

BBVA Compass

2015 Responsible Banking Report



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Executive Summary

This is BBVA Compass' eighth annual corporate responsibility report. It reflects the organization's commitment to social, environmental and governance performance during calendar year 2015. The BBVA Compass Responsible Banking Report focuses on priority issues for both the company and our stakeholders. This report has been prepared in accordance with Global Reporting Initiative (GRI) G4 at a core level.

Letter from the U.S. Country Manager and BBVA Compass Chairman and CEO



Dear Stakeholder,

When we made our commitment in late 2014 to invest \$11 billion toward lifting low- to moderate-income people and neighborhoods over the next five years, we put the full force of our creative energy behind the effort. It paid off. BBVA Compass put 5,427 families into new homes and 24,019 small businesses on firmer capital footing during 2015, the first full year of our commitment. And now we have legions of families and small businesses out there who know what we've always known to be true – they can count on BBVA Compass.

One of the things I'm most proud of is that we didn't wait for people to come to us. We went to them, and we're going to continue to go to them on their terms because we're immersed in finding ways to better reach the people who need us most. We're not just reaching them, though, we're empowering them by giving them access to the products and services they need to build brighter futures for themselves.

We put more ATMs in low- to moderate-income, or LMI, neighborhoods – and not just ATMs that dispense cash, but full-service ATMs that give people remote-video access to financial advisors so they can get the help they need to make the smartest decisions. Our prepaid cards don't just allow people to load money. We gave our prepaid clients a budgeting app and real-time alerts so they can track and manage their spending. Our HOME mortgage,

which allows qualifying borrowers to finance up to 100 percent of a home's value, helps LMI borrowers overcome one of the most significant barriers to homeownership – saving enough cash to cover down payment and closing costs.

We've also set up a 19-member community advisory board of some of the most connected, sharpest minds to give us a catbird seat on the issues affecting LMI neighborhoods. If there's a need, we want to hear about it first. Our employees also keep their ears to the ground, and gave 100,000 hours of their time to building their communities last year.

We've dedicated more than \$2.5 billion overall in our efforts so far, with \$819 million in mortgage loans to LMI households and areas, \$1.1 billion in small-business loans, \$457 million in community development lending, and \$205 million in community development investments. And that's important. But what's even more important is that as we reimagine ourselves as a bank of the future, we're putting LMI individuals and areas squarely in the center of our equation.

We know that the digital transformation that's making us one of the more influential banks is also going to make us a better bank for LMI individuals. Our research has found that technology – access to the internet, to smartphones and other mobile devices – is a key factor in whether a community boasts high levels of financial inclusion. In fact, internet access matters more than someone's race or education level. If people have access to the internet, then they can rely on the traditional banking system and don't have to turn to payday lenders. They can earn interest on their savings. They can plan for a brighter tomorrow.

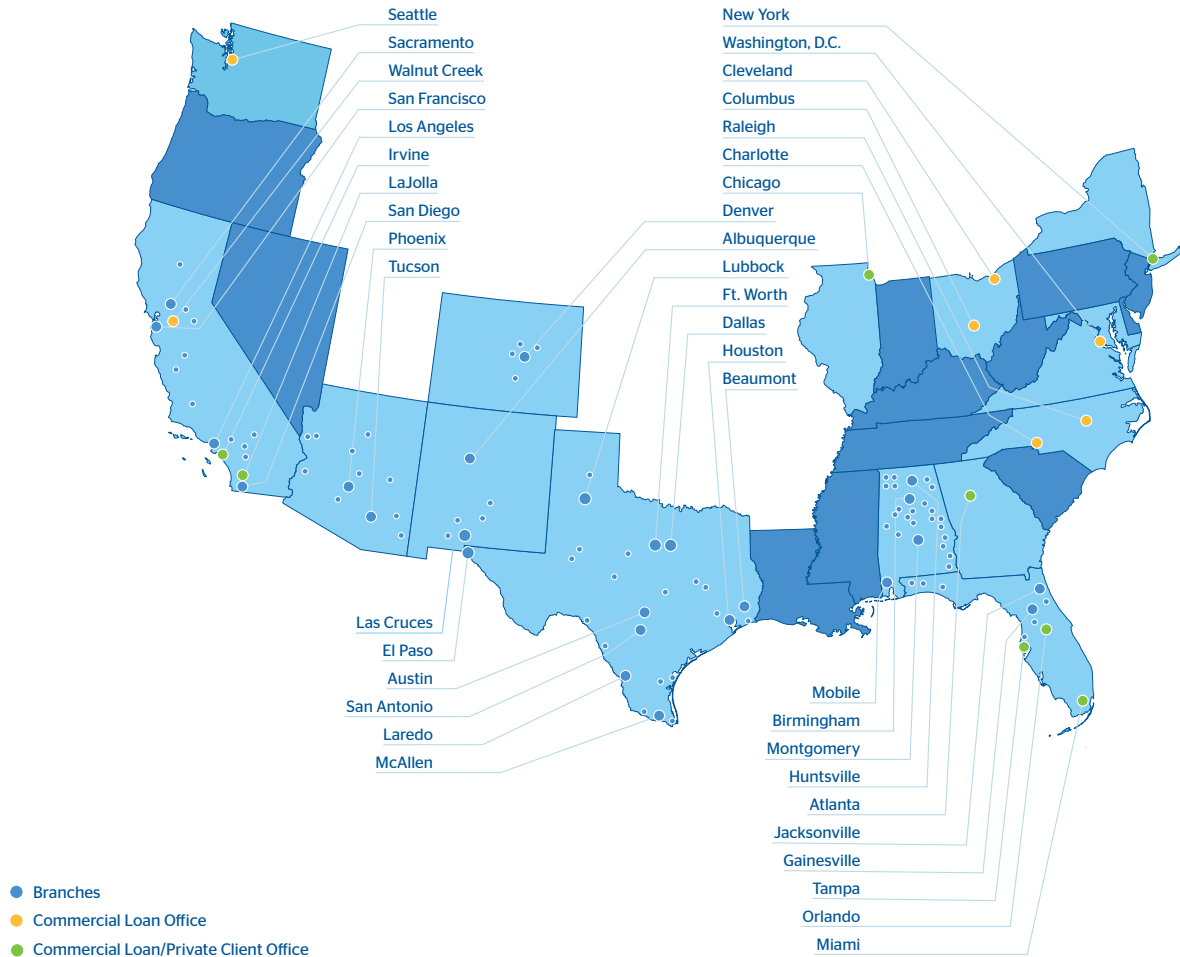
That makes me think of Henry Ford and his quest to put a car in every garage. He wanted to close the gap between humans and frontiers. But there was one thing missing: gas stations. Without them, this great technological feat was going to sit idle, benefiting no one.

BBVA Compass is determined to be both: an engine of opportunity and the fuel for a brighter tomorrow.

A stylized, handwritten signature in black ink, consisting of a large, sweeping 'M' followed by a horizontal line.

Manolo Sánchez
U.S. Country Manager and BBVA Compass Chairman and CEO

Company Profile



BBVA Compass Bancshares, Inc. is a Sunbelt-based bank holding company whose principal subsidiary, BBVA Compass, operates 666 branches, including 340 in Texas, 89 in Alabama, 73 in Arizona, 61 in California, 45 in Florida, 38 in Colorado and 20 in New Mexico. BBVA Compass was recently named the best regional bank in the South and West, and earned best mobile app, in Money magazine's "Best Banks in America 2015-16." Additional information about BBVA Compass can be found under the Investor Relations tab at bbvacompass.com, by following [@BBVACompassNews](https://twitter.com/BBVACompassNews) on Twitter or visiting newsroom.bbvacompass.com.

BBVA Compass Bancshares Inc., is a wholly owned subsidiary of BBVA Group (NYSE: BBVA) (MAD: BBVA). BBVA is a customer-centric global financial services group founded in 1857. The Group is the largest financial institution in Spain and Mexico, and has leading franchises in South America and the Sunbelt Region of the United States. It also is the leading shareholder of Garanti, Turkey's largest bank based on market capitalization. Its diversified business is focused on high-growth markets, and it relies on technology as a key sustainable competitive advantage. Corporate responsibility is at the core of its business model. BBVA fosters financial education and inclusion, and supports scientific research and culture. It operates with the highest integrity, a long-term vision and applies best practices. The Group is listed in the main sustainability indexes. More information about the BBVA Group can be found at bbva.com.

This report contains data related to BBVA Compass Bancshares Inc., a public registrant with the Securities and Exchange Commission. It is the holding company for its subsidiary, Compass Bank, which operates under the trade name BBVA Compass referenced throughout this report. This report is aligned with the public filings available on the Investor Section of the BBVA Compass website at bbva.investorroom.com.

During 2015, BBVA Compass launched BBVA Compass ClearChoice Free Checking, the first product to roll out under the bank's new "banking on a brighter future" tagline. The account features no monthly service charge, no minimum balance requirements, unlimited check writing, complimentary online and mobile banking with bill pay, mobile alerts and other features.

BBVA Wallet, a digital wallet that gives customers a convenient way to monitor and safeguard their BBVA Compass credit and debit cards, also launched in 2015. BBVA Wallet provides customers a real-time view of their card transactions and the ability to temporarily or permanently deactivate lost or stolen credit cards. The service is available as an app for both iPhone and Android devices.

With BBVA Wallet, BBVA Compass also became the first major U.S. bank to offer its credit-card clients real-time redemption of rewards earned on qualified purchases made at any retailer. The patent-pending innovation was introduced with the latest release of BBVA Wallet.

BBVA Compass earned two awards in Money magazine's "Best Banks in America 2015-16" list. BBVA Compass was named the best regional bank in the South and West based on its ClearChoice deposit products. BBVA Compass was also awarded best mobile banking app for its broad array of capabilities and user-friendly interface.

BBVA Compass announced a new card-issuing partnership that brings together three global brands – BBVA, American Express and the NBA – through the BBVA Compass NBA American Express® Card. The new card represents a unique offering and better reflects customers' expectations in today's digital age as the paper application and lengthy approval time has been replaced by an exclusively online application, instant approvals for qualified customers and around-the-clock customer service.

BBVA Compass also announced that its customers will be able to send and receive funds instantly through Dwolla, an all-digital payments network. The collaboration makes BBVA Compass the largest financial institution to use the Dwolla platform for real-time transfers, thus eliminating the wait associated with Automated Clearing House (ACH) transfers that typically can take two to five business days to clear.

BBVA COMPASS DATA

Revenues	\$2,989,436
Operating costs	\$1,009,086
Employee wages and benefits	\$1,071,196
Payments to providers of capital	\$247,913
Payments to government	\$379,087
Total workforce	10,812
Number of branches	666
Number of suppliers	2,218
Community investments	\$8,441
Employee donations	\$1,104
Employee volunteer hours	100,314

* The data in the adjoining table are intended to be an at-a-glance snapshot of BBVA Compass Bancshares' activity during calendar year 2015. Financial data are presented in thousands of US Dollars. Also available at <http://bbva.investorroom.com/annual-financial-statements>.

NUMBER OF EMPLOYEES AND BRANCHES BY STATE

	Employees	Branches
Alabama	3,584	89
Arizona	848	73
California	541	61
Colorado	296	38
Florida	465	45
New Mexico	123	20
Texas	4,549	340
Other*	406	—
Total	10,812	666

* Includes employees located in states where BBVA Compass does not have a retail branch network.

Key Impacts, Risks and Opportunities

Managing risk is an inherent part of our business and our role in the financial services industry. The BBVA Compass Board of Directors is responsible for the ongoing monitoring and evaluation of risks and opportunities, including social and environmental factors. A detailed review of key risk factors is included in the Form 10-K, found on <http://bbva.investorroom.com/sec-filings>.

The BBVA management team evaluates social and environmental factors using the company's established comprehensive set of policies and procedures. This framework helps BBVA thoroughly and consistently evaluate risks and ensure responsible investment and lending. The policies include the U.S. Operations Credit Risk Framework, Environmental Site Assessment, among others, in addition to external principles such as the Equator Principles and Principles for Responsible Investment.



Corporate Governance

BBVA Compass is governed by a Board of Directors that consists of both executive and non-executive (outside, independent) directors, with Manolo Sánchez serving as both Chairman of the Board and Chief Executive Officer of BBVA Compass Bancshares, Inc. Six of BBVA Compass' 11 directors are outside, independent directors. At BBVA Compass, an outside director is defined as a director who is not, and within the preceding fiscal year has not been, an officer or employee of BBVA Compass or any affiliate of BBVA Compass. A director is not considered to be independent if he or she does not meet several criteria including, among others, that he/she has been, within the past three years, an employee of BBVA Compass or any of its affiliates or an immediate family member is, or has been

within the past three years, an executive officer of BBVA Compass or any of its affiliates. Detailed information about BBVA Compass' Board of Directors and the bank's corporate governance structure can be found by visiting: <http://bbva.investorroom.com/company-officers>.

Board of Directors

Manolo Sánchez (Chairman)
 William C. Helms (Vice Chairman)
 Eduardo Aguirre Jr.*
 Shelaghmichael Brown*
 José María García Meyer-Döhner*
 Fernando Gutiérrez Junquera

Charles E. McMahan*
 J. Terry Strange*
 Guillermo F. Treviño*
 Lee Quincy Vardaman
 Mario Max Yzaguirre*

* Outside, independent Directors

Materiality and Stakeholder Engagement

Material topics for the purpose of managing BBVA Compass and for determining the content of this report include areas of priority for both our company and our stakeholders. In 2015, BBVA Compass worked to determine the priority issues for our company and our stakeholders in order to identify the relevant, material issues to include in our report and drive sustainability strategy moving forward. Over the course of the year, BBVA Compass surveyed customers and employees, solicited input from advisory boards and leveraged our relationship with Reputation Institute to better understand current positioning and needs with various stakeholder groups.

Process for defining material issues

In 2015, BBVA Compass participated in BBVA Group's global materiality process for identifying and prioritizing material issues. Our matrix includes issues that have been recognized as risks or otherwise material topics through a wide variety of communications and dialogue tools with each of our key stakeholder groups. We reviewed available information regarding stakeholder perceptions beyond our dialogue with them through expert observers, regulatory trends, the competitive landscape, media and social networks.

Material issues are prioritized based on the impact on our stakeholders and on our business.

Stakeholder input

As a part of our vision of working for a better future for people, BBVA Compass places a high priority on developing positive and engaging relationships with our key stakeholders. Doing so enables us to respond quickly and effectively as stakeholder needs and concerns change. Our stakeholders include people, institutions or organizations that significantly affect BBVA Compass' activity and decisions as well as those that may be affected by them. These groups include customers, employees, suppliers, community organizations, investors and regulators. Transparency, demonstrated in this report, is one of the important ways that we continue to earn our stakeholders' trust.

Communication with stakeholders allows BBVA Compass the opportunity to continually improve its operations and programs and to anticipate risks or threats. By engaging stakeholders, we can create action plans as needed to respond to stakeholder expectations, mitigate risk and effectively manage our reputation.

For our 2015 report, BBVA Compass, in tandem with BBVA Group, evaluated stakeholder interests through a systematic materiality process based on the surveys and analysis outlined as follows, as well as BBVA Compass business priorities.

2015 Stakeholder Engagement

Customers

BBVA Compass engaged the services of Reputation Institute to conduct surveys that included our customers. The responses and resulting analyses allow our organization to manage its reputation and identify threats and opportunities based on perceptions of corporate responsibility, product offerings, fair treatment of employees, and much more.

In addition, key BBVA Compass customers are selected to become a part of one of the various advisory boards that provide feedback to our organization on important issues in the marketplace.

Customers ranked the most important issues as products, governance and performance.

Employees

BBVA Compass seeks feedback from employees in a variety of ways throughout the year. We conduct a detailed survey of employees' perceptions every other year along with various polls and surveys during 2015, including the annual Internal Reputation Survey conducted by the Reputation Institute. During the spring of 2015, more than 700 randomly selected employees participated in the survey from across the organization. The sample was representative of two key groups: retail employees (those directly in contact with the client) and non-retail employees (employees from other lines of business and support areas).

Employees ranked ethical business practices, clear and transparent communications and leadership with integrity as the most important issues.

Community

In 2015, the Corporate Responsibility and Reputation (CRR) team made a concerted and systematic effort to gather feedback from non-profit organizations that operate in communities throughout our footprint. The Community Relations team conducted 51 community-needs assessments with community-development leaders and key stakeholders across seven states.

The foundation of our strategy is built on our responsibility to our customers. We focus on offering products and services that are responsive to local needs, particularly in LMI communities. Our key responsibilities also include communicating transparently and clearly to ensure that customers can make more informed financial decisions, and promoting financial literacy. Building lasting, long-term relationships and avoiding opportunistic short-term customer relationships are also essential.

Our research, including our external reputation survey, the Edelman Trust Barometer and GlobeScan, support this approach in consistent findings that a bank's reputation is based first and foremost on ethics and customer focus.

