5. Corporate *Governance*

This chapter presents our corporate governance structure, designed to ensure transparency and strategic decision-making aligned with the expectations of our stakeholders. We also address risk management, our focus on regulatory compliance, and the promotion of ethical business conduct.

5.1 Board of *Directors*[9]

The governance of BBVA Mexico is overseen by its corporate governance bodies: the General Shareholders' Meeting, the Board of Directors, its delegate committees, the Chief Executive Officer, and other officers, in accordance with the applicable legal framework.

Board of Directors' Composition

In accordance with Articles 180 and 181 of the General Law of Commercial Corporations (Ley General de Sociedades Mercantiles), the members of the Board of Directors are appointed by the General Shareholders' Meeting and must meet the requirements set forth in Articles 35, 37, and other relevant provisions of the Law to Regulate Financial Groups (Ley para Regular las Agrupaciones Financieras). Articles Thirty-four and Thirty-six of the bylaws establish the characteristics and functions of the Audit and Corporate Practices Committee.

The management of BBVA Mexico and its member financial entities rests with the Board of Directors which, under applicable regulations, is responsible for appointing the committees and the Chief Executive Officer, as well as approving the objectives, guidelines, and policies related to the organization and administration of credit, in compliance with Comprehensive Risk Management framework. Likewise, at the proposal of the Audit and Corporate Practices Committee, the Board reviews and approves the objectives of the internal control system and the guidelines for its implementation.

The Board of Directors defines the procedures that key executives must follow to keep BBVA Mexico informed and updated on the financial, administrative, operational, and legal situation of each of the financial entities and, where applicable, other entities controlled by BBVA Mexico.

To prevent potential conflicts of interest among employees, board members, and directors, we have a Code of Conduct approved by the Board of Directors. This document establishes the guidelines to ensure that the actions of any person associated with BBVA Mexico are aligned with BBVA's principles and values.

To serve on the Board, directors must possess technical expertise, integrity, and a satisfactory credit history, as well as extensive knowledge and experience in financial, legal, or administrative matters, pursuant to Article 35 and other relevant provisions of the Law to Regulate Financial Groups.

The Board is composed of 18 members: 9 proprietary members and 9 alternates. Of these, 5 proprietary members and 5 alternates are independent directors, and 4 members are women. The average tenure of the directors is 9 years and 4 months. Women represent 22% of BBVA Mexico's Board of Directors, while men represent 78%.

100% of the directors are aged 50 or older.

9 Information's scope: Grupo Financiero BBVA México.

BBVA

● Position ● Board Tenure ● Other Board Memberships Sex: Female Male

Name	Sex	Position	Board Tenure	Other Board Memberships
Jaime Serra Puche	Male	Chairman of the Board / Independent proprietary	18 years	Fondo México, Vitro and Alpek
Alejandro Mariano Werner Wainfeld	Male	Independent alternate member	4 years	Not a member of any other Board
Eduardo Osuna Osuna	Male	Vice Chairman / Proprietary member	10 years	Entities comprising the BBVA Mexico Financial Group
Armando Garza Sada	Male	Alternate member	7 years	Grupo Alfa and Nemak
Onur Genc	Male	Proprietary member	6 years	Banco Bilbao Vizcaya Argentaria
Juan Asúa Madariaga	Male	Alternate member	6 years	Not a member of any other Board
Carlos Torres Vila	Male	Proprietary member	9 years	Banco Bilbao Vizcaya Argentaria
Rafael Salinas Martínez de Lecea	Male	Alternate member	2 years	Not a member of any other Board
Vicente María Rodero Rodero	Male	Independent proprietary member	13 years	Not a member of any other Board
Patricia Espinosa Cantellano	Female	Independent alternate member	2 years	Not a member of any other Board
Carlos Vicente Salazar Lomelín	Male	Independent Proprietary member	20 years	Banco Bilbao Vizcaya Argentaria
Alejandra Palacios Prieto	Female	Independent alternate member	1 year	Not a member of any other Board
Arturo Manuel Fernández Pérez	Male	Independent Proprietary member	31 years	Industrias Peñoles, Grupo Bal
Ana Laura Magaloni Kerpel	Female	Independent alternate member	4 years	Not a member of any other Board
Jorge Saenz-Azcunaga Carranza	Male	Proprietary member	9 years	Not a member of any other Board
Enrique de Jesús Zambrano Benítez	Male	Alternate member	5 years	Grupo Proeza, Alpek, ITSM
Valeria Moy Campos	Female	Independent proprietary member	Less than one year	Entities comprising the BBVA Mexico Financial Group
Alejandro Ramírez Magaña	Male	Independent alternate member	12 years	Cinépolis

13 directors are of Mexican nationality, while the rest are foreign nationals. All meet the requirements to serve on the Board, in accordance with the Law to Regulate Financial Groups.

