansen.

If you believe someone has engaged in a violation of this Code or in other unethical or illegal conduct, promptly report the conduct to your supervisor, Jill Hansen, or the Chairman of the Audit Committee of our Board of Directors. Further information about how to report such conduct may be found in the Whistle-Blower Policy, summarized on pages 17-18 of this Code.

Violations and Their Consequences

Violations of our Code compromise our reputation in the marketplace and may affect our success. Violations of the Code, including failure to cooperate with an investigation or inquiry, may result in disciplinary action, including termination.

Enforcement of this Code shall be prompt, fair and consistent, and may be administered by a supervisor, company management or the Audit Committee.

Certification Process

As a condition of employment, we are each required to comply with the Code. Once each year, each of us is asked to certify our compliance with the Code. Please ensure you are completely familiar with these standards before the certification process begins.

Background

We always compete aggressively and ethically in the marketplace, and we will not violate the law or our ethical standards in conducting our business activities. An illegal or unethical act cannot be justified by saying it benefited the Company, or that it was directed by someone else in the organization, even a higher authority. You are never authorized by the Company to commit or to direct another employee to commit such an act.

Employees are expected to act lawfully, ethically and professionally in the performance of their jobs at all times. We pride ourselves on the fact that we are clear, truthful and accurate in what we say and do. We always act in a manner that preserves and enhances our reputation. Disparaging remarks to or about customers that compromise or jeopardize our reputation are not acceptable. Our demands for excellence and the preservation of our integrity and objectivity are our distinguishing characteristics. We rely on employees to report the discovery of any questionable, fraudulent or illegal activities that may violate this Code. If an instance involving a senior officer is identified, the report should be made to the Chief Executive Officer or the Chairman of the Audit Committee of the Board of Directors as appropriate.

Our standards will also be strictly enforced. Any action or behavior that, in the opinion of senior management or the Board of Directors, violates or jeopardizes this standard of honesty, integrity and nondiscriminatory behavior will result in immediate disciplinary action up to and including termination.

If you're ever in a situation where the right thing is unclear, ask for clarification or examine your options with this quick test:

- Could it harm our reputation?
- Is it legal and is it the right thing to do?
- How would it look in the newspaper or on the news?
- How would my friends, family, the community or shareholders view it?
- Is it consistent with our values?

Our reputation, and your conscience and good name, are far too valuable for you to put at risk by actions that wouldn't pass this test. This means that all of us must tell the truth and fulfill our promises, and we must treat fellow employees, customers, shareholders and those with whom we come in contact in our communities with honesty and respect.

Honesty

Our business is based on mutual trust and absolute honesty in our internal and external affairs. This philosophy must be respected at all times and demonstrated in personal and corporate behavior. Our business demands personal candor and openness by all.

Complete candor with our lawyers, auditors, compliance staff and senior management is essential. We expect everyone to be frank and objective with information that leads to the earliest identification of problems, whether real or potential, small or large. Violations of laws involving dishonesty or breach of trust, or which may affect our reputation, must be disclosed and reported even if they are outside the scope of employment.

Integrity

The nature of our business provides opportunities that can be developed through integrity in our personal and professional business practices. We are accountable to a number of constituencies-our shareholders, our customers, our communities and all employees.

We must treat all our resources, including our name, with the respect befitting a valuable asset. We should never use them in a manner that could be interpreted as imprudent, improper or for personal gain.

Gifts

State and federal laws prohibit employees, officers, directors, agents and attorneys of financial institutions from seeking or accepting anything of value in connection with any transaction or business of their financial institutions. The employee need not benefit directly from the item of value. It still can be considered a bribe if the item of value is for the benefit of a third person or party.

Directors, officers, employees and members of their families shall not solicit nor allow themselves to be solicited or accept gifts, entertainment, or other gratuities intended to or appearing to influence our decisions concerning a customer's business.

Reasonable entertainment and other accommodations of nominal value (generally defined as \$50.00 or less) may be accepted if offered and accepted in goodwill only and not as a return for special treatment by us. We recognize that the refusal of such offers may damage relations, and in these situations employees should consult with their supervisor or the Company's Chief Executive Officer regarding the appropriateness of exceptions. Exceptions occasionally are made allowing or encouraging employees to attend events sponsored by a significant customer or vendor, if attendance at the event is important to maintaining our relationship with that customer or vendor. Generally, however, gifts are to be limited to a nominal value, and never are to be accepted with the expectation of preferential treatment. Cash or checks cannot be accepted regardless of the amount.

Other Payments and Uses of Vendor Resources

Payments that include fees and commissions are an integral part of business activity. We regularly engage the service of vendors as well as lawyers, accountants, consultants, and other professionals. While selection for performance of a specific service may involve a degree of subjectivity, the choice should always be predicated on quality, competence, competitive price and service, business relationship, and evidence of the same standards of integrity demanded by this Code.

