Governance

Transparency, integrity, responsibility and adherence to the best corporate governance practices make up the governance system of Grupo Financiero BBVA México, which, together with ethical values and efficient management of financial and non-financial risks, guarantees the sustainability of the business in the long term.



Governance Corporate

BBVA México's corporate governance system is made up of four key institutional principles:

- 1. The appropriate composition of its governing bodies
- 2. Clear delimitation of roles for the Board of Directors, its Committees and Senior Management
- 3. A sound decision-making process and a consolidated information model
- **4.** A system of monitoring, supervision and control of

Since 2021, BBVA México's corporate governance system has been governed by the Group's **General Corporate** Governance Policy, which aims to maintain coherent management in line with international standards of good governance, minimum requirements in terms of structure, composition, operation and diversity, as well as the parent-subsidiary relationship model.

Corporate Structure of Grupo Financiero BBVA México

As of December 31, 2022



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Management Structure

As of February 28, 2023

Audit Committee

General Management of Grupo Financiero BBVA México and Vice-Chairman of the Board of Directors

Eduardo Osuna Osuna

General Management - Audit

(area independent of the General Management)

Adolfo Arcos González

General Management - Company and Government Banking

Alejandro José Cárdenas Bortoni

General Management - Finance

Luis Ignacio de la Luz Dávalos

General Management -Regulation and Internal Control

Jesús María Verdugo Borja

General Management -Commercial network

Guillermo Estrada Attolini

General Management - Legal Services and Secretary of the **Board of Directors**

Jacobo De Nicolás y De Benito

General Management -Risks Mexico

Blanca Cecilia Muñoz Martínez

General Management -CIB Mexico

Álvaro Vaqueiro Ussel

General Management -**Engineering & HoD MX**

Rafael Juan Rosales Gómez

General Management -Talent and Culture

Enrique José Fernández Gutiérrez

General Management -Customer Solutions México

Hugo Daniel Nájera Alva

General Management -**Seamless Experience**

Rafael Humberto Del Río Aguirre

Chief of Cabinet

Luisana Carrasco Casas

SUPPORT

BUSINESS

Composition of the Board of Directors of Grupo Financiero BBVA México⁴

Management of GFBB is entrusted to the Board of Directors, whose members are appointed by the General Ordinary Shareholders' Meeting. The selection criteria are based on GFBB's bylaws, Chapter V, Article 25, as well as the processes and requirements of the applicable law. The General Ordinary Shareholders' Meeting is also responsible for assessing the Board's performance by approving its Annual Report, the audited financial statements, and ratifying its members.

Appointment and selection of the Board of Directors is governed by the provisions of Articles 23 and 45-K of the Banking Law of Mexico. The criteria applicable to the delegated Board Committees are those described in Articles 70. 145 and 168 Bis 8 of the General regulations governing credit institutions.

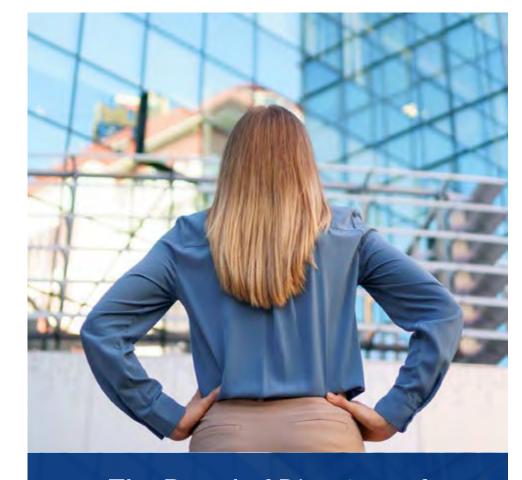
BBVA México's Board of Directors is the highest governing body of GFBB and is responsible for approving objectives, guidelines and policies on the organization and administration of credit, which must be consistent, compatible and complementary to those established for Comprehensive Risk

Management. It is also responsible for appointing the Committees and officers of the Group in charge of developing these objectives, guidelines and policies.

One of the powers of the Board of Directors is to elect the members of the various committees. It also approves the objectives and guidelines of the internal control system proposed by the Audit Committee.

To prevent potential conflicts of interest among its employees, directors and officers, the Institution's Code of Conduct was approved by the Board of Directors. This document contains the guidelines that must be followed to ensure that the actions of any person related to BBVA México are in accordance with its principles and values.

Part of the responsibilities of the Board of Directors is to establish mechanisms for the relevant management to keep GFBB informed on the financial, administrative, operating and legal condition of all financial entities and other companies under its control. For this reason, it ensures that everything is clear and well defined to ensure efficient management.



The Board of Directors of BBVA México is made up of nine members and nine alternates, of whom six are independent and two are women.

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⁴ In this **link** are the documents related to the Board of Directors and other information considered of interest in relation to this matter.

Board of Directors of BBVA México

Members and information as at 31 December 2022

The **average tenure** of BBVA México directors is 9.22 years.

