CULLEN/FROST BANKERS, INC.
RISK COMMITTEE CHARTER

(Amended and Restated as of November 12, 2026)

I. COMMITTEE MEMBERSHIP

The Risk Committee (the "Committee") of the Board of Directors (the "Board") of Cullen/Frost Bankers, Inc. and Frost Bank (collectively, the "Company") shall be comprised of four or more directors, a majority of whom the Board has affirmatively determined are "independent" under the then-existing rules of the Texas Stock Exchange ("TXSE") and the Sarbanes-Oxley Act of 2002 and the rules of the Securities and Exchange Commission (the "SEC") promulgated thereunder, the Dodd-Frank Wall Street Reform and Consumer Protection Act and the rules of the Board of Governors of the Federal Reserve System promulgated thereunder, and other applicable law and regulation (each such independent director, an "Independent Director"). At least one member shall have experience in identifying, assessing, and managing risk exposure of large, complex firms.

The members of the Committee (as used herein, "Members") shall be appointed by the Board. Members shall serve at the pleasure of the Board and for such term or terms as the Board may determine. Upon the expiration or termination of the term of any Member, and in accordance with the first paragraph above, the Board may appoint a successor thereto, as necessary.

The Board shall appoint one Member of the Committee to serve as its chairperson (the "Chairman"). The Chairman will be a director who (a) is not an officer or employee of the Company; (b) has not been an officer or employee of the Company during the past three (3) years; (c) is not a member of the "immediate family" (as defined by Regulation Y) of a person who is, or has been within the last three (3) years, an "executive officer" of the Company (as defined by Regulation O); and (d) qualifies as an "independent director" under the then-existing rules of the TXSE.

The Committee may invite such members of management of the Company ("Management") to its meetings as it may deem desirable or appropriate.

II. COMMITTEE STRUCTURE AND OPERATIONS

The Committee shall meet as often as it determines necessary, but not less frequently than quarterly. The Chairman may convene special meetings of the Committee. The Committee shall also meet separately with the Chief Risk Officer, Chief Credit Officer, and other members of Management as often as it determines necessary.

Members of the Committee may participate in a meeting of the Committee by means of conference call, videoconference, or other communications equipment by means of which all persons participating in the meeting can hear each other. Participation in a meeting by means of conference call, videoconference, or such other communication

equipment shall constitute attendance at such meeting. A quorum of any meeting will be met when a majority of the Members are in attendance, provided that a majority of such attendees are Independent Directors. Minutes of all Committee meetings will document risk management decisions and be maintained.

III. PURPOSE OF THE COMMITTEE

The purpose of the Committee is to assist the Board in its oversight of Cullen/Frost's long-term strategy development and implementation, exercise of fiduciary duties, and enterprise-wide risk-management framework, including processes established to identify, assess, monitor, manage, and report material risks to the Company. The Committee provides active oversight and independent challenge of management's risk-related decisions, practices, and reporting, and monitors whether the Company's risk profile remains consistent with its approved risk appetite, strategic objectives, capital strength, financial condition, and safety and soundness.

The Committee promotes a strong risk culture and provides oversight of the governance structures, policies, and practices designed to support effective risk management, regulatory compliance, and informed decision-making throughout the Company. Included in this oversight is an assessment whether risk types and levels are congruent with the Company's mission, culture, and values.

IV. DUTIES AND RESPONSIBILITIES OF THE COMMITTEE

To carry out its purposes, the Committee shall have the following duties and responsibilities:

1. Oversee the Company's enterprise-wide risk governance and risk management framework, including:

    a. Annually review and approve the risk governance framework.

    b. Establish and oversee risk appetite and Board-level metrics.

    c. Ensure the risk profile remains consistent with risk appetite and short and long-term strategy.

2. Receive and review regular reports, meeting minutes, presentations, and other information regarding the direction, quantity, and management of risk, including:

    a. Consideration of significant current and emerging risks;

    b. The adequacy of risk management processes, capabilities, reporting, and resources; and,

c. The overall effectiveness of the risk management process, including the transparency and escalation of significant risk issues.

3. Review reports of the Company's overall risk profile, including input from the independent auditor, and assess whether the profile is congruent with the Company's mission, culture, and values.