In all cases, we shall compete for business only on the basis of the quality and price of our services and to meet our customers' immediate and future needs. At no time will we enter into any payment or other arrangement that violates this principle, lowers our ethical standards, or could conceivably damage our reputation.. Gifts, monetary payments, loans, lavish entertainment, or other values or favors made to or received from vendors or other outside parties in exchange for business or influence of any kind are strictly prohibited.

Personal Benefit

We do not take advantage of our position to profit personally from information, corporate property, services or other business opportunities, unless the situation is deemed incidental and authorized in advance by the Company's CEO.

Commitments

You shall not make actual or apparent commitments, formally or informally, on our behalf without appropriate authorization in accordance with approved procedures. Approved commitments within the scope of one's authority must be properly documented and retained.

Compliance

We are in a business that is highly regulated at both the state and federal level. We comply with all local, state and federal laws and regulations that apply to our business. When laws or regulations seem unclear or ambiguous, employees should consult their immediate supervisor or the Compliance Officer for further clarification.

Special attention must be paid to compliance with the laws and regulations governing privacy, money laundering, and identity theft. Each of us must adhere to established internal control procedures, and to policies and procedures that are designed to prevent the bank from being used as a conduit for money laundering or the funding of terrorist activity. The penalties for failure to comply with the established federal regulations can be severe. In addition to personal fines and prison time, we can be subjected to corporate fines and would experience significant reputation damage should we be implicated with an event implicating security concerns..

We must comply with our established accounting and reporting rules, regulations and controls. Records should accurately reflect transactions in a timely manner, and errors must be corrected immediately. If an employee, director or officer has concerns or complaints regarding questionable accounting or auditing matters, then he or she is encouraged to promptly submit those concerns or complaints (anonymously, confidentially or otherwise) to the Chairman of the Audit Committee. The Audit committee will, subject to its duties arising under applicable law, treat such submissions confidentially.

Political Activities and Contributions

Employees are encouraged to participate in political activities of their choosing, individually and on their own time. This participation is completely voluntary, however, and no individual political effort shall be reimbursed or compensated by us. Employees and directors may serve in an elective or government appointed office as long as it does not interfere with job performance, utilize an unreasonable amount of company time or resources, or present a conflict of interest. No employee or director shall indicate, directly or indirectly, that the individual is representing the Company or the Bank while serving in an elective or government appointed office, or participating in a personal political activity of their choice.

You may, of course, make personal political contributions to the candidate of your choice, but you may not be reimbursed from corporate funds for such personal contributions.

Employees are prohibited by law and by these ethical standards from using normal work time or our corporate resources to engage in activities related to local, state, or national elections, or political conventions or caucuses.

Loan and Investment Decisions

We believe that all loan and investment decisions should be made in the most responsible and constructive manner possible. Loan and investment decisions should be made with strict attention to legal and financial implications and in strict accordance with the bank's asset quality standards.

We must always carefully evaluate the long-term implications of our decisions. As individuals, we should not act on behalf of the Company in transactions involving people or organizations with which we or our families have a financial commitment, interest, or decision-making influence.

Use of inside or confidential information in any personal investment decision is prohibited. It is also a violation of federal securities laws to buy or sell securities on the basis of material inside information that has not been made public, or to provide material inside information to others for their use. Please refer to additional policies in this

section on Maintaining Confidentiality, Insider Trading and Proprietary Information and Customer Lists for more information.

Financial Responsibility

Your personal financial matters should be handled with prudence at all times. As representatives and advocates of West Bank products and services, all employees are expected to open a West Bank savings or checking account, free of charge, at the commencement of employment. Employees and their families are prohibited from borrowing from customers (other than financial institutions), suppliers, other employees, contractors, consultants, or contingent workers. Employees are expected to manage their personal finances in a manner that avoids embarrassment to themselves or the Company. This includes writing checks against insufficient funds, which are evidence of poor financial judgment and a violation of state law. Evidence of a pattern of overdrafts, unusual deposits or check kiting by an employee, or by any family member or associate of the employee who has been given access to the account, will result in disciplinary action, up to and including termination of employment

Employee privileges carry the responsibility of prudent use, prompt payment, and care to follow all guidelines and reimbursement procedures.

A corporate credit card may be used for business-related expenses only and may not be used to secure personal cash advances or for personal purchases. Misuse of any corporate credit card or repeated late payments may be grounds for denying future use of the card or other forms of disciplinary actions, including termination. When an employee terminates, any balance owed on the account must be reconciled and payment arranged.

Falsifying business related expenses is grounds for termination. In addition, misuse of an employee checking account or any bank product or service may result in the loss of account privileges and could subject you to disciplinary action up to and including termination.

Account Transactions

Many of us are required to process customer account transactions such as cashing checks, waiving service fees, approving credit, etc. Employees are not allowed to process or approve transactions relating to their own personal accounts, the accounts of family members or personal acquaintances, or accounts in which they may have a personal interest or on which they are an authorized signer. Specifically, this includes, but is not limited to, refunding, reversing or waiving fees; approving or increasing credit lines; cashing checks; etc. There may be other specific restrictions pertaining to transactions on personal accounts or the accounts of family members or personal acquaintances.