Regulators

As a responsible financial institution, BBVA Compass is committed to effective management and compliance with regulations. Throughout 2015, BBVA Compass worked diligently to address weaknesses noted in the October 2013 “needs to improve” rating from the Federal Reserve Bank of Atlanta on the Community Reinvestment Act (CRA) exam. As referenced throughout this report, we recognized the imperative to do more – more lending, investing and volunteering – and that we focus our efforts on initiatives that qualify for CRA credit. In 2015, we began to make good on our pledge of \$11 billion in lending, investments and services toward supporting LMI individuals and neighborhoods over the next five years.

We also continued to make significant enhancements to our CRA program by building out our staffing, governance and strategy. Our CRA program continued to expand with 11 community-relations officers in place across the BBVA Compass footprint who serve as the bank’s local champions for lending, investments and services to benefit community-development efforts.

BBVA Compass is committed to continually work on these important issues that will benefit all of our stakeholders. We also will continue to seek feedback and adjust our priorities as stakeholder needs change.

Investors

As a wholly owned subsidiary of BBVA, BBVA Compass Bancshares is responsible for supporting the overall business strategy of the Group. BBVA Compass is aligned with the Group’s sustainability priorities and goals. BBVA Compass also supports BBVA Group shareholders through the U.S.-based Investor Relations department, which communicates on Securities and Exchange Commission (SEC) filings such as the 10-K, along with governance information.

Company Priorities

In 2015, BBVA Compass launched a new three-year strategic plan called ONE. The plan outlines the bank’s vision for the future with the goal of being a ONE-of-a-kind bank that leads the industry’s digital transformation. BBVA Compass aims to lead the industry in client satisfaction and continue to grow our business as a team of talented professionals working together.

“One Team, Client First” is our plan’s tagline. Our plan ONE was shared, discussed and adopted by 200 top managers during a two-day conference and various working sessions in January 2015.

ONE is our blueprint to achieve the ambitious goals we have set for our organization. This plan will evolve with the changing environment. Periodic tracking and reporting will show the progress we’ve made toward reaching our goals.

The strategic plan has four themes:

- Put the client first and become a digital challenger
- Re-energize the organization as One Team
- Achieve diversified and profitable growth
- Maintain the highest principles and standards with a strong risk and control foundation

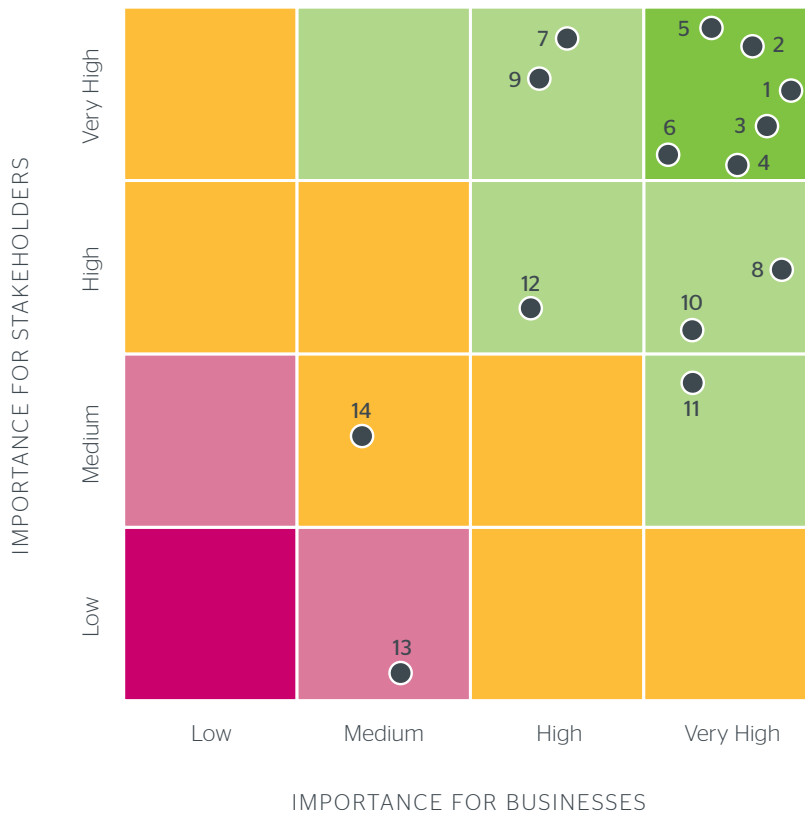
Findings and Outcomes

Following a thorough analysis of the topics raised by our stakeholders and our business leaders, we developed the materiality matrix (opposite page) to identify those topics that are most important for BBVA Compass’ success. These material topics inform our sustainability strategy as well as the topics of focus within this report.

BBVA Compass identified the following strategic priorities as material items:

- Financial inclusion
- Responsible communication
- Community impact
- Supportive workplace
- Environmental responsibility
- Ethical management

MATERIALITY MATRIX



MATERIAL

- 1 Financial inclusion
- 2 Responsible communication
- 3 Community impact
- 4 Supportive workplace
- 5 Environmental responsibility
- 6 Ethical management

IMPORTANT

- 7 Human rights
- 8 Corporate governance
- 9 Service accessibility
- 10 Economic development
- 11 Diversity and work/life balance
- 12 Responsible procurement
- 13 Reputation/risk management
- 14 Executive compensation

MATERIAL ISSUE	CORRESPONDING GRI G4 TOPICS	ASPECT BOUNDARY WITHIN BBVA COMPASS	ASPECT BOUNDARY OUTSIDE BBVA COMPASS
Financial Inclusion	Society - Local Communities	BBVA Compass Bancshares	Communities where we operate
Responsible Communication	Product and Service Labeling, Marketing Communications	BBVA Compass Bancshares	Communities where we operate
Community Impact	Society - Local Communities Human Rights - Non-Discrimination Product Responsibility - Product Portfolio	BBVA Compass Bancshares	Communities where we operate
Supportive Workplace	Labor Practices and Decent Work: Employment , Labor/Management Relations, Training and Education	BBVA Compass Bancshares	Not material
Environmental Responsibility	Environmental - Materials, Energy, Water, Emissions, Effluents and Waste	BBVA Compass Bancshares	Communities where we operate
Ethical Management	Society - Anti-Corruption, Anti-Competitive Behavior	BBVA Compass Bancshares	Communities where we operate

Corporate Responsibility & Reputation

BBVA Compass' commitment to corporate responsibility is an intrinsic part of the enterprise – instilled in employees at all levels, in our corporate goals and philosophy, and in the products and services we offer. The primary commitments of the BBVA Compass corporate responsibility policy are: to uphold excellence at all times; to minimize the negative impacts caused by our business activity; to generate both social and economic value for BBVA Compass; and to invest in the communities where we operate. We are committed to supporting the work of nonprofit and other organizations – especially those involving community development and education.



BBVA Compass Chairman and CEO Manolo Sánchez teaches financial literacy to students at the KIPP CONNECT campus in Houston, Texas.

Managing and Governing Corporate Responsibility

The Management Committee approves the corporate responsibility policy at BBVA Compass. The Corporate Responsibility & Reputation (CRR) department is responsible for managing and coordinating that policy. In 2015, the CRR department maintained its role in managing corporate responsibility through the following offices:

- Office of Community Giving
- Office of Employee Involvement
- Office of Financial Education
- Office of Environment and Natural Resources
- Office of Diversity and Inclusion
- Office of Responsible Practices

CRR continues to make quarterly presentations to the Management Committee on the transformation of CRR policies and programs and launched BBVA Compass' formal Corporate Responsibility and Reputation Committee in 2012.

The CRR Committee is charged with directing CRR policy at BBVA Compass and with driving the integration of CRR criteria, activities and policies throughout the company's business and support areas. It is composed of BBVA Compass Management Committee members and is chaired by the U.S. Country Manager and BBVA Compass Chairman and CEO, Manolo Sánchez. As chairman of the CRR Committee and as a member of the BBVA Compass Board of Directors, Sánchez updates the BBVA Compass Board of Directors on CRR policy and programs on an as-needed basis.

Social and Environmental Risk Management

In the risk-analysis and decision-making processes, BBVA Compass (the Bank) assesses and takes into consideration not only financial aspects, but also social, environmental and reputational factors

Equator Principles

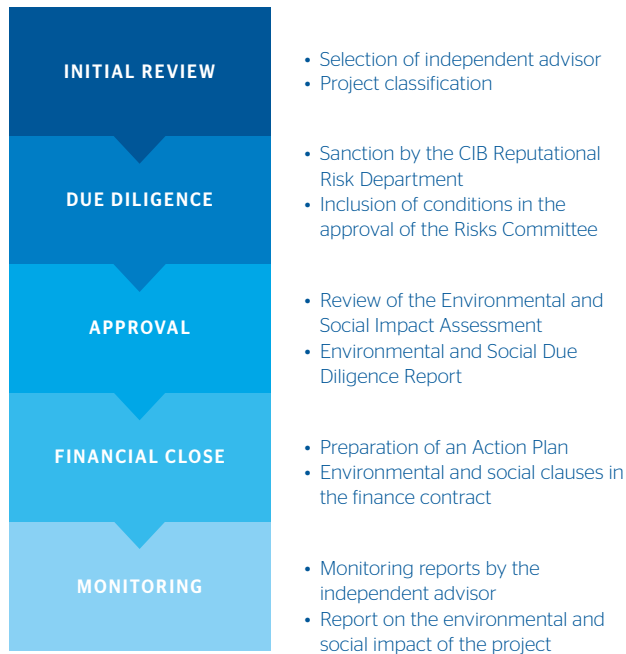
The energy, transport and social services infrastructures that boost economic development and create jobs impact the environment and society. BBVA is committed to managing the financing of these projects in order to avoid and reduce negative impacts and boost their economic, social and environmental value. All the decisions on project finance rely on the principles as part of the criteria. Placing people at the core of the business implies dealing with stakeholder expectations and the social demand to fight against climate change and respect human rights.

In line with this commitment, BBVA Group signed on to the Equator Principles (EP) in 2004. Based on the International Finance Corporation's (IFC) Policy and Performance Standards on Social and Environmental Sustainability and the World Bank's Environmental, Health and Safety guidelines, the Equator Principles are a set of standards for managing the environmental and social risks in project finance. These principles have set the benchmark for responsible finance. Once more in 2015, BBVA Group has contributed to their development and dissemination as a member of the EP Association Steering Committee and the working groups in which it takes part.

The Corporate & Investment Banking (CIB) Reputational Risk team takes on responsibility for analyzing the financed projects, representing the Bank before stakeholders, being accountable to senior management and designing and implementing the management system, proposing the adoption of best practices and contributing toward training and communication on matters related to the EP. In 2015, representatives of BBVA Group's Reputational Risk team took part in training sessions given by the IFC, the Organization for Economic Cooperation and Development (OECD) and the International Association for Impact Assessment (IAIA) on the best environmental and social risk practices.

Project analysis involves subjecting each transaction to environmental and social due diligence that starts with assigning a category (A, B or C) that reflects the project's level of risk. The documentation submitted by the customer and the independent advisors is reviewed, allowing the level of compliance with the requirements established in the EP to be graded in accordance with the project category. Finance agreements incorporate the customer's environmental and social obligations, which are monitored by a specialist CIB team.

RISK-ANALYSIS PROCESS



To promote integrity in BBVA's application of the EP, their management is integrated into the internal transaction structuring and admission processes and is subject to regular checks by the Internal Audit Department. For BBVA, the EP are the basis for applying best practices in responsible finance and the framework for dialogue with customers and stakeholders in the projects we finance.

Privacy

BBVA Compass is committed to compliance with all applicable federal and state privacy laws and regulations. Examples of such laws and regulations include, but are not limited to, Regulation P, the Affiliate Marketing Rule and the Right to Financial Privacy Act. Regulation P implements portions of Title V of the Gramm-Leach-Bliley Act. It governs the treatment of non-public personal information about consumers by financial institutions and requires that an institution, under certain circumstances, notify consumers about its privacy policies and practices.

The affiliate marketing provision of the Fair and Accurate Credit Transaction Act went into effect on Oct. 1, 2008. Subject to some important exceptions, an entity may not use "eligibility information" received from its affiliate to market to a consumer unless the consumer was notified that such marketing may occur, was given an opportunity to "opt out" of such marketing and has not opted out.

The Right to Financial Privacy Act is largely procedural and requires government agencies to provide persons notice and an opportunity

to object before a financial institution can disclose personal information requested by a federal government agency.

BBVA Compass consolidated the affiliate-marketing opt-out notice with its Regulation P notice (collectively referred to as the "Privacy Disclosure"). The Privacy Disclosure is provided to consumers at account opening, is available online and in branches, and is mailed to customers annually.

To help prevent unauthorized access to customer information, BBVA Compass uses physical, electronic and procedural safeguards. We periodically test and update those safeguards to help ensure the protection and integrity of our customer information. BBVA Compass also trains and regularly educates our employees about the importance of maintaining confidentiality and the proper handling of customer information. All of our employees are governed by a Code of Conduct that authorizes access to customer information for business purposes only and includes strict standards for maintaining confidentiality.

In addition, the bank maintains a Customer Information Disclosure Event Plan in case there is ever an unauthorized or unintentional disclosure of customer information. If BBVA Compass becomes aware of an unauthorized disclosure of customer information, the Event Team meets to evaluate the situation and direct subsequent notifications and activities.

Transparency, Advertising and Labeling

Transparency is an important commitment we make to our customers. In this respect, BBVA Compass has the following measures in place to reinforce clarity in our product and services campaigns:

- We provide disclosures in all of our products, advertisements and customer materials to ensure transparency and a clear understanding of our terms, features and offers.
- BBVA Compass ads and literature go through a rigorous process and are reviewed by legal counsel and compliance officers to help ensure the accuracy and clarity of the communications.
- BBVA Compass strives to provide clarity in all product features and terms.

Anti-Corruption

BBVA Compass' business processes are designed to prevent corruption. Our Code of Conduct outlines our expectations. BBVA Compass employees are continually trained to identify and prevent corrupt activities. Specific training programs to support this include Foreign Corrupt Practices Act) Training, "Know the Code" Training, and the Bank Secrecy Act and Anti Money Laundering Training.

Letter from Executive Vice President, Director of Corporate Responsibility & Reputation



Dear Stakeholders,

BBVA Compass has built a strong reputation among its customers thanks to our solid banking products, strong governance and corporate citizenship. We aim to continue to build on that into the future, especially as we evolve further into digital offers for customers, including those that are outside the financial mainstream.

In 2015, we answered the call for an improved program to meet community-reinvestment goals. We built the infrastructure to support measurable community-development programs. We made a public commitment to invest \$11 billion in our communities. We added 20 staff members to help ensure that our work in the community has real impact.

We also realized that we needed help from community leaders outside BBVA Compass to make decisions that will truly meet the needs of families and small businesses in our neighborhoods. We asked local and national leaders to be part of our new Community Advisory Board. This group is now helping to shape our community-investment strategies.

There has also been an internal shift at BBVA Compass. Beyond the Corporate Responsibility & Reputation team that I lead, this renewed focus on investing in our communities has permeated throughout the BBVA Compass team. Our people have enthusiastically embraced and supported these efforts. It has been gratifying to see our employees across the footprint focus their time, their resources and their energy to reinforce the impact of our financial investments with their own volunteer activities.

Moving forward, BBVA Compass remains committed to this journey and to learning and making consistent progress. We will continue to seek feedback through ongoing conversations with our stakeholders, including the Community Advisory Board, to ensure that our projects and programs meet community needs.

A handwritten signature in black ink that reads "J. Reymundo Ocañas".

J. Reymundo Ocañas

Corporate Responsibility & Reputation — EVP, Director

Financial Solutions

BBVA Compass puts its clients first. We are focused on not only meeting, but exceeding expectations. We aim to offer a best-in-class client experience and we are investing in advanced digital capabilities. Our digital transformation will be fueled by our efforts to improve how we engage clients online, the development of a new digital value proposition and differentiated offerings such as the NBA AmEx card, and by shifting our mindset to designing everything with mobility in mind.

BBVA Compass is not only in the business of banking, it is in the business of building a brighter future for all.

We've been working hard to deliver products and services that are easy and convenient, personalized, clear and fast. And we deliver them along with trusted advice and information.

Our unique products and services are designed to help customers stay in control of their finances. These include consumer banking services, consumer loans, mortgages, home-equity lines and loans, credit cards and personalized Visa® Debit Cards, and more.

Our programs make banking a one-stop shop.

We serve our customers by offering:

Convenience — BBVA Compass has taken digital banking to the next level. We offer an award-winning mobile app that helps customers manage money on the go, including depositing a check with a smartphone, checking balances, transferring money, paying bills and even paying people.

Checking and Savings — BBVA Compass has a range of accounts that allow customers to track and maintain better control of spending and make it possible to save for the important things in life.

Credit Solutions and Mortgages — BBVA Compass offers products designed to help first-time homebuyers and those who have struggled with credit. We help guide our customers through the process and provide pre-approvals that make sense for families.

Second Chance Banking — BBVA Compass wants to help customers who have had financial troubles to repair their credit and get back on track.

Financial Education — BBVA Compass provides the tools and information to help customers make informed decisions about managing their money. We've created the Financial Fitness Center online at bbvacompass.com/moneyfit. The site offers advice on mortgages, smart budgeting, saving for major expenses, building better credit and much more.