MEMBERS

Jaime Serra Puche

Chairman of the Board

Seniority: 15 years

Eduardo Osuna Osuna

Vice Chairman of the Board Seniority: 7 years **Onur Genc**

Seniority: 4 years

Carlos Torres Vila

Seniority: 6 years

Vicente María Rodero Rodero

Seniority: 10 years

Carlos Vicente Salazar Lomelín*

Seniority: 17 years

Ricardo Guajardo Touché*

Seniority: 31 years

Jorge Saenz-Azcunaga Carranza

Seniority: 6 years

Cristina de Parias Halcón

Seniority: 3 years

ALTERNATES

Alejandro Mariano Werner Wainfeld

Seniority: 1 year

Armado Garza Sada

Seniority: 4 years

Juan Asúa Madariaga

Seniority: 4 years

Fernando Gerardo Chico Pardo

Seniority: 13 years

Eduardo Javier Garza Fernández

Seniority: 4 years

Arturo Manuel Fernández Pérez*

Seniority: 28 years

Ana Laura Magaloni Kerpel*

Seniority: 1 year

Enrique de Jesús Zambrano Benítez

Seniority: 3 years

Alejandro Ramírez Magaña

Seniority: 9 years

* Independent member.



Meetings of the Board of Directors

They are held on a quarterly basis and may also be called when requested by the Chairman, Secretary, Assistant Secretary, one of GFBB's Statutory Examiners or when at least one quarter of the directors so request. To hold a meeting, the attendance of at least 51% of the members, including one independent member, is required.

In 2022, seven meetings of the BBVA México's Board of Directors were held on the following dates:

January 20

October 4

March 23

October 27

April 28

• December 15

• July 21

Remuneration

Non-BBVA Group directors are compensated for their attendance at each Board of Directors meeting by multiplying the value of 2 (two) fifty-peso gold coins, commonly referred to as "Centenarios," by 1.53846 for residents of Mexico, or 1.33333 for non-residents.



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Regional boards FS5

Regional Boards aim to foster progress and growth of Grupo Financiero BBVA México by providing a forum for discussion and creating an active business community to contribute to the development of the country. They serve as a platform to gather feedback on the banking activity, service levels, and local business culture. Additionally, they facilitate business referencing and establish strong relationships between GFBB officials, the community, and local authorities. The Regional Boards also actively participate with the Fundación BBVA México.

Structure of the Regional Advisory Boards:

- At least 10 members, depending on the size of the region
- The Coordinator of the Board must be an office of BBVA México.



Regional Advisory Boards are composed of 540 leaders.

52 women participated in the Regional Advisory Boards in 2022.

In 2022 we held the following meetings of the Regional Advisory Boards:

- 3 Chairmen Boards
- 1 National Board of Members
- 7 Divisional Meetings
- Local Boards in all 27 Boards
- 2 Trade Missions: to the United Arab Emirates and Silicon Valley
- Multi-regional Board of Members
- Summer Courses in Mexico and Spain for the children of the Directors

NORTHWEST

Baja California Chihuahua Sinaloa Sonora

NORTHEAST

Tamaulipas La Laguna Nuevo León

WEST

Colima Jalisco Michoacán Nayarit

METROPOLITAN AREA

Toluca Metropolitana

BAJÍO

Guanajuato Aguascalientes San Luis Potosí Querétaro Hidalgo

SOUTH

Morelos Puebla Guerrero Oaxaca Veracruz

SOUTHEAST

Chiapas Peninsular Quintana Roo Tabasco



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Sustainability governance

GRI 2-13

At BBVA, sustainability is a strategic priority. This means doing business at the same time as making a decisive contribution to solving the environmental and social problems of our times and creating opportunities for all. To this end, we have a Global Sustainability Office whose management model is replicated in Mexico and is operated by sustainability professionals located in the bank's different business units.

This area is responsible for creating the strategic sustainable plan and coordinating the management of sustainability-related issues through various functions such as the

development of sustainable and innovative products, the dissemination of specialized knowledge through differential advice to customers, and the establishment of marketing methodologies and relationships with strategic partners.

We have implemented this model as part of our Global Sustainability Policy, which has been approved by BBVA's Board of Directors. As the highest supervisory body of the Bank, the Board of Directors will oversee the implementation of the Policy, either directly or through its Committees. This will be based on periodic or *ad hoc* reports received

from the leader responsible for sustainability, the various areas of the Bank that will integrate sustainability into their day-to-day business and activities, and, if necessary, the heads of the different control functions within BBVA.

Financial risk management

Organizational Structure

BBVA México's General Risk Department reports directly to the Institution's General Management, thus guaranteeing its independence from the Business Units and allowing it the necessary autonomy to carry out its activities.

In general terms and considering the best national and international practices, three teams specialized in Credit Risk have been created, the first one targeting the Wholesale portfolio, with the functions of admission, monitoring and recovery. The second team focuses on the SME sector and the last one on the Individuals sector, both with the functions of admission and monitoring. The three teams are supported and complemented by an area dedicated to the management of recovered Non-Financial Assets (NFA). For the SME and Retail sectors, there is also a specific area that concentrates the recovery functions given the common characteristics and synergies involved in performing the function for these sectors. The management of market, structural and liquidity risks is also integrated in

a single unit, which includes risk management in non-banking businesses and asset management.

There is also Advanced Analytics, Risk Solutions and Risk Transformation to support the aforementioned units.

Advanced Analytics

addresses the specialized needs of the Risk areas in terms of methodologies and technologies.

