

Sustainable Transaction Banking Framework

Madrid, December 2019



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Background

BBVA is committed to achieving the targets set by the Paris COP21 (Conference of the Parties) and the United Nations sustainable Development Goals (the “SDGs”). In line with this commitment, in 2018 BBVA approved its new strategy on climate change and sustainable development, which covers comprehensive management of the risks and opportunities deriving from the fight against climate change and the resolve to achieve the SDGs. Pledge 2025 is based on three pillars:

- To finance: BBVA is pledging to mobilize € 100 billion in green finance, sustainable infrastructure and agribusiness, entrepreneurship and financial inclusion.
- To manage the environmental and social risk associated with the Bank's activity, to minimize potentially negative direct and indirect impacts.
- To engage all stakeholders to increase the financial sector's collective contribution to sustainable development.

As part of Pledge 2025 BBVA's Sector Norms for environmental and social due-diligence were developed with the purpose to provide clear guidance on the procedures that must be followed during client management and transactions in these sectors. These sector norms are divided in four: infrastructure, energy, agricultural and mining.

BBVA is committed to aligning its lending portfolio with a 2 degrees scenario. BBVA is the first bank to report on carbon-related assets (3,4% of BBVA Group total assets). As a reflection of this commitment, BBVA is the first bank to commit to the Science Based Targets Initiative to certify that emission goals are consistent with the decarbonisation level required to meet the 2°C goal set for 2050. BBVA is participating in the 2 Degrees investing initiative pilot program for banks to align their portfolios to a 2 degree scenario and signed the Katowice Bank Agreement.

BBVA is working together with many important stakeholders in the world of sustainable finance. BBVA is an active member of the Green Bond Principles and the Green Loan and Sustainability Linked Principles, and is a member of the Spanish Green Growth Group. Furthermore BBVA is signatory of Equator Principles and the Principles for Responsible Investment, and is one of the founding 30 signatories of the Principles for Responsible Banking, and is committed to RE 100 Initiative, pledging to reach 100 percent renewable energy target by 2050.

One of the core elements of BBVA's business model is the integration of opportunities arising from the contribution to global sustainability, thus providing its customers with innovative solutions to fund their investments with positive environmental and social impacts. BBVA aims to foster sustainable financing, assess its strategic impact and boost and manage transformation initiatives that best respond to challenges related to climate change and social issues.

BBVA is committed to sustainability and strives to operate by:

- i. Carrying out its activity in a responsible manner and placing people at the core of its purpose, and
- ii. Maximizing the creation of sustainable and shared value for its shareholders and for other stakeholders and the wider society in which it operates.

Sustainable Transaction Banking Framework

BBVA believes that sustainable finance is an important strategy to help its clients on their sustainability journey and is a powerful tool to increase corporate responsibility. BBVA is betting on the development of innovative sustainable finance solutions. This framework is in line with this strategy, our commitment to the SDGs, Paris Agreement, and was developed as a solution for the transaction banking market.

The framework is broken down into two product linked types:

■ **SDGs linked:**

SDGs linked products consist of financial solutions for BBVA customers that have projects that directly contribute to one or more of the SDGs. These projects can be considered as green, social or sustainable based on their use-of-proceeds.

■ **Sustainability linked:**

Sustainability linked products consist of financial solutions for BBVA customers that are not use of proceeds based. Rather transactions are eligible based on overall sustainability criteria defined in the framework.

Typology of transactional products covered under this framework:

- a) **Buyer's credit**, understood as medium to long term financing of export contracts, through credits granted to the importer covered by the Export Credit Agency (ECA) of the exporter's country of residence.
- b) **Factoring**, understood as the purchase of commercial credits in favor of the client by BBVA, who becomes the owner of those collection rights.
- c) **Guarantees**, understood as financial instruments through which a third party is liable for the commitments made by other company in order to facilitate and provide security (Bid bond, advanced payment bond, performance bond, letter of credit stand by, etc.).
- d) **Letter of credit**, understood as any arrangement, named or described, which is irrevocable and constitutes a firm commitment of a Bank, at the request of its client (Applicant), or acting on its own, to honor¹ a complying presentation of documentation.
- e) **Renting and leasing**, understood as the use of a good, service or property on a medium / long-term rental basis, during which it may dispose of the good as well as additional services related to its correct functioning.
- f) **Reverse factoring or supply chain finance**, understood as the payment service to suppliers in which BBVA offers these suppliers the possibility of selling their commercial credits to BBVA through a Factoring operation.