Q&A: A saving guide for Millennials

Personal Banking

BBVA Compass Premier Personal Banking™

Premier Personal Banking is BBVA Compass' premium level of service, created to reward some of our most loyal customers. This program lets us work together on our customers' financial goals with the best tools and personalized service we have to offer.

Features include dedicated personal customer support, including:

- Automatic ATM-fee rebates, including fees other banks charge, as well as international exchange fees
- No monthly service charge for BBVA Compass ClearChoice Premium Checking and BBVA Compass ClearChoice Money Market Accounts
- Financial planning with a financial advisor and MoneyGuidePro™ session
- Select Credit Card with no annual fee
- Complimentary personal checks and cashier's checks
- Complimentary small safe deposit box
- Lending discounts on products such as home equity lines of credit and signature express loans

* The Premier Personal Banking program is reserved for customers who have a BBVA Compass consumer checking account and maintain a balance of at least \$100,000 in deposits and/or investments. Trust customers are not eligible to enroll in the Premier Personal Banking Program.

Professional Program

BBVA Compass offers a suite of services designed to meet the unique needs of professionals such as doctors, dentists, CPAs and attorneys. The Professional Program is designed to provide maximum financial flexibility along with significant savings.

Features include:

- Everyday banking with added benefits, such as earning interest on checking accounts, no ATM fees at an Allpoint® ATM and market-leading rates on Money Market accounts and CDs.
- Maximum credit with minimal fees and no collateral requirements.
- Professional Mortgage Program with low down payment options, no Private Mortgage Insurance and loan amounts up to \$1,750,000.
- Our Home Equity Professional program offers loans and lines of credit of up to \$1,750,000 with expanded Loan to Values and Bank Paid Closing Costs.
- MoneyGuidePro™ sessions, which provide a customized financial map to reach retirement goals.

Student Banking

To meet students' particular need for simple banking, BBVA Compass offers Student Banking.

BBVA Compass ClearChoice Free Checking:

- No monthly service charge
- Free online and mobile banking with alerts and bill pay
- Free online and paper statements
- One free BBVA Compass Visa® Debit Card, which can be personalized with a favorite photo
- Additional features, like no BBVA Compass fee to use other banks' ATMs, can be added individually. With Custom Features, customers pay a low monthly fee for only the features that they want.

BBVA Compass ClearSpend prepaid card:

- \$0 monthly or annual fee
- \$0 reload fees
- \$0 purchase transaction fees
- Low \$4 one-time Initial Load Fee
- No overdraft fees
- No credit check
- A mobile application budget tracker to manage finances and help eliminate overspending
- Plus, receive real-time transaction alerts to stay in the know

Everyday Heroes

Everyday Heroes Banking is BBVA Compass' way of saying thanks to military personnel, law enforcement officers, firefighters, educators and healthcare providers for their special contributions to our community.



Features include:

- BBVA Compass ClearChoice Free Checking — with no monthly service charge and free online and mobile banking.
- BBVA Compass ClearChoice Savings — makes saving automatic with a minimum \$25 recurring monthly transfer from a BBVA Compass Checking account to a BBVA Compass ClearChoice Savings.
- Credit Card with Bonus Points
- Mortgage Options — make buying, building or refinancing more affordable than ever.
- Consumer Loans — 0.25% basis point discounts off borrower's interest rate for an auto, boat, motorcycle, RV or other depreciating collateral loan.
- Home Equity Loans and Lines — 0.25% interest rate discount that can be combined with additional collateral discounts, plus Bank Paid Closing Costs on loan amounts up to \$500,000.
- Signature Express Loan — 0.25% basis point interest rate discount on loan amounts from \$2,000 to \$150,000, with loan amounts up to \$50,000 potentially receiving credit notification and funding the same day.

Opportunity Banking

Introduced in 2015, BVA Compass' Opportunity Banking offers a full array of affordable and transparent tools to help low-income or financially underserved customers navigate the economic challenges and realities they face every day.

In addition to the ClearChoice Free Checking and ClearSpend card detailed above, Opportunity Banking includes:

Secure Send International Money Transfer

BBVA Compass offers connection to one of the largest money-transfer networks in Mexico and Latin America. BBVA Bancomer is one of several banks in Mexico where BBVA Compass deposit-account holders can send money for a flat \$5 fee.

Secure Send provides affordable and reliable transfers of funds to Mexico and the rest of Latin America, as well as China, India, the Philippines and Vietnam. After setup, customers can make transfers right from their mobile device or computer.

Expansion of La Michoacana ATM partnership

The BBVA Compass and La Michoacana (largest independent Hispanic grocery-store chain) partnership helps improve accessibility of services in LMI neighborhoods across Texas. In 2015, the bank expanded its partnership and now services a total of 23 full-service, deposit-accepting ATMs to La Michoacana supermarkets in lower-income areas throughout the state. The new machines allow customers to deposit cash and checks, withdraw funds, check account balances and transfer funds between checking and savings accounts.

Small Business Banking

Business Banking Solutions

BBVA Compass Business Checking Accounts provide several options with different benefits, based on what makes sense for each business. Visit bbvacompass.com/business for more information.

BBVA Compass ClearConnectSM for Business Checking is a flexible, convenient account that allows the management of business finances online and on the go 24/7, with no monthly service charge, plus 2 in-branch deposits and a total of 5 checks and in-branch withdrawals per month at no additional charge.

BBVA Compass ClearChoiceSM for Business Checking is a customized account built specifically to meet the unique banking needs of a business with premium features and benefits.

BBVA Compass ClearChoiceSM Premium for Business Checking for established businesses that maintain a higher balance and have higher check-writing volume, wish to earn interest, and be rewarded with a comprehensive package of complimentary features.

All business checking accounts include:

- Business Visa® debit card that can be personalized with a company logo
- Online and mobile banking with bill pay
- Dedicated customer service unit
- Access to Small Business Online Resource Center
- Account alerts
- No BBVA Compass fee to use another bank's ATM
- Complimentary online statements



Business Preferred Program

The Business Preferred Program recognizes our best business customers by rewarding them with unique benefits and a higher level of service.

Business Lending Solutions

At BBVA Compass, we don't take a one-size-fits-all approach to business lending. Businesses have access to lending solutions for their unique needs. Our business lending options include:

Commercial Real Estate Loans

- Loan amounts up to \$2,500,000
- Terms up to 20 years
- Fixed rates and no balloon payments
- 80% LTV for owner-occupied property

Equipment Loans

- Terms up to 5 years
- 100% financing on qualified equipment

Business Term Loans

- Unsecured and secured options
- Terms up to 5 years
- Beginning at \$5,000

Business Lines of Credit Traditional Lines of Credit

- Interest-only payment period available
- Line amounts of \$10,000 and up
- Unsecured and secured options

Convenience Line of Credit

- Unsecured
- Line amounts up to \$100,000

Visa® Business Rewards Credit Card

- No annual fee
- Earn CompassPoints® on qualifying purchases
- Manage this card online at bbvacompass.com/businesscard

Small Business Administration (SBA) Loans

With a portion of the loan guaranteed by the U.S. government, SBA Loans can be more flexible than conventional financing. SBA Loans can also be a good option for businesses that qualify for conventional financing by providing extended terms and lower payments.

Benefits include:

- Longer repayment terms to help cash flow
- No balloon payments
- Lower equity requirements, up to 100% financing
- Low down payments
- Use for almost any business purpose
- SBA Guaranty Fees for SBA Express Loans paid by BBVA Compass

SBA Express

- Loan amounts up to \$350,000
- Secured or unsecured

SBA 7(a)

- Loans from \$350,000 to \$5,000,000
- Secured or unsecured

SBA 504

- Loans up to \$15,000,000
- Secured

Commercial Banking

BBVA Compass' commercial banking services combine our bankers' knowledge of local markets while leveraging our international capabilities and financial strength to support our clients' success.

This powerful combination gives us the ability to provide the expertise and resources to fuel company growth. Whether a company needs additional working capital, equipment or property, BBVA Compass offers solutions.

BBVA Compass provides:

- Working Capital Financing¹
- Commercial Real Estate Lending¹
- International Lending²
- Business Equipment Leasing

- Small Business Administration Lending¹
- Business Insurance³
- Employee Benefits & Consulting⁴
- Retirement Solutions⁵

Helping Businesses Grow

From adding a new division to expanding into new markets, BBVA Compass helps companies take advantage of every opportunity to enhance their competitive edge. BBVA Compass offers a wide range of solutions including IPOs, bond issues, syndicated loans, mergers and acquisitions and the financing capacity to fund the largest of projects,¹ both domestic and international.

We connect businesses with experts who can help businesses thrive. BBVA Compass serves the needs of business well beyond traditional banking, including:

- Interest Rate Risk Management
- Investment Banking⁵
- Access to Capital Markets
- Corporate Investment Services⁵

Helping Businesses Expand Globally

The ability to do business across borders or across continents can be critical to some companies. Thanks to BBVA Compass' global reach, companies have access to extensive resources and expertise to support and expand their operations.

Our international services offer businesses the speed, convenience and competitive pricing needed to operate effectively in overseas markets.

And, when more complex financing solutions are required, BBVA Compass can bring together project-finance teams from across the globe. Combining international expertise with knowledge of local markets, these teams offer advisory, structuring, underwriting, syndication and portfolio-management services.

¹ All loans subject to approval, including credit approval. All accounts are subject to approval.

² International lending services not available in some countries.

³ Insurance products are offered through BBVA Compass Insurance Agency, Inc. Insurance products are NOT FDIC insured, are NOT bank guaranteed, are NOT insured by any other Federal Government Agency and may LOSE value.

⁴ Employee benefits consulting services and employee benefits-related insurance products are offered through BBVA Compass Consulting & Benefits, Inc., an affiliate of Compass Bank.

⁵ Securities and investment products offered by BBVA Compass and/or its affiliates are NOT FDIC insured, are NOT bank guaranteed, are NOT insured by any other Federal Government Agency and may LOSE value. Not applicable in all countries.



Global Wealth Solutions

Solutions for Managing Wealth

Building a successful business means more than just managing day to day. It means planning for the future of the business as well as personal finances. Managing wealth is a multi-faceted process that typically includes investments, managing credit and liquidity, and tax and estate planning. The BBVA Compass team has the expertise and commitment to work with businesses and their legal or tax advisors to bring all of these elements together to create a unified plan.

Building Wealth

It is never too soon to begin setting long-term goals and working toward them. Our investment specialists help clarify a business' goals and create a customized plan that aligns its vision with its financial resources by providing:

- Financial planning
- Brokerage services
- Discretionary investment management services
- Individual retirement accounts

Preserving and Protecting Wealth

While financial priorities may change, it is important to keep long-term objectives in focus. The Global Wealth team provides forward-thinking strategies reflective of each customer's goals, time frame and risk tolerance. These strategies may involve some of the following:

- Strategies for tax-advantaged investing and saving
- Risk-management services
- Estate planning
- Trust and fiduciary services

Wealth Transition Planning

Whether our customers' goals include providing for future generations, continuing a family business, or creating a philanthropic foundation, we can help translate their vision for the future into action through:

- Business succession planning
- Multigenerational trusts
- Life insurance offered through BBVA Compass Insurance Agency, Inc.
- Lifetime giving programs

Neither BBVA Compass nor any of its affiliates provide tax or legal advice.

Securities and Insurance Products: Not FDIC Insured, Not Guaranteed by the Bank, May Lose Value, Not a Deposit, Not Insured by Any Federal Government Agency

Online and Mobile Solutions

Helping businesses succeed means giving them the tools to manage their finances anytime, anywhere.

Merchant Services Powered by First Data

- Accept Visa®, MasterCard®, Discover®, American Express®, JCB, Diner's Club International®, UnionPay
- Wireless, mobile and virtual merchant solutions available
- Next-day funding to a BBVA Compass business checking account
- To learn more about First Data's industry-leading solutions, visit bbvacompass.com/business/merchant-services/

Remote Deposit Online®

- Deposit checks into a BBVA Compass account from the office
- Same-day ledger credit up to 9:00 PM Central Time
- First scanner at no charge

Online Banking

- Review account activity, set daily balance alerts, assign different levels of access to different employees
- View, download and/or print copies of cleared checks and past 16 months of statements
- Make payments through online bill pay, ACH, or wire transfer
- For businesses with more complex banking needs, we offer Compass e-Access: a web-based treasury-management system
- Manage a business' payroll directly through online banking with BBVA Compass Payroll Service Powered by Execupay

Mobile Banking

- Available for iPhone® and Android™
- Review account activity, transfer money, and even pay bills from a wireless device
- Mobile Deposit®
 - Deposit checks into an account by taking a picture of the check with an iPhone or Android smartphone
- View demos and learn more at bbvacompass.com/go/mobile

Community

We strive to be a financially inclusive organization in the model of the global BBVA Group. Financial inclusion is a material topic for BBVA Compass aligned with community reinvestment and financial education. As such, financial inclusion is a pillar of our corporate responsibility and community reinvestment programs. In 2015, we continued to increase our investment in these programs. We facilitate access to financial education, and our employees teach these classes in communities throughout our footprint.

CRA Evolution and Direction

During 2014 and 2015, BBVA Compass has been focused on strengthening the institutional infrastructure to meet the requirements of the CRA along with the needs of LMI communities across the market. This was spurred, in large part, by the “Needs to Improve” rating we received on the 2011-2013 CRA Performance Evaluation conducted by the Federal Reserve Bank of Atlanta. The process revealed the need to develop a more robust CRA program. BBVA Compass believes this clarity of focus, the ensuing changes and improving trends all support Satisfactory performance for our subsequent exam(s). Further, the Bank expects continuing improvement in CRA performance going forward.

Beginning in 2014, Corporate Responsibility and Reputation was restructured and charged with leading the effort to develop a new strategy, governance structure and delivery system to enhance CRA performance. CRR’s oversight of the CRA program is reinforced with the department being housed in the Office of the CEO, elevating it to the highest level in the institution.

BBVA Compass further developed the new CRA program strategy in 2015. By engaging all levels of bank leadership, the plan is designed to create a culture of ownership of CRA performance through highly engaged employees who understand CRA requirements and have the tools to meet them.

The procedures and processes put in place include a bank tool for identifying, qualifying, and tracking community-development lending, along with service and investment activities.

In November 2014, the bank announced an \$11 billion commitment to products and services for LMI communities over five years beginning in January 2015. To execute this commitment, new teams across the Bank are in place to address mortgage lending, small-business lending, community-development lending, community-development investing contributions, retail services, volunteerism and governance.

We have also invested in the infrastructure by hiring a significant number of team members with the depth of expertise and experience serving the needs of LMI communities. By the end of 2015, the Corporate Responsibility and Reputation had grown from a team of 10 to a team of 30 over an 18-month period.



Avenue Station, Houston, Texas.

The front end of the new strategy includes bringing a deeper understanding of the needs of LMI communities to the Bank. BBVA Compass established an annual survey of community stakeholders to identify the needs of individuals and families in the local markets it serves. The findings help pinpoint areas of focus for the Bank’s community-development activities, including lending and investing, grant making, and volunteering.

BBVA Compass’ new team of 11 Community Relations Managers and Officers are responsible for CRA in the Bank’s assessment areas within the region they are assigned. One of their primary responsibilities is to deepen existing relationships and develop new ones with nonprofit organizations, community-development financial institutions, public entities and community groups that have insight into the needs of LMI individuals and neighborhoods in the local markets. The community relations team then helps ensure that the bank responds effectively to local market needs.

BBVA Compass added a team of nine CRA professionals to administer the Bank’s CRA program. The team is in place to report on all CRA-related activities and ensure that bank management and lines of business are aware of performance and remain CRA progress focused. New tracking and reporting systems are being developed by the team, such as a multi-phased CRA CD Portal and Reporting System. The CRA CD Portal is a tool that enables the efficient collection, qualification and reporting of CD activities across program areas. A new CRA Self-Assessment and Reporting System, also in the development phase, is a tool that will substantially improve quantitative analyses and results.

The Bank’s new governance structure has been developed to ensure leadership at every level is apprised of CRA progress and able to take action to ensure strong performance.

The meaningful shift in the Bank’s CRA focus produced significant results in 2015 as outlined in the following pages.

Community Development Lending Team

In order to provide focus and participate in more complex lending transactions, which require specialized underwriting skills and experience, the Bank created a new Community Development Capital Group (CDC Group). Formed in January 2015, this team applies innovation and leadership to the Bank's community-development loans and investments that strengthen LMI communities. The new department, which operates as a segment of the Commercial Real Estate Department, is charged with establishing a strong pipeline of real-estate projects that provide affordable housing and stabilization for LMI families and communities.

The CDC Group is gearing up to complete a five-member team that includes the Director and four Community Development Relationship Managers who will be located in each of the Bank's major regions. To date, three of those Relationship Managers have been hired. These Relationship Managers will maintain active relationships with nonprofit and for-profit developers who acquire tax credits in order to generate an active pipeline of debt and equity opportunities.

Community Development Investments Team

BBVA Compass created its first community-development investment team charged with creating an investment strategy and building a diversified and robust investment portfolio in October 2014. This group, called Community Development Finance (CD Finance), was developed with the idea that seasoned community development finance professionals needed to lead the strategy to expand and diversify the Bank's community development investments. To this end, an executive-level CRA Investment Committee was created to set strategic goals and approve the investments of the new CD Finance team.