All account transactions must be handled in strict compliance with our policies and procedures. Examples of inappropriate transactions include, but are not limited to, misappropriation of funds; opening, closing or altering accounts without proper

authorization; unauthorized transfer of funds; and transactions that are inconsistent with policies, procedures or practices, including kiting and overdrafts.

Violation of this policy is grounds for disciplinary action, including termination. Please discuss restrictions and appropriate procedures with your supervisor.

Insider Trading

Our activities frequently result in obtaining material and non-public information about other companies.

Directors, employees or other insiders who possess material non-public information concerning a company or specific securities are prohibited by law from effecting any transactions in the relevant securities.

Directors, employees or other insiders may not buy or sell securities of companies with which they have significant dealings on our behalf or for which they have responsibility on our behalf.

Transactions by Employees or Other Insiders in the Securities of West Bancorporation, Inc.

We recognize the special interest that employees and other insiders may have in owning the Company's common stock. No director or employee may trade in the Company's common stock while in possession of material non-public information about the Company or the Bank in violation of the provisions of our Insider Trading Policy. Employees and other insiders will be provided a copy of the Insider Trading Policy and will be required to sign a statement agreeing to comply with its terms. Any questions concerning the policy should be directed to the Chief Financial Officer.

Maintaining Confidentiality

It is essential that we maintain a professional standard of conduct that assures confidentiality of information and relationships with our customers. Confidential information regarding customers or banking transactions should not be discussed except with co-workers or fellow directors with a need to know in the normal transaction of business.

The use of any banking information stemming from your employment shall be restricted to that which is absolutely necessary for legitimate and proper business purposes. Externally, we should protect the privacy of our customers. A random remark with family, friends or acquaintances can form the basis for misinterpretation or otherwise violate the integrity of our relationships.

The improper release of customer or banking information may result in disciplinary action up to and including termination. When your employment ends, your obligation to maintain the confidentiality of such information continues to apply.

Proprietary Information and Customer Lists

As directors and employees, we may produce, develop and have access to information, ideas, inventions, techniques, processes, computer software, “know how,” materials, programs, reports, studies, records, data, customer lists, customer information, trade secrets and other information not generally available to the public regarding the bank and all related entities, their customers, prospective customer and other third parties (collectively “Proprietary Information”). Proprietary Information may be original, duplicated, computerized, memorized, handwritten or in another form.

Proprietary Information (whether developed or produced by an employee, or provided to any employee by the bank or a customer or other third party) is entrusted to employees as representatives of the Company. Our directors and employees may not use, duplicate or remove any Proprietary Information except for the sole purpose of conducting business on our behalf. All records, files, documents and other Proprietary Information employees prepare, use or come into contact with shall remain our property.

Because it is unique and cannot be lawfully duplicated or easily acquired, we protect this information with trade secret status. Directors or employees may not use, divulge or disclose Proprietary Information to any third party. Under no circumstances should a director or an employee reveal to or permit this information to become known by any of our competitors, or any other third party, either during or after employment.

We are expected to use reasonable care to prevent the disclosure or destruction of Proprietary Information that we possess or use. If you cease to be employed by us, you must return all Proprietary Information, including information that may have been retained in personal items (e.g. electronic devices or home computers).

Employees are paid to work for us and may be using our facilities and equipment to develop Proprietary Information. As a condition of employment, all employees acknowledge and agree that Proprietary Information is our sole property and disclaim any rights and interest in any Proprietary Information and assign these rights to us. Additionally, all employees agree to immediately disclose all Proprietary Information to us.

Our customer lists and other Proprietary Information about customers, directors, and employees are to be treated as highly confidential in all cases. This information may not be disclosed to any third party or used for any purpose other than performance of job duties for us either during or after employment.

Unauthorized use or duplication of customer lists and other information (including copies in electronic form and information committed to memory) is expressly forbidden.

Conflict of Interest

It is a conflict of interest if you have an interest outside of work that interferes with your responsibilities to us or affects your ability to perform your duties properly. You must avoid conflicts of interest and potential conflicts of interest, including situations where there might be an appearance that there is, or could be, a conflict of interest.

Employees may not engage in any employment or activity which is in competition with our business; which conflicts with the fiduciary obligations of any other department; or which creates a conflict of interest with the employee's position or department. In all cases, positions in which you are employed outside of work must be approved in advance by your supervisor.

We encourage participation in civic affairs as a part of our commitment to community involvement including service with constructive and legitimate for-profit and not-for-profit organizations. There are cases, however, in which organizations have business relationships with us or in which the handling of confidential information might result in a conflict of interest.

All actual and potential conflicts of interest must be reported immediately to your supervisor.