Risk Solutions

ensures that the areas have the necessary technological resources to carry out their functions and leads the portfolio of projects in this area.

Risk Transformation

seeks the efficient execution and continuous improvement of the Risk areas' processes.



The Portfolio Management, Data & Reporting unit has been implemented for the preparation, monitoring and generation of reports for the management of the areas, as well as for the measurement of operational risk and loss management. This area is also responsible for disclosing information within the Risk area in strict compliance with national and international regulations.

In accordance with the regulatory requirements of the CNBV regarding the disclosure of the policies and procedures established by credit institutions for Comprehensive Risk Management, the measures implemented for this purpose by BBVA México's management, as well as the relevant quantitative information, are presented below.



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Qualitative information Participation of corporate bodies

The risk governance model in Grupo Financiero BBVA México is characterized by the direct involvement of its corporate bodies, both in establishing the risk strategy and in the continuous monitoring and supervision of its implementation.

The Board of Directors of Grupo Financiero BBVA México and of each one of its subsidiaries in Mexico approves, at the proposal of the Risk Committee:

- The objectives, guidelines and policies of Comprehensive Risk Management, and any potential modifications
- The global risk exposure limits and, where appropriate, the Specific Risk Exposure Limits, considering the Consolidated Risk, broken down by business unit or risk factor, as well as, where appropriate, the Risk Tolerance Levels
- The special cases or circumstances in which both the Global Risk Exposure Limits and the Specific Risk Exposure Limits may be exceeded
- The Capital Adequacy Assessment including the capital estimate and, where applicable, the capitalization plan
- The Contingency Plan and its amendments

The Delegate Risk Committee of the Board of BBVA México approves:

- The Specific Risk Exposure Limits and Risk Tolerance Levels, and liquidity risk indicators
- The methodologies and procedures to identify, measure, monitor, limit, control, inform and disclose the different types of risk to which BBVA México is exposed, and their potential modifications
- The models, parameters, scenarios, assumptions, including those related to stress tests, which are used to conduct the Capital Adequacy Assessment and which will be used to carry out the valuation, measurement and control of the risks proposed by the Comprehensive Risk Management Unit, which must be in accordance with BBVA México technology
- The methodologies for the identification, valuation, measurement and control of the risks of new transactions, products and services that BBVA México intends to offer to the market
- The correction plans proposed by the CEO
- The evaluation of the aspects of Comprehensive Risk Management

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• The level of effectiveness that the mechanisms of validation of the security elements of the identifications presented by potential clients, as well as the technology to carry out the biometric recognitions contemplated in the law.

As well as other activities in accordance with the applicable regulations and those that are delegated by the Board of Directors of Grupo Financiero BBVA México and each of its subsidiaries.

Politics and procedures

There are risk manuals that reflect the strategy, organization, operational framework, technological framework, methodological framework and regulatory processes according to the needs of each procedure or policy of Comprehensive Risk Management of Grupo Financiero BBVA México.

A training program on risks and disclosure of regulations is carried out, including the defined and delimited liability of third parties.

Tactical decision making

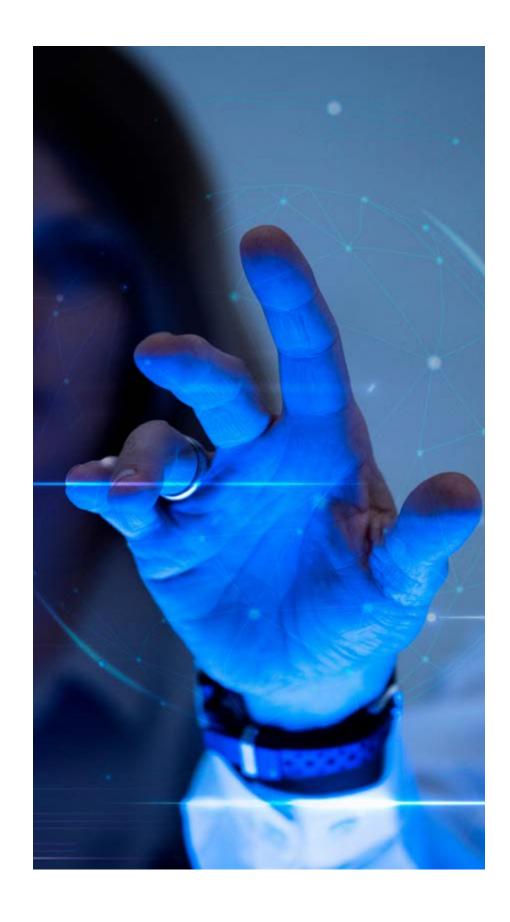
The management model of Grupo Financiero BBVA México and each of its subsidiaries ensures the independence of the Comprehensive Risk Management Unit. It establishes monitoring processes through reports and alerts to timely detect deterioration and deviations from business objectives and the limit structure defined by type of risk.

Regarding the risk appetite, the different risk units participate in the preparation of the Risk Appetite that Grupo Financiero BBVA México is willing to assume to achieve its business objectives and that must be submitted in general terms and particular exposures and sub-limits by the Risk Committee and/or the Board of Directors, for approval, where appropriate.

Appropriate authorization processes are carried out for new products and/or services that involve risk for BBVA México, which include the ratification of the new product and/or service by the Risk Committee.