The CD Finance team works closely with the CDC Group in the real-estate department to provide capital through innovative investment vehicles that increase the flow of capital into projects that benefit LMI communities. CD Finance may use the following investments to achieve depth and diversity on behalf of the Bank:

- Low Income Housing Tax Credit (LIHTC) Investments
- Community Development Financial Institutions (CDFIs) through Equity Equivalent Loans (EQ2s)
- Small Business Investment Companies (SBIC) or SBA programs
- New Market Tax Credit (NMTC) Investments
- Other community-development qualified investment tools

While the CDC Group takes the lead on real-estate investments such as proprietary LIHTC and NMTC transactions, the CD Finance team currently focuses on multi-investor fund LIHTC opportunities and CDFI investments. The CD Finance team also builds awareness within the Bank, and focuses on building the capacity of nonprofit investment partners by providing technical assistance grants in cooperation with the Bank's Foundation, as well as support through hands-on technical assistance.

The strategic plan calls on the CDC Group and CD Finance to produce CD loans and investments in assessment areas, prioritizing the markets with the greatest need. Some markets are particularly challenging due to a lack of available tax credits, lack of CDFI partners or other conditions such as the absence of government support. To address these challenges, the team is building relationships with government agencies, nonprofit organizations, and other intermediaries to help build capacity in those markets.

The Bank's proprietary fund model allows for the cross sale of deposits, derivatives and other products that will capture revenue opportunities. This model offers a "one-stop shop" that can provide debt and equity, and service other banking needs.

The Bank is working with Opportunity Finance Network (OFN), the leading national network of community development financial institutions (CDFIs). OFN's mission is to lead CDFIs and their partners to ensure that low-income, low-wealth people and communities have access to affordable, responsible financial products and services.

The CD Finance team has engaged Ernst & Young (E&Y) for consulting services to help underwrite multi-investor LIHTC transactions. E&Y also provides reviews of syndicators, funds and the underlying properties to receive investments that qualify under the investment test. With E&Y, the CD Finance team provided an executive training and briefing on LIHTCs to the Bank's management committee in January 2015. The CD Finance team has also sought out the expertise of the Federal Home Loan Bank to provide in-house training to BBVA Compass staff and senior management, creating a culture and awareness around CRA investments within the Bank. The CD Finance team has created a policy manual to guide the development of a sustainable community-development investment program.

Accessibility

BBVA Compass' retail banking services are accessible to essentially all segments of the Bank's CRA assessment areas and meet the needs of residents and businesses. As of Dec. 31, 2015, 28 percent of BBVA Compass retail branches were located in LMI areas, and 33 percent of BBVA Compass' ATMs were located in low- to moderate-income areas.

BBVA COMPASS COMMUNITY LENDING

	2015		2014	
	Number of Loans	Total Loan Amount	Number of Loans	Total Loan Amount
CRA Qualified Small Business Loans	24,019	\$1.1 billion	24,252	\$1 billion
Community Development Loans	96	\$457.5 million	41	\$191.9 million
Mortgage Loans to Low- and Moderate-Income People	3,062	\$394.7 million	2,292	\$272 million
Mortgage Loans to Low- and Moderate-Income Areas	2,365	\$424.7 million	1,850	\$323.7 million

During 2015, BBVA Compass provided significant support to its local communities in the form of community-development loans that supported affordable housing, promoted economic development by financing small businesses, helped to revitalize and stabilize communities and provided community services such as health care and job training.

Small-business lending is critically important to help our communities create and retain jobs, and small-business lending is the cornerstone of BBVA Compass' CRA qualified lending. Of the total CRA reportable small-business loans, almost 16,000 totaling over \$643 million were made to very small businesses, those having revenues \$1 million or less. Further, 2,365 loans totaling more than \$424 million were in LMI areas.

BBVA Compass continues its long-standing participation in the U.S. Small Business Administration's (SBA) capital access programs, and is committed to assisting small businesses through the SBA's various loan initiatives, including 7(a), SBA Express and the 504 real-estate program. As an SBA National Preferred Lender, BBVA Compass is proud to do its part to help small businesses overcome economic challenges and position themselves for

future growth. BBVA Compass has been recognized as one of the leading small-business lenders by the SBA, and was recognized in 2015 as the 6th Most Active 7(a) Lender based on unit volume and the 11th Most Active 7(a) Lender based on dollar volume.

BBVA Compass also increased support for mortgage lending in 2015 by offering the HOME loan in its local communities. This is a targeted, 100% loan-to-value mortgage product that is available to LMI borrowers and in low- or moderate-income geographies. The bank made 2,170 HOME loans totaling \$205.4 million to LMI borrowers and \$169.6 million to borrowers who live in low- or moderate-income communities.

CRA Investments

During 2015, BBVA Compass invested \$205 million in community-development investments. We have taken a leadership role in helping to meet economic development and affordable housing needs, as well as to revitalize and stabilize low- to moderate-income communities with investments in Low-Income Housing Tax Credits (LIHTCs), Community Development Financial Institutions (CDFIs), Housing Bonds, and Charitable Contributions.

As of Dec. 31, 2015, we invested \$88 million in LIHTC investments, an increase from \$54 million in the prior year. The long-term investments are key financing tools that provide needed equity injections that cannot otherwise be acquired for affordable housing projects. The introduction of equity-equivalent investments in CDFIs allowed us to enhance opportunities for access to capital in LMI communities within the BBVA Compass footprint. In response to a severe lack of financial capacity in markets underserved by traditional financial institutions, we invested \$20.5 million in microenterprises and small businesses. BBVA Compass implemented a strategy to enhance our investment in certain assessment areas where other CRA investments, such as LIHTCs, were not always available. Investments in housing bonds allowed BBVA Compass to provide additional affordable housing financing opportunities for LMI communities. The bonds and securities also provide market liquidity, resulting in more capital for construction and permanent financing for new and rehabilitated affordable housing projects. BBVA Compass' Community Giving Program creates social value by strategically investing in projects that directly impact LMI families and individuals, small businesses and nonprofit organizations. We contributed \$5.3 million in charitable contributions to support small-business advocacy, financial education, affordable housing, community services, and technical assistance for LMI populations.

Financial Education

FINANCIAL EDUCATION PROGRAMS (Number of beneficiaries)

	2015	2014	2013
EverFi	31,682	32,631	11,597
Money Smart	19,481	5,101	800
Teach Children to Save	24,323	11,699	5,563
Get Smart About Credit	3,597	1,363	3,111
Junior Achievement	45,926	14,345	4,726
NBA Cares	1,147	—	—
Total	126,156	66,291	25,797

EverFi@Work

EverFi@Work is an online platform designed to empower adults with the skills to successfully manage their finances and plan for a prosperous future. It is a 90-minute, computer-based program that includes eight learning modules covering topics from savings and investments to identity protection.

BBVA Compass was the first organization to launch the Spanish-language version of this popular adult financial wellness program, EverFi@Work. The interactive learning tool is specifically designed to help the growing Hispanic population develop important money-management skills and gain a deeper knowledge of topics such as credit, investing and saving for retirement. The Bank offers the course to community nonprofit partners that provide services for Spanish-speaking populations. The Bank has plans to leverage its relationship with partner schools to offer this online curriculum to parents, giving both students and parents the opportunity to engage in discussions regarding the EverFi experience.



BBVA Compass Denver Market CEO Cedric Buchanan teaches financial education to students at Kullerstrand Elementary School during Week of Service, Denver, Colorado.

FDIC Partnership: Money Smart

BBVA Compass continued its partnership in 2015 with the Federal Deposit Insurance Corporation (FDIC) to utilize its financial education program called Money Smart. This program is designed to help adults — even those with no prior banking experience — build financial knowledge, develop financial confidence, use banking services effectively and create positive banking relationships. BBVA Compass also requires that all applicants of its First Time Home Buyer Mortgage product complete Money Smart's "Own Your Own Home" (Module 10) online course. This partnership with FDIC allows BBVA Compass employees and our nonprofit community partners to teach the Money Smart curriculum — helping to ensure that the people in our communities have the knowledge they need to effectively manage their finances.

Junior Achievement Partnership

BBVA Compass also continued its partnership with 21 Junior Achievement (JA) affiliates across its footprint. Junior Achievement Worldwide is the world's largest organization dedicated to educating students about workforce readiness, entrepreneurship and financial literacy through experiential, hands-on programs.

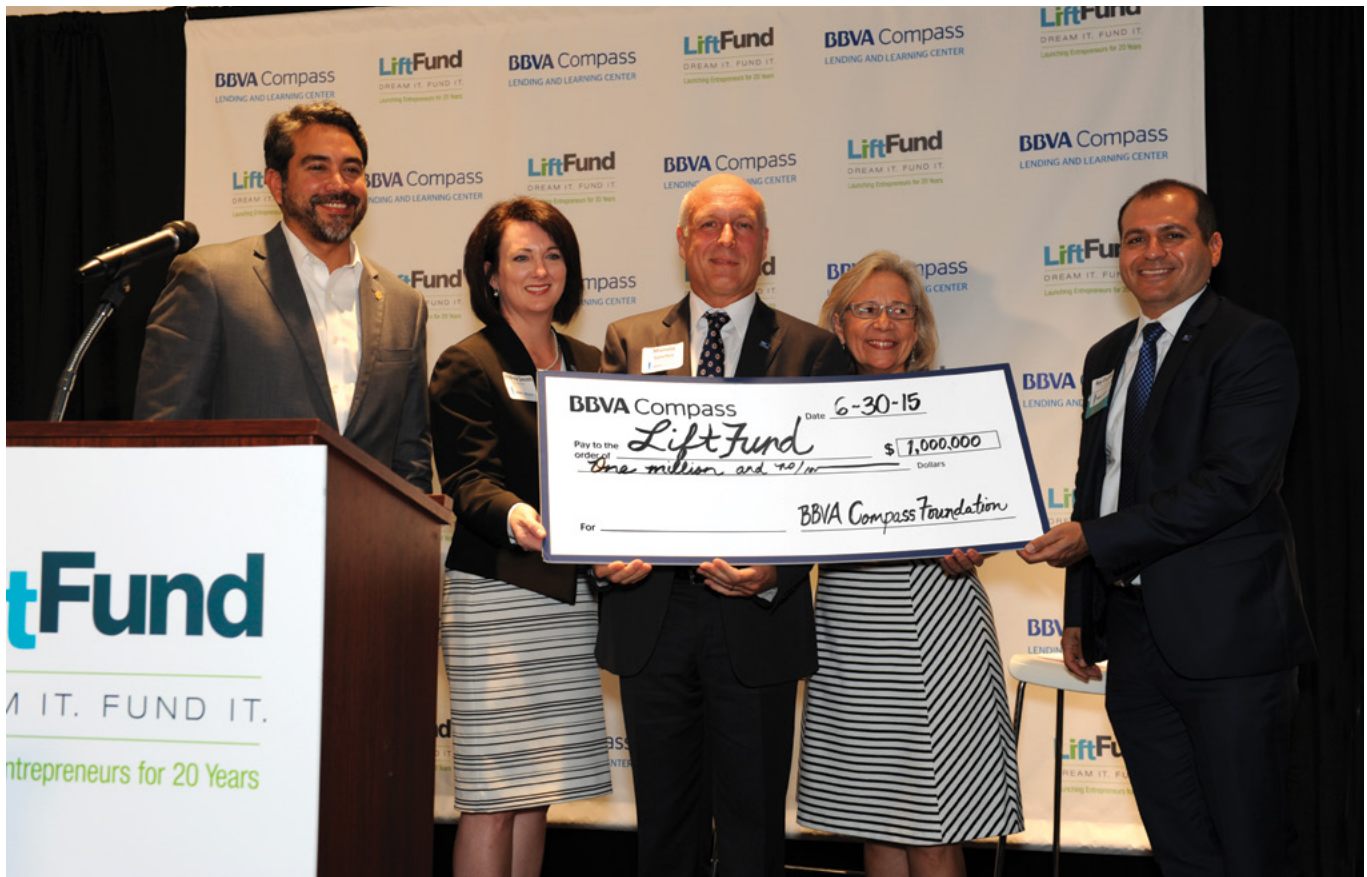
JA programs help prepare young people for the real world by showing them how to generate wealth and effectively manage it, how to create jobs that make their communities more robust and how to apply entrepreneurial thinking to the workplace.

BBVA Compass contributed more than \$245,000 in support of Junior Achievement affiliates in 2015. This partnership allows our employees to volunteer and provide financial education to students of all ages. BBVA Compass plans to continue expanding this partnership because we see the value when students can put these financial education life-lessons into action and learn the importance of contributing to their communities.

Job Shadow with the Houston Rockets

More than 500 students received an inside look at a day in the life of a professional sports administrator as part of a bank-sponsored event with Junior Achievement.

The students from 20 Houston-area high schools learned about sports management, workforce readiness and financial literacy during Junior Achievement's Job Shadow with the Houston Rockets, sponsored by BBVA Compass. The event was designed to familiarize the students, the majority of whom go to schools in lower-income areas, with the world of work and bring their learning to life while supporting the Bank's goal of building its communities.



BBVA Compass Lending and Learning Center Grand Opening at LiftFund, San Antonio, Texas.

Corporate Citizenship

BBVA Compass Foundation

Each calendar year, the BBVA Compass Foundation manages a grant program designed to listen and respond to low- to moderate-income communities. Working in partnership with local community-relations committees, the Foundation awards charitable contributions to local nonprofit organizations that are positioned to address current opportunities and challenges in the regions where BBVA Compass has an operating presence.

The BBVA Compass Foundation is a private foundation that funds eligible for 501(c)(3) organizations in six focus areas:

- Community Development (including Financial Education)
- Education
- Health and Human Services
- Arts and Culture
- Diversity and Inclusion
- Environment and Natural Resources

In 2015, the BBVA Compass Foundation awarded \$8.4 million to nonprofits with diverse missions across the country. BBVA Compass' giving strategy is aligned with BBVA Group's recognized work in reducing traditional barriers to financial well-being for low- to moderate-income communities. Community-development and education focus areas comprise 70 percent of the Foundation's annual spending, and a consistent focal point of social investment strategy year over year.

The Foundation accepts grant requests from nonprofit organizations serving neighborhoods and communities in the Bank's footprint, including Alabama, Arizona, California, Colorado, Florida, New Mexico and Texas. The BBVA Compass team offers monthly webinars to help interested nonprofits understand the Bank's approach to eligibility, giving strategy and application processes. In 2015, more than 1,500 nonprofit representatives participated in these tutorials.

Following webinar participation, nonprofits complete and submit an online application. The community-relations committee for the market of the applying organization completes the initial application review. These committees, comprised of BBVA Compass staff, follow the Foundation guidelines to review the applications and ensure that funded organizations address the needs specific to the community. Visit bbvacompass.com/foundation for more information on the BBVA Compass Foundation.

Signature Programs & Strategic Social investments

In 2015, the Bank celebrated the third year of its signature program – Project Blue Elf. A holiday initiative of the BBVA Compass Foundation, Project Blue Elf seeks to bring joy and promise to children of low- and moderate-income families who attend schools in communities where the Bank operates. BBVA Compass Volunteers, otherwise known as Blue Elves, provided financial education and toys donated from the Foundation to over 5,000 kindergarten through second-grade students in Alabama, Arizona, California, Colorado, Florida, New Mexico, New York and Texas.



Project Blue Elf at Crespo Elementary, Houston, Texas.

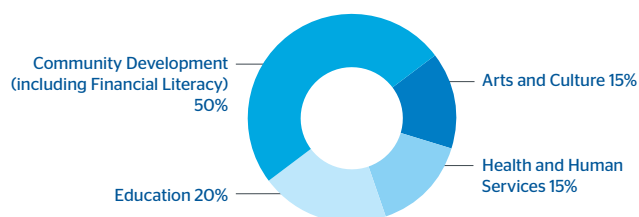
In addition, the BBVA Compass Foundation provided capital for local initiatives, demonstrating innovation and sustained commitment to low- and moderate-income in the key areas of microfinance, education and the arts. Among these leadership investments, LiftFund, the UAB Educational Foundation and the Houston Symphony received grants to support community-building efforts.

LiftFund, a leading community-development financial institution with a highly successful model for small-business start-ups and expansion partnered with the Bank to create the BBVA Compass Lending and Learning center. Through a \$1 million donation, the BBVA Compass Lending and Learning Center offers financial education, business support, counseling, loan generation and funding to local citizens in San Antonio, Texas. The center was established, improving the micro-lending industry and supporting over 1,600 small businesses and entrepreneurs.

The BBVA Compass Foundation also partnered with the Houston Symphony and the Houston Independent School District to launch the Houston Symphony in Residence at Crespo Elementary. The pilot program, in its first year, placed teaching artists in the classroom to deliver an interactive learning curriculum to over 400 third- through fifth-grade students. Based on a thorough evaluation of the impact of this program on student and family engagement,

school culture and diversity in the arts, we will look to replicate and scale learnings from the Houston, Texas, program in other school sites and communities.

