

INSIDER TRADING AND CONFIDENTIALITY POLICY APPLICABLE TO ALL EMPLOYEES

As approved October 29, 2015

It is the policy of West Corporation (“West” or the “Company”) to comply with all applicable federal and state rules and regulations governing insider trading.

Insider Trading Prohibitions

In the interest of prudence and to preserve the public image and integrity of West Corporation, West’s Board of Directors has adopted this Insider Trading and Confidentiality Policy for our directors, officers and employees with respect to the trading of the Company’s securities, as well as the securities of publicly traded companies with whom West has a business relationship. Federal and state securities laws prohibit any employee, regardless of title or rank, buying or selling any securities of the Company on the basis of material information regarding the Company that is not known to the general public. It is also illegal for a person with material, non-public information to reveal that information to others for use in the trading of securities or otherwise. This conduct is frequently referred to as “insider trading.”

West Corporation forbids any officer, director or employee from communicating material, non-public information about the Company to others in violation of the law. The Company also forbids any officer, director or employee from trading securities of the Company, either personally or on behalf of others, while aware of material, non-public information regarding the Company.

It can be difficult to determine whether information is material for purposes of the securities laws. The general test for materiality is whether a reasonable investor would consider it important in deciding whether to buy, hold or sell a security. Both positive and negative information can be material. Because trading that receives scrutiny will be evaluated after the fact with the benefit of hindsight, questions concerning the materiality of particular information should be resolved in favor of materiality, and trading should be avoided.

Information is non-public until it has been effectively communicated to the marketplace and reflected in trading prices. Any material information relating to the Company which has not yet been made public by press release or otherwise for at least one full business day is considered “non-public.” Material information which has not yet been publicly disseminated continues to be a proprietary asset of the Company. Maintaining the confidentiality of Company information is essential for competitive, security and other business reasons, as well as to comply with the securities laws.

Prohibition Against Speculative Trading and Derivatives on West Securities

The Company considers it improper and inappropriate for those employed by the Company or a director on the Company’s Board of Directors to engage in short-term or speculative transactions in the Company’s securities or in other transactions in the Company’s securities

that may lead to inadvertent violations of the insider trading laws. In addition, hedging transactions may insulate you from upside or downside price movement in the Company's stock which can result in the perception that you no longer have the same interests as the Company's other stockholders. Accordingly, you may not enter into hedging or monetization transactions or similar arrangements with respect to the Company's stock, including the purchase or sale of puts or calls or the use of any other derivative instruments.

Margin Accounts and Pledging

Securities held in a margin account or pledged as collateral for a loan may be sold without your consent by the broker if you fail to meet a margin call or by the lender in foreclosure if you default on the loan. A margin or foreclosure sale that occurs when you are aware of material nonpublic information may, under some circumstances, result in unlawful insider trading. Because of this danger, you may not hold Company securities in a margin account nor pledge Company securities as collateral for a loan.

Caution Regarding Trading In Securities of Clients, Vendors, Targets and Entities in Which Substantial Transactions are Contemplated.

Whenever you receive information about a company other than West which you know or have reason to believe is directly or indirectly attributable to West or which was obtained in the course of your employment with West, you must determine that the information is public before trading or recommending trading on the basis of such information or before divulging such information to any person. If you have any question as to whether the information is material or whether it is inside information and not public, you must resolve the question or questions with the General Counsel's Office before trading, recommending trading or divulging the information. Non-public information learned as a result of your employment belongs to your employer and you are not entitled to use it to profit whether you trade in your employer's securities or another company's securities.

Persons who violate these prohibitions are subject to potential civil and criminal penalties which do not depend on whether you personally benefited from the trade. The Securities and Exchange Commission ("SEC") is increasingly seeking stiffer penalties and continues the trend of coordinating its activities with the Department of Justice. Potential penalties for insider trading violations include imprisonment for up to 20 years, criminal fines of up to \$5 Million, and civil fines of up to three times the profit gained or loss avoided. In addition, the SEC has the power to bar persons found to have conducted insider trading from serving as a director or officer of any publicly held company. Accordingly, even a civil insider trading case can severely limit an executive's career.

The West General Counsel's Office should be consulted whenever any questions arise concerning the possession of material inside information and also if you have suspicion of possible insider trading by anyone. Under a "controlling persons" theory, civil penalties can extend personal liability to the Company's directors, officers and other supervisory personnel if they fail to take appropriate steps to prevent insider trading. Good judgment is imperative, and consulting with counsel about any questionable activities or violations of the Company's ethics policies will help prevent infractions and unfavorable ramifications. If you have any unresolved questions as to the applicability or interpretation of the foregoing standards or the

propriety of any desired action, the matter must be discussed with the Office of the General Counsel prior to trading or recommending trading.

Blackout Periods and Pre-Clearance

To help prevent inadvertent violations of the federal securities laws and to avoid even the appearance of trading on the basis of inside information, the Company has designated certain individuals who, because of their position or the information they may receive, are subject to blackout periods and/or pre-clearance requirements. A blackout period is a period of time when trading in West's securities is not permitted even if the person is not in possession of insider information. In addition, some individuals will be required to get pre-clearance from the General Counsel (or his designee) of all trades regardless of when trading (even during an open window period).

If you are subject to the blackout period or pre-clearance requirements, the Company will notify you.

Confidentiality Reminder

Any employee who possesses confidential information has an important responsibility to keep that information confidential within the Company until it is made public. Consistent with the foregoing, all internal Company matters or developments relating to the Company or its customers are confidential. Such information should be divulged within the Company only to persons who have a need to know in order to carry out their job responsibilities, and should not be discussed with family, relatives, or business or social acquaintances. Similarly, you should be discreet with this information and not discuss Company matters in places where it can be overheard, such as elevators, restaurants, taxis and airplanes.

This prohibition also applies to inquiries about the Company made by the press, investment analysts or others in the financial community, including security holders. It is important that all such communications on behalf of the Company be made only through authorized individuals. If you receive any inquiries of this nature, you should decline comment and refer the inquirer directly to the West Investor Relation's Office.

These are matters that the Company takes very seriously, and, accordingly, violations of these policies and procedures may result in disciplinary actions, including the possibility of dismissal. This policy is designed to prevent insider trading or allegations of insider trading, and to protect the Company's reputation for integrity and ethical conduct. It is your obligation to understand and comply with this policy. If you have any doubts as to your responsibilities under this Statement of Policy, seek clarification and guidance from the General Counsel's Office before you act. Do not try to resolve uncertainties on your own, as the rules relating to insider trading are often complex, not always intuitive and carry severe consequences.