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Tools and analytics

Continuous measurement of credit, market and liquidity risks under consistent methodologies and parameters. Budgets are prepared for these metrics, which serve as the axis of direction of risk management.

In the reports, the risks incurred by the different business units of BBVA México are monitored and analyzed. Said monitoring considers Risk Metrics, Risk Appetite, Main Concentrations, Compliance with Regulatory Limits, Analysis of Credit Stress, Calculation of Regulatory Capital Requirement, Structural Risks, Market Risks, Liquidity Risk, Operational Risk and Legal Risk.

Methodologies and parameters used to measure risks are periodically calibrated and submitted for approval to the authorized bodies.

The establishment of periodic processes for sensitivity analysis, stress testing and review and calibration of models are carried out.

The establishment of methodologies for the monitoring and control of operational and legal risks is also carried out according to international standards.

Information

Information is an essential pillar in risk management and is used to carry out early management through the definition and establishment of early warning indicators and metrics that make it possible to anticipate movements –positive and negative– in the risk profile (customers, portfolios, products, asset classes), prevent deterioration and point out deviations and potential threats, in all risks, by all defined axes, in all its phases (current, impaired and in recovery), at all organizational levels of the function (risk units in the business areas, corporate area and specialist areas) and corporate bodies, ensuring compliance and coherence with regulatory requirements in this area.

It ensures that the data used in the preparation of the reports come from unified sources by type of risk, reconciled, traceable, automated to a greater extent (or if they are manual, have controls), with a single definition, guaranteeing the frequency, distribution and confidentiality of reporting among other aspects.

Technological Platform

The source and calculation systems for risk measurements are periodically reviewed and a process of continuous improvement is carried out in order to guarantee the quality and sufficiency of data and aiming, as far as possible, at the automation of processes.

Audit

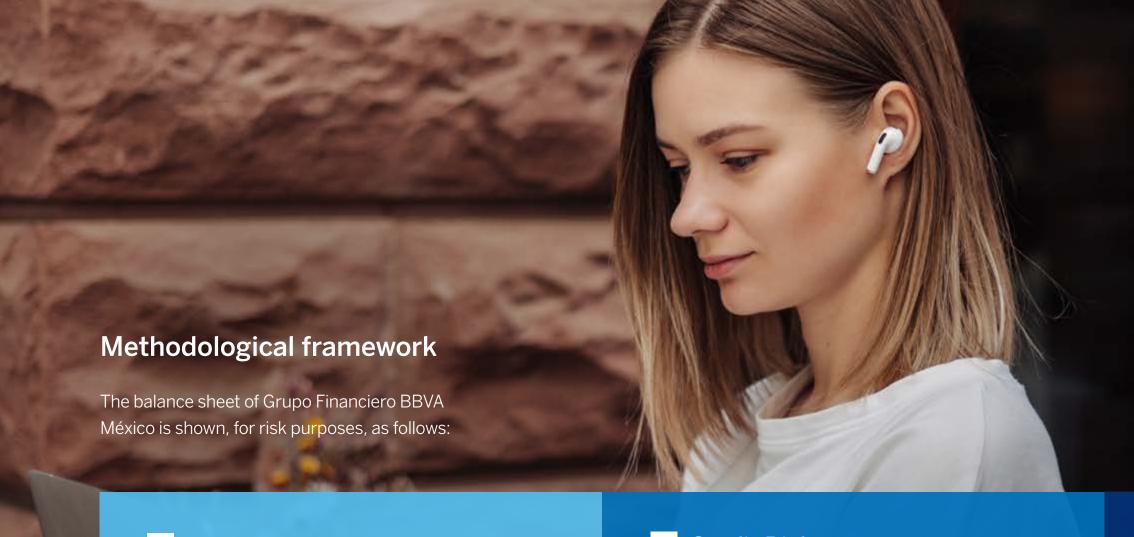
Annually, in compliance with the obligations set forth in the General Regulations applicable to Credit Institutions ("CUB"), Internal Audit performs a Comprehensive Risk Management Audit in accordance with the legal provisions applicable to the matter, which is sent to the CNBV. The recommendations in each of the audits conducted are followed up periodically by the Audit Committee delegated by the Board of Directors.

Also, audits of compliance with the Banking Law, the CUB and other legal provisions applicable to Grupo Financiero BBVA México and its subsidiaries BBVA México are conducted by independent experts, through which it has been concluded that the models, systems, methodologies, assumptions, parameters and risk measurement procedures comply with their functionality in view of the characteristics of the operations, instruments, portfolios and risk exposures of Grupo Financiero BBVA México.



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BBVA México considers that to date it fully complies with the provisions regarding Risk Management, and it continues with improvement projects in measurements and limitations, process automation and methodological refinements.



▲ Market Risk

- Portfolios of transactions and investments.
 Investments in securities for trading, repos and transactions with derivative financial instruments.
- Structural Balance
 Available-for-sale, other transactions, including held-to-maturity securities and derivative financial instruments to manage structural risk of interest rates and exchange rates.

▲ Credit Risk

- Companies and Corporations

 Traditional credit portfolio, including small and medium-sized companies, as well as exposures for investments in issues as counterparties in derivative financial instruments.
- Consumer Credit cards and financing plans.
- Mortgage
 Mortgage portfolio.