Fiduciary Appointment

You may not accept an appointment or continue to act as a fiduciary or co-fiduciary of any estate, trust, agency, guardianship or custodianship account of one of our customers (other than a family member) unless authorized by the Board of Directors of West Bank. If you wish to seek such authorization, you must notify Alice Jensen, Secretary of the Board of Directors, who will place it on a Board agenda. You may not begin your service as a fiduciary or co-fiduciary prior to obtaining such approval.

Inheritance under Wills or Trusts

You or your immediate family members may not receive any inheritance from a customer unless the customer is an immediate family member or you have never dealt with the customer as a representative of the company or any of its affiliates. If you have been named as a beneficiary in a prohibited situation, immediately notify the Chief Financial Officer of the Company, who will discuss the situation with your supervisor.

Directorships

You may accept election or appointment to public or civic commissions and to boards of nonprofit corporations if you give reasonable notice to your supervisor before you are elected or appointed.

Antitrust and banking laws prohibit certain interlocking corporate directorships and management positions. All candidacies or appointments to business corporation boards, and the terms and remuneration related to the directorship, must be approved in advance by the Chief Financial Officer and your supervisor.

To avoid a potential conflict of interest you may not, without the approval of the Chief Financial Officer and your supervisor, serve on the board of an entity that: competes with us; is in substantial default to the bank on a loan, contract, or other obligation; or is involved in a substantial controversy or litigation with us.

In all cases, senior management's knowledge and approval of the appointment or candidacy does not imply that you are serving at our direction or desire, nor does it imply our endorsement of the organization or its purposes.

Antitrust Compliance

Antitrust law is extremely complex. You are prohibited from entering into arrangements with competitors to set or control prices, rates, trade practices or marketing policies. You must avoid any situation in which it might even appear that you have entered into such an arrangement. You also must avoid conversations with competitors regarding pricing, trade practices, marketing policies, or similar information.

It also is an antitrust violation to require customers to engage in certain tied or reciprocal transactions. We will not extend credit, lease or sell property of any kind, furnish any service, or fix or vary the consideration for any business activity on the conditions that:

- The customer obtain some additional credit, property or service other than a loan, deposit or trust service;
- The customer obtain any additional service from a bank affiliate;
- The customer provide some additional credit, property, or service to us; or
- The customer not obtains some other credit, property, or service from one of our competitors.

Employees are encouraged to contact the Compliance Officer when contemplating transactions involving multiple products and services.

Use of Company Resources

Our telephones, personal computers, copy and fax machines, supplies, mail service, e-mail, bulletin boards and conference rooms are intended primarily for business use. Personal use of these or other of our resources can disrupt the vital flow of information or

tie up resources our customers depend on. Personal telephone calls should be limited and Company addresses or mail, including e-mail, should be used only rarely for personal correspondence. Misuse or abuse of Company resources may result in disciplinary action, including termination. Company resources assigned to you during the course of your employment, including cell phones provided to employees eligible to participate in the Company's cell phone plan, must be returned upon termination and/or at our request.

Use of Non-Company Resources

During the employee's working hours, the use of employee-owned computers and electronic devices, whether accessed via the Company's system or otherwise, is subject to the Company's Use of Company Technology policy, set forth below. This includes, but is not limited to, access to the internet, communication on personal webpages, transmission or receipt of e-mail messages, blogging, instant messaging, use of regular and cellular phones, voicemail, and/or text messaging.

The following section of this policy provides guidance specifically regarding e-mail and other electronic communications, but also applies in principle to all other forms of communication as well, including voice mail and memos.

Use of Company Technology (including E-mail and Internet)

Use of company technology, including computer hardware, software, and communication capabilities, is an important asset for us and our customers. All company resources and data, whether available electronically or otherwise, should be used only for authorized purposes, accessed only by those individuals with appropriate authorization, and disclosed only on a need-to-know basis. All Company-provided electronic communication systems are to be used primarily for business purposes. Any personal use of electronic communication systems is not private, is subject to this policy, and must be incidental, occasional, and kept to a minimum (not more than a few minutes on any given day).

Our e-mail, voice mail, Internet access, and electronic banking, are the exclusive property of the Company. We have the right to view, copy, modify and delete any information transmitted through or stored in the system, including e-mail messages, without notice, to ensure the systems are being used properly for business purposes. Computer access is provided by the Company to assist in the efficient conduct of company business. E-mail communication and employee internet activities are subject to all existing Company policies, including those prohibiting discrimination and harassment and requiring professionalism and ethical behavior in all aspects of employment. Defamatory, obscene, offensive, or harassing messages are strictly prohibited, as is accessing any internet site that may contain obscene, offensive, or otherwise inappropriate materials. Personal internet accounts or personal software may not be installed or utilized on our computer

system. Employees are specifically prohibited from installing or facilitating instant messaging software, accessing or establishing chat rooms, message boards, or listserves on our computer system, and employees generally may not engage in instant messaging without the written consent of the CFO of the Company. All software must be used in accordance with its license agreements. Use of Company computers to download, copy or otherwise access copyrighted or licensed materials is strictly prohibited, and employees will be personally liable for any fines or sanctions caused by license or copyright infringement. Employees' e-mail messages and internet access histories will be monitored regularly without prior notice.