BBVA COMPASS FOUNDATION CONTRIBUTION TARGETS (by focus area)



Environment and Natural Resources, Diversity and Sustainability remain discretionary

In 2015, the University of Alabama at Birmingham broke ground on a 2,500-seat soccer stadium – BBVA Compass Field. Through a grant from the BBVA Compass Foundation, the stadium will contribute to the ongoing revitalization of Birmingham's urban core and community-development efforts. Community outreach and student-athlete programming to benefit Birmingham residents will complement the construction, in addition to providing a home for popular sporting events.

Employee Involvement

In 2015, BBVA Compass increased the focus of our volunteer services activities that support low- to moderate-income communities. Employee volunteers supported our community involvement through signature volunteer initiatives; including affordable housing fairs, small-business seminars and financial education for school-aged children.

BBVA Compass encourages employees to donate their time and professional expertise via the BBVA Compass Volunteers program and make charitable gifts via payroll deduction through the BBVA Compass Charity program. Both programs enable employees to become active contributors in their communities.

In the fall of 2015, we launched a new employee portal, Volunteer Connection. This website provides an enhanced user experience, creating improved data management and ease for employees to log on, search and sign up for volunteer opportunities. BBVA Compass Charity contributions will be transferred to the new site in 2016.

BBVA Compass Volunteers

BBVA Compass provided each employee an additional eight hours of paid time off this year, totaling 16 hours of community-service time to participate in the Bank's employee volunteer program.

The BBVA Compass Volunteers program is aligned with the BBVA Compass Foundation's six focus areas and provides employees opportunities to participate in footprint-wide "signature" volunteer programs, as well as local, chapter-based volunteer events for individual and team volunteerism, including:

- BBVA Compass' financial education program, in partnership with FDIC, EverFi and Junior Achievement, is composed of the robust, multi-faceted Money Smart curriculum for adults and small-business owners. (For more information, see page 26.)
- Project Blue Elf, our annual holiday service project; funded by the BBVA Compass Foundation, is an opportunity for BBVA Compass volunteers to provide financial education and a gift to children in low-income schools. (For more information, see page 28.)
- BBVA Compass Volunteers in two of the bank's major markets partnered with NBA Cares and EverFi on their joint "Future Builders Program." (Additional information is available on page 29.)

In 2015, BBVA Compass held its second annual bank-wide week of service. Over the course of one week, volunteers lent both their financial and professional expertise to community-development organizations and area nonprofits that serve low- to moderate-income individuals. More than 2,000 employees provided approximately 10,000 hours of volunteer service in more than 25 markets where the Bank has a presence.

Our transfer to the new Volunteer Connection facilitated and enhanced reporting capabilities for BBVA Compass. These self-reported volunteer hours were recorded by employees, both as individuals and in teams, on behalf of BBVA Compass.

During 2015, more than 4,300 BBVA Compass employees contributed 100,314 hours of volunteer service to more than 2,300 nonprofit organizations and public school districts across our footprint.

Additionally, the CRR team continued to work with local market leadership throughout the year to advise the 24 active BBVA Compass Volunteers chapters across the Bank's seven-state footprint.

BBVA Compass Charity

BBVA Compass Charity, the bank's voluntary employee charitable giving program, offers employees management and transparency when it comes to their charitable contributions.

Employees have the ability to control how much they want withheld from each paycheck, the way in which their dollars are withheld (either a recurring fixed-dollar amount or a percentage of their pay) and the 501(c)(3) nonprofit organization they want their donations to assist. Employees can select up to four organizations from the complete IRS database of more than 2 million 501(c)(3) nonprofits to be the recipients of their gifts.

In 2015, over 2,700 employees donated more than \$1.1 million to qualified nonprofits through BBVA Compass Charity.

BBVA Compass Future Builders Program

BBVA Compass teamed up with NBA Cares for the sixth consecutive year. Over 1,000 students took part in the BBVA Compass Future Builders program, receiving hands-on and EverFi's online financial education lessons. More than 180 BBVA Compass volunteers teamed up with NBA legends Chandler Parsons, Steven Hunter, DeLisha Milton-Jones, and a host of other NBA and WNBA talent. Additionally, BBVA donated tablets to improve technology and students learning.

"Building a Better Houston" Initiative with the Houston Dynamo and Dash

BBVA Compass volunteers teamed up with the Houston Dynamo and Dash in 2015 for its fourth year of the joint "BBVA Compass' Building a Better Houston" campaign, an initiative to boost the city's East End.

Employee volunteers, alongside players and team staff, painted, landscaped and made repairs to a home occupied by an underprivileged family for the initiative's "Building a Better Community" event. The home was selected by Rebuilding Together, and the initiative was made possible, in part, by a \$25,000 donation from the BBVA Compass Foundation.



Building a Better Houston, Houston, Texas.

Talent & Culture

Cultural shift was a hallmark in 2015 for BBVA Compass, and perhaps the greatest change was the transition from Human Resources to its new identity as Talent & Culture. We committed to focus on becoming a more purpose-driven organization, putting people before strategy to create an environment in which all team members can thrive. We encourage deep respect and appreciation among co-workers, which ultimately increases employee satisfaction and retention.

Talent & Culture had much to celebrate in 2015. We made enhancements to our Vacation Carryover and Paid Time Off for Community Service policies and successfully transitioned to a bi-weekly pay schedule. We implemented a new time and attendance tracking system, and launched well-received Taste of BBVA events. We also introduced ALEX®, our new virtual benefits counselor, while continuing to focus on leadership and employee development, including launching the Role Certification and Development program. As always, we continued to focus on physical and financial wellness.

We know that we still have room to improve, but we are proud of the strides we made in 2015 and look forward to a strong 2016.

Employment and Recruitment

With an eye toward simplicity and accessibility in recruiting and employment services, in 2015, Talent & Culture continued to work on ways to bring the processes and resources that affect people managers, candidates and new hires online. We also implemented enhancements to our new-hire onboarding process to make the first days and months of employment with us more efficient and the transition seamless.



Virtual Employment Campus and Employee Referral Site

BBVA Compass leverages BBVA Group's interactive careers site at <https://careers.bbva.com>. Here, job seekers can view job opportunities throughout the global footprint and formally submit interest in a position.

The Employee Referral Site continued to offer another useful resource, allowing current BBVA Compass team members to take a proactive role in referring external candidates for open positions.

Targeted Recruiting

In addition to leveraging the usual internal and external recruiting portals, BBVA Compass utilizes three targeted recruiting portals. The Diversity, Military, and University recruiting portals allow and encourage partnerships with community agencies and resources for bringing in specific talent. These portals not only allow for targeted recruiting campaigns, but they allow Talent & Culture to track campaign results and the career progression of employees hired through those targeted recruiting efforts. The portals have been included on the websites of several community agencies, schools and universities.

Internal Careers Site

Talent & Culture remains committed to filling vacancies with internal candidates whenever possible. The Internal Careers Site allows employees to browse and apply for current vacancies throughout the Bank. Employees can also set up parameters matching their career interests to be notified when applicable vacancies become available. The Internal Careers Site not only helps employees take a proactive step in their own career development, but it also streamlines the job-application process and shortens the time it takes to fill vacancies with qualified internal talent. In 2015, 52 percent of open positions were filled with internal talent.

Welcome to BBVA Compass Avatar Presentation

Talent & Culture offers a streamlined, easily accessible channel for welcoming new employees to the company. The online Welcome to BBVA Compass video avatar presentation offers an overview of our corporate culture, detailed information about our benefits package, information about compliance requirements, a glimpse into some of our employee benefits and much more.

The Welcome to BBVA Compass presentation resides on the You&BBVA online portal. It is accessible to all employees, not just new hires, so that anyone can view it at any time for information about the BBVA Compass employment experience.

NETprofile My Portfolio Tab

In an effort to develop a pipeline of internal talent, throughout 2015, Talent & Culture reminded and encouraged employees to register information about their work skills, educational backgrounds and relocation preferences in the My Portfolio tab of NETprofile. The information employees provide serves to create an internal database that will help Talent & Culture identify internal candidates who are well-suited for job vacancies.

Non-Discrimination and Equal Opportunities

BBVA Compass embraces Equal Employment Opportunity. BBVA Compass has a firm and unwavering policy to provide equal employment opportunity without regard to age, citizenship, color, disability, ethnic origin, gender, gender identity and expression, marital status, nationality, national origin, race, religion, sexual orientation, genetic predisposition, protected veteran status, or any other status or other classification protected by federal, state or local law. This policy includes all job groups, classifications and organizational units.

BBVA Compass, from time to time, and in the ordinary course of its business, may receive claims, including litigation, alleging violations of employment laws. As of Dec. 31, 2015, BBVA Compass was not involved in any regulatory actions related to alleged employment discrimination and working conditions that were material to our financial position. Furthermore, BBVA Compass has a firm commitment to equal employment opportunity and non-discrimination, as evidenced by widely disseminated policies prohibiting discrimination in all aspects of the employment relationship. Employees are afforded numerous avenues to raise complaints, including through management, Human Resources, the Office of General Counsel, Corporate Talent & Culture or by anonymous reporting through telephone hotlines.

While we do not prohibit freedom of association, as of Dec. 31, 2015, there were no BBVA Compass employees covered by collective bargaining agreements. We have not identified any operations where the right to exercise freedom of association and collective bargaining may be at significant risk.

Employee Development and Training

BBVA Compass holds firm to the belief that the ongoing development of team members and the effective deployment of their talents are the keys to creating value. Talent Management & Training was instrumental in offering a variety of programs and initiatives in 2015 that focused on helping employees develop the key skills, abilities and knowledge required to succeed.

CAMPUS BBVA

Update yourself_

Campus BBVA

Campus BBVA is a virtual learning platform that offers a sophisticated search engine, learning paths, communities and forums. Learning paths outline learning events based on employee roles or training initiatives, and communities and forums give employees the chance to interact with course instructors and each other on the platform.

Other features of the platform include new reporting capabilities and a personal calendar of training events that can be filtered by categories such as registered, approved, waitlisted and others.

Role Certification & Development

In 2015, BBVA Compass introduced a certification program for Financial Sales Advisors (FSA) and Sales and Service Advisors (SSA). In 2015, nearly 58 percent of those eligible, or 489 team members, successfully completed role certification during two open certification periods.

Role certification allows FSAs and SSAs to demonstrate proficiency in their current role and provides an opportunity to identify areas for further development.

The certification includes an online assessment to gauge knowledge and a manager observation to allow team members to demonstrate their ability to apply knowledge and skills to client interactions. Role certification is mandatory for FSAs and SSAs who have been in their role for six months and is a consideration for advancement opportunities.

Career Foundation Programs

Career Foundation Programs is one of the many ways we keep our eyes on the future, by choosing the best and the brightest college graduates and giving them the tools and the development to go as far as their motivation will take them. Career Foundation Programs include: leap, RISE and Summer Internships.



leap Associates, Birmingham, Alabama.

leap (learning, evaluation, application and placement) Program

The leap program took place for the sixth consecutive year in 2015. An acronym for learning, evaluation, application and placement, leap is designed to recruit, develop and retain top university talent.

The core of the program is the rotation through the lines of business — part of the application phase — which allows the associates to begin contributing right away and get a sense of what it would be like to work in a particular department. In 2015, the leap associates participated in a three-week Agile sprint, where they observed and researched the methodology in order to provide recommendations to assigned Bank departments on implementing Agile.

Since the program's inception, 87 program graduates have continued to contribute to BBVA Compass' success, and many of them have already been promoted from their original program placements. Another class of leap associates will arrive this summer.



RISE Spring 2015, Houston, Texas.

RISE

Following a successful pilot, the Retail Intensive Sales Experience (RISE) officially rolled out in 2015. RISE is an accelerated Retail Banking training program that recruits top talent from universities across the footprint. During this 16-week program, participants receive extensive sales, systems and product training. Rotations with top sales performers provide them with mentors to emulate so they can quickly move into applying their knowledge through direct interaction with customers. At the conclusion of the training period, the goal is to place participants in one of the bank's retail branches as Financial Sales Advisors.



RISE Fall 2015, Houston, Texas.

Internship Program

Twenty college students from across the country opted into BBVA Compass' rigorous internship program in the summer of 2015, looking for an opportunity to hone their skills and get much-needed work experience in a real workplace. The 10-week program placed interns full time in Birmingham, Houston, Dallas, Atlanta, Montgomery and San Antonio. Risk management, engineering, business development, consumer & commercial banking and economic research hosted interns in 2015.

During the eight weeks within their assigned departments – working on individual and group projects, as well as job shadowing – the interns worked on “action learning presentations” with intern teammates, which they presented to senior leaders in the organization during the last two weeks of the program.

2015 EMPLOYEE TRAINING

	Number of Hours	% of Total Completions	Number of Completions
Training hours completed	447,064	100%	380,861
Live training	129,413	28.9%	32,476
Online training	317,651	71.1%	348,385
Employees trained in 2015	12,678		
Total investment in training (in dollars) ¹		\$2,991,612	
Training investment per employee		\$276.69	

¹Total investment in training (in dollars) refers to the true expense of training materials, content development, etc. It does not include calculations for any expenses related to employee time, travel, etc. This is the estimate of expense as of January 3, 2016.

Toastmasters Clubs

Employees continued to participate in the Bank's two active Toastmasters clubs throughout 2015. Toastmasters, an international organization that trains people to communicate effectively and develop leadership skills, provides employees opportunities to practice and improve their public speaking skills during each meeting. Additional leadership opportunities result from participation in Toastmasters, such as serving as a local or regional club officer or joining the club's Speaker's Bureau and speaking outside the club setting.

Leadership Development

Talent Management and Training continued to be rigorous in its approach to developing leaders, offering a wide range of initiatives designed to help managers build their leadership abilities. Through these leadership development programs, Talent Management & Training provided 163,519 hours of training to the BBVA Compass leadership community during 2015.

Continuous Learning Requirement (CLR)

The Continuous Learning Requirement is a leadership-development strategy intended to ensure that all people managers remain focused on keeping their skills sharp. This program requires that all people managers complete a minimum of 12 hours of developmental training each year. In 2015, nearly 89 percent of all people managers completed their CLR requirement. This means that 1,538 managers completed a total of 26,425 hours of learning in 2015. As we shift from a rolling 12-month to a calendar-year cycle, managers will have 16 months to complete the requirement in 2016.

Harvard ManageMentor

In 2015, we moved 44 Harvard ManageMentor (HMM) online learning modules into the Campus BBVA learning platform to further streamline our training options for team members. These modules, developed by Harvard Business Publishing, cover a broad range of topics including time management, persuading others, presentation skills, project management and more.

All BBVA Compass employees have access to HMM. In 2015, they completed a total of 5,911 courses, equaling 17,733 hours of training. Among people managers and employees, “Persuading Others” was the most popular HMM course, with 302 individual completions in 2015.

Leadership Essentials

Leadership Essentials, introduced in 2012, ensures that managers who are new to the people-manager role learn critical Human Resources policies and procedures via a series of targeted communications and webinars. Newly promoted people managers are required to complete Leadership Essentials prior to starting in a people-manager role, and people managers hired from outside must complete it within 90 days of hire.

All newly hired or promoted first-time people managers completed Leadership Essentials in 2015.

Targeted Leadership Training

Talent Management & Training offered targeted development solutions for multiple segments of the leadership population in 2015, including a series of training programs for senior executives. Throughout the year, members of this targeted leadership group attended programs at Campus BBVA in Madrid, including the Corporate Management Program, Building a Customer Centric Organization, Corporate Leadership Program, Entrepreneurial Strategies for Growth Program and Leadership Based in Values.

BBVA Compass School of Management

In the fall of 2015, 35 senior BBVA Compass leaders participated in the BBVA Compass School of Management on the campus of The University of Texas (UT) at Austin. Sponsored by Talent Management & Training, in partnership with the McCombs School of Business at UT, this comprehensive educational program explored topics including advocacy and influence, leading high-performance teams, world economic outlook and change management, among others.

The program's sixth "graduating class" collaborated on projects and prepared formal presentations, which were delivered to the BBVA Compass Management Committee. The School of Management will continue in 2016.

Mentoring

The Leadership Essentials Mentoring Program has allowed people managers the opportunity to partner with mentors who provide guidance as they work toward their overall professional development.

It offers participants an opportunity to expand their network of business partners and collaborate with, as well as learn from, experienced and successful leaders across all lines of business. An online platform helps facilitate the professional relationship between mentors and mentees. In 2015, more than 130 team members connected with and learned from mentors within the program.



Sister Accord Leadership Enrichment Tea Party, Birmingham, Alabama.



Employee Benefits

Personal Benefits

Because every team member contributes to the success of the organization, BBVA Compass is committed to providing a variety of benefit programs designed to meet employees' needs. These programs offer financial security through life insurance and retirement plans as well as support our employees' physical and financial health and overall well-being.

Employee Benefit Plans

BBVA Compass provides a comprehensive benefits package designed to meet the needs of employees and their families. Benefit plans and programs include health care, vacation and paid time-off programs, savings and retirement plans, the Wellthy for Life wellness program, discounts on banking services through Employee Banking Perks, special discounts on products and services, tuition assistance and scholarship programs for employees' dependent children.