¹ Honor means to pay at sight if the credit is available by payment at sight; committing to deferred payment and pay at maturity if the credit is available by deferred payment ; or accept a bill of exchange drawn by the beneficiary and pay at maturity if the credit is available against acceptance.

- g) **Supplier's credit**, understood as medium to long term financing of export contracts, through credits granted to the exporter covered by the Export Credit Agency (ECA) of the exporter's country of residence.
- h) **Trade Loan**, understood as a commercial loan granted due to import / export operations, including forfaiting operations.
- i) **Working capital loan**, understood as a commercial loan for the purpose of financing operations covered under working capital.
- j) **Credit Facility**, understood as a line of credit. It has an established maximum amount, where the business has access to the funds at any time when needed.
- k) **Deposits**, understood as a transfer of funds to another party for safekeeping.
- l) **Structured deposits**, understood as a contract combining a deposit and an investment product with capital not guaranteed in some cases in which the return is linked to the performance of a quoted instrument.
- m) **Structured bonds**, understood as securities arranged or issued by BBVA or a subsidiary that may include a derivative component.

(*) The typology of eligible transactional products may include other financial solutions as long as they meet the requirements of the Framework.

(**) Transactional products could be part of a facility, being all the different transactional products included in the facility in compliance with the Framework. (Example: Letter of credit facility, guarantee facility, etc.).

Finally, the funds or guarantees obtained through green, social or sustainability transactional products provided under this Framework will not be used under any circumstance in any project related to any of the following **excluded activities**:

- | | |
|----------------------------|---------------------|
| ■ Nuclear power generation | ■ Civilian firearms |
| ■ Defense | ■ Gambling |
| ■ Mining | ■ Pornography |
| ■ Carbon related | ■ Tobacco |
| ■ Oil & Gas | |

BBVA will use and rely primarily on information provided by the client, and on any other information available from generally recognized publicly accessible sources without having independently verified it. Under no circumstances BBVA will be responsible for the veracity or accuracy of documents, information or any other detail provided by the client, or from public sources.

SDGs linked products

The SDGs is a set of 17 global Goals with 169 targets covering a broad range of sustainable development issues; they call for action by all the countries to promote prosperity while protecting the planet. The private sector has been called on to contribute to the realization of the new agenda.

A key way BBVA can contribute is by providing funds. It is clear that governments alone cannot finance the \$ 2.5 trillion gap needed in areas such as climate change, innovation or sustainable consumption, among others; the private sector has a crucial role to play, and BBVA is convinced it can help achieve the SDGs purpose of ensuring prosperity for all and helping the planet by financing projects and entities that support the Global Goals and the UN 2030 Agenda. Therefore, funds will be allocated to a mix of projects that contribute to a sustainable future primarily related to the following SDGs:

SDG 3: Good health and well-being.

SDG 4: Quality education.

SDG 6: Clean water and sanitation.

SDG 7: Affordable and clean energy.

SDG 8: Decent work and economic growth.

SDG 9: Industry, innovation and infrastructure.

SDG 10: Reduce inequalities.

SDG 11: Sustainable cities and communities.

SDG 12: Responsible consumption and production.

SDG 13: Climate action.

SDG 14: Life below water.

SDG 15: Life on land.

In line with this Framework, BBVA may classify as green, social or sustainable those customer projects that meet the requisites defined in this document externally reviewed by Vigeo Eiris. SDGs linked products will consist of financial solutions for BBVA customer projects in fields such as renewable energies, energy efficiency, waste management, water treatment and access to basic services such as inclusive homes and finance. Notably, not all SDGs transactional products involve financing, such as with guarantees.

BBVA can offer three types of SDGs transactional products into which a customer project can be defined under this Framework:

- A. **“Green transactional products”**: financial instruments where the finance or coverage will be exclusively applied in part or in full to new and/or existing green projects (as defined in section “Use of proceeds and guarantees” below) and which meet the reporting requirements (as defined in section “Reporting”).
- B. **“Social transactional products”**: financial instruments where the finance or coverage will be exclusively applied in part or in full to new and/or existing social projects (as defined in section “Use of proceeds and guarantees” below) and which meet the reporting requirements (as defined in section “Reporting”).
- C. **“Sustainable transactional products”**: financial instruments where the finance or coverage will be exclusively applied in part or in full to new and/or existing green projects and social projects (as both terms are defined in section “Use of proceeds” below) and which meet the reporting requirements (as defined in section “Reporting”).