Employees may not knowingly engage in any activity that might be harmful to the Company's systems or to any stored information, such as but not limited to creating or propagating viruses, disrupting services, or damaging or altering information.

Use of Company computers by non-employees is strictly prohibited. Screen savers must be utilized to prevent the general public from viewing one's computer screen. All computers must be turned off at the close of business, unless required to function overnight on rare occasions. Passwords must be kept in an inaccessible location, and changed regularly in accordance with the following requirements:

<u>Password and Security Parameters</u>	<u>Windows</u>	<u>ITI</u>	<u>Other Applications</u>
Minimum length of password	8 characters	6 characters	8 characters
Password complexity* enforced	Yes	No**	No**
Maximum password age	90 days	90 days	30 days
Minimum password age	Yes, 1	No	No
Retain password history	Yes, 24	Yes	No
Number of unsuccessful sign on attempts allowed before account is "suspended" or "locked out"	3	3	3

**Password complexity for this purposed is defined as requiring any three of the following: 1)capital letter, 2)lowercase letter, 3)number, 4)special character.*

***Numeric is required.*

Other Applications Containing Confidential/Private Information: All such applications should follow as much of the Windows security settings in the Password and Security Parameters table.

Personal identifying information of customers, including names, addresses, social security numbers, taxpayer identification numbers, account numbers, etc., must never be sent by electronic means except through company-provided secure e-mail procedures.

Electronic mail (e-mail) messages will be deleted from the Bank's electronic communication system, following transmission or receipt, on a monthly basis. This will occur routinely, as part of the standard operation of our electronic information system.

Violation of Company policies governing e-mail, internet, instant messaging, and computer usage will result in appropriate disciplinary action, up to and including termination of employment.

Computer and Information Security

Protecting information from unauthorized disclosure is a responsibility of all employees. The Information Security Program, available through your supervisor, provides direction for using technology and identifies precautions that should be taken to secure data from unauthorized access. All employees who use our technology resources must become familiar with and understand policies and standards and comply with their provisions. In general, here are a few basic rules to keep in mind:

- Ensure that all of your computer access is on a need-to-know basis and is limited to the information required to perform your job.
- Provide for the physical security of the hardware. Laptop computers and system components are extremely vulnerable to theft.
- Ensure you have power-on and screensaver passwords on your personal computers.
- Ensure you have current virus detection software on your computer.
- Do not write down access codes or passwords.
- Do not share your user ID or passwords with anyone. You are responsible for all unauthorized use of your user ID.
- Change your passwords if you suspect your user ID has been compromised and contact Information Security Services.
- Never electronically transmit sensitive or confidential customer identifying information, including but not limited to account numbers, social security numbers, or taxpayer identification numbers, except through company-provided secure e-mail procedures.

The Information Security Program will be available on the company intranet and all employees will be required to certify on an annual basis that they have read and understand its provisions.

Media Contacts and Attribution

- (a) We are committed to building and maintaining effective and ongoing communications with key stakeholders through the media and through other means of communication, verbal, electronic and written. Effective media relations also ensure that our public statements express a clear and factual representation of the Company.

The Company has designated employees who may publicly communicate on its behalf. Employees who are not designated to do so may not communicate on behalf of the Company or make any statements that are attributed to the Company. If you receive a media inquiry, please find out who is calling, why they are calling, and to what telephone number Dave Nelson should return a call. After that information is obtained, the media inquiry should be forwarded to Dave Nelson. In his absence such inquiries should be forwarded to Brad Winterbottom, Doug Gulling, or Harlee Olafson.

- (b) When employees post messages to electronic posting forums or blogs on the Internet using the Company's system, the messages must contain a disclaimer at the end of the message that states: "The opinions expressed in this message are mine only, and do not reflect the opinion or position of my Company."
- (c) When employees post messages to electronic posting forums or blogs on the Internet not using the Company's system, and identify themselves as employees of the Company or by their comments may be presumed to be associated with the Company, the messages must contain a disclaimer at the end of the message that states: "The opinions expressed in this message are mine only, and do not reflect the opinion or position of my Company."

Respect and Consideration in Our Dealings with All

Our goal is to treat fellow employees with respect, consideration and understanding. Our intention is to foster a climate conducive to a high level of performance through full communication at all levels. We encourage the open discussion of job-related problems and prompt resolution of those problems.

Externally, we must treat customers, potential customers, vendors and the communities we serve with equal respect. This demands courteous service, as well as ethical business conduct and compliance with all laws and regulations. As employees of a customer-driven institution, we have the responsibility to act in a manner that reflects favorably on us. In addition, we are frequently asked by our customers to offer opinions on legal or tax matters. Employees should act within the scope of their positions, encourage customers to seek independent counsel, and never offer professional advice to customers.

