

HEARTLAND FINANCIAL USA, INC.

Code of Business Conduct and Ethics

**Approved and Effective January 15, 2016
Reapproved with No Changes October 18, 2016**

PREAMBLE: The DIRECTORS of Heartland Financial USA, Inc., and those of each member bank are subject to, and expected to, comply with the Heartland Code of Business Conduct and Ethics.

The Code shall be distributed to each DIRECTOR annually and acknowledged by the DIRECTOR'S signature.

CODE OF BUSINESS CONDUCT AND ETHICS

CONTENTS

- I. GENERAL POLICIES AND DEFINITIONS
- II. CONFIDENTIALITY
- III. CUSTOMER/COMMUNITY RELATIONSHIPS
- IV. IMPROPER TRANSACTIONS
- V. CONFLICTS OF INTEREST
- VI. RELATIONSHIPS WITH COMPETITORS
- VII. FINANCIAL REPORTING AND COMPLIANCE WITH CONTROLS
- VIII. ADMINISTRATION/COMPLIANCE

I. GENERAL POLICIES AND DEFINITIONS

Every Heartland employee is responsible for doing business in an ethical manner. The two main principles that are expressed throughout this Code, and that are the major tenets of all ethical conduct for employees, officers and directors of Heartland, are as follows:

- respect for and compliance with the laws, rules and regulations of the United States, and the states, counties, cities and other jurisdictions, in which Heartland conducts its business as well as all other laws, rules and regulations that are applicable to Heartland; and
- loyalty to the interests of Heartland's stockholders.

These principles require that employees, officers and directors of the Company act in a manner that will ensure:

- honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- avoidance of conflicts of interest, including disclosure to an appropriate person or person identified in this Code of any material transaction or relationship that reasonably could be expected to give rise to such a conflict;
- full, fair, accurate, timely and understandable disclosure in reports and documents that Heartland files with, or submits to, the Securities and Exchange Commission and in other public communications made by Heartland;
- compliance with applicable governmental laws, rules and regulations; and
- prompt internal reporting of violations of this Code to an appropriate person or persons.

These principles form a standard of conduct that you, as a Heartland representative, must follow. You must also obey both the letter and spirit of all laws and regulations governing our business, as well as the requirements placed on employees by the Employee Manual. Directors, officers and employees must not engage in any criminal, dishonest or inappropriate conduct, or other conduct prejudicial to Heartland.

If you become aware of a violation of this Code, or any law or regulation, please notify the Heartland Human Resources Department, or one of the members of the Audit/Corporate Governance Committee as set forth in the attached document entitled, "Violation Reporting Procedures and Contact Information."

As deemed necessary, the President and CEO of the Company will be notified of reported violations within the Company, unless the violations relate to financial reporting or accounting improprieties or errors or if the perceived conflict of interest or violation

involves the President and/or CEO. In these cases, employees should report the conflict or violation directly to Heartland's Audit/Corporate Governance Committee.

As previously referenced, attached to this Code is a set of procedures for reporting potential violations of the Code. The attachment also contains contact information for the individuals at Heartland to whom violations should be reported. The information contained in the attachment may also be found at Heartland's website at www.htlf.com.

A. Ask for Help

Sometimes you may find yourself in a situation which this Code does not cover or where the proper course of action is not clear to you. If that happens, or if you have questions, be sure to ask someone for help (usually your manager). Also, feel free to ask someone in the Heartland Human Resources Department.

B. For More Information

If you would like more information about the laws or regulations referred to in this Code, contact a member of the Heartland Human Resources Department.

C. Definitions

1. Bank - means any member bank or non-bank subsidiary of Heartland Financial USA, Inc.
2. CEO - means the Chief Executive Officer of Heartland Financial USA, Inc. or its subsidiaries. The Chief Executive Officer may designate a person or persons to act in his or her place.
3. Code - means this Code of Business Conduct and Ethics.
4. Family Member - means mother, father, sister, brother, son, daughter, husband, wife, mother-in-law, father-in-law, sister-in-law, brother-in-law, son-in-law, daughter-in-law, grandparent, aunt, uncle, niece, nephew, first cousin, or any other individual living in your household.
5. Heartland - means Heartland Financial USA, Inc. and its subsidiaries.
6. Related Business - means any company or business in which you, or a Family Member, have a controlling interest or an interest as a director or officer.
7. Customers, vendors or employees - means both current and prospective customers, vendors or employees of Heartland.
8. Subsidiary - means any of the subsidiaries of Heartland Financial USA, Inc.