The Framework take as reference, regarding use of proceeds and reporting, the current market standards reflected in the Green Bond Principles (GBP), the Social Bond Principles² (SBP), the Sustainability Bond Guidelines and the Green Loan Principles (GLP).








² <https://www.icmagroup.org/Regulatory-Policy-and-Market-Practice/green-social-and-sustainability-bonds/>

Use of proceeds linked to SDGs

BBVA is determined to support its clients' transition to becoming more sustainable, while promoting innovation in their sustainability strategies. BBVA provide financial solutions which contribute to the sustainability of our planet and promote positive social impact.

For the purpose of this Framework, all projects to be classified should be cataloged under one of the eligible green categories ("green projects"), social categories ("social projects"), or under both green and social categories ("sustainable projects") in compliance with the following definitions:

Green eligible categories

Category - SDG	Description*
Sustainable water and water management 	<ul style="list-style-type: none"> Water collection, treatment, recycling, re-uses upgrades, technologies and related infrastructure.
Energy efficiency  	<ul style="list-style-type: none"> Measures which reduce energy consumption. Includes the financing of retrofitting/improving/upgrading existing assets, as well as of new technology development and manufacture. Energy recovery (waste to energy). Measures that facilitate the access to renewable energy. Green buildings. In order for Green building financing to be included the asset must possess environmental certifications such as LEED (minimum silver), BREEAM (minimum good), HQE (minimum good), DNGB (minimum silver), or GBC España – VERDE among others. Other rigorous green building rating system may be included and taken into consideration in the criteria.
Clean transportation  	<ul style="list-style-type: none"> Rail infrastructure and public mass transportation systems which contribute to reducing the circulation of cars. Examples include metro, light rails, buses, etc. Development, operation and upgrade of rail transports for goods. Transport infrastructure. Renewal or replacement of vehicle fleets, trains or boats with technologies that include electricity or hydrogen. Manufacture of above components.
Environmentally sustainable management of living natural resources and land use  	<ul style="list-style-type: none"> Measures and technologies to expand green zones. Sustainable management of livestock to reduce methane or other GHG emissions.

Pollution Prevention and Control



- Non-conventional waste management and disposal activities which include: source reduction, in-process recycling, reuse, resource recovery, and treatment.
- Measures and technologies to reduce air pollution.

Renewable energy



- Renewable energy generation: wind, solar, biogas, biomass, thermal, waste treatment, small-scale hydropower substations (max. 20MW).
- Manufacture of components of renewable energy technology: wind turbines, solar panels, etc.
- Transmission and distribution projects when connecting to defined renewable energy assets.

Aquatic biodiversity conservation



- Prevention and reduction of marine pollution.
- Measures and technologies that enhance the conservation and sustainable use of oceans and rivers.
- Environmentally sustainable fishery and aquaculture.

Terrestrial biodiversity conservation



- Measures that ensures the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems.
- Reduction of emissions that result from deforestation and degradation of ecosystems.
- Environmentally-sustainable forestry, including afforestation or reforestation.
- Preservation or restoration of natural landscapes.

(*) Green Eligible categories may include other projects in accordance with any update of the ICMA Green Bond Principles at any time.

Social eligible categories

SDG	Description*
	<p>Affordable basic infrastructure</p> <ul style="list-style-type: none"> • Hospitals, medical equipment and technologies. • Developments and measures that improve healthcare or facilitate the access to healthcare.
	<p>Access to essential services</p> <ul style="list-style-type: none"> • Universities and other centers of tertiary education, primary and secondary schools technical/ vocational training centers and programs, capacity building, entrepreneurship, and literacy and numeracy training centers and programs.
	<p>SME financing and microfinancing</p> <ul style="list-style-type: none"> • Formalization and encouragement of micro, small, and medium sized enterprises. • Access to banking and financial services in underserved populations. • Financial literacy.

Affordable housing



- Access to adequate, safe and affordable housing for excluded and/ or marginalized populations and /or communities.

(*)Social Eligible categories may include other projects in accordance with any update of the ICMA Social Bond Principles at any time

The Projects include new projects, and ongoing projects (refinance or update of guarantees). Additionally, a project will be considered green if the 80% of its main activity is dedicated to any of the green eligible categories; and a project will be considered social if the 80% of its main activity is dedicated to any of the social eligible categories.

