

BBVA Group Whistleblowing Channel Policy Statement

1. Introduction

The BBVA Group has a firm commitment to legality and the protection of those who internally report any potential breaches of the applicable laws, BBVA Code of Conduct and Internal Regulations (hereinafter, “**Regulatory Infringements**”).

The BBVA Group Whistleblowing Channel Policy (hereinafter, the “**Policy**”), which was approved by the BBVA Board of Directors in June, 2023, complies with the provisions of the *Law 2/2023, of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption*, which transposes Directive (EU) 2019/937 of the European Parliament and of the Council, of 23 October 2019, into Spanish law.

2. Purpose and scope

This Policy establishes the applicable corporate standards in the BBVA Group regarding the protection of whistleblowers who report Regulatory Infringements and strengthens the culture of internal reporting of breaches at BBVA. The Policy shall apply to BBVA and to all companies in which the Group owns a direct or indirect stake of more than 50% or over which the Group has management control, without prejudice to their separate legal personality and the autonomy and independence of each company.

This Policy will prevail over any other Internal Regulation of executive scope in what respects the matter it regulates. In the event that any provision of the Policy is contrary to the legal system in force in a jurisdiction in which the BBVA Group has a presence, such provision shall not apply, and the locally applicable law shall prevail.

3. General principles

The BBVA Group conducts its business on the basis of the principles of: (i) integrity; (ii) prudent risk management; (iii) transparency; (iv) achievement of a profitable and sustainable business in the long term; and (v) compliance with applicable legislation at all times.

This Policy sets out the essential principles of operation of the BBVA Whistleblowing Channel:

- 1) It is open: allows any interested party to report, even anonymously, actions or omissions that in their opinion represent breaches of Regulatory Infringements.

- 2) It allows anonymity, guarantees confidentiality and the rights of the whistleblower, of the reported person and any third party.
- 3) Protection of personal data: BBVA adequates the treatment of personal data in accordance with the applicable regulations on the protection of personal data.
- 4) Autonomy and independence in the functioning and management of the Whistleblowing Channel.
- 5) Non-retaliation and protection: those who use the BBVA Whistleblowing Channel in good faith are protected against retaliation and possible adverse consequences arising from their communications.
- 6) Information protection and security: BBVA Whistleblowing Channel has specific measures for the protection and security of information, preventing access by unauthorized personnel.

4. Policy provisions

a. General provisions

BBVA's Whistleblowing Channel is suitable for reporting any Regulatory Infringements, preferably to external channels unrelated to BBVA.

The Compliance Unit is responsible for receiving and processing the reports received through the Whistleblowing Channel, guaranteeing independence and absence of conflicts of interest.

b. Communications management procedure.

The internal process for receiving and processing communications in the BBVA Whistleblowing Channel is structured in the following phases:

- Once the communication is received in the BBVA Whistleblowing Channel, the Compliance Unit will issue an acknowledgement of receipt of the communication within seven calendar days of its receipt, unless this could compromise the confidentiality of the communication.
- When the facts reported could be indicative of a crime, the information received shall be forwarded to the Public Prosecutor's Office immediately. Where the facts affect the financial interests of the European Union, it shall be forwarded to the European Public Prosecutor's Office. This referral of information shall respect the rights recognised to those affected by the Constitution and the applicable legislation.

- The information will be analyzed by the Compliance Unit, which will promote its management, assigning the investigation to the BBVA areas best suited to fully review the facts reported. The information will only be shared with those areas whose knowledge is necessary for the proper investigation of the reported facts.
- Where necessary for the proper conduct of the investigation, the informant may be contacted at any time for the purpose of expanding or clarifying information. Similarly, at any time during the process, the reported person shall be informed of the stage of the internal proceedings, provided that this is possible and does not harm the investigation.
- Internally, the necessary steps shall be taken to verify the plausibility of the facts reported and to complete the investigation within a period that may not exceed three months or, if the case is particularly complex, six months, both from the date of acknowledgement of receipt of the report or, if no acknowledgement of receipt was sent, from the expiry of the period of seven days after the report was made.
- The person concerned by the communication shall be informed of the acts or omissions attributed to him and shall have the right to be heard at any time. Such communication shall take place at such time and in such manner as is deemed appropriate to ensure the proper conduct of the investigation, guaranteeing respect for the presumption of innocence and honour, ensuring the protection of whistleblower identity.
- Once the investigation has been completed, the whistleblower and the affected person(s) shall be informed, as appropriate and without delay, of the outcome of the investigation.

In accordance with the provisions of the BBVA Code of Conduct (art 6.4.3.), all employees or areas involved in the management of information must maintain the confidentiality of the actions related to this process.

c. Protective measures for the informant

- 1) Integration of communication mechanisms.
- 2) No retaliation.
- 3) Protection identity of the whistleblower and prevention of conflict of interest.
- 4) Possibility of communication with the Compliance Unit.
- 5) Dissemination of information on competent authorities.
- 6) Information on how it works.

7) Ease of access and use.

d. Protective measures for others affected

- 1) Right to the presumption of innocence, honor and defense of the persons affected.
- 2) Right to information and to be heard.

e. Protection of personal data

Compliance with personal data protection regulations in the receipt and management of communications is governed by the provisions of the applicable regulations.

Annex: BBVA Whistleblowing Channel

You can contact the BBVA Whistleblowing Channel via the following link:

<https://www.bkms-system.com/bbva>