Committees

The Board of Directors of Grupo Financiero BBVA Mexico is supported in its duties by the Audit and Corporate Practices Committee, which is composed of three non-executive members.

The bodies responsible for decision-making and impact management regarding economic, environmental, and social issues are the following:

Aspects	Responsible bodies
Economical	Audit and Corporate Practices Committee and Board of Directors
Social	Board of Directors
Environmental	Board of Directors

Remuneration

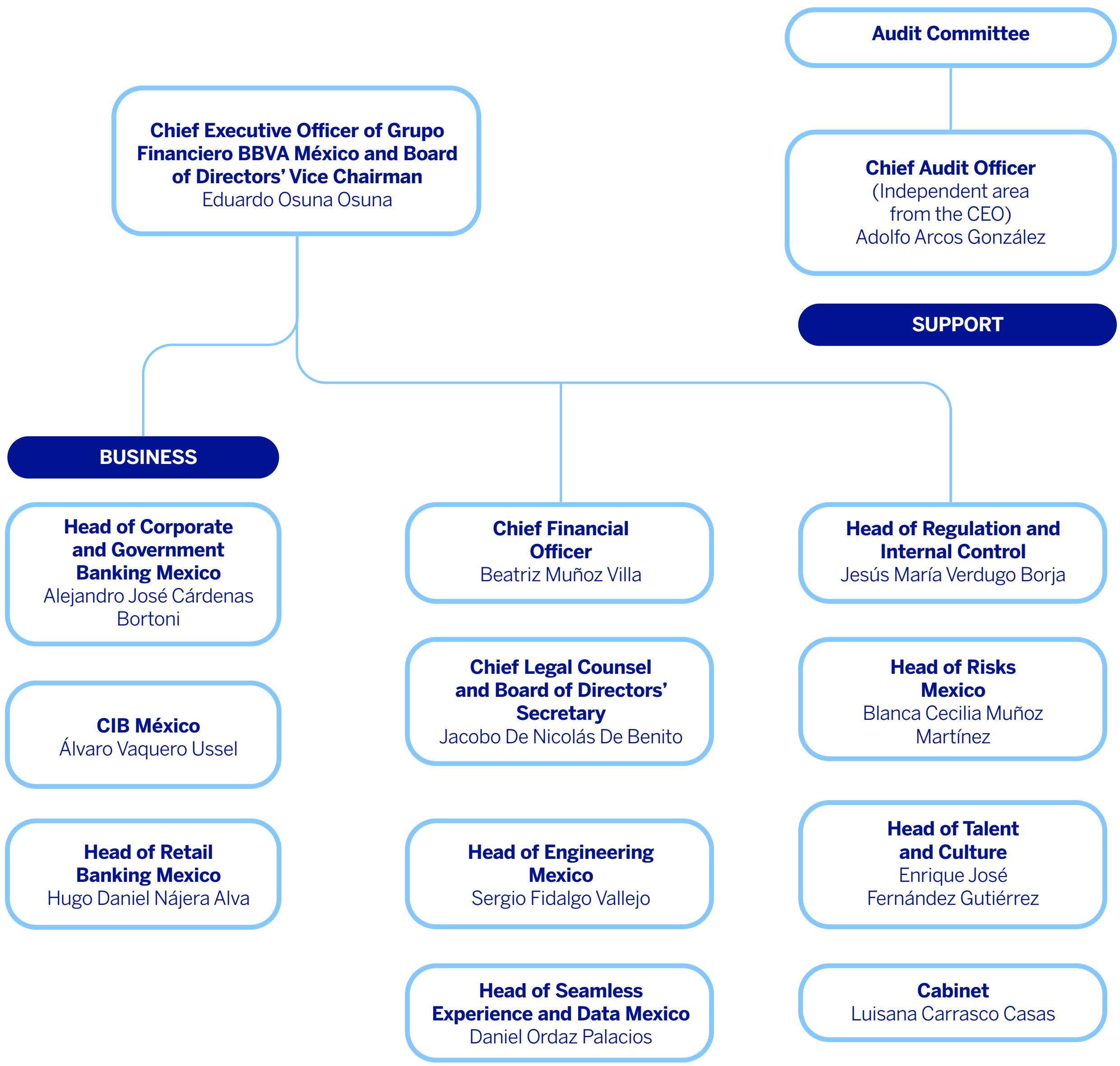
As compensation for their duties and participation in each Board meeting, BBVA Mexico directors receive an amount equivalent to the value of two fifty-peso gold coins multiplied by 1.53846 for Mexican residents or by 1.33333 for foreign residents. In any case, active officers of entities belonging to BBVA do not receive any emoluments for performing their duties as directors.