Whether dealing with fellow employees or members of the general public, e-mail, voicemail, Internet, wireless, and fax transmissions are never appropriate vehicles for transmitting confidential information.

Being considerate and open in our dealings demands the development, encouragement and maintenance of a positive attitude towards ethical behavior, one important dimension of which is an open appreciation of diversity. It is absolutely essential for us to value and respect differences among the people with whom we interact daily.

We must be compelled to conduct our day-to-day business with the highest standards of integrity, and we must devote our best efforts to successfully performing our jobs to ensure the attainment of our Company goals and objectives.

Information on Social Networking Sites

To the fullest extent permitted by state and federal law, the Company will consider all information concerning an applicant or an employee in making hiring, firing, and other employment-related decisions. The term “all information” includes information of any kind (verbal, written, photographic, video, etc.) that is accessible in any medium (print, electronic, etc.) from any source.

The Company will consider public information and other information to which it has lawful access. This may include information that is contained in social networking sites, blogs, and other electronic sites, including but not limited to YouTube. If there is information that pertains to you that you believe requires explanation, interpretation, or clarification when it is considered by the Company, it is your obligation to communicate this information to the Human Resources department.

In any posted comments employees should make it clear that their comments are their own individual opinion and not that of the Company. All expressions of opinion should contain a representation that they are not representing or providing any opinion or statement as the policy or view of the Company or of any individual in their capacity as an employee, or otherwise on behalf of the Company. Under no circumstances should customer information be posted.

Employees may not post text, video, pictures, or other material that could be viewed as malicious, obscene, threatening or intimidating or that might constitute bullying or harassment. Examples of such posts might include pictures that are meant to harm a person’s reputation or that contribute to a hostile work environment on the basis of age, race, sex, religion, disability, sexual orientation, or any other status protected by law. Employees should keep in mind that once an item is posted it is publicly available on the internet and cannot be retracted.

If an employee becomes aware of any content that violates the letter or spirit of the above policies, the employee is expected to bring it to the attention of management or the employee's supervisor.

Equal Employment Opportunity/Non-Discrimination

We have made a commitment to create a work environment that values each individual's unique talents and background, respects differences, and recognizes the opinions and ideas of every employee. To ensure the safety and integrity of our workforce, all employees are subject to pre-employment background checks and drug screens.

Current employees, the labor market and our existing and prospective customers comprise a widely diverse population. We are committed to equal employment opportunity. Embracing diversity is not only the right way to do business, it is essential to the success of our business. The way we will serve a diverse marketplace is by having a diverse workforce.

We prohibit both discrimination against and harassment, including offensive or degrading remarks and conduct, of any employee or applicant, and ensure that all personnel practices are administered on individual merit and capability without regard to race, religion, color, age, sex, national origin or ancestry, sexual orientation, disability, veteran status, or other factors identified and protected by federal, state, and local legislation. These practices include, but are not limited to, recruitment, advertising, selection, compensation, training, placement, transfer, demotion, promotion, disciplinary action and termination. Harassment because of race, religion, color, age, sex, national origin or ancestry, sexual orientation, disability, veteran status, or other factors identified and protected by federal, state, and local legislation may be prohibited by law and is not tolerated.

If you have a concern or complaint about discriminatory treatment, please contact your supervisor or Jill Hansen. Allegations of discriminatory treatment are taken seriously. We will investigate and will take appropriate corrective action if it is determined that a violation of our policy has occurred. No employee will be subjected to retaliation for making a report of discriminatory treatment.

Offensive Behavior and Harassment

It is the Company's policy and the responsibility of all employees to maintain a working atmosphere free of harassment, intimidation and/or unwelcome or inappropriate conduct, including sexual overture, jokes, graphic material, etc. Verbal or physical conduct of a demeaning or sexual nature that creates an intimidating, hostile or offensive working environment, that in any way affects the employment relationship or that is otherwise deemed to be inappropriate by the Company, is not permitted.

Harassment may include verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of the individual's race, religion, color, age, sex, national origin or ancestry, sexual orientation, disability, veteran status, or other factors protected by state and local legislation. Harassment may include but is not limited to: disparaging remarks; slurs; negative stereotyping; threats; intimidation; hostile acts; and denigrating or hostile written or graphic material posted or circulated in the workplace.

Employees may not post or circulate in any manner text, video, pictures, or other material that could be viewed as malicious, obscene, threatening or intimidating or that might constitute bullying or harassment. Examples of such posts might include pictures that are meant to harm a person's reputation or that contribute to a hostile work environment on the basis of age, race, sex, religion, disability, or any other status protected by law.

Harassment may also include sexual harassment which includes any unwelcome sexual advance, request for sexual favor, and other verbal or physical conduct of a sexual nature where:

- Submission to the conduct is or is threatened to be a condition of employment;
- Submission to or rejection of such conduct is used or is threatened to be used as the basis for employment decisions;
- The conduct has the purpose or effect of unreasonably interfering with an individual's work performance; or
- The conduct has the purpose or effect of creating an intimidating, hostile or offensive work environment

Employees who violate this policy are subject to disciplinary action up to and including termination.

