EQUAL EMPLOYMENT OPPORTUNITY POLICY

Texas Capital Bancshares, Inc., Texas Capital Bank, N.A., and BankDirect Capital Finance, LLC (the “Companies”) are committed to providing positive business and personnel practices designed to promote equal employment opportunity for job applicants and employees without regard to age, race, color, religion, qualifying disability, sexual orientation, gender, gender identity, gender expression, national origin, U.S. military obligation or protected veteran status, marital status, pregnancy, genetic information or any other legally protected category.

To implement this policy, the Companies will continue to:

- Recruit, hire, develop and promote individuals in all job classifications in accordance with this equal opportunity policy;
- Make selection decisions according to the principles of equal opportunity by using job-related and non-discriminatory job requirements; and
- Ensure that all personnel practices and programs including, but not limited to, compensation, benefits, transfers, training, job assignments, performance management, and terminations of employment will be administered without regard to the protected categories listed above.

All officers, directors, managers, and supervisors are responsible for the implementation of our equal employment opportunity policy.

Through these individuals and with your help, the Companies are committed to providing a work environment that supports these principles in our daily actions. Individuals who engage in conduct that violates this policy will be subject to corrective action, up to and including termination of employment. An employee who is impacted by or observes a potential violation of this policy should report it to his or her supervisor, Human Resources, or another member of management. The Companies prohibit retaliation of any kind against individuals who have made good faith reports or complaints of violations or possible violations of this policy. The following employee resources are also available to report a concern:

- Human Resources at 866-513-9692; select Option 4
- Anonymous Employee Hotline at 877-776-0996
- Anonymous Employee Website at https://tcbi.alertline.com
- For employees in Maine – Maine Human Rights Commission at www.maine.gov/mhrc
- California Department of Fair Employment and Housing at www.dfeh.ca.gov

If you have questions regarding this policy, feel free to contact Human Resources at hr@texascapitalbank.com.

Updated January 2019