Additionally, the financial departments perform an analysis to determine the inflationary effect on the directors' emoluments, which are determined directly by the General Shareholders' Meeting.

5.2 *Executive* Structure

A central pillar in BBVA Mexico's operations is its ethical corporate governance system, which enables the management of financial and non-financial risks, and ensures ethical communication with stakeholders.

The governance system is designed to integrate fundamental principles, promote regulatory compliance, and strengthen comprehensive risk management.



5.3 *Risk* Management

Organizational Structure

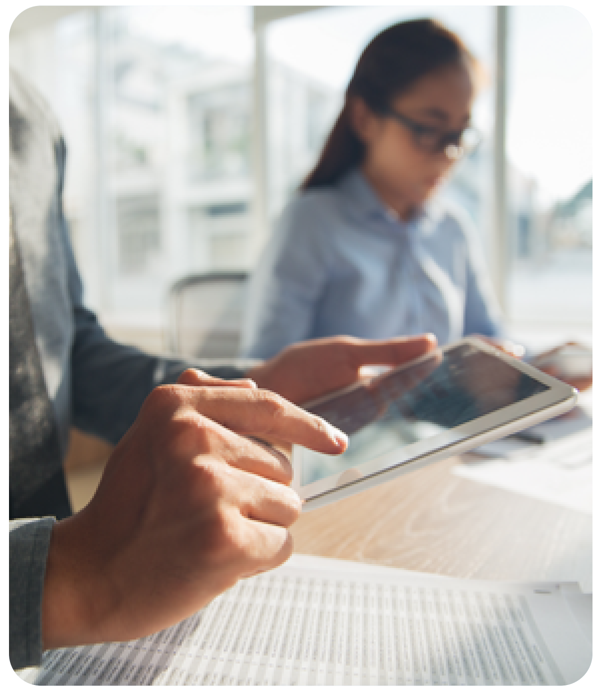
The Risk Management Division of BBVA Mexico reports directly to the Bank's CEO, thereby ensuring its independence from Business Units and the autonomy required to perform its duties.

In alignment with national and international best practices, the Risk function is organized into three specialized teams in Credit Risk: Wholesale portfolio: Responsible for origination, monitoring, and recovery; SME segment: Focused on small and medium enterprises; Retail segment: Focused on individuals.

The latter two perform origination and monitoring functions. These teams are complemented by a unit dedicated to the management of Recovered Non-Financial Assets (DANF). Additionally, for the SME and Retail segments, there is a specific recovery area that leverages operational synergies.

The management of Market, Structural, and Fiduciary Risks is concentrated in a specialized unit, together with other areas responsible for risk management of non-banking businesses and asset management.

In addition, supporting units include Advanced Analytics, which addresses methodological and technological needs; Risk Transformation, that leads the transformation project portfolio; and Risk Strategy & Performance, which ensures the availability of technological resources, efficient execution, and continuous improvement of risk processes.



Furthermore, the Portfolio Management, Capital & Expected Losses Unit was implemented. It is responsible for integrating, monitoring, and generating risk management reports, as well as measuring operational risk and loss management. This unit is also in charge of risk disclosures, strictly adhering to national and international regulations.