D. Scope

Sometimes this Code will prohibit you from doing something. If something is prohibited, you may not do it directly, indirectly or make arrangements for someone else to do it for you.

II. CONFIDENTIALITY

A. Confidential Information

Public confidence is important to any company. To be a provider of financial services public confidence is essential to a company's existence and well-being. Customers must feel complete and unquestioned confidence in Heartland and its employees. As an employee of Heartland, you will be exposed to a great deal of confidential information. All relationships between Heartland and our customers are confidential. No information should be disclosed except as authorized by a customer or as required by law. All employees should use care not to discuss customer business in any place or manner that risks a breach of customer confidentiality in any way. Employees must never make random or otherwise innocent remarks concerning any customer's business. Similarly, you should not discuss the confidential business of Heartland in any manner that would impair Heartland's business or benefit Heartland's competitors.

B. Inside Information

You may not (except in the normal and proper discharge of your job responsibilities) use or provide others with "material inside information" about Heartland, any Heartland subsidiary, or any customer or vendor. "Inside information" is information that has not been made generally available to the public. Information is considered "material" if it is likely that a reasonable investor would think it important in making an investment decision.

Here are some examples of information that might be considered inside information:

1. If a company is about to announce an increase or decrease in quarterly profits or dividends;
2. If a company is about to be acquired by or merged into another company; and
3. If a company is about to announce a significant change in senior management or in the company's strategic business plan.

If, through your employment at Heartland, you have material inside information about any company, including Heartland Financial USA, Inc., or its subsidiaries, you may not pass that information on to others, nor buy, sell or recommend the purchase or sale of that company's securities until the information has been made available to the public. The same restrictions apply if you are buying or selling a security in the course of your job responsibilities.

III. CUSTOMER/COMMUNITY RELATIONSHIPS

Heartland provides a variety of services on an equal basis to all. During your employment, you are expected to give customers efficient and courteous service at all times without expecting any reward other than your salary. You may not ask for or accept a gift from a customer or vendor. Gifts include substantial favors, money, credit, special discounts on goods or services, free goods or services, loans of goods or money, trips, hotel expenses, excessive entertainment and other similar items.

Additionally, each employee, officer and director of Heartland should endeavor to deal fairly with Heartland's customers, suppliers, competitors, officers and employees. Employees, officers and directors should not take unfair advantage of any other party through fraud, manipulation, concealment, abuse of privileged information, misrepresentation or omission of material facts or any other unfair practices.

A. Receipt of Gifts

1. In compliance with the Federal Bank Bribery Law, employees are prohibited from offering, soliciting or accepting anything, including gifts, of value in connection with any transaction or business with Heartland or its subsidiaries. Heartland employees are required to report to the Internal Auditor of Heartland, or the Compliance Officer of Heartland, the offer or acceptance of any gift in excess of \$100.00 i.e., tickets to sporting events, expensive liquor, personal items such as gift cards, candy or gift baskets, personal discounts or rebates. Employees may not accept gifts of cash. Reasonable entertainment, travel, advertising or promotional materials, or awards may be accepted, but must be reported. With respect to these limits, multiple gifts that would, if combined, total more than \$100.00 in value must be reported per these requirements.

2. Employees are advised of the critical importance of ensuring that anything of value accepted is a gift, and not any form of quid pro quo. Under the Federal Bank Bribery Law, if the improperly received amount exceeds \$100, , the offense is a felony punishable by up to five years imprisonment and a fine of \$5,000 or three times the value of the bribe or gratuity. If the value does not exceed \$100, the offense is a misdemeanor punishable by up to one year imprisonment and a maximum fine of \$1,000.

B. Gifts to Potential or Existing Customers and to Public Officials

1. It is the policy of Heartland that no individual representing any of the member banks or subsidiaries shall provide directly, or indirectly, any gratuity to any individual, company or governmental unit in consideration for doing business with us as a customer or supplier of equipment or services. In this context, normal business entertainment is appropriate, such as lunches, dinners, theater tickets, sporting events and the like, if of a reasonable nature.
2. Gifts shall be of modest value and shall be related to such events as promotions, embarking on a new job, weddings, anniversaries and the like.