An employee who believes he or she has been harassed by a co-worker, member of management, vendor or customer, or has witnessed any incident of harassment, should make a prompt report to the supervisor or Jill Hansen. A timely investigation will be conducted and appropriate action will be taken. We will not tolerate any retaliatory action against any individual for reporting such an incident. If you ever feel physically threatened, or have knowledge of another co-worker having a physical safety concern, we ask you to immediately report this to Jill Hansen, Dave Nelson, Harlee Olafson, Brad Winterbottom, or Doug Gulling.

Employees and Customers with Disabilities

Individuals with disabilities are entitled to the same access to goods, services, products, accommodations and employment as persons without disabilities. We are committed to

providing reasonable accommodations for qualified employees and customers who have disabilities.

We include individuals with disabilities in our non-discrimination policy and as part of the diversity of the workforce. We will make reasonable accommodations so that an individual with a disability may have the opportunity to perform the essential functions of a particular position and otherwise participate fully in employment. Sometimes this may involve special equipment or simple physical adjustments to the work site.

If you have a disability that requires special accommodation within your current job or in a position for which you wish to apply, please discuss your situation with your supervisor or Jill Hansen. They will work with you to try to evaluate accommodation options.

It is important to be aware that customers may have disabilities that need to be accommodated. Whether you work with customers face to face or over the phone, please pay attention to any physical or communication barriers customers encounter, offer assistance and provide your manager with information about the situation. We want to ensure that architectural and communication barriers are remedied where feasible so that all customers have equal access to our products and services.

Workplace Violence

The well-being and personal safety of our employees, and of anyone conducting business on our premises, is of paramount importance. The Company strictly prohibits Workplace Violence of any kind. Acts of violence, threats of violence, and threatening behavior, whether or not such acts are actually intended, and whether expressed or implied, are prohibited and will not be tolerated. Workplace Violence includes, but is not limited to, behavior that causes or threatens physical or emotional harm to a person or property. This includes behavior on Company premises, regardless of the relationship between the Company, the perpetrator, and victim of the behavior; and behavior off Company premises, where the perpetrator is acting as an employee or representative of the Company or where the victim is exposed to the conduct because of his or her work relationship with the company. This prohibition extends to oral statements, phone calls, voice mails, e-mails, letters, website materials, drawings, gestures, and any other form of communication; stalking; and any unwelcome contact. Possessing or bringing onto Company property (including parking lots) weapons, firearms, or incendiary devices of any type, whether licensed or not, is strictly prohibited unless in the possession or control of a peace officer or contracted security guard.

If you believe that there has been a violation of this policy, you should report the details immediately to a Company supervisor, to Jason Nelson at extension 2373, or to Jill Hansen at 2305. A 911 emergency call may be an appropriate first step.

This policy applies to all persons involved in the operations of the Company, including Company employees, contract and temporary workers, vendors, customers, and others who might have occasion to come onto the Company's property. Any employee who

engages in Workplace Violence will be subject to disciplinary action up to and including termination of employment. Violators of this policy, including those who fail to report violations of this policy, may be directed to stay away from Company property or employees and may be subject to criminal prosecution.

Solicitation

Solicitation during working time for products, services, charities or interests not related to Company business can have a negative impact on our ability to serve our customers and can be disruptive to our internal workflow particularly when multiple employees are soliciting for the same event. For this reason, we prohibit any active solicitation of employees by other employees and non-employees during any work time, whether it is for participation in volunteer agencies, the sale of goods or services, or contributions to a charitable organization, except for Company-sponsored charitable fund-raising or events which receive senior management approval. The term “work time” is defined as time spent in the performance of job duties

Substance Abuse

We recognize that alcohol and drug abuse adversely affect job performance and safety in the workplace. We believe that a productive and safe work environment is in the best interest of our employees, our customers and our shareholders. Therefore, we prohibit the possession or use of alcohol narcotics, depressants, stimulants, hallucinogens, marijuana, and all controlled substances in the workplace or during regular working hours, as well as the use of prescription drugs when resulting behavior or appearance adversely affects work performance. Successful completion of a pre-employment drug screen is a prerequisite to employment.

Absent a lawful prescription written for the employee, possession, use or being under the influence of narcotics, depressants, stimulants, hallucinogens, marijuana, or controlled substances of any kind on Company premises is prohibited and constitutes grounds for immediate dismissal.

Consumption of, being in possession of, or being under the influence of alcoholic beverages on Company premises, other than for sanctioned activities after normal business hours, is prohibited and will be grounds for disciplinary action including dismissal.

Consumption of intoxicating beverages during lunch or a business meeting is not acceptable business behavior. If you feel such consumption is necessary then request the remainder of the day off.

