

Item 5.05. Amendments to the Registrant’s Code of Ethics, or Waiver of a Provision of the Code of Ethics.

On October 2, 2006, Zions Bancorporation (“Zions”) made effective a new Code of Business Conduct and Ethics that applies to Zions’ officers and employees, including its principal executive officer, principal financial officer and principal accounting officer by posting the new code on Zions internal intranet site. The new code will be posted to Zions’ public website in the near future. The new code addresses, among other things, honesty, respect for others, conflicts of interest, compliance with laws, regulations and policies, including disclosure requirements under the federal securities laws, speaking up and administration of standards. Each of these topics was also covered by Zions’ prior code of business conduct and ethics.

Item 9.01 Financial Statements and Exhibits

(d) Exhibits:

Exhibit 14. 0 Code of Ethics

Zions Bancorporation

Date: October 6, 2006

By: /s/ Thomas E. Laursen

Executive Vice President
and General Counsel