C. Political Contributions and Corporate Payments

1. Various laws and regulations may prohibit or restrict Heartland or its subsidiaries from contributing corporate funds or property in support of a political party or a candidate for public office. Similarly, Heartland and its subsidiaries may not compensate employees for time dedicated to working for political parties or candidates. Questions as to the propriety of any action that may involve a political candidate or campaign should be discussed with the CEO, or his designee, before any steps are taken that may involve any employee or Heartland in possible violations of the law.
2. Expenses for travel and entertainment incurred on behalf of Heartland's member banks or subsidiaries should be ordinary and necessary to accomplish a business purpose and be documented in conformity with the established requirements for reimbursement.
3. Employees should be sensitive to criticism of the member banks and subsidiaries, or staff members, for self-dealing for personal advantage. Employees may purchase property or equipment from Heartland, or any of its subsidiaries, through the normal bidding process for equipment and through the established guidelines for consumer and mortgage loans.

D. Referring Customers Who Seek Advice Beyond the Scope of Heartland Services

1. In many cases, discussions with customers lead to a request that an employee make statements that may relate to the legality of a proposed transaction. Heartland's member banks and subsidiaries cannot practice law or give legal advice. Therefore, extreme care must be exercised in discussions with customers, and nothing should be said that might be interpreted as the giving of legal advice.
2. No employee shall provide a customer with advice on matters concerning tax issues, on the preparation of tax returns or on investment decisions except as may be necessary or appropriate in the performance of a fiduciary duty or as otherwise required in the ordinary course of his or her duties.

3. As a matter of policy, employees are not to recommend attorneys, accountants, insurance brokers, real estate agents and the like to customers unless they have been specifically instructed otherwise by their manager.

E. The Receipt of Bequests and Legacies

An employee who receives information relative to a bequest to himself or herself in excess of \$100 under the Will or Trust instrument of a customer of Heartland's member banks or subsidiaries (other than from a relative, including relatives by marriage), whether or not the member bank is the fiduciary named under such instrument, should promptly report the same, with a full account of the circumstances, to the CEO, or his designee.

F. Borrowing From Customers

Borrowing from an individual or business customer of Heartland must be avoided under all circumstances, not only because of the potential influence on the employee's judgment and decisions, but also because the grant or denial of such a request imposes an unreasonable conflict on the customer. Borrowing from other financial institutions and lending to employees of other financial institutions must be free of any reciprocity regarding terms or interest rates received or given.

IV. IMPROPER TRANSACTIONS

A. Sales of Goods, Services or Properties

To avoid the appearance of a conflict of interest, you, your Family Members and any Related Business may not sell goods, services or properties to Heartland or to Heartland's member banks or subsidiaries in a material amount without the prior approval of the Heartland Audit/Corporate Governance Committee. Unless approved in advance by the Audit/Corporate Governance Committee, you, your Family Members and any Related Business may not receive services from Heartland's member banks or subsidiaries if these services are not generally available upon the same or similar terms to other employees or to the public.

B. Credit Accommodations

Officers and employees may not directly or indirectly secure credit accommodations, make credit recommendations or extend any other financial benefit to or for:

1. Family Members;
2. Any individual or organization lending money to or employing the officer, employee or a family member; or

3. Any other organization in which the officer or employee, or a family member, has a material financial interest.

C. Business Transactions

No employee of Heartland's member banks or subsidiaries is allowed to process a business transaction on any account upon which the employee is directly or indirectly liable, including, but not limited to; deposit accounts, loan accounts, trust accounts, non-deposit accounts and insurance accounts. Additionally, no employee of Heartland's member banks or subsidiaries is allowed to process a business transaction for a member of his or her immediate family.

D. Corporate Opportunities

Employees, officers and directors are prohibited from:

1. Taking for themselves personally opportunities that properly belong to Heartland or that are discovered through the use of corporate property, information or position;
2. Using corporate property, information or position for personal gain; or
3. Competing with Heartland.

V. CONFLICTS OF INTEREST

It is a conflict of interest if you have an interest outside of work that interferes with your responsibilities to Heartland or affects your ability to perform your duties properly. There is a potential for conflict any time you have an outside interest.