Sustainability linked products

The sustainability linked finance product market is relatively new and is growing rapidly, allowing companies and sectors that do not have sustainable projects to finance but are looking for ways to start on or expand their sustainable finance journey. Sustainability linked products aim to facilitate and support environmentally and socially economic activity and growth. By putting these types of products into the framework BBVA can actively support our clients in transforming their sustainability and ESG behavior. The products in this section are possible due to the positive sustainable performance of companies. There are three overarching goals that BBVA would like to achieve with this section of the framework:

- Promote corporate sustainability best practices by facilitating debt market access and liquidity for organizations which can be shown to outperform their peers in sustainability.
- Encourage in BBVA CIB's bond/equity portfolio outperformers in sustainability.
- Offer BBVA clients the ability to invest in a broad range of sustainability-linked liquidity and funding products

The four products currently conceived under this framework are sustainable deposits, sustainable structured deposits, structured securities and sustainable supply chain finance.

In the case of sustainable deposits and securities, the proceeds will be used to maintain the BBVA CIB sustainable portfolio (the Portfolio). This Portfolio is made up of bonds and equity from companies deemed sustainable based on the Eligibility Criteria. The proceeds will be matched to Eligible bonds and equity in the Portfolio. The volume of outstanding deposits is not to exceed the notional amount of the Eligible bonds and equity in the Portfolio. A buffer will be established to ensure sufficient Eligible bonds and equity to cover all outstanding deposits. The list of Eligible bonds and equity will be reviewed quarterly by BBVA Sustainable Finance team.

BBVA will assess the sustainable performance of the Portfolio based on the following Eligibility Criteria:

1. The company must comply with one of the following two:
 - Member of a Sustainability Index (DJSI, FTSE4Good, CDP, MSCI...).
 - Above industry average CSR score from CSR Wire or other recognized ESG rating provider.
2. Company may not be involved at all in excluded activities (see above) and it must comply with the BBVA sector norms as regards client activity.
3. Controversy check. The BBVA CIB Sustainable Finance team will use RepRisk to search the Eligible Companies for controversies. A controversy is defined as a large scale, public event which calls into question the integrity and ethics of a company or an NGO or investor campaign concerning a certain ESG issue such as cases of gross negligence or blatant disregard for laws and industry best practices. These types of events would make a company ineligible because they are clear demonstrations that they are not living up to their values and ESG commitments.

During quarterly reviews, customers that are found to no longer be in compliance with Eligible Criteria will be removed from the Portfolio.

In the case of sustainable supply chain there is a pricing benefit for suppliers that can be shown to perform according to established Buyer sustainability standards. BBVA understand that this product can be offered to Buyers that have developed criteria to classify its supplier base according to any sustainability performance. BBVA is able to offer assistance to clients in developing their sustainability standards and classification systems.

There are various approaches to add the sustainable feature to a Supply Chain program a Buyer can take to establishing these criteria/standards. This product should finance all manner of approaches. Below there are two examples we may expect to see:

1. Buyers may have in place or will develop with BBVA's help, already established sustainability assessments for their suppliers or sustainable purchases/projects that suppliers can participate in.
2. Buyers may choose to reward suppliers that participate in certain industry assessments or certifications. The following is a non-exhaustive list of possible options:
 - IFC-ILO Better Work Program.
 - Responsible Alliance's Self-Assessment score.
 - Sustainable Apparel Coalition's' Higg Index.
 - CDP (including water and forest programs).
 - Dow Jones Sustainability Index/FTSE4GOOD/other reputable sustainability index.
 - Product standard certifications, including: Better Cotton Initiative, Ecocert, Fairtrade, Oeko-Tex Standard, etc.

In order for a supplier to be eligible for a pricing benefit, the systems the Buyer has in place to classify and rank suppliers must be well defined and credible. The BBVA Sustainable Finance team will be in charge of the revision to evaluate whether the systems the client has in place for its suppliers are eligible for this product. The Evaluation will be based on a thorough review of:

- Client sustainability strategy.
- Client expectations of its suppliers in terms of sustainability.
- Client sector and sector-specific key sustainability issues.
- Targets and metrics associated with supplier performance.

Additionally when a certification is required BBVA will ensure the certification is market-recognized and reputable.