▲ Liquidity Risk

 Banking business
 With on and off balance sheet positions, including loans, traditional deposits, investments in securities, derivatives and wholesale financing, among others.

Also, with respect to contractual obligations, the monitoring and control of the liquidity risk of the banking business integrates the liquidity that its subsidiaries, entities belonging to the same financial group or relevant related persons may require, and liquidity that the banking business itself may require from any of the related entities or persons mentioned.

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Regulatory compliance.

Grupo Financiero BBVA México (through its subsidiaries) has a Compliance System designed to mitigate risks related to issues such as anti-money laundering, conduct with customers, corporate compliance, data protection, and the securities market.

The system includes the implementation of various elements, such as risk identification, procedures, communication and training actions that provide for rigorous ethical standards for daily conduct. In addition, there is a compliance function charter that regulates the performance of the Compliance Department in the Group.

The system consists of seven basic pillars:





mechanisms and policies





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Non-financial risk management.



Just as Grupo Financiero BBVA México is exposed to risks and opportunities on financial, regulatory, market and tax issues, it is also exposed to social, ethical and climate change-related risks, which could have adverse effects on customers, the business and communities should they materialize.

In this regard, there is a Corporate Policy for Non-Financial Risk Management, which contains the guidelines and regulations for the management of operational risks inherent to the activities; this is in addition to the financial risk management and control model.

In accordance with this policy and with the support of the Business and Support Areas, the Non-Financial Risk Units and the Specialized Control Units, procedures and methodologies are developed to prioritize, assess and monitor potential risks on a regular basis, which allows for the implementation of appropriate mitigation and control measures.

Reputational risk management

Institutional reputation is an extremely important issue for Grupo Financiero BBVA México. For this reason, methodologies and tools were implemented to assess, identify and prioritize reputational risks based on the strength of Grupo Financiero BBVA México with respect to risk and the impact perceptions of stakeholders.

As part of the mechanisms for identifying and assessing reputational risk, mitigation controls and action plans are generated to reduce the risk and maintain or improve our reputation.

Since 2020, GFBB has implemented a manual that guides and supports the Operational Risk Admission Committee in the identification and assessment of reputational risks. Each year, the results of the assessment are reported to the Board's Standing Committee and the Global Corporate Assurance Committee of Grupo Financiero BBVA México.

Risk management associated with climate change

GFBB recognizes the effects and negative impacts of climate change and therefore manages the potential related risks through governance processes and mechanisms in the credit, market, liquidity, operational and non-financial risk management frameworks.



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Human Rights

As part of its commitment to human dignity and rights, Grupo Financiero BBVA México abides by the standards provided in the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the Global Compact.

To this end, it strives to create a favorable environment that preserves well-being and contributes to the integral development of the societies where it operates, and for this, it generates sustainable actions that improve the well-being of these communities.

Respect for human rights and human freedoms is fostered and put into practice on a daily basis for employees, customers, suppliers, business partners and other stakeholders.

As part of the Grupo Financiero BBVA México's efforts in this area, in 2022 a human rights due diligence process was carried out in line with the United Nations Guiding Principles on Business and Human Rights. With a preventive approach, the objective was to identify the possible impacts of operations on human rights and establish the necessary procedures to repair any damage in case of violation.

The following six topics for the prevention, mitigation and repair of impacts on human rights were evaluated:



Conditions of employment

Hiring and fair compensation, labor rights and relations, and health and safety.



Projects and products

Impact on human rights derived from the credit activity.



Supply chain

Fair contract conditions, supplier control and responsible purchasing policies.



Customer welfare

Accessibility and service, security and respect.



Respect for communities

Environmental protection and inclusive businesses.



Cross-cutting issues:

Data protection and the impact of new technologies on human rights.





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The human rights due diligence process conducted by Grupo Financiero BBVA México evaluated the inherent and residual risks related to six issues with respect to its stakeholders, including employees, suppliers, customers and local communities. The results determined a medium-high effectiveness of the management and mitigation measures and allowed the detection of improvement opportunities and the establishment of action plans for strategy, disclosure and processes of Grupo Financiero BBVA México. With a preventive approach, the impacts of the transactions were evaluated and the appropriate procedures were identified to repair any damage in the event of a breach.

BBVA and human rights

2002

- Publication of the Code of Conduct
- Members of the UN Global Compact

2004

1st Spanish bank to adhere to the Equator Principles

2005

Publication of the 1st Regulation of the defense sector

2007

Publication of the 1st Commitment on human rights

2008

Adherence to the United Nations Principles for Responsible Investment (UN-PRI)

2011

Launch of the Diversity Plan

2012

- Adherence to the Thun Group of Banks
- Publication of the Responsible Purchasing Policy
- Publication of the Low-Income Housing Policy

2014

Review of the defense sector standard

2017

1st global human rights due diligence in human rights Publication of the Code of Ethics for suppliers

2018

- Update of the Commitment on human rights
- Publication of the Human Rights Action Plan 2018-2020
- Publication of Sector Standards for environmental and social due diligence

2019

Expansion of the scope of the Sector Standards and the scope of the Defense Sector Standard

2020

- New CSR policy
- Update of the human rights commitment
- Publication of the Environmental and Social Framework for due diligence in the mining, agribusiness, energy, infrastructure and defense sectors
- Update of the Code of Ethics for Suppliers
- General Procurement Principles

2021

- 2nd Global Human Rights Due Diligence Process
- Expansion of the scope of the Environmental and Social Framework
- Update of the General Procurement Principles

2022

3rd Global Human Rights Due Diligence Process with results and action plans by country

In **2023** we will be working on the Business and Human Rights Accelerator of the Global Compact in Mexico.



