

BBVA

Whistleblowing

Channel

2017 Information

The Whistleblowing Channel forms an essential part of BBVA's compliance system, as one of the processes established to guarantee the effective application of the procedures and standards of the Code of Conduct. The channel is also a resource to assist in reporting transgressions that are observed or which are reported by team members, customers, suppliers or colleagues. Communication through this channel includes, but shall not be limited to, reporting suspicious illegal conduct or professionally unethical conduct

The Compliance department will process all reports they receive carefully and promptly, ensuring that they are investigated and providing the resources to ensure that they are resolved, in accordance with the Whistleblowing Channel management procedures. Information will be analyzed objectively, impartially and confidentially. The identity of the person reporting it will be kept confidential. The information will be made known only to those departments whose cooperation is necessary for the process of investigation, to avoid compromising the result of the investigation or the good name of any persons affected by it. The result of the investigation will be advised to the departments which need to take appropriate measures to mitigate or correct the transgression, as well as to the person being reported and the reporter, as appropriate.

Whoever in good faith lodges a complaint with the channel will not be the object of reprisal nor suffer any other adverse consequences as a result of having done so.

The channel is open 24 hours a day, 365 days a year, also to Group suppliers.

A total of 1,820 complaints were filed in 2017 through the channel concerning the following areas:

- Conduct with customers (5.1%)
- Conduct with colleagues (45.4%)
- Conduct with the company (39.8%)
- Conduct with society (3.7%)
- Other (6%)

Some 32.1% of the complaints processed resulted in disciplinary action.