ALEX® the Benefits Counselor

A very important team member joined the organization in late 2015: ALEX®, our new virtual benefits counselor. ALEX played a crucial role during benefits Open Enrollment, asking team members a series of questions about themselves, their families and the type of insurance needs they might encounter in the near future. ALEX then compared and contrasted the available options, recommending the one that may be the best fit for the team member.

ALEX was so popular and changed the face of Open Enrollment so completely that he earned a long-term spot at the Bank. ALEX is available 24/7 to new hires and existing team members who want help understanding the Bank's health and welfare benefits.



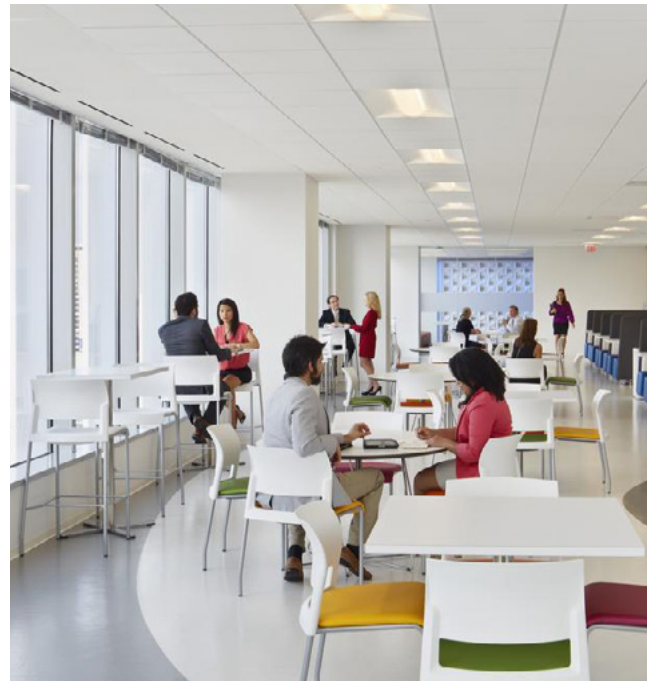
Wellthy Points and Health Reimbursement Account (HRA)

In 2015, BBVA Compass continued to offer employees an important option to save money on their out-of-pocket medical costs, taking charge of their health and wellness at the same time. By completing designated wellness activities in the Wellthy for Life wellness program, employees were able to earn up to 720 Wellthy Points in 2015. These wellness activities include:

- Biometric Testing
- Health Assessment
- Healthy Ranges for Biometrics and Labs
- Improvement in Biometrics and Labs
- Chronic Care Management
- Virgin Pulse (formerly Virgin HealthMiles)
- Wellness Webinars
- Preventive Wellness Exam
- BBVA Compass-sponsored Activities
- Wellness Challenges
- Wellness Workshops

For employees who are enrolled in the Choice 80/20 Health plan, each Wellthy Point earned equates to a company-paid \$1 contribution to a Health Reimbursement Account (HRA), and employees were able to earn up to \$720 in HRA funds in 2015. HRA dollars may be used to pay for eligible medical, dental, prescription and vision expenses, including co-pays, co-insurance and deductibles. Because unused HRA balances roll over from year to year, participants are able to add to any balance they may carry over from the 2015 plan year and build on it going forward. As of Dec. 31, 2015, a total of \$1,745,377 HRA dollars had been funded.

Employees who are not enrolled in the health plan may also complete wellness activities and earn Wellthy Points, and they will retroactively receive HRA contributions for these completed activities should they enroll at a later date within the plan year due to a qualifying life event or a qualifying employment-status change.



BBVA Compass Employee Health Center

In 2015, BBVA Compass continued to offer access to the Employee Health Center. Located less than a mile from the BBVA Compass Plaza in Houston, the center provides a wide variety of health and wellness services to employees, their spouses and children covered under the company's health plan.

Retirement Benefits

BBVA Compass employees have the option of participating in the Compass SmartInvestor 401(k) Plan, which allows employees to defer a portion of their salary on a pre-tax basis and to receive employer matching contributions. All employees are immediately eligible to make salary deferrals under the Plan upon hire and are eligible to receive employer matching contributions after completing one year of service. Employees are also eligible to receive employer company contributions under the Plan after completing one year of service. These employer company contributions range from 2 percent to 4 percent of the employee's compensation based on years of service.

BBVA Compass has a defined benefit plan known as the Compass Retirement Plan that pays a defined monthly benefit at retirement. The plan is 100-percent funded by BBVA Compass and has been closed to new participants since January 2003. In 2003, participants elected either to continue their participation in the Compass Retirement Plan or transfer their participation to the Compass SmartInvestor Retirement Plan, which was a defined contribution plan that subsequently merged into the Compass SmartInvestor 401(k) Plan.

Benefit accruals under the Compass Retirement Plan will cease for active participants as of Dec. 31, 2017. Beginning Jan. 1, 2018, these participants will be eligible to receive enhanced employer company contributions under the Compass SmartInvestor 401(k) Plan.

Total Compensation Statements

"Total Awareness + Total Understanding = Total Appreciation" is the tagline that describes Total Compensation Statements, a resource designed to help employees understand the full investment BBVA Compass makes on their behalf, beyond just take-home pay. Total Compensation Statements, which are available on mybbvacompassbenefits.com, break down employees' annual total compensation into several categories, including cash compensation, retirement benefits, company-paid health and welfare benefits and other benefits.

Paid Time Off

BBVA Compass believes that regular times of rest and relaxation away from the job are crucial for health, well-being and performance on the job. Employees are encouraged to take advantage of annual paid vacation time.

Enhanced Vacation Carryover Policy

Employees are enjoying greater flexibility in planning time off courtesy of an expanded vacation-carryover policy announced in 2015: Team members may carry over five days of vacation to the following year.

This enhancement allows team members to choose what works best for them – to use vacation time within the year they earn it or carry time over for whatever they have planned in the following year.

This policy provides greater flexibility to those unable to use all of their allotted vacation time in a single year and helps accommodate team members who might require additional time off in an upcoming year. Additionally, exempt team members enjoyed a simplified vacation-carryover process that no longer required submission of a formal request; the accrued time off remaining in the system at year-end automatically rolled over for all team members.

Approximately 8,100 employees carried over eligible vacation balances from 2015 to 2016.

Enhanced Paid Time Off for Community Service Policy

BBVA Compass is committed to giving back to the communities in which we have a presence, and our employees are key to helping us make a difference. Under our enhanced Paid Time Off for Community Service policy, employees were encouraged to use even more time – up to 16 hours of paid time off – in 2015 to participate in volunteer activities, community development or Community Reinvestment Act (CRA)-qualified service activities.

In 2015, employees logged more than 18,950 hours of service under the new policy, with many counting as CRA-qualified service activities.

Leave and Attendance Programs

BBVA Compass' leave and attendance policies are designed to help employees achieve a healthy balance between work and their personal lives.

Sick Pay Provision for Family Leave

Under the Sick Pay Provision for Family Leave, employees may use up to half of their current accrual of sick time each calendar year to provide care for an ill or injured family member, to assist a family member with attending medical appointments or to attend to a personal or family-related medical emergency.

Pregnancy Leave

Employees who give birth via a natural or Caesarian delivery may receive two weeks of pregnancy leave paid at 100 percent, followed by one week of parental leave paid at 100 percent per birth event. In addition, while under a doctor's care, a birth mother has access to 100 percent of her accrued sick-pay balance up to a maximum of six weeks for a natural birth and a maximum of eight weeks for a Caesarian birth, unless otherwise extended by the physician and/or as required by state or local law. Following these periods of up to six or eight weeks, as applicable, new birth mothers may also use up to 50 percent of their remaining accrued sick-time balance under the enhanced Sick Pay Provision for Family Leave, followed by any accrued vacation time, and go unpaid for the remainder of their approved leave.

Parental Leave

Under the Parental Leave policy, all employees receive up to one week of fully paid parental leave per birth or adoption event for the purpose of bonding with a newborn or with a newly adopted child under the age of 18. Following this one week, employees may opt to use up to half of their accrued sick-time balance available as of the effective start date of the leave.

Continuous Time Away

The Continuous Time Away work-life balance and leave policy remained in place during 2015. Under the terms of this policy, employees are required to remain away from job duties for at least five consecutive business days annually. Remaining continuously away from the job means that employees are not allowed to transact or otherwise carry out, either physically or through electronic means, their regularly assigned duties during the required time away. Certain employees who work in identified high-risk areas or who are involved with high-risk responsibilities may be required to remain continuously away from their job duties for 10 consecutive business days.

Strict adherence to this policy helps ensure that our organization remains in compliance with federal regulatory risk-management policies, as well as provides employees a tangible benefit, as regular times of rest and relaxation away from the job are crucial for their health, well-being and performance on the job.

Sick Pay, Short-Term Disability Benefits and Long-Term Disability Insurance

BBVA Compass provides the opportunity to accrue sick pay to be used to help avoid an interruption in base pay if work is missed due to medical necessity, personal emergency or another necessary absence. Short-term disability benefits are provided to eligible employees, and long-term disability benefits may be available for employees who cannot return to work because of health problems.

Health and Safety at Work

BBVA Compass is committed to providing tools to help employees live healthy, productive lives, as well as finding ways to help them manage their physical, emotional and financial health.

Wellthy for Life Health Fairs

Employees once again had the opportunity to get a snapshot of their overall health with an eye toward improving their wellness at Wellthy for Life Health Fairs. These onsite events took place throughout February, March and April. Health fairs were scheduled for 32 locations in 2015 – nearly double the number in years past – and took place in cities that had not previously held health fairs. More than 3,500 employees completed a screening that measured total cholesterol, triglycerides and glucose levels, as well as biometric information including height, weight, body mass index (BMI) and blood pressure.

By completing these activities, employees earned 100 Wellthy Points. For those employees on the BBVA Compass health plan, these Wellthy Points equated to \$100 in contributions to the Health Reimbursement Account (HRA) that may be used to pay for eligible medical, dental, prescription and vision expenses, including co-pays, co-insurance and deductibles.

In all, more than 3,500 employees across the footprint attended the health fairs in 2015.

Virgin Plus

Employees continued to track their physical activity in 2015 with Virgin Pulse. This program is making a big impact on employees' level of fitness – and their financial well-being – by promoting daily physical activity, healthy lifestyle choices, and personal and group challenges.

During 2015, there were 8,319 employees, or 76 percent of all BBVA Compass employees, enrolled in the Virgin Pulse program — up from 72 percent in 2014. This is well above the national average (50 percent) among companies that participate in Virgin Pulse. In 2015, BBVA Compass employees took 10,186,819,700 steps, averaging 7,917 steps per day.

Forty-seven percent, or 3,879 employees, earned HealthCash in 2015. Among all employees earning incentives, the average cash earned was \$431. HealthCash payouts to all participating BBVA Compass employees totaled \$1,674,850.

Teamwork and community play an important role for participants at BBVA Compass. At the end of 2015, 62 percent of members, or 5,187 employees, had made friend connections via the LifeZone website, and 47 percent of members, or 3,906 employees, had joined a group.

Enrollment in the Virgin Pulse program is available at no cost to employees.

Live Well Learning Series

The bank is committed to providing programs and resources to help team members live their healthiest, best life. Comprehensive wellness goes beyond just exercise and a healthy diet. It's about focusing on the whole person — body, mind and spirit.

More than 4,000 team members registered to get useful tips and information through the Live Well Learning Series in 2015. Each webinar was one hour long and was available to all employees across the footprint. Eleven sessions were led by experts in a variety of fields, who were contracted as part of the Wellthy for Life wellness program. Topics covered in 2015 included:

- Live Well, Eat Better
- Challenges of Single Parenting
- Stress Management
- Smoking Cessation

Financial Wellness

In 2015, team members at several corporate locations were invited to panel discussions with financial-wellness experts who answered questions about general savings and investing, insurance, 401(k) options, effective budgeting and more. The panel discussion that was held at BBVA Compass Plaza in Houston was recorded for team members across the footprint to view.

Additionally, throughout 2015, Talent & Culture posted a series of informative articles on topics such as being a savvy healthcare consumer, understanding what it means for the Bank to be self-insured and ways that team members can earn financial incentives through the Bank's wellness programs.

BBVA Compass wants team members to have the foundational financial knowledge to make their lives better and give them the tools that can help them build a plan that puts them on track to meet their future needs.

Wellthy for Life

The Wellthy for Life program continues to offer numerous resources designed to improve the health and overall well-being of employees and their families. A guidebook with complete information about Wellthy for Life programs is available at wellthyforlife.com.

Passion for People

BBVA Compass demonstrates a personal investment in employees by providing tangible benefits through Passion for People initiatives.

Play It Forward

In its second year, Play It Forward remained an employee favorite, helping team members and their families get active, have fun and give back to the community all at the same time. Nearly 850 employees and their guests attended Play It Forward in Houston, Birmingham and Dallas.

The 2015 events featured family-oriented sports, fitness and agility challenges for all ages. But the main event at Play It Forward was assembling donated children's bicycles. BBVA Compass partnered with CYCLE (Changing Young Children's Lives through Education) to provide new bicycles and helmets for schoolchildren who had met reading goals set by their schools. Team members collectively assembled 300 bicycles at the events.



Play It Forward, Houston, Texas.

Aspire Plus Recognition Program

The Aspire Plus Recognition Program launched at the beginning of 2015 and was a huge success, with approximately 61 percent of team members participating over the course of the year. The program allows employees at all levels to recognize others by sending Aspire ecards. Users can send an ecard to any employee in any department in only a few clicks, choosing from several options showing different messages of appreciation, and may also add a personalized message for the recipient.

The most popular Aspire card was the One Team card, which accounted for 31,638 of the nearly 70,000 cards sent in 2015. Managers accounted for 36 percent of the total ecards sent for the year.

Team members across the organization earned 2,000 (500 each quarter) BBVA Compass Visa Reward Cards worth \$250 each.



Taste of BBVA, Birmingham, Alabama.

Taste of BBVA

The first-ever Taste of BBVA cooking contest gave team members in Birmingham and Houston a chance to prepare desserts for world-renowned chefs, the Roca brothers.

Taste of BBVA: A Sweet Cooking Contest with the Roca Bros. was held in conjunction with the second Roca brothers BBVA-backed world tour. More than 40 team members seized the opportunity to cook for the chef-owners of the No. 1 restaurant in the world (according to Restaurant magazine), El Celler de can Roca. Top desserts in each city were chosen in the categories of Best Tasting, Best Presentation and Most Creative.

Additionally, Talent & Culture introduced the first Taste of BBVA Cookbook during the 2015 holiday season, featuring photos and recipes from the events. The cookbook included a variety of dessert recipes from 42 team members.



Celebrating U

Recognizing and thanking employees for their many contributions was center stage in April 2015 as Celebrating U took place at BBVA Compass. This is a special time to show team members how much they are valued. During the week-long celebration, every teammate received tokens of appreciation, including a rechargeable mobile power bank and an extra day off to take any time in 2015.

Across the entire organization, managers and departments leveraged a multitude of creative ways to make employees feel even more special. Employees were treated to ice-cream socials, participated in fun games and conducted meetings in the park. Business partners treated neighboring departments to breakfast and lunch. No matter what form the appreciation took, employees embraced the creative gestures of camaraderie and fun – and they acknowledged each other through the week by sending 3,596 ecards via the Aspire Plus Recognition Program.

Celebrating U gives us the chance to be intentional in taking the time to show that we value each team member, we value their work and we value their contribution to the organization.

Passion for People Photo Contest

More than 100 team members entered photos in the 2015 You&BBVA Around the World Photo Contest, and it was a daring first-time skydiver whose image took first place.

The photo, featuring the employee and the You&BBVA Passion for People logo zooming toward the ground at 120 mph, racked up the majority of more than 2,700 votes cast by team members during the contest. As a result, the winner received a vacation package that she and her husband plan to use to take an anniversary trip to San Juan in May 2016.

The second- and third-prize winners won Hotelopia hotel vouchers, valued at \$600 and \$400.



See Share Smile, Birmingham, Alabama.

See Share Smile

More than 1,200 children attended See Share Smile in 2015. This annual event gives employees' children between the ages of 8 and 14 the chance to experience a workday at BBVA Compass. Each participant received a See Share Smile messenger bag containing an activity book, T-shirt, other fun learning supplies and a \$10 deposit for participants who opened a Young Savers account.

Employees across the footprint volunteered to lead the children through the day's activities, which were designed to teach the youngsters in a fun way about BBVA and BBVA Compass, the banking industry in general, money and the importance of saving.

2015 marked the fifth time we've held the See Share Smile event, and it is scheduled to take place again in 2016.

Virtual 5K/10K

BBVA Compass Virtual 5K/10K provided runners and walkers across the footprint a flexible alternative to a single-day race, and participants logged a total of 8,009 miles as they worked their way toward the virtual finish line. Team members were able to complete the equivalent of a 5K or 10K route at their own pace in their own location over a 10-day period.

More than 1,900 employees registered to participate in the event, and two-thirds of them successfully completed the challenge by logging their progress on the event website. More than 1,200 employees completed the 10K route, and 80 others reached the 5K mark. All received a 5K or 10K medal in recognition of their accomplishment, along with 10 Wellthy Points and 250 Virgin HealthMiles.