Some examples of a conflict of interest include:

- owning a material financial interest in a competitor of Heartland or an entity that does business or seeks to do business with Heartland;
- being employed by, performing services for, serving as an officer of, or serving on the board of directors of any such entity;
- making an investment that could compromise your ability to perform your duties to Heartland; or
- having a Family Member who engages in any of the activities identified above.

You must avoid conflicts of interest and potential conflicts of interest. You must also avoid situations where there might be an appearance that there is, or could be, a conflict of interest. Employees, officers and directors who become aware of a conflict or the

appearance of a conflict should immediately present the situation to Heartland Human Resources or to the other individuals identified in Article VIII of this Code, as the situation merits.

A. Fiduciary Appointment

1. 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 a Heartland member bank customer (other than a Family Member) unless authorized by the Audit/Corporate Governance Committee.

2. Here are some examples of fiduciaries: An executor under a Will; an administrator or personal representative for an estate; a guardian or custodian for a minor, and a trustee under a trust.

B. Lending Relationships

1. Lending services are available to serve the legitimate and deserving credit needs of all customers on an equal basis. Loan terms and conditions shall be based upon a borrower's creditworthiness.

2. Lending officers and retail bankers are not permitted to extend credit to Family Members or Related Businesses. When approached by a Family Member or a Related Business, the underwriting, approval, document preparation, and loan closing should be referred to another associate so as to comply with the Code.

C. Business Affiliations

Employees should not have business affiliations, or commence or continue, any business relationships with outsiders that might, even by implication, cause embarrassment to themselves, or impair Heartland's best interests or public position. Employees are to avoid conflicts involving business opportunities that come to their attention as a result of their duties with Heartland. Periodically, a questionnaire, which deals with outside business affiliations, will be distributed to all employees to be completed and returned as instructed.

D. Board Directorships

Employees are encouraged to participate in appropriate professional groups and responsible civic organizations, provided that such participation does not interfere with their duties at Heartland and provided that such relationships would not be prohibited or limited because of statutory or administrative requirements regarding conflicts of interest.

E. Outside Employment

You may not accept outside employment unless such employment does not cause a conflict of interest or interfere with your job performance at Heartland.

F. Participation in Community Affairs

1. Heartland is committed to improving the quality of life in the communities in which it does business.
2. Heartland believes communities should be better off for its presence and strongly encourages employees to volunteer for civic, political and public affairs activities. While most volunteer activities take place after regular business hours, Heartland will support volunteer activity even if it requires a limited amount of company time or company resources such as paper, telephones or copy machines. Your manager's approval is needed if you use company time or resources.
3. Laws prohibit employees from using normal work time for activities related to local, state or national elections, or political conventions or caucuses. You are, however, encouraged to seek or accept part time public service jobs on, for example, school boards, municipal councils and public boards and commissions.
4. If conflicts of interest arise between a public position and Heartland's member banks or subsidiaries you must inform both Heartland and the public organization about the potential conflict and refrain from participating and voting on that issue. If conflicts of interest persistently arise, you must resign from the public position or from Heartland.

G. Directorships

1. Heartland is proud of its employees and their talents and skills. It is only natural for civic and community groups and private businesses to want Heartland employees to join their boards and executive offices.
2. You may accept election or appointment to public or civic commissions and to boards of nonprofit corporations so long as such acceptance does not create a conflict of interest or the appearance of a conflict of interest with Heartland.
3. Antitrust and banking laws prohibit certain interlocking corporate directorships and management positions. Therefore, all candidacies or appointments to business corporation boards must be approved in advance by the Audit/Corporate Governance Committee.
4. To avoid a potential conflict of interest, you may not, without approval of the CEO or designee, serve on an entity that:
 - a. Competes with Heartland's member banks or subsidiaries;
 - b. Is in substantial default to a member bank or subsidiary on a loan, contract or other obligation; or

c. Is involved in a substantial controversy or litigation with a Heartland member bank or subsidiary.

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

6. Please remember the time involved in these outside activities cannot interfere unreasonably with your normal work hours or job duties for Heartland.

H. Outside Compensation

You may retain all payments received for approved service on boards, commissions or offices unless the service is as a representative of Heartland at the request of Heartland. In those cases where you retain payments, any related expenses should be your responsibility.