Compliance System

The Compliance function is included in the Compliance Statute of Grupo Financiero BBVA Mexico, which consists of a series of elements that together address the risks associated with Anti-Money Laundering Prevention, Customer Conduct, Corporate Compliance, which oversees the expected ethical behavior standards in the Group, the Protection of Personal Data in our possession, and the behaviors to be observed in the Securities Market.

The foregoing is achieved through compliance programs that include the proper identification of risks, the design of policies and procedures, communication actions, training, and the government model that oversees the application of the programs to establish standards of ethical behavior to conduct daily activities and mitigate eventual risks that may appear.

Thes statute has the following elements that regulate the framework of action of the Compliance Department within Grupo Financiero BBVA México.



This system consists of seven basic pillars:

- 1. Adequate organizational structure
- 2. Policies and procedures
- **3.** Mitigation processes and compliance controls
- **4.** Technological infrastructure
- **5.** Communication and training mechanisms and policies
- **6.** Monitoring metrics and indicators

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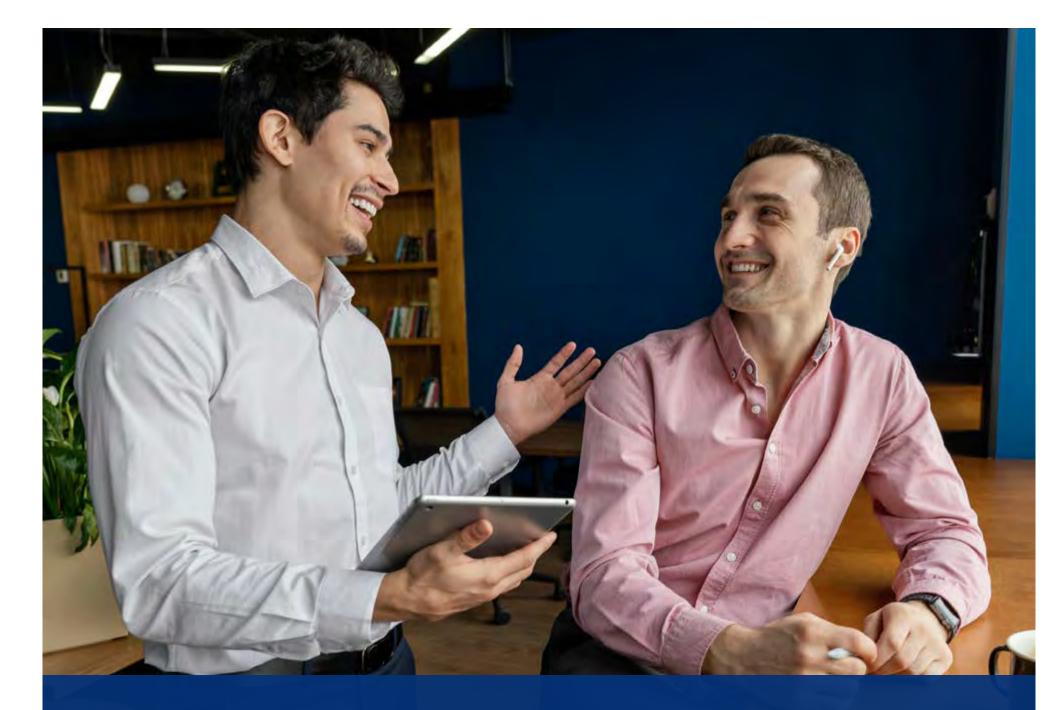
7. Independent periodic review

Integrity Program

For Grupo Financiero BBVA México, integrity is a fundamental value in the development of its activities and a requirement towards the different Stakeholders. Within the institution, everyone must act honoring the Code of Conduct, the applicable laws and regulations in a comprehensive, transparent and professional manner, in accordance with the social impact of the financial activity carried out and the trust placed in the Group by its shareholders and customers.

As part of the efforts of Grupo Financiero BBVA México and to reinforce the culture of integrity, the "Soy Íntegro" Program was implemented, the first phase concluded in July 2021, where 1,485 virtual sessions were given benefiting 36,951, which includes an interactive miniseries called "Friends and Judges" where situations or ethical dilemmas are presented to be solved in each of the chapters.

Given the positive impact on employees, it was decided to continue this program online in 2022 for new employees and for those who were unable to take it in the first phase.



During 2022, in the second phase, **8,266 employees have taken the online course,** achieving a progress of 88.2% and 85.8% in Central Areas and Commercial Network, respectively.

