



EQUAL EMPLOYMENT OPPORTUNITY POLICY

To provide equal employment and advancement opportunities to all individuals, employment decisions at Cullen/Frost Bankers, Inc. and its affiliates will be based on merit, qualifications, and abilities. CFBI and its affiliates do not discriminate in employment opportunities or practices on the basis of race, color, religion, sex (including pregnancy, childbirth or related medical conditions), sexual orientation, gender identity, national origin, ancestry, age, disability, veteran status, or any other characteristic protected by law.

CFBI and its affiliates will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship. CFBI and its affiliates prohibit harassment of any individual on the basis of any characteristic listed above. For information regarding CFBI and its affiliates' internal policies for addressing complaints of harassment, please refer to the Policy on Harassment of CFBI and its affiliates.

This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training.

Any employee with questions or concerns about any type of discrimination in the workplace is encouraged to bring these issues to the attention of his or her immediate supervisor or the Regional HR Manager. Employees can raise concerns and make reports without fear of reprisal, harassment, intimidation, threats, coercion, or discrimination because they: (1) file a complaint with their employer or with federal, state, or local agencies; (2) assist or participate in any investigation, compliance review, hearing, or any other activity related to the administration of any federal, state or local equal employment opportunity or affirmative action statute; (3) oppose any act or practice made unlawful by federal, state or local law requiring equal employment opportunity or affirmative action; or (4) exercise any other employment right protected by federal, state or local law or its implementing regulations.

CFBI and its affiliates maintain an audit and reporting system to determine overall compliance with its equal employment opportunity mandates and to respond to any specific complaints applicants or employees file with the corporate equal employment opportunity office. Overall responsibility for the implementation of equal employment opportunity programs and for affirmative action compliance activities is assigned to the Human Resources Technology & Compliance Manager.

CFBI's covered affiliates have in place affirmative action plans for individuals with disabilities and covered veterans. A copy of the plans are on file with the Regional HR Office, and are available for review by any applicant or employee during regular business hours.

Phillip D. Green
Chairman of the Board