VI. RELATIONSHIPS WITH COMPETITORS

In offering financial and other services, Heartland engages in vigorous, fair and open competition. If conducted on an ethical basis, this competition is healthy and helps to inform and serve customers.

As a representative of Heartland, you are expected to observe the highest standards of ethical conduct with our competitors. It is against Heartland policy to spread rumors or make harmful, negative statements about our competitors. You may not inform Heartland's competitors about any Heartland plan or proprietary information that is not known generally by the public.

A. Antitrust Compliance

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

2. It also is an antitrust violation to make "conditional" agreements with customers. Heartland 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 condition that:

a. The customer obtains additional credit, property or service other than a loan, deposit or trust service;

- b. The customer obtains any additional service from a Heartland subsidiary;
- c. The customer provide some additional service to Heartland's member banks or subsidiaries; or
- d. The customer not obtain some other service from a Heartland competitor.

VII. FINANCIAL REPORTING AND COMPLIANCE WITH CONTROLS

Employees, officers and directors must comply with all financial reporting and other regulatory requirements applicable to Heartland. All business transactions must be reported and disclosed in a manner consistent with generally accepted accounting principles of the United States. All employees, officers and directors must cooperate with and assist Heartland's internal and independent accountants in the performance of their duties to Heartland and must comply with all internal control procedures established by Heartland for the safeguarding of assets and proper reporting and disclosure of financial information.

It is of critical importance that Heartland complies with all of its regulatory disclosure obligations. Filings by Heartland with the Securities and Exchange Commission and other regulatory bodies must be accurate and timely. Depending on their position with Heartland, an employee, officer or director may be called upon to provide necessary information to ensure that Heartland's public reports are complete, fair and understandable. Heartland expects employees, officers and directors to take this responsibility very seriously and to provide prompt and accurate answers to inquiries related to Heartland's public disclosure requirements.

If any employee, officer or director of Heartland has concerns or complaints regarding questionable accounting or auditing matters of Heartland, including a failure to comply with internal controls of Heartland or to cooperate with Heartland's internal or independent auditors, then he or she should submit those concerns or complaints to the Audit/Corporate Governance Committee of the Board of Directors.

VIII. ADMINISTRATION/COMPLIANCE

A. Ethical conduct is essential at Heartland. We have a tradition of openness, integrity, honesty and fairness in business and personal conduct - a tradition that can continue only through your conduct.

B. Because ethical conduct is an individual obligation, Heartland holds you responsible for meeting your ethical obligations. You are expected to be familiar with Heartland's Code, and you are expected to abide by the letter and spirit of its provisions at all times. Violations of the Code may subject an employee to disciplinary action, up to and including termination.

C. If you become aware of a violation of this Code, or any law or regulation, please follow the instructions on the attached document, “Violation Reporting Procedure and Contact Information.” If the violation involves your manager, or if you are not comfortable discussing the violation with your manager, you may contact the Heartland Human Resources Department or any member of Heartland’s Audit/Corporate Governance Committee. As deemed necessary, the President and CEO of the Company are to be notified of reported violations within the Company, unless the violations relate to financial reporting or accounting improprieties or errors or if the perceived conflict of interest or violation involves the President and/or CEO. In these cases, employees should report the conflict or violation directly to Heartland’s Audit/Corporate Governance Committee.

Attached to this Code is a set of procedures for reporting potential violations of the Code. The attachment also contains contact information for the individuals at Heartland to whom violations should be reported. The information contained in the attachment may also be found at Heartland’s website at www.htlf.com.

D. Heartland will not permit retaliation of any kind by, or on behalf of, the Company by any of its employees, officers or directors against any individual reporting violations of this Code in good faith.

E. If you are a manager, you are responsible for making sure your employees receive and review a copy of this Code.

**HEARTLAND FINANCIAL USA, INC.
CODE OF BUSINESS CONDUCT AND ETHICS**

**VIOLATION REPORTING PROCEDURE
AND CONTACT INFORMATION**

**Approved by Heartland Financial USA, Board of Directors
October 15, 2013**

Heartland Financial USA, Inc. takes its ethical obligations seriously. It is important that Heartland employees take their ethical obligations seriously as well. It is also important that Heartland employees feel that they can report potential violations of Heartland's Code of Business Conduct and Ethics or other potential ethical violations discretely and without fear of reprisal. To that end, Heartland has established a set of procedures for its employees to report potential violations of the Code or other ethical concerns. Please review these procedures to determine how and to whom to report the type of potential violation you are reporting.