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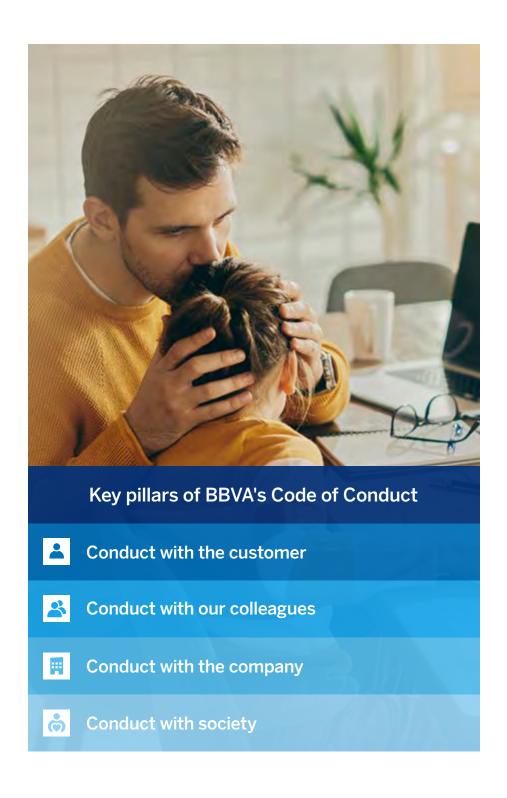
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Code of Conduct

Grupo BBVA México, through its Board of Directors, approved the **new Code of Conduct** on March 23, 2022, which provides for the guidelines for action and ethical behavior expected of all those who make up the Group. This new Code of Conduct includes new sections that are adjusted to the current needs of the social environment, however, it still retains the essential fundamentals of the previous Code.

BBVA's Code of Conduct represents an ethical commitment to its main stakeholders, as it seeks to promote principles of upright behavior throughout the organization, in order to maintain the highest standards of integrity and honesty. Strict standards of conduct are established for the development of Grupo BBVA México's activities, focused on safeguarding customer information in accordance with legal provisions.

In order for everyone to know and become aware of the importance of the **Code of Conduct**, nearly 42 thousand Group employees were enrolled, of which by the end of 2022, 35,395 had been accredited, equivalent to 84% progress. The course will continue to be offered at Campus BBVA until we achieve the goal of having 100% of our employees complete the course, which is the target we have set for the end of the first quarter of 2023.



In May 2022, another significant milestone was reached, as the **Emotional Support Hotline** that Grupo BBVA México makes available to employees who need support in matters of Emergencies, Health, Domestic Violence, Harassment and Sexual Harassment was publicized.

The line is available 365 days a year, 24 hours a day, by calling 55 5621 - 4357 in Option 3, or from the corporate cell phone by dialing 814357. Throughout the year, this effort can be seen in different instances of the corporate buildings and is in a process of maturing.

In May 2022, as an additional effort to consolidate a culture of anti-corruption and conflict of interest prevention, we launched the **Gift and Event Registration Tool**, in which the Group's employees must register:

- Receiving gifts from third parties
- Delivery of gifts from third parties
- Events organized by BBVA, and
- Attendance at third party events

Whistleblower Channel and Consultation Channel

The Whistleblower Channel and the Consultation Channel continue to be available to customers, suppliers and employees who wish to report any possible non-compliance with the Code of Conduct, regulations or unlawful practices. The channels are available 24/7, 365 days a year.

▲ The channels are:

www.bkms-system.com/bbva

Q Consultation Channel:

www.bkms-system.com/consultas

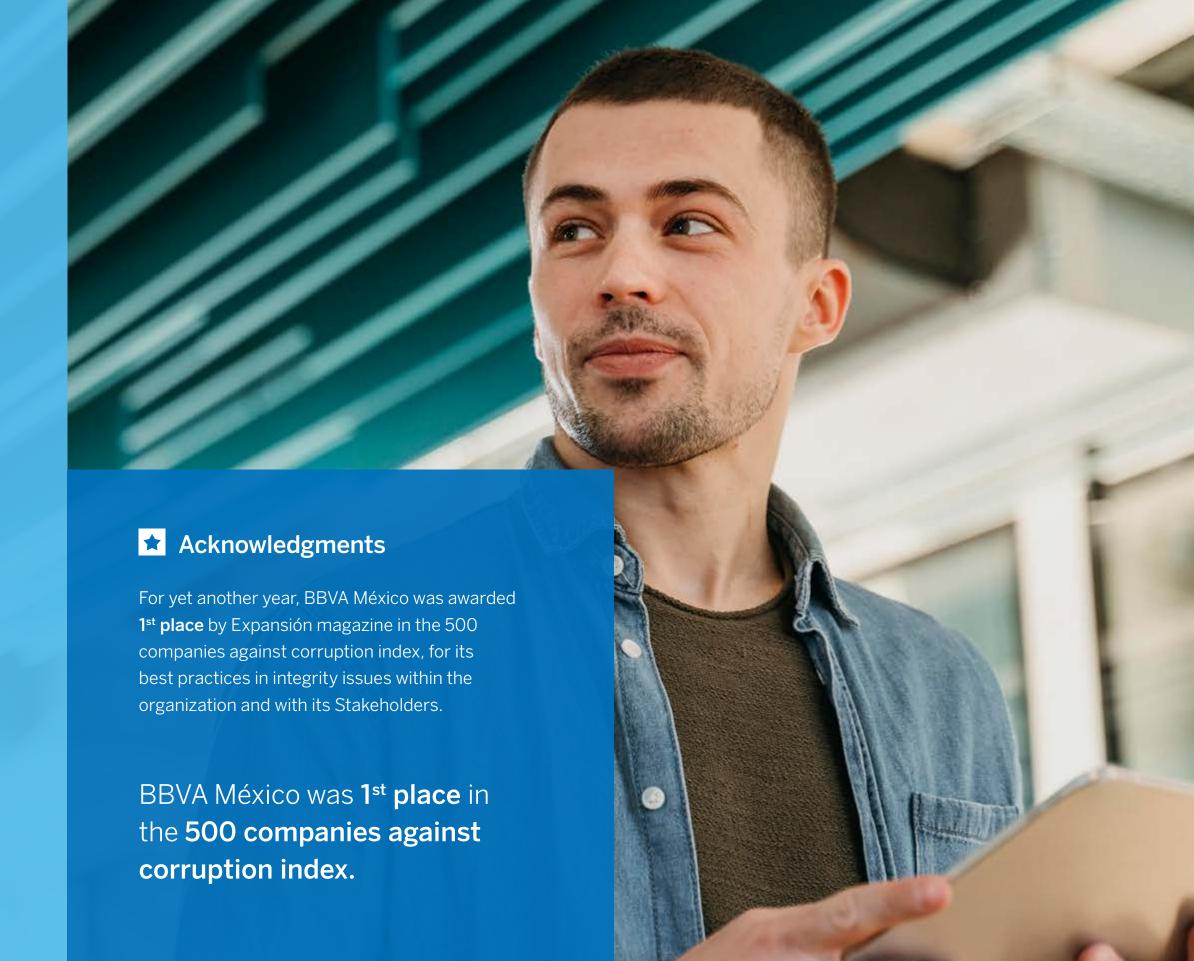


2023 Objectives

By 2023, we seek to consolidate the Culture of Integrity through the relaunch of the Integrity Program, focused mainly on ensuring that employees continue to act in accordance with the values of our corporate culture and in line with the leadership model promoted by Grupo BBVA: Empowerment, Entrepreneurship and Accountability.

In a corporate manner, we expect to launch and implement a tool to declare conflicts of interest and the declaration of other professional activities, which will tentatively be available for 2Q 2023 and aims to have an adequate means of declaration to support the management of conflicts of interest and to have an inventory of the second activities of employees to help identify conflicts of interest for their proper management.

In addition, the Antitrust, Anti-corruption, Conflict of Interest and Corporate Criminal Liability Programs will be reinforced in order to strengthen the ethical behavior of the Group's employees, who are more exposed to the risks contained in the Program.



Anti-Money Laundering and Financing of Terrorist Activities



Grupo Financiero BBVA México commitment to Anti-Money Laundering (AML) and the financing of terrorism (FT) is a priority objective for the company.

In order to preserve the well-being of the communities in which it operates, GFBB works actively in the fight against drug trafficking, terrorism and other forms of organized crime. To achieve this, it has adopted a series of measures such as the following:

- · Collaborate with government agencies.
- Establish corporate criteria and procedures aimed at mitigating the risk of its products and services being used for criminal purposes.
- Design and implement an organizational structure with the necessary resources to manage this function and a clear assignment of responsibilities.

- Create a regulatory body that determines the obligations for AML and TF, with special emphasis on Know Your Customer (KYC) measures.
- Implement measures for monitoring and filtering customers and their operations, aimed at identifying potential suspicious activities and ensuring their reporting to the competent authority.
- Implement a new and robust international sanctions⁵ program, which provides for the basis for managing the program through: an expansion of the internal regulatory framework; a comprehensive assessment of the bank's risks and controls; standardization of key processes; and socialization and awareness of the program.
- To act as a consultative body within BBVA with respect to the application of the rules, criteria and procedures for anti-money laundering and financing of terrorism.

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⁵Economic, financial sanctions, arms embargoes, admission/diplomatic restrictions (collectively referred to as "international sanctions" or "sanctions") are foreign policy tools used by countries or international organizations to safeguard their national security interests. The foregoing through the prohibition to establish business or commercial relations with certain actors (individuals, legal entities or jurisdictions) that are considered harmful to national security and that are generally related to money laundering, terrorism, proliferation of weapons of mass destruction or violations of human rights.

• Execute annual communication and training plans for employees, which are designed by the Asociación de Bancos de México (ABM), based on the level of exposure of each group to the risk of money laundering and in order to provide them with the necessary skills to comply with applicable regulations.

GFBB is committed to being an internal consultation body to ensure the application of AML and FT rules and procedures.

Training of employees, members of the Board of Directors and Executives in AML and FT includes the disclosure of Know Your Customer policies, as well as the criteria, measures and procedures for due compliance with the applicable regulations;

the dissemination of the provisions and their modifications. It also considers information on techniques, methods and trends to prevent, detect and report transactions that could be intended to favor, provide aid, assistance or cooperation of any kind for money laundering and terrorist financing.

Once the employee takes the course, he/she is accredited through the application of evaluations on the knowledge acquired.

AML and FT training			
	2020	2021	2022
Participants in AML training activities	36,472	37,967	39,565
Specialists in activities on anti-money laundering and terrorist financing activities	347	352	371
AML and TF Management Committee and Board of Directors	31	31	31



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