Campus LFP

In 2015, 10 children of BBVA Compass team members received the opportunity of a lifetime — traveling to Seva, Spain, to attend a world-class soccer camp.

Campus LFP — which stands for Liga de Futbol Profesional, or Professional Soccer League — is a BBVA Group-sponsored soccer camp for boys and girls between the ages of 8 and 13. The U.S. group joined more than 100 children from around the world for the event, which took place July 5-12. Since 2011, BBVA Compass has sponsored 51 children in the soccer camp.

During the camp, the children participated in staff-led workshops, activities and games. The campers also visited Barcelona, about a 45-minute drive from Seva, to tour Camp Nou, home of professional Spanish soccer team FC Barcelona, and RCD Espanyol Stadium, home of the RCD Espanyol Barcelona football club.

Employee Banking Perks Program

Employees have access to special benefits and discounted rates on a wide range of banking products and services, including checking and savings accounts, mortgage financing, consumer loans, the BBVA Compass ClearPoints credit card, wealth management and brokerage services and more.

In 2015, the Bank introduced a new installment loan, the Signature Express Loan, and the BBVA Compass NBA American Express Card® with TripleDouble Rewards.

Special discounts on products, services and entertainment opportunities are also available through selected vendors with whom BBVA Compass contracts.

Scholarship Programs

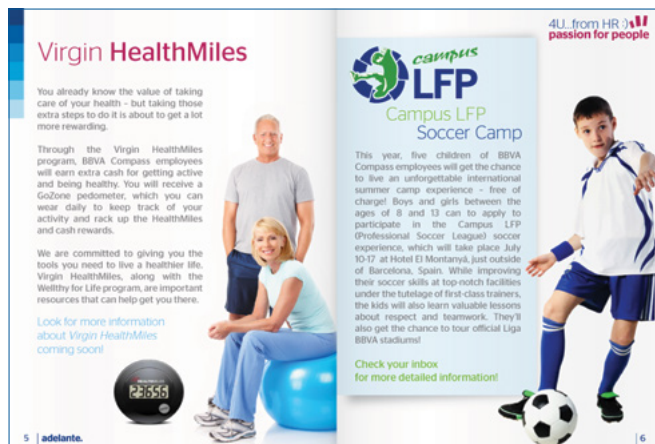
In an effort to support academic achievement, two scholarship programs are available to children of BBVA Compass employees: the BBVA Compass Passion for Education Scholarship and the Harry B. Brock, Jr. Scholarship Program at Samford University. In 2015, 42 scholarships in the amount of \$3,000 each were awarded to children of BBVA Compass employees through the BBVA Compass Passion for Education Scholarship. The average GPA for these high-performing high school senior recipients was 4.0, and the average GPA for college recipients was 3.89.



Talent & Culture Communications

You&BBVA Portal

The You&BBVA Portal remained the primary platform for Talent & Culture news, information and resources in 2015. Featuring four distinct pillars — Passion for People, My Careers, My Compensation and My Processes — it's a one-stop shop that organizes information from an employee-centric point of view.



You&BBVA e-Newsletter

Employees stayed apprised of the latest Talent & Culture-related news throughout the year with the You&BBVA e-Newsletter. Visually engaging and easy to read, the electronic e-Newsletter with page-turning features is distributed on a regular basis and serves as an important outlet for keeping the lines of communication open between employees and Talent & Culture.

Team Member Services Self-Service Application

Employees can search for information regarding Talent & Culture-related policies, practices and programs via the Team Member Services Self-Service Application. This resource offers another avenue for accessing the team of Talent & Culture professionals dedicated to providing answers to and assistance with all employees' HR-related questions and needs. Team Member Services are also available via email and over the phone.



Workforce Statistics

NUMBER OF EMPLOYEES

	2015	2014	2013
	10,812	10,481	10,933

AVERAGE LENGTH OF SERVICE OF WORKFORCE (years)

	2015	2014	2013
	6.7	7.1	6.7

EMPLOYEES BY PROFESSIONAL CATEGORY (percentage)

	2015	2014	2013
Senior-level Management	4.8	6.9	7.0
Middle Management	8.9	9.4	9.0
Entry-level Management	2.7	1.3	3.6
Professional	20.6	17.8	17.3
Technical	4.7	4.3	4.6
Sales	27.5	27.7	24.8
Clerical	30.8	32.6	33.7



Celebrating U, Birmingham, Alabama.

Diversity & Inclusion

Diversity & inclusion includes the BBVA Compass material aspects of supportive workplace and ethical management. BBVA Compass believes that diversity is inherent in our business, from our relationships with clients of different backgrounds, to our local and international team members, to the work we do with minority and women-owned vendors operating as suppliers to the organization. The CRR department, Talent & Culture and Procurement work in parallel to ensure a solid infrastructure for Diversity & Inclusion.



Strategy

Our strategy for diversity and inclusion focuses on three core areas: Talent & Culture, Procurement and Community Involvement. Working together with the Office of the CEO, we issued BBVA Compass' official CEO Statement on Diversity:

"When we envision a better future for people, we mean all people. As a global company, we embrace diversity, and in the U.S., we value the diversity of our employees, customers, vendors and communities. From supplier diversity, to employee programs, to support for our communities, we make diversity a competitive advantage."

Procurement

In 2015, BBVA Compass sponsored and exhibited at Houston Minority Development Council Expo in Houston, Texas. Participating in this type of event allows us to meet new and qualified companies that might not appear on our radar during normal business practices. In addition, it enables BBVA Compass to expand its brand to a new group of businesses. These discoveries assist us in broadening our database of potential suppliers to consider for our sourcing events.

We are members of the Women's Business Enterprise National Council (WBENC), which is one of the most respected organizations in the United States for corporate and business members. We have drafted a regional sourcing strategy initiative that can be a valuable tool to demonstrate a "practitioner's approach" as a participating corporation.

Employees

In 2015, BBVA Compass' Blending the Best Workplace Diversity & Inclusion effort reached another milestone with a continued commitment to learning and an enhanced focus on practical application. A second e-learning course, Building Inclusion for Impact, was created, and 99 percent of all team members completed the course in 2015. Today, two e-learning courses are required for new hires and new people managers, so every team member gets actively involved in the cultural-change effort across the organization.

The Workplace Diversity & Inclusion Council, comprising 24 dedicated team members representing each line of business, remains committed to championing workplace diversity and inclusion across the organization. As such, in 2015, they facilitated the first in a series of four in-person and WebEx discussions across the footprint, with a participation rate of nearly 90 percent. The discussions, aimed at ensuring everyone understands specific inclusive behaviors they can demonstrate, began in the fourth quarter with subsequent quarters dedicated to each of the inclusive behavior categories: Welcomed, Heard, Valued and Respected.

The organization continues to follow the five-phase Progression Strategy, developed by the Council, to guide WD&I efforts to deliver value at every stage, to build a sustainable effort and guide growth and maturity year over year.

In 2015, the company made progress in the Foundational Phase of the Progression Strategy and began moving beyond simply recognizing differences and similarities and toward creating a more inclusive environment. The company also moved toward the goal of ensuring every employee feels welcomed, heard, valued and respected.

Our commitment to workplace diversity and inclusion is underscored publicly on bbvacompass.com, our recruiting portal and all of our social media sites.



Human Rights Campaign Corporate Reception, Houston, Texas.

Community

BBVA Compass works closely with organizations nationally and locally across our footprint that represent the voices of diverse populations. At the national level, we are actively involved in supporting the National Association for the Advancement of Colored People (NAACP), National Council of La Raza (NCLR) and the Human Rights Campaign (HRC), among others.

In January 2015, BBVA Compass sponsored a convention of the national coalition for Asian Pacific American Community Development. This important gathering focused on addressing poverty within the Asian American Pacific Island population across the country and in Houston specifically. The group helped explore the unique banking needs of this community to guide the development of solutions.

BBVA Compass also became a founding pledge signer of the Texas Competes Pledge in 2015. The Texas Competes Pledge represents the unified pledge of businesses in Texas supporting the fair treatment of lesbian, gay, bisexual and transgender (LGBT) workers, families, customers and tourists.

WORKFORCE: BREAKDOWN BY GENDER & AVERAGE AGE (percentage)

	Gender		Average age		
	Males	Females	<30	30-50	>50
2015	39.3	60.7	21.1	54.2	24.7
2014	37.7	62.3	21.2	56.9	21.9
2013	36.9	63.1	22.4	56.2	21.4

FUNCTIONAL DISTRIBUTION BY GENDER AND PROFESSIONAL CATEGORY (percentage)

	2015*		2014		2013	
	Males	Females	Males	Females	Males	Females
Senior-level Management	67.9	32.1	67.8	32.2	68.1	31.9
Middle Management	42.1	57.9	42.1	57.9	41.9	58.1
Entry-level Management	44.4	55.6	43.2	56.8	23.9	76.1
Professional	41.3	58.7	38.7	61.3	39.0	61.0
Technical	64.2	35.8	65.0	35.0	64.0	36.0
Sales	50.7	49.3	49.6	50.4	50.4	49.6
Clerical	16.2	83.8	15.6	84.4	15.7	84.3

* The data included in the report have been adjusted from prior years to reflect subcategories currently used by the human resources system, enabling better comparison of performance going forward.

WORKFORCE: BREAKDOWN BY EMPLOYMENT TYPE & GENDER (percentage*)

	2015		
	Males	Females	Total
Full-time	40.1	59.9	95.67
Part-time	21.0	79.0	4.32
Temporary	0.0	100.0	0.01

* This table includes only full-time, part-time and temporary BBVA Compass employees. It does not include contract workers.

VOLUNTARY TURNOVER^{1,2}

	Total turnover	Males	Females
2015	19.9	19.5	20.1
2014	20.5	20.2	20.6
2013	17.5	18.2	17.1

1) Voluntary turnover rates adjusted from prior period to better reflect industry standard calculation: (total voluntary terminations over 12-month period/average headcount over 12-month period) x 100.

2) BBVA Compass does not currently track employee turnover by age group or region.

NEW HIRE RATE

	Total	Males	Females
2015	24.7	26.5	23.6
2014	23.8	25.6	22.8
2013	22.7	26.6	20.5

Environmental Management

Representing the material aspect of environmental responsibility, BBVA Compass continues to make progress in support of BBVA Group's Global Eco-efficiency Plan. The BBVA Group prioritizes sustainable development. We carefully measure and monitor our environmental footprint and make strategic decisions to minimize our impacts.



As a financial institution, the Group's activities have a significant impact on the environment: be it through its consumption of natural resources, management of our properties, use of paper, travel, etc. (direct impacts), or through the consequences for the environment of the products and services we provide, particularly those related to financing, asset management and management of its chain of suppliers (indirect impacts).

The BBVA Group Global Eco-efficiency Plan for established the following objectives for 2013-15:

- 6% reduction in CO₂ emissions (per employee)
- 3% reduction in paper consumption (per employee)
- 3% reduction in water consumption (per employee)
- 3% reduction in energy consumption (per employee)
- 33% of employees working in buildings awarded environmental certifications (ex. LEED)

BBVA Compass initiatives that support the Eco-efficiency Plan include:

- Separation and recycling of solid urban waste and hazardous waste
- Separation and recycling of computer waste
- Reduction of electricity consumption per employee
- Reduction of paper consumption per employee
- Establishing sustainability criteria for purchasing
- Increase the number of ISO 14001 certifications
- Use of videoconferences to reduce the number of business trips

- Offsetting CO₂ emissions and reforestation
- Training, dissemination and education programs

In support of the BBVA Group's Global Eco-efficiency Plan, the following measures were implemented in 2015:

- Initiated 225 energy-saving ideas in the Portfolio Energy and Environmental Reporting System (PEERS) software. These projects included energy-conservation projects, infrastructure improvements and material replacement projects. 111 projects have been completed with an annual energy savings of \$100,000 and 3,274,637 kBTUs.
- Corrected several billing anomalies for water, natural gas and electricity with the Real Estate's team use of the PEERS tool.
- Continued utilization of a third-party bill-pay system for utilities that provides daily feeds of utility usage via upload into PEERS.
- Began tracking 598 locations in the Environmental Protection Agency's ENERGY STAR Portfolio Manager. 352 sites have scores above 50 and 147 sites have scores above 75. ENERGY STAR-certified buildings earn a score 75 or higher on EPA's 1-100 energy performance scale and are verified by a licensed Professional Engineer (PE) or Registered Architect (RA).
- Replaced 57 Heating Ventilation and Air Conditioning (HVAC) units at 35 sites, upgrading to more energy-efficient and environmentally friendly Seasonal Energy Efficiency Ratio (SEER) units with R-410a refrigerant. These units replaced those with R-22 refrigerant, thereby minimizing potential contribution to ozone depletion.
- Developed a comprehensive water-use mitigation plan for all sites in California to include xeriscaping, fixture replacement and other initiatives. Thirty-two of our branches are in Tier 7 areas or higher, requiring a conservation goal of over 25 percent.
- A proposal to install remote monitoring and control of the irrigation systems has been researched and a proposal is scheduled to be presented to BBVA for approval. This proposal is a multi-tiered plan with the first tier addressing the California sites (44) and high-usage sites for a total of 85 sites. Tier 2 has another 235 sites.
- Vetted 115 sites for exterior LED site lighting upgrades. These upgrades include design requirements to provide photometric layouts that show the light levels at 50,000 hours of operation. This design will ensure that the light levels around the ATM's meet state guidelines for lighting requirements for the next 11+ years.

Energy and Emissions

In 2015, BBVA Compass consumed 37,057 (1,434 GJ) liters of diesel, which had 100 metric tons associated GHG emissions. Diesel fuel is used by the Bank to power generators in emergency situations and test these generators throughout the year to ensure readiness.

In 2015, the total electricity consumption for all of BBVA Compass' properties was 134,694,510 kWh, which translates to 69,440 metric tons of CO_{2e}. Around 18 percent of this amount was estimated for leased sites or those with shared utilities, based on extrapolated usage by square foot from similar buildings reporting actual meter readings. BBVA Compass consumed 23,535 DTH of natural gas, which had associated emissions of 1,250 metric tons of CO_{2e}. 1,350 metric tons of CO_{2e} is the total for Scope 1, not an individual quantity.

ENERGY & GHG EMISSIONS

	2015	2014	2013
Diesel (liters)	37,057	34,413	42,205
Natural Gas (dekatherms)	23,535	NR*	NR*
Electricity (Kwh)	134,694,510	142,323,099	132,950,885
Scope 1 GHG emissions (metric tons CO _{2e})	1,350 (diesel and natural gas)	1,787 (diesel and natural gas)	107 (diesel only)
Scope 2 GHG emissions (metric tons CO _{2e})**	69,440	98,139	65,712

* Not reported due to lack of data.

** The following gases are included in the GHG inventory: CO₂, CH₄, N₂O, and HFCs. We utilized Greenhouse Gas Protocol Corporate Accounting and Reporting Standard published by the World Business Council for Sustainable Development and the World Resources Institute for reporting the GHG inventory. We utilized the latest available emission factors for each fuel type and region and Global Warming Potential factors from the Second Assessment Report (SAR) published by Intergovernmental Panel on Climate Change to calculate GHG inventory.

Earth Hour Participation

For the seventh straight year, the Bank participated in the international Earth Hour energy-conservation event. The Corporate Headquarters in Birmingham and several other landmark buildings went dark for one hour on Saturday, March 28, 2016 in solidarity with our counterparts across the globe who recognize climate change as an ongoing problem.

Green Product Standards

Since 2008, BBVA Compass has been working with our janitorial vendors to develop programs to ensure all janitorial cleaning supplies and cleaning policies meet Leadership in Energy and Environmental Design (LEED) requirements for a "High Performance green cleaning program." This includes our banking center drive-thru lanes, which are cleaned by waterless concrete and asphalt cleaners using natural agents. In addition, our pest-control and exterior landscape partners are contracted with integrated pest-control management techniques and other sustainable concepts in their scopes of work.

Technology vs. Travel

BBVA Compass continues to invest in technology with a goal of reducing business travel. The Bank increased the number of video and audio conferences/meetings it hosted during 2015, and also saw a slight increase in air travel (commercial air travel). This increase was the result of business growth along with retaining great business relationships with existing clients. BBVA Compass remains committed to this goal, and we are diligently working to report a decrease for 2016.

Air-travel data were gathered from a third-party travel agency. In 2015, BBVA changed the way we report these emissions. Conversion to GHG emissions followed the GHG Protocol Corporate Standard distance-based conversion methodology, and 2015 EPA emission factors as provided by the 2015 Guidelines to EPA's GHG Conversion Factors for Company Reporting.