Reporting

SDGs linked products

Client reporting to BBVA

The client is committed to deliver to BBVA the Client's corporate social responsibility and environmental strategy at the time of signing the deal and a specific report dedicated to the Project with the following periodicity:

- (i) Initially at time of deal signature;
- (ii) annually, to be submitted before the end of the first quarter of each year the Project is in effect (or on the expiration date of the operation if this is less than one year) and, if applicable;
- (iii) on the expiration date of the deal if it is different from the signing anniversary of the deal.

The report dedicated to the Project will contain information about:

1. Allocation of proceeds in each green or social eligible category. In case of facilities, if possible, a list of green or social projects (as appropriate) will be disclosed. If this is not possible, other insights and information will be provided in respect to the portfolio of projects..
2. An indication of which SDG is applied to each eligible green or social category in the green, social or sustainable product.
3. Relevant expected environmental or social impacts per green or social eligible category and, if possible, actual impact metrics according to market standards (Example: greenhouse gas protocol).
4. If a supplier of a client is the beneficiary of financing or coverage, the client will deliver BBVA information regarding the establishment of certain supplier selection requisites. The requisites must cover the suppliers who carry out their activities ethically, responsibly and respectfully of the environment, in line with market standards when possible (Example: standard ISO 14001, standard ISO 45001, standard SA 8000, etc.).

Sustainability linked products

Client reporting to BBVA

In the case of supply chain finance, the client is committed to deliver to BBVA the Client's corporate social responsibility and environmental strategy at the time of signing the deal and a specific report dedicated to the Project with the following periodicity:

- (i) Initially at the time of signature of the deal;
- (ii) annually , to be submitted before the end of the first quarter of each year the Project is in effect (or on the expiration date of the operation if this is less than one year) and, if applicable;
- (iii) on the expiration date of the deal if it is different from the signing anniversary of the of the deal.

The report dedicated to the Project will contain an indicator relevant to the incentives program such as the percentage of suppliers receiving improved pricing conditions or another such that provides information on the impacts of the program.

BBVA reporting to client

In the case of sustainable deposits and structured sustainable deposits, previous to the operation, BBVA will put the inclusion criteria at prospective client's disposal. At the end of the deposit term, BBVA will put the composition of the portfolio including number of companies, industries and geographies at the client disposal.

BBVA to public

BBVA will publish in its Annual Report, an annual consolidated report including the allocation of the funds and the impact of the transactional products classified under this Framework.

Examples of relevant quantitative impact indicators that the SDG linked products report may include are:

Green eligible categories

Category - SDG	Quantitative impact indicators
Sustainable water and water management 	<ul style="list-style-type: none"> • Annual water savings (m3). • Annual volume of wastewater treated or avoided (m3). • Number of households delivering to the facility. • Liters of clean water provided.
Energy efficiency  	<ul style="list-style-type: none"> • Estimated annual GHG emissions avoided (tCO2e). • Automated meters modules or number of smart meters provided. • Amount of energy saved (MW). • Number of LED or SSL lighting fixtures with lumen/watt (Lm/W). • Number of household/residents benefitting from affordable and clean energy.
Clean transportation  	<ul style="list-style-type: none"> • Number of people with access to sustainable transport systems. • Estimated GHG emissions reduced or avoided (tCO2e). • Number of electric/hybrid/low-emission vehicles provided. • Number of electric vehicle charging points installed. • Reduction of air pollutants: particulate matter (PM), sulphur oxides (SOx), nitrogen oxides (NOx), carbon monoxide (CO), and non-methane volatile organic compounds (NMVOCs) (µg/m3). • Ambient noise reduction from the transport infrastructure (decibels). • Reduction in congestion, calculated on the vehicle speed.
Environmentally sustainable management of living natural resources and land use  	<ul style="list-style-type: none"> • Reduction of air pollutants: particulate matter (PM), sulphur oxides (SOx), nitrogen oxides (NOx), carbon monoxide (CO), and non-methane volatile organic compounds (NMVOCs) (µg/m3). • Increase of green areas in proportion to the total area.
Pollution Prevention and Control   	<ul style="list-style-type: none"> • Materials sourced sustainably or recycled (Tons/ Kg). • Reduction of hazardous materials used (Tons/ Kg). • Avoided resource waste (Tons/ Kg). • Energy recovered from waste (minus any support fuel) (MWh or GWh or KJ). • GHG emissions from waste management before and after the project (tCO2e). • Area with improved regular (daily, weekly or bi-weekly) waste collection service.
Renewable energy  	<ul style="list-style-type: none"> • MW capacity. • Expected annual generation MWh. • Estimated annual GHG emissions avoided (tCO2e). • Number of household/residents benefitting from affordable and clean energy. • Transmission line miles (Km).

