BBVA Whistleblowing Channel

Madrid, July 2023



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2022 Information

The Whistleblowing Channel forms an essential part of the BBVA Group's compliance system, as one of the processes established to ensure the effective application of the regulations and guidelines of the Code of Conduct. This Channel is also a means to help BBVA employees as well as other third parties outside the BBVA Group to report, confidentially and, if they wish, anonymously, any breaches of the Code of Conduct or applicable laws, including human rights complaints



Compliance will process all reports they receive carefully and promptly, ensuring that they are investigated and providing the resources to ensure that they are resolved, in accordance with the Whistleblowing Channel internal procedures



Information will be analyzed objectively, impartially and confidentially. The identity of the person reporting it will be kept confidential

The information will be made known only to those departments whose cooperation is necessary for the process of investigation, to avoid compromising the result of the investigation or the good name of any persons affected by it. The BBVA Group has the appropriate mechanisms in place to prevent potential conflicts of interest during the process of investigating reports. The result of the investigations will be advised to the departments which need to take appropriate measures to mitigate or correct the transgression, in addition to the person being reported, and the person making the report, where appropriate.

Whistleblowers play a key role in preventing and detecting any inappropriate behaviour, so providing them with protection is a priority for the BBVA Group. Those who report facts or actions to the Whistleblowing Channel in good faith will not face any retaliation or other adverse consequences for making the report.

The Whistleblowing Channel is available 24 hours a day, 365 days a year. During the 2022 financial year, the BBVA Group has implemented a global Whistleblowing Channel tool provided by an external provider in most of those areas where it is present. This online platform is accessible to all employees through the corporate intranet where there is a portal dedicated exclusively to the Whistleblowing Channel that includes more detailed information on how to make a report. Third parties outside BBVA can access it through a public link available on the BBVA Group's corporate website ((www.bkms-system.com/bbva). This new global tool raises the standards of security, confidentiality and anonymity of the whistleblowers and thus ensures their protection. In addition, during the year, various





actions have been carried out to raise awareness of the use of the BBVA Whistleblowing Channel.

1,597 complaints were received in 2022 through the Group's channels:



Reporting areas	FY 2022
Conduct with customers	229
Workplace relations	571
Conflicts of interest	101
Fraud	55
Discrimination or Harassment ¹	405
Money Laundering or Insider trading	84
Privacy and data security	24
Other	128
Total	1,597

46% of the complaints processed during the year ended with disciplinary action being taken including 156 disciplinary dismissals.

¹ During financial year 2022, the sexual harassment protocol has been activated in the Group on 13 occasions, having verified the existence of sexual harassment in 8 cases that ended in the dismissal of the people reported. The moral harassment protocol has been activated on 1 occasion, and in this case there is no conduct constituting moral harassment. Please see 2022 BBVA's Annual Report (page 244/546).,