TECHNOLOGY AND TRAVEL

	2015	2014	2013
Videoconferences (nº)	13,656	8,788	5,516
Audioconferences (nº)	101,224	125,724	88,730
Telepresences (nº)	140	206	206
Air travel (km)	27,672,328	40,291,173	36,874,610
Air travel (CO ₂ in tons)*	4,263	8,776*	6,913*

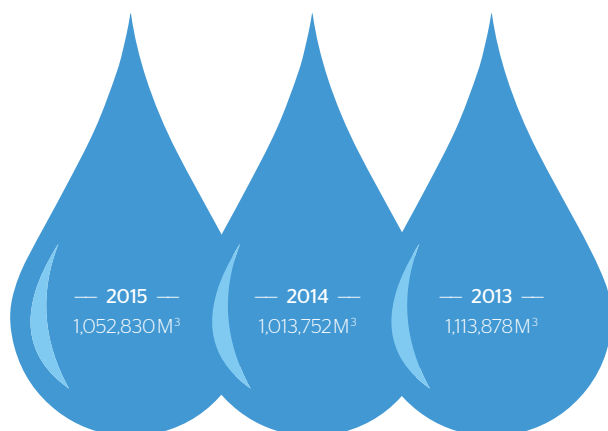
* The following gases are included in the GHG inventory: CO₂, CH₄, N₂O, and HFCs. We utilized Greenhouse Gas Protocol the Corporate Value Chain (Scope 3) Accounting and Reporting Standard published by the World Business Council for Sustainable Development and the World Resources Institute for reporting the GHG inventory. We utilized the latest available emission factors for each fuel type and region and Global Warming Potential factors from the Second Assessment Report (SAR) published by Intergovernmental Panel on Climate Change to calculate GHG inventory.

Consumption and Recycling

Water

In 2015, total water consumption for BBVA Compass' properties was 1,052,830 m³. This amount covers municipal water data only. Around 27 percent of this amount is estimated for leased sites or those with shared utilities, based on extrapolated usage by square foot from similar buildings reporting actual meter readings.

WATER USAGE



Solid Waste

In 2015, BBVA Compass' national recycling program resulted in the tracking of 1,455,068.7 kg of total waste, 1,086,670.35 kg of which was trash and 368,398.35 kg was recycled. In 2015, BBVA Compass consumed 850,463 kg of paper with an average of 34.22 percent recycled input material, and we recycled more than 1,976,151 kg of paper. Recycled input material percentage is calculated by dividing paper purchased that contains some recycled material, as well as other sustainably sourced materials (which varies for different paper products) by total paper purchased for the year. The weight of the paper that the bank sent for recycling outweighs the amount of paper that the bank purchased during 2015 because of the bank's records-management procedures. Also in 2015, BBVA Compass' technology vendor reported that an estimated aggregate total of 49,112 kg of computer equipment was either recycled on the bank's behalf. Additionally, 513 printer toner cartridges were recycled.

Prior to 2010, Compass Bank and the other U.S. banks that were consolidated under the BBVA Compass name and brand were not managing paper records efficiently. Therefore, the Bank now has hundreds of thousands of offsite boxes of records that are eligible for destruction in addition to the contents collected in our office and branch shred bins. The length of time we keep these records is dictated by the Bank's approved retention schedule, which is based on line-of-business need, government regulations and common business practices.

RECYCLED AND WASTE

	Recycled	Waste	Total
2015	368,398 kg	1,086,670 kg	1,455,069 kg
2014	674,543 kg	2,408,193 kg	3,082,736 kg

2015 waste amounts capture approximately 42% of buildings within BBVA Compass footprint where the service provider manages waste pick-up. Most of the locations estimate the weight of waste pick-ups using the following assumptions based on the waste service provider's experience with commercial bank branches employing fewer than 100 people:

- Trash dumpster – 50lbs/yard
- Cardboard dumpster – 50lbs/yard
- Single stream dumpster – 55lbs/yard
- Trash cart or toter – .54 lbs/gallon
- Single stream/comingle cart or toter – .47 lbs/gallon
- Cardboard only cart or toter – .38 lbs/gallon

Part

8

Appendix

Responsible Business Principles and Policies

Code of Conduct

The BBVA Compass Code of Conduct defines the fundamentals of ethical conduct and the operating guidelines for preserving one of the principal sources of value creation for the organization: BBVA Compass corporate and personal integrity. The BBVA Group Code of Conduct is applicable to all entities and employees. Both the BBVA Compass and the BBVA Group Codes of Conduct publicly reflect the sum of pledges made by BBVA Compass to our direct stakeholder groups and to the communities where we operate. As a condition of employment, all active BBVA Compass employees are annually required to acknowledge that they have read and understand the Codes of Conduct.

In addition to the BBVA Compass and BBVA Group Codes of Conduct, we have the following important policies, guidelines and governing bodies in place for managing commitments in various operating areas with regard to ethical conduct and controls:

- *Corporate Integrity Management Committee*
- *Capital Markets Code of Conduct for BBVA in the U.S.*
- *BBVA Group Policy on Conduct in the Securities Markets*

National Memberships

- American Bankers Association (ABA)
- Bank Insurance & Securities Association (BISA)
- Consumer Bankers Association (CBA)
- Equipment Leasing and Finance Association (ELFA)
- Financial Services Roundtable (FSR)
- BITS
- Housing Policy Council (HPC)
- Institute of International Bankers (IIB)
- Loan Syndications & Trading Association (LSTA) — Associate Member
- Mortgage Bankers Association (MBA)
- National Association of Government Guaranteed Lenders (NAGGL)
- Network Branded Prepaid Card Association (NBPCA)
- Securities Industry and Financial Markets Association (SIFMA) International (with U.S. nexus — BBVA Group or NY Branch is the member)
- Americas Society / Council of the Americas (AS/COA)
- Bankers Association for Finance and Trade (BAFT)
- Institute of International Finance (IIF)
- International Swaps and Derivatives Association (ISDA)

- Spain-U.S. Chamber of Commerce
- Trans-Atlantic Business Council (TABC)

State Memberships

- Alabama Bankers Association
- Arizona Bankers Association
- Florida Bankers Association
- Florida International Bankers Association (FIBA)
- Texas Bankers Association

International Agreements

BBVA Compass monitors the BBVA Group's commitment and participation in the following international initiatives and protocols:

- United Nations Global Compact (since 2002): globalcompact.org
- UNEP- FI (since 1998): unepfi.org
- Equator Principles (since 2004): equator-principles.com
- CDP (since 2004): cdproject.net
- Principles for Responsible Investment (since 2008) unpri.org
- International Integrated Reporting Council integratedreporting.org
- Thun Group on Banks and Human Rights bancaresponsable.com/wp-content/uploads/2013/10/thun-group_eng.pdf
- Natural Capital Declaration naturalcapitaldeclaration.org
- Global Initiative for Sustainability Ratings ratesustainability.org
- Green Bond Principles icmagroup.org

In addition, the BBVA Group respects the United Nations' Universal Declaration of Human Rights (un.org), the basic employment legislation of the International Labour Organization (ilo.org) and the OECD Guidelines for Multinational Enterprises (oecd.org).

Significant Fines and Non-monetary Sanctions

BBVA Compass accumulated no significant fines or non-monetary sanctions for non-compliance with environmental laws and regulations in 2015. BBVA Compass has not recorded any fines or penalties for breaches of legislation related to environmental issues or the supply of products and services that might be significant in terms of the company's equity, financial situation or consolidated results and that are not provisioned in our financial statements.

Procurement Model and Policy

BBVA Compass' procurement model follows the structure developed by the BBVA Group, and is aligned to industry best practices. BBVA Compass manages the supply chain to deliver and sustain value across the organization by building and managing an external supplier network that meets the operational needs of the organization in a responsible manner and at minimal cost. This is achieved by adopting procurement best practices, by establishing partnerships across BBVA Compass to expand category coverage and by continuing to secure savings.

Principles Applicable to Those Parties Involved in the Procurement Process

As a member of the BBVA Group, BBVA Compass follows its Code of Conduct and Principles applicable to those parties involved in the Procurement process. These principles and guidelines include respect for the law, commitment to integrity and transparency, competition, objectivity, value creation and confidentiality. Additionally, procurement at BBVA Compass is governed by the procedures outlined in BBVA Compass; Management Manual, Policy Section 109 – "Procurement of Goods, Engagement of Services and Contract Administration."

The contract and supplier-management group under the Procurement umbrella also performs many tasks to ensure that BBVA Compass is in compliance with regulatory requirements and best practices such as financial health assessments, supplier risk assessment and supplier performance-management scorecards. The financial health assessment is a process to evaluate the financial well-being of a supplier to ensure that the company has the financial strength and stability to provide the goods and services requested. The risk assessment and supplier performance-management scorecards enable objective scoring to ensure protection of customer data, and a measure of whether the supplier is meeting its service-level agreements.

The Procurement team works together with the BBVA Compass Corporate Reputation and Responsibility (CRR) and the Diversity & Inclusion team for supplier opportunities and small-business banking initiatives.

Report Criteria

BBVA Compass has developed and disseminated annual corporate responsibility reports annually since 2008. This report, which covers the 2015 calendar year, includes information for the BBVA Compass Bancshares, Inc. portion of the U.S. business unit (including any leased facilities, subsidiaries, etc.). The BBVA Compass report is supplemented by the BBVA Group's 2015 Financial Report and by the information available via BBVA Compass' main website, bbvacompass.com, and its investor relations website, <http://bbva.investorroom.com>.

Additional Context

As of the publish date of this report, BBVA Compass is not aware of the need for restating any material from previously published reports. This report reflects BBVA Compass Bancshares, following the company becoming an SEC registrant in January 2014. Prior reports focused on BBVA Compass Bank. In 2015, there were no relevant legal actions with a final ruling against BBVA Compass related to anti-competitive behavior.

GRI G4 Content Index

This report is organized and presented in accordance with the GRI G4 guidelines, using the "Core" option including financial services sector disclosures. Deloitte & Touche LLP provides a review report on this report. Statement of assurance is located on page 58. BBVA Compass has developed and disseminated annual corporate responsibility reports annually since 2008. This report, which covers the 2015 calendar year, includes information for the BBVA Compass Bancshares, Inc. portion of the U.S. business unit (including any leased facilities, subsidiaries, etc.). The BBVA Compass report is supplemented by the BBVA Group's 2015 Financial Report and by the information available via BBVA Compass' main website, bbvacompass.com, and its investor relations website, <http://bbva.investorroom.com>.

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G4-22 Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement.	54
G4-23 Significant changes from previous reporting periods in the scope, boundary, or measurement methods.	54
Stakeholder Engagement	
G4-24 List of stakeholder groups engaged by the organization.	9-11
G4-25 Basis for identification and selection of stakeholders with whom to engage.	9-11
G4-26 Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.	9-11
G4-27 Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting	9-11
Report Profile	
G4-28 Reporting period for information provided.	54
G4-29 Date of most recent previous report.	54
G4-30 Reporting cycle (annual, biennial, etc.).	54
G4-31 Contact point for questions regarding the report or its contents.	59
G4-32 GRI 'in accordance' option and GRI Content Index.	54
G4-33 Policy regarding external assurance.	54
Governance	
G4-34 Governance structure of the organization, including committees under the highest governance body.	8
Ethics and Integrity	
G4-56 Describe the organization's values, principles, standards and norms of behavior such as codes of conduct and codes of ethics.	53

BBVA Compass GRI Indicators

SPECIFIC STANDARD DISCLOSURES	PAGES	OMISSION
Category: Economic		
Aspect: Economic Performance		
G4-DMA Disclosure on management approach.	6-7	—
G4-EC1. Direct economic value generated and distributed.	7	—
G4-EC3. Coverage of the organization's defined benefit plan obligations.	37	—
Aspect: Indirect Economic Impacts		
G4-DMA Disclosure of management approach.	22	—
G4-EC8 Significant indirect economic impacts, including the extent of impacts.	22-27	—
Category: Environmental		
Aspect: Materials		
G4-DMA Disclosure on management approach.	51	—
G4-EN1 Materials used by weight or volume.	51	—
G4-EN2 Percentage of materials used that are recycled input materials.	51	—
Aspect: Energy		
G4-DMA Disclosure on management approach.	49	—
EN3 Energy consumption within the organization.	50	Energy consumption reported in local units of measure for comparability with the US-based reporting context.
EN6 Initiatives to reduce indirect energy consumption and reductions achieved.	49	—
Aspect: Water		
G4-DMA Disclosure on management approach.	49	—
G4-EN8 Total water withdrawal by source.	51	—
Aspect: Emissions		
G4-DMA Disclosure on management approach.	49	—
G4-EN15 Direct greenhouse gas emissions by weight.	50	—
G4-EN16. Indirect greenhouse gas emissions by weight.	50	—
G4-EN17. Other relevant indirect greenhouse gas emissions by weight.	51	—
Aspect: Effluents and Waste		
G4-DMA Disclosure on management approach.	49	—
G4-EN23 Total weight of waste by type and disposal method.	51	—
Aspect: Compliance		
G4-DMA Disclosure on management approach.	49	—
G4-EN29 Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	53	—
Category: Social		
Sub-Category: Labor Practices and Decent Work		
Aspect: Employment		
G4-DMA Disclosure on management approach.	30-31	—
G4-LA1 Employee turnover rates.	47	Regional data not available.
G4-LA2 Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation.	35-38	—
Aspect: Labor/Management Relations		
G4-DMA Disclosure on management approach.	30-31	—
G4-LA4 Minimum notice periods regarding operational changes, including whether these are specified in collective agreements.	32	—
Aspect: Training and Education		
G4-DMA Disclosure on management approach.	32	—
G4-LA10 Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.	32-35	—

BBVA Compass GRI Indicators (continued)

SPECIFIC STANDARD DISCLOSURES	PAGES	OMISSION
Aspect: Diversity and Equal Opportunity		
G4-DMA: Disclosure of management approach.	44	—
G4-LA12: Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity	47	—
Sub-Category: Human Rights		
Aspect: Non-Discrimination		
G4-DMA Disclosure on management approach.	32	—
G4-HR3 Total number of incidents of discrimination and corrective actions taken.	32	—
Aspect: Freedom of association and collective bargaining.		
G4-DMA Disclosure on management approach.	32	—
G4-HR4 Operations and suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and measures taken to support these rights.	32	—
Sub-Category: Society		
Aspect: Local Communities		
G4-DMA Disclosure on management approach.	22	—
FS13 Access points in low-populated or economically disadvantage areas by type.	25	—
FS14 Initiatives to improve access to financial services for disadvantaged people.	25-26	—
Aspect: Anti-Corruption		
G4-DMA Disclosure on management approach.	14	—
G4-SO4 Communication and training on anti-corruption policies and procedures.	13-14	—
Aspect: Anti-competitive behavior		
G4-DMA Disclosure on management approach.	54	—
G4-SO7 Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes.	54	—
Sub-Category: Product Responsibility		
Aspect: Product and Service Labeling		
G4-DMA Disclosure on management approach.	14	—
G4-PR5 Results of surveys measuring customer satisfaction.	9	—
Aspect: Marketing Communications		
G4-DMA Disclosure on management approach.	14	—
G4-PR6 Sale of banned or disputed products.	13-14	—
Aspect: Compliance		
G4-DMA Disclosure on management approach.	53	—
G4-PR9 Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.	53	—
Sector Specific Aspect: Product Portfolio		
G4-DMA Disclosure on management approach.	16-18	—
G4-FS7: Monetary value of products and services designed to deliver a specific social benefit for each business line broken down by purpose.	25	—
Sector Specific Aspect: Audit		
G4-DMA Coverage and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures.	13-14	—
Sector Specific Aspect: Active Ownership		
G4-DMA Disclosure on management approach.	13-14	—
G4-FS11 Percentage of assets subject to positive and negative environmental or social screening.	—	Data is not currently available. Planning to report on or before 2017.



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INDEPENDENT ACCOUNTANTS' REVIEW REPORT

**Board of Directors and Stockholder
BBVA Compass Bancshares, Inc.
Houston, Texas**

We have reviewed the accompanying 2015 Corporate Responsibility Report of BBVA Compass Bancshares, Inc., (the "Company") for the year ended December 31, 2015. The Company's management is responsible for the Corporate Responsibility Report.

We conducted our review in accordance with attestation standards established by the American Institute of Certified Public Accountants. A review consists principally of applying analytical procedures, considering management assumptions, methods, and findings, and making inquiries of and evaluating responses from persons responsible for corporate sustainability and operational matters. It is substantially less in scope than an examination, the objective of which is the expression of an opinion on the Corporate Responsibility Report. Accordingly, we do not express such an opinion. A review of the Corporate Responsibility Report is not intended to provide assurance on the entity's compliance with laws or regulations.

The preparation of the Corporate Responsibility Report requires management to interpret the criteria, make determinations as to the relevancy of information to be included, and make estimates and assumptions that affect reported information. The selection of different but acceptable measurement techniques can result in materially different measurements. Different entities may make different but acceptable interpretations and determinations. The Corporate Responsibility Report includes information regarding the Company's corporate sustainability initiatives and targets, the estimated future impact of events that have occurred or are expected to occur, commitments, and uncertainties. Actual results in the future may differ materially from management's present assessment of this information because events and circumstances frequently do not occur as expected.

Based on our review, nothing came to our attention that caused us to believe that the Corporate Responsibility Report does not include, in all material respects, the required elements of the Global Reporting Initiative G4 Sustainability Reporting Guidelines under its "In accordance level Core"; that the data included therein have not been accurately derived, in all material respects, from the Company's records, or that the underlying information, determinations, estimates, and assumptions of the Company do not provide a reasonable basis for the disclosures contained therein.

Deloitte + Touche LLP

July 15, 2016

CR contact info

If you would like to submit a question, opinion, inquiry or suggestion regarding the information contained in this report, please contact one of the following:

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