During bank or other social functions please keep consumption of alcoholic beverages to a reasonable level. The Company's image is a direct result of its staff's behavior.

This policy applies to all employees, including contract employees or employees of temporary employment agencies. The policy is applicable at Company facilities or wherever Company employees are performing Company business.

We recognize that drug and alcohol abuse are serious problems that may be successfully treated. Employees who feel that substance abuse is a problem for themselves or family members can obtain confidential help through the Employee Assistance Program.

Any employee who is unable to work due to alcohol or drug use, who uses illegal drugs at or outside of work, or who violates this policy may be sent home and may be subject to disciplinary action, up to and including termination. In addition, the employee may be referred to the Employee Assistance Program for an evaluation. This referral does not preclude other disciplinary action, including termination of employment, nor does it imply or constitute disciplinary action.

Smoking

The Company provides a smoke-free workplace for our employees and customers. This means that you are not permitted to use tobacco products in any Company facility. Smoking is allowed outdoors.

Serving as an Expert

The expertise you develop in the course of your employment may provide opportunities to participate in outside activities as a paid or unpaid speaker or consultant. It is important to discuss these opportunities with your supervisor to ensure there is no conflict between organizational and personal interests. Use or distribution of materials or products developed as part of your responsibilities with us should occur only with the authorization of your supervisor.

Privacy in the Workplace; Searches

We may assign workspace, equipment, or other Company property for use in performing your job responsibilities. All such property shall at all times be and remains the property of the Company, and does not become your personal property by virtue of its assignment to or use by you. We reserve the right to access and/or search workspace and equipment (including drawers and file cabinets, locked or unlocked, computer files, bookshelves, desks, credenzas) that have been assigned to you or are under your control, and to conduct reasonable searches of employees' outer clothing, packages, handbags, brief cases, backpacks, pockets, and other personal effects located on Company premises, as well as vehicles parked on Company property (owned, leased, or occupied) or used in conducting Company business. Equipment owned by employees but used for business purposes is not considered private and may be accessed and searched for any purpose. We also reserve the right to monitor employee accounts and electronic forms of communication, including e-mail, telephones, computer systems and other electronic records for any reason, without prior notice, as set forth in the preceding paragraph.

Any refusal to permit an inspection upon request may result in disciplinary action, up to and including termination of employment. The discovery of any violation of any other Company policy as a result of such a search may also result in disciplinary action, up to and including termination of employment. Any illegal activity discovered during an inspection is subject to referral to the appropriate law enforcement authorities.

Whistle-Blower Policy

If you observe or become aware of any matters implicating potential fraudulent or unethical behavior, questionable accounting, or improper auditing by employees, officers, or directors of the Company, you should inform the Audit Committee using the following procedures. These procedures may be amended from time to time by the Audit Committee of the Board of Directors of the Company.

1. **Scope of complaints.** Any employee or non-employee of the Company who has a complaint regarding alleged improper disclosure, legal matters, regulatory matters, accounting matters, internal accounting controls, auditing matters, internal fraud or unethical behavior may submit a **written complaint** pursuant to these procedures (hereinafter referred to as a “Complaint”).
2. **Method of Submitting Complaints.** A Complaint by an employee of the Company may be submitted in a confidential and anonymous manner without revealing the employee’s identity. A Complaint shall be directed to the Chairperson of the Audit Committee at the following address:

**West Bancorporation Audit Committee
James Noyce
Director and Chairperson
905 48th St.
West Des Moines, IA 50265
By Telephone: (515) 321-0380
By E-mail: jimnoyce@live.com**

3. **Content of Complaints.** Each Complaint must be in writing to be considered, and must contain enough information and specificity to allow the Audit Committee to investigate the Complaint. Complaints by employees made anonymously shall be treated confidentially to the extent possible, consistent with the need to conduct an adequate investigation.
4. Any Complaint that is received by an employee, officer or director of the Company, other than the Chairperson of the Audit Committee, shall be immediately forwarded to the Chairperson of the Audit Committee.

5. All complaints will be handled in accordance with the Company's Whistleblower Protection Policies and Procedures. Employees who make or receive a Complaint, or who otherwise have involvement in administration of the matter, must not disclose information pertaining to the Complaint, other than as necessary for the proper administration of the matter.

6. Protection for Employees who are the Subject of a Complaint. Employees, officers or directors who are the subject of an adverse allegation in a Complaint may secure their own accounting or legal representation. Reimbursement of the cost of such representation may be considered by the Company in accordance with procedures established in the Company's Whistleblower Protection Policies and Procedures.

Employees, officers or directors will be assumed to be innocent of any adverse allegation contained in a Complaint until evidence is produced to the required standard of proof to show otherwise, and will always be given the opportunity to respond to an adverse allegation made about them in a Complaint before any adverse finding is made.

Retaliation

The Company will not retaliate against employees, officers or directors who in good faith make reports or complaints of violations of this Code of Conduct.