

Equal Employment Opportunity and Affirmative Action Statement of Policy

The Bank has long pursued a policy of equal employment opportunity. The Bank feels very strongly that equal employment opportunity is not only a legal and economic necessity, but also an extension of our desire to fulfill the citizenship role of the Bank. A successful Affirmative Action Program requires not only aggressive, ambitious goal setting programs, but also the tangible evidence of measurable results.

It is the policy of the Bank to hire well-qualified people to perform the many tasks necessary in providing high quality products and services at a reasonable cost. An integral part of this policy is to provide equal employment opportunity for all persons by administering recruitment, hiring, training, promotion, compensation, benefits and privileges of employment, appointments for advancement (including upgrading and promotion), transfers, relocations, social and recreation programs, and terminations of employment (including layoffs and recalls) for all associates without discrimination because of race, color, religion, national origin, sex, age, disability, protected veteran status, sexual orientation, gender identity, genetic information, military membership, application, or obligation, or any other legally protected status.¹ To further the principle of equal employment opportunity, all employment decisions of the Bank are based only on valid job-related requirements.

The Bank will not discriminate or take adverse action against any individual who is a member, or who applies to become a member, of a uniformed service, performs or applies to perform uniformed service, or has an obligation to perform uniformed service. "Uniformed Service" for purposes of this policy includes active duty, active duty for training, initial active duty for training, inactive duty training, and full-time National Guard duty. The Bank will not deny such an individual initial employment, reemployment, retention in employment, promotion, or any other benefit on the basis of this protected status.

The Bank will not discharge or in any other manner discriminate against associates or applicants who inquire about, discuss, or disclose their own pay or the pay of another associate or applicant. However, associates who have access to the compensation information of other associates or applicants as a part of their essential job functions cannot disclose the pay of other associates or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is: (a) in response to a formal complaint or charge; (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the Bank; or (c) consistent with the Bank's legal duty to furnish information.

Harassment, retaliation, coercion, interference, or intimidation of an associate due to an associate's race, color, religion, national origin, sex, age, disability, protected veteran status, sexual orientation, gender identity, genetic information, military membership, application, or obligation, or other legally protected status is strictly forbidden. Such activity should be reported to an associate's manager, the Human Resources Consultant, the Human Resources Compliance and Diversity Manager, or the Chief Human Resources Officer immediately. Every associate at the Bank is responsible for furthering the implementation of this policy.

Associates and applicants shall not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in, or may engage in, any of the following activities:

- Filing a complaint.
- Assisting or participating in an investigation, compliance review/evaluation, proceeding, hearing, or any other activity relating to the enforcement of Title VII of the Civil Rights Act of 1964 ("Title VII") or the administration of section 503 of the Rehabilitation Act of 1973, as amended ("section 503"), the affirmative action provisions of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended ("VEVRAA"), or any other federal, state, or local law requiring equal opportunity for disabled persons or protected veterans.
- Opposing any act or practice made unlawful by Title VII, section 503, VEVRAA, or their implementing regulations, or any other federal, state, or local law requiring equal opportunity for disabled persons or protected veterans.
- Exercising any other right protected by Title VII, section 503, VEVRAA, or their implementing regulations.

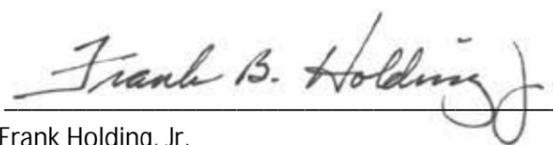
As Chairman and Chief Executive Officer of First Citizens Bank, I fully support our Affirmative Action Program and I am committed to the implementation of the Bank's Equal Employment Opportunity and Affirmative Action Policy. To accomplish these aims, I have designated specific accountability to the Chief Human Resources Officer for the administration of the Bank's Equal Employment Opportunity Policy and Affirmative Action Program. Management of the Bank will be held accountable for achieving the Affirmative Action Program placement goals set forth for their areas.

A detailed system to audit, report, and monitor the achievements and goal attainment set forth in the Bank's Affirmative Action Program has been established and results will be reported to the top management of the Bank on at least an annual basis. The Bank and its management intend to further the principles of affirmative action and equal opportunity so full utilization of our minority and female workforce may be achieved, and so the skills offered by qualified individuals with disabilities and protected veterans in the workforce are maximized within the Bank.

Every management level associate of the Bank is responsible for encouraging and increasing employment opportunities for minorities, females, individuals with disabilities, and protected veterans in the workforce and maintaining an atmosphere conducive to a civil and professional workplace through practices and personal example. All management staff shall take an active and/or supportive role in both the planning and implementation of the Bank's Affirmative Action Program.

The non-confidential portion of the Bank's Affirmative Action Program for Individuals with Disabilities and Protected Veterans is available for inspection by any associate or applicant for employment upon request. The Program may be reviewed during the Bank's normal business hours. Please contact Human Resources to schedule an appointment to review the Program.

For further information, contact your Human Resources Consultant or Corporate Human Resources Compliance and Diversity Division.



Frank Holding, Jr.
Chairman and Chief Executive Officer

¹ In California, additional protected categories include: religious creed, ancestry, medical conditions, marital status, gender, and gender expression.