Conduct Related to the Code of Business Conduct and Ethics. Heartland's Code of Business Conduct and Ethics addresses the ethical and legal concerns that can arise in connection with employees' and directors' business dealings on behalf of or related to Heartland and its subsidiaries. For example, the Code explains that if an employee or director were to receive a gift in connection with any transaction or business with Heartland or its subsidiaries that could be a violation of both Heartland's Code of Business Conduct and Ethics and the Federal Bank Bribing Law. If an employee becomes aware of a violation of the Code, or any law or regulation, the employee should immediately contact the Heartland Human Resources Department toll free at 1-888-739-2100 or one of the members of Heartland's Audit/Corporate Governance Committee listed below.

Conduct Related to Financial Reporting and Accounting Matters. Violations of the Code and the law that relate to financial reporting or accounting improprieties or errors by any employee, or any perceived conflict of interest or self-dealing by any employee including the President and CEO, should be reported anonymously to Heartland's Audit/Corporate Governance Committee pursuant to the methods described below.

Conduct Related to Human Resources Matters. Unethical conduct that is of a human resources nature, such as sexual harassment, age or other prohibited discrimination or general inappropriate treatment of co-workers, is to be reported to Heartland's Human Resources Department. If the human resources violation involves Heartland's Human Resources Department itself, the matter should be reported directly to Heartland's President and CEO- Mr. Lynn Fuller at 563-589-2105 or lfuller@htlf.com. If the human resources violation involves the President and CEO himself, the matter should be reported to the Chairman of the Compensation/Nominating Committee of the Board- Thomas Flynn at 563-590-1220, or senatortom@aol.com.

Contact Information. If an employee is uncomfortable discussing a potential violation of the Code or Heartland’s ethical standards with the above-named individuals directly, the employee may report the potential violation in the following manner:

Anonymous Letter. An employee may send an anonymous letter to a post office box that Heartland has established for receiving reported violations of its Code of Business Conduct and Ethics and other ethical standards. The address is:

Heartland Financial USA, Inc.
Attn: Audit/Corporate Governance Committee
c/o Heartland Administration Department
P. O. Box 778
Dubuque, IA 52004-0778
(Mark correspondence “Confidential”)

An employee can also send an anonymous letter to Heartland’s Legal Department, Attention: Mike Coyle, EVP, Senior General Counsel, or to Lynn B. Fuller, President and CEO through the post office box identified above. In addition, an employee may contact them directly by email or phone at:

Mike Coyle
Heartland Financial USA, Inc.
Email: mcoyle@htlf.com
Phone: 563-587-4096

Lynn B. Fuller
Heartland Financial USA, Inc.
Email: lfuller@htlf.com
Phone: 563-589-2105

Direct Contact with Audit/Corporate Governance Committee Members. An employee may contact the following members of Heartland’s Audit and Corporate Governance Committee directly at the email addresses and telephone numbers below:

Mark C. Falb
E-mail: mfalb@kendallhunt.com
Office phone: 563-589-1200

Thomas L. Flynn
E-mail: senatortom@aol.com
Office phone: 563-557-7877

An employee can log on to the Heartland Financial USA, Inc. website at www.htfl.com. By clicking on the button entitled “Investor Relations” from the homepage, the employee will be redirected to another page that gives them the option to send a confidential e-mail to a member or members of the Heartland Audit/Corporate Governance Committee as named above. **However, Heartland cannot guarantee that the employee’s identity will be kept completely confidential under this method.**

An employee's report will be taken seriously by the individual contacted and by Heartland Financial USA, Inc. Recipients of all complaints will keep a record of all communications received and will address the matters reported through the proper channels. Heartland encourages its employees to report violations of its Code of Business Conduct and Ethics or other ethical violations and to live up to their ethical responsibilities as Heartland employees. If employees have any additional questions regarding these reporting procedures, they may contact Mike Coyle at the address above.

Approved July 19, 2005

Updated December 31, 2012 (changed phone contact of Tom Flynn)

Updated October 15, 2013 to change contact from Lois Pearce to Mike Coyle.

Updated October 15, 2016 noting no changes.

Updated October 18, 2017 noting no changes.