

The prevention of corruption in the BBVA Group

1. Introduction

The BBVA Group (hereinafter, BBVA) has a firm and irrevocable commitment to legality and ethical principles, especially evidenced in terms of anti-corruption. BBVA not only rejects categorically any corrupt practice but also expects from its employees and third parties, and assumes as its own, the commitment to participate actively in the eradication and prevention of corruption, both in public and private sector. To that end, BBVA has in place several internal policies, procedures and controls that complement, develop and specify the principles and guidelines set out in section 5.3 of the Code of Conduct under the heading “Anti-corruption Policy”.

BBVA's conduct conforms at all times to the most rigorous national and international standards on the subject, taking into consideration the guidelines of international organizations for the prevention of corruption as well as those outlined by the international Organization for Standardization (ISO).

2. Scope of application

These principles and behavior patterns are applicable to all entities that are part of BBVA and will be mandatory for all its directors, members of the senior management and employees in all activities derived from their positions at BBVA. In addition, its scope of application may be extended to individuals or entities not belonging to BBVA, provided that they maintain a contractual relationship with BBVA and their conduct poses a risk or responsibility to BBVA or may directly or indirectly affect its reputation.

3. Key aspects on the prevention of corruption in BBVA

In this Policy, corruption is understood as any conduct consisting of:

- the offer, promise, grant, acceptance or request, either directly or indirectly, of a gift or an undue personal benefit regardless of its value (financial or non financial) as an incentive or reward for an individual to act or omit to act in a particular way in the performance of his/ her duties, irrespective of where the actions take place;
- the offer, promise or giving of a gift or any undue personal benefit regardless of its value (financial or non-financial) to a public official in consideration of his/her official role or position: or
- unduly influencing a public official on the basis of a personal relationship with the intention of obtaining an undue benefit for oneself or for a third party, whether or not there is any compensation.

BBVA rejects, prevents and penalizes any corrupt practice and/or unfair behavior aimed at obtaining unlawful, undue or improper advantages for the entity, its directors, members of the senior management or employees.

The following general principles for action must be followed:

- It is not permitted to give, promise, offer or accept gifts or personal benefits, directly or indirectly, that may be aimed at:
 - (i) Improperly obtaining or retaining any type of business, contract, interest or dishonest advantage in favor of BBVA or by BBVA; or
 - (ii) Influencing, with that purpose, those with decision-making power.
- It is not permitted to request or accept unjustified payments from third parties or payments that involve commissions or compensations different from those arising from the provision of products and services inherent to BBVA's business.
- It is not permitted to improperly favor entities or individuals with whom BBVA maintains, or may maintain, contractual or business relationships.
- It is not permitted to use one's position within BBVA or one's personal relationship to seek to influence a public employee or an individual to engage in inappropriate conduct
- Good judgment, diligence and prudence must be exercised in any dealings with public employees, especially if such employees adopt, or have power to adopt, resolutions and decisions that directly or indirectly affect BBVA.
- Conflicts of interest must be identified and managed in accordance with the provisions set forth in the internal regulations on Conflict of Interest. In the event that an employee finds himself/herself in a situation of conflict of interest, or believes that it may be perceived as such, he/she must always report it to his/her direct manager and register it through the tools that the BBVA Group makes available to him/her

Likewise, specific principles for action must be followed and complied in relation to those activities and processes that involve a greater risk of corruption, such as, for example: the offer, delivery and acceptance of gifts or personal benefits; the invitation to or attendance at events; professional and travel expenses; donations and sponsorships; relationships with third parties (i.e. suppliers, agents, intermediaries and business partners); the selection and recruitment procedures or facilitation payments.

To promote compliance with the above general and specific principles for action, aside from its continuous monitoring and supervision, BBVA:

- Account, records and documents all transactions, income and expenses in an appropriate and accurate manner, without omitting, hiding or altering data or information in relation to them; so that the accounting and operational records reflect the true image and can be verified by the supervisory departments and by internal and external auditors.
- It makes available to employees and third parties not belonging to BBVA the [Whistleblowing Channel](#) where they can report indications or suspicions of corrupt practices within BBVA or the existence of a risk of corruption or a breach of the Policy. BBVA shall ensure the confidentiality and safety of complainants and shall not take, or permit, any reprisals or adverse consequences against those who, in good faith, make use of the Whistleblowing Channel in accordance with the provisions of the internal regulations on the management of Whistleblower Channel communications.
- Has in place a disciplinary system that can lead to termination of the employment or commercial relationships, as appropriate, and in accordance with the applicable laws and
- Ensures the objectivity and independence of Compliance, which has been entrusted by the Board of Directors with the task of promoting and supervising that BBVA acts with integrity, particularly in the field of the prevention of corruption.

All BBVA members undergo specific training courses in this field, adapted to their professional activities.

BBVA in Colombia has adopted the ABC Group Policy .