

Cullen/Frost Bankers, Inc. ("CFBI") and its affiliates are committed to providing a workplace free from all forms of unlawful discrimination and harassment. Accordingly, CFBI will not tolerate any form of harassment, or any conduct that may create or lead to a hostile work environment, including intimidation or hostility toward an individual based on that person's sex, sexual orientation, gender identity, age, race, color, national origin, religion, disability, genetic information, military or veteran status, or any other characteristic protected by law. Harassment of any sort, whether verbal, physical, visual or otherwise, is strictly prohibited where such conduct:

- a) has the purpose or effect of creating an intimidating, hostile or offensive work environment, or could lead to a hostile work environment; or
- b) has the purpose or effect of unreasonably interfering with an individual's work performance; or
- c) otherwise adversely affects an individual's employment opportunities.

While all forms of harassment as set forth above are prohibited, CFBI further stresses its commitment to provide a work environment free of sexual harassment. No supervisor, manager, or other employee shall threaten, suggest or imply, directly or indirectly, that submission to or rejection of unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature will in any way affect an individual's employment or employment opportunities with CFBI. Unwelcome conduct of a sexual nature is strictly prohibited and will be grounds for disciplinary action up to and including immediate termination of employment.

Examples of harassing behavior, both sexual and other, constituting prohibited conduct includes, but is not limited to, the following:

- a) Unwelcome sexual flirtations, advances or propositions;
- b) Verbal abuse of a sexual nature, sexually related comments and joking, graphic or degrading comments about a person's physical appearance or body;
- c) Uninvited and unwelcome physical contact or touching such as patting, pinching, brushing against another's body, impeding, blocking or other physical interference with a person's normal work or movement;
- d) Verbal harassment regarding a person's sex, sexual orientation, gender identity, age, race, color, national origin, religion, disability, genetic information, military or veteran status, or any other characteristic protected by law, such as, but not limited to, epithets, slurs, derogatory comments, negative stereotyping, gestures, jokes or forms of address;
- e) Threatening, intimidating, or hostile acts, that relate to a person's sex, sexual orientation, gender identity, age, race, color, national origin, religion, disability, genetic information, military or veteran status, or any other characteristic protect by law;
- f) Visual forms of harassment including written or graphic material that denigrates or shows hostility or aversion toward a person or group because of sex, sexual orientation, gender identity, age, race, color, national origin, religion, disability, genetic information, military or veteran status, or any other characteristic protected by law, such as derogatory posters, sexually oriented cartoons,

pictures, drawings or the display of sexually suggestive objects or pictures on the premises; and

- g) Undesirable work assignments due to a person's sex, sexual orientation, gender identity, age, race, color, national origin, religion, disability, genetic information, military or veteran status, or any other characteristic protected by law.

Every employee of CFBI has a right to expect a workplace free of such conduct, and no person's employment, advancement, salary, evaluation, duties, hours or other conditions of employment will be affected because he or she refuses to submit to or tolerate such conduct.

It is the policy of CFBI that all employees are responsible for assuring that the workplace is free from discrimination and harassment, specifically including sexual harassment. CFBI will not condone such conduct under any circumstances. Any employee who feels that he or she is being discriminated against, sexually harassed or harassed in any manner by a supervisor, manager, co-worker, visitor, or other person, or who believes they have witnessed such conduct, should immediately bring the problem to the attention of responsible CFBI management. Employees may bring their complaints to their supervisors, department heads, or the Human Resources Department. If the complaint involves someone in the employee's direct line of command, the employee is encouraged to go to the Human Resources Department.

No employee will suffer retaliation or discrimination as a result of making a complaint of discriminatory harassment or any other illegal discrimination. All complaints of discrimination or harassment will be investigated promptly and, to the extent possible, confidentially, and CFBI will take appropriate action to stop and remedy any violations of this policy. Any person found in violation of this policy is subject to disciplinary action, including termination of employment.

Failure of a manager or supervisor to report allegations of discrimination or harassment will lead to disciplinary action if it is determined that the manager or supervisor had knowledge but did not report the information to appropriate CFBI management.

Any questions concerning the scope of this policy or its enforcement should be directed to the Human Resources Department.