4. Perform the following actions, specifically related to credit risk:

   a. Review and approve material additions, changes, and amendments that affect the underwriting standards of Frost Bank's Credit Policy, as recommended by Frost Bank's Credit Policy Committee.

   b. Review material modifications to Frost Bank's Credit Policy that are a result of changes to applicable laws, rules, or regulations.

   c. Review, from a strategic viewpoint, loan portfolio trends, quality, composition, and outlook.

   d. Review loan portfolio metrics.

   e. Review and discuss risks associated with counter-party exposures related to interest rate swaps, commodity hedging activities, fed fund sales, and deposit relationships.

   f. Review significant matters arising from the internal examination of any loan portfolio or lending unit.

   g. At least annually, or when significant changes are made, approve the risk-based internal loan review examination plan, including scope and sampling methodologies.

   h. At least annually, review and approve Concentrations of Credit.

   i. Review and recommend, at least annually, extensions of credit to Directors of the Company and its subsidiaries whose borrowings must comply with the Financial Institutions Regulatory and Interest Rate Control Act of 1978 (FIRA). All extensions must be recommended to the Board for final approval.

   j. Review and recommend, from time to time, limitations and restrictions on extensions of credit to officers (who are non-Directors) of the Company and its subsidiaries whose borrowings must comply with applicable law and applicable

regulations. Any limitations and restrictions on such extensions must be recommended to the Board for final approval.

5. Perform the following actions, specifically related to interest rate and liquidity risk:

    a. Review and discuss key risk indicators relating to net interest margin, economic value of equity, and liquidity coverage.

    b. Review with management the results of stress tests conducted by the Company, including methodologies and significant assumptions.

6. Perform the following actions, specifically related to operational risk:

    a. Review and discuss issues and reports relating to information security risk, including program maturity, risk assessment, significant incidents, and emerging threats or trends.

    b. Review and discuss issues and reports relating to third-party risk, including program maturity, significant incidents, and emerging threats or trends.

    c. Review and discuss issues and reports relating to model risk, including model performance issues and aggregate model risk.

    d. Review and discuss issues and reports relating to business disruption risk, including program maturity, significant incidents, and emerging threats or trends.

7. Perform the following actions, specifically related to compliance and regulatory risk:

    a. Review and discuss issues and reports relating to compliance risk, including results of regulatory examinations, ongoing monitoring and testing, risk assessment, information regarding identified compliance risk issues, and customer complaints trends.

    b. Review and discuss issues and reports relating to fair lending risk, including results of statistical testing and analyses, risk assessment output and updates, and information regarding other identified fair lending risk issues.

8. Discuss significant legal matters that may have a material impact on the Company.

9. Review and discuss initiatives supporting the achievement of strategic priorities.

10. Review and approve changes to company policies for which the Committee has been assigned responsibility.

11. Review the experience, stature, authority, and seniority of the Company's senior level risk management officers, including the Chief Risk Officer and Chief Credit Officer.

12. Review the independence, authority, and adequacy of the Company's risk management function, including any scope, budget, or resource constraints that may impact or limit execution of the risk management program.

13. Perform such other duties and responsibilities as may be directed by the Board or required by applicable laws, rules, and regulations.

14. Present a summary of the significant actions taken at each Committee meeting to the Board.

V. DELEGATION TO SUBCOMMITTEE

The Committee may, in its discretion, delegate all or a portion of its duties and responsibilities to a subcommittee of the Committee.

VI. PERFORMANCE EVALUATION

The Committee shall assist in the preparation of an annual performance evaluation of the Committee, which shall be conducted in accordance with the procedures established by the Corporate Governance and Nominating Committee. The performance evaluation must compare the performance of the Committee with the requirements of this Charter, and it should also recommend to the Board any improvements to this Charter deemed necessary or desirable by the Committee.

VII. RESOURCES AND AUTHORITY OF THE COMMITTEE

The Committee shall have the resources and authority appropriate to discharge its duties and responsibilities, including the authority to select, retain, terminate, and approve the fees and other retention terms of legal, accounting, or other experts and advisors as it deems necessary or appropriate, without seeking approval of the Board or Management.

The Company shall provide for appropriate funding, as determined by the Committee, in its capacity as a committee of the Board, for payment of:

1. Compensation of any experts and advisors employed by the Committee; and

2. Ordinary administrative expenses of the Committee that are necessary or appropriate in performing its duties.