Aquatic biodiversity conservation



- Number of marine species protected in the concessions.
- Hectares of marine wildlife conservation areas protected.

Terrestrial biodiversity conservation



- Number of species protected in the concessions.
- Hectares of wildlife conservation areas protected.
- Increase of the area of forest area in proportion to the total area.
- Reduction of the percentage of degraded land compared with total surface.
- Estimated annual GHG emissions avoided (tCO2e).

Social eligible categories

SDG	Quantitative impact indicators
<p>Affordable basic infrastructure</p>	<ul style="list-style-type: none"> • Number of hospital and other healthcare facilities built/upgraded. • Number of beds. • Number of residents benefitting from healthcare. • Cost reduction for standard treatments and medicines.
<p>Access to essential services</p>	<ul style="list-style-type: none"> • Number of educational institutions funded - location and type. • Number of students supported. • Number of years of education provided which is otherwise not accessible.
<p>SME financing and microfinancing</p>	<ul style="list-style-type: none"> • Number of SMEs financed. • Number of jobs created. • Number of jobs retained. • Number of local SME suppliers and smallholder farmers in supply chain. • Number of new accounts opened in underserved populations. • Number of products aimed at financial inclusion. • Number of applicants for products targeted at underserved populations. • Number of financial literacy initiatives put into place. • Number of beneficiaries / participants of financial literacy initiatives.
<p>Affordable housing</p>	<ul style="list-style-type: none"> • Number of supported affordable housing units financed. • Number of first-time internet connections. • Number of people benefited. • Increase of households with internet access (absolute or percentage).

External review

Framework verification

BBVA has developed a Framework of which Vigeo Eiris has provided an independent opinion.

Vigeo Eiris is an independent international provider of environmental, social and governance (ESG) research and services for investors and public & private organizations. It supports the integration of ESG criteria into business functions and strategic operations (including sustainable bonds, corporate ratings, CSR evaluations and more).

Reporting assurance

The GTB Sustainable team is responsible for the review and maintenance of the Framework for BBVA sustainable transaction banking, in collaboration with the business units through the CIB Sustainable Finance team and the Sustainable Finance Working Group.

In addition to the independent verification assessment referred above, BBVA will request on an annual basis a limited assurance report of the allocation of the proceeds or guarantees of the green, social or sustainability transactional products by its external auditor or another suitably qualified provider.

BBVA will continue working to follow the future recommendations that LMA or ICMA may publish on best practices in the green social and sustainability market; this may request the update and revision of this Framework.

Commitment

The consequences of breaching the Framework conditions will be reflected in the contract with the client.

BBVA sector norms

BBVA has certain standards and criteria for its financings.

BBVA is committed to its strategy around climate change and sustainable development, pledge 2025³. The strategy will help the bank meet the United Nations Sustainable Development Goals and is in line with the Paris Agreement on Climate Change. Pledge 2025 will help the bank align its activity to a 2°C Scenario and strike a balance between sustainable energy and fossil fuel investments and is based on three lines of action: financing, management and engagement.

BBVA's sector norms⁴ are a part of this pledge. The norms address four high environmental and social risk sectors: energy, agriculture, mining and infrastructure. They provide guidance on the procedures to follow in the management of customers and transactions in these sectors. These sector norms, in addition to the Equator Principles⁵, help BBVA to reduce the risks these sectors can have on the environment and on society.

These norms embody the Commitment to human rights⁶ that BBVA took on board in 2008 and recently updated. The commitment takes as a reference point the United Nations Guiding Principles on Business and Human Rights and is framed within the Group's CSR policy and is aligned with BBVA's Code of Conduct⁷.

³ <https://www.bbva.com/wp-content/uploads/2018/02/Brochure-Fledge2025bbva.pdf>

⁴ https://shareholdersandinvestors.bbva.com/wp-content/uploads/2019/03/Sector-Norms_GL_110319-1_-Final-1.pdf

⁵ https://accionistaseinversores.bbva.com/wp-content/uploads/2019/03/BBVAin2018_Eng.pdf

⁶ <https://shareholdersandinvestors.bbva.com/wp-content/uploads/2018/02/Commitment-to-Human-Rights.pdf>

⁷ <https://shareholdersandinvestors.bbva.com/wp-content/uploads/2017/05/RCReportCodeofconduct.pdf>

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