In compliance with the regulatory requirements of the National Banking and Securities Commission (CNBV) regarding disclosure of policies and procedures established by credit institutions for Comprehensive Risk Management, the measures adopted by BBVA Mexico and the corresponding quantitative information are presented below.

Qualitative Information

Participation of Corporate Bodies

The risk governance model at BBVA Mexico is characterized by the direct participation of its corporate bodies in defining the risk strategy, as well as in the continuous monitoring and supervision of its implementation.

The Board of Directors, at the proposal of the Risk Committee, approves the objectives, guidelines, and policies for Comprehensive Risk Management, as well as any modifications; global and specific risk exposure limits and risk tolerance levels; special cases or circumstances where these may be exceeded; the Capital Adequacy Assessment and, if applicable, the capitalization plan; as well as the Contingency Plan and the Contingency Funding Plan.

The Risk Committee, as a delegated body of the Board, approves: specific exposure limits and risk tolerance levels; liquidity indicators; methodologies and procedures to identify, measure, monitor, limit, control, report, and disclose risks; models, parameters, scenarios, and assumptions—including stress tests—used for the Capital Adequacy Assessment and for the valuation, measurement, and control of risks proposed by the Comprehensive Risk Management Unit; methodologies for new operations, products, and services; corrective plans proposed by the CEO; effectiveness levels for security validation mechanisms (biometrics) as contemplated by law.

In addition, it approves other activities in accordance with applicable regulations and those delegated by the Board of Directors of BBVA Mexico.

Policies and Procedures

BBVA Mexico maintains risk manuals defining the strategy, organization, and the operational, technological, and methodological frameworks, as well as regulatory processes required for adequate comprehensive risk management. These guidelines are complemented by risk training programs and regulatory disclosure, including defined responsibilities for third parties.

Tactical Decision-Making

The management model ensures the independence of the Comprehensive Risk Management Unit and establishes monitoring processes through reports and early warning alerts to detect deviations from business objectives or defined risk limit structures.

Risk units participate in determining Risk Appetite, which is submitted to the Board for approval. Authorization processes are also required for new products and services, including approval by the Risk Committee.

Tools and Analytics

The measurement of credit, market, liquidity, structural, operational, and legal risks is performed continuously using consistent methodologies and periodically calibrated parameters, and then submitted for approval to the appropriate authorities. Risk reports are analyzed and monitored to track risks incurred by the different business units of BBVA Mexico. This monitoring considers metrics such as risk appetite, main concentrations, regulatory limit compliance, credit stress analysis, regulatory capital requirements, structural, market, liquidity, operational, and legal risks.

Sensitivity analysis, stress testing under extreme conditions, and model calibration are performed periodically.

Methodologies are also established for operational and legal risk monitoring in accordance with international standards.

Information

Information, as an essential pillar in risk management, is used to carry out proactive management through the definition and establishment of indicators and early warning metrics that make it possible to anticipate movements, both positive and negative, in the risk profile (clients, portfolios, products, asset classes). Likewise, these indicators make it possible to avoid deterioration and to identify deviations and potential threats, across all risks, all defined dimensions, in all their stages (current, deteriorated, and in recovery), at all organizational levels of the risk function (risk units in business areas, corporate area, and specialist areas) and at the corporate bodies' level, ensuring compliance and consistency with regulatory requirements in this matter.

We ensure that data used in the report preparation come from unified sources by type of risk, are reconciled, traceable, largely automated (or, if manual, subject to controls), with a single definition. Thus, we guarantee the frequency, distribution, and confidentiality of reporting, among other aspects.

Technological Platform

Source and calculation systems are periodically reviewed to ensure data quality and maximize process automation, with the goal of automating processes, where possible.

Audit

Each year, Internal Audit performs a Comprehensive Risk Management Audit in compliance with the Single Banking Circular (CUB), which is submitted to the CNBV. Subsequently, the Audit Committee delegated by the Board of Directors periodically follows up on the recommendations issued in each of the audits performed.

Likewise, audits are carried out by independent experts regarding compliance with the Law for Credit Institutions, the CUB, and other legal provisions applicable to BBVA Mexico. These have determined that the models, systems, methodologies, assumptions, parameters, and risk measurement procedures comply with their intended function in view of the characteristics of BBVA Mexico's operations, instruments, portfolios, and risk exposures.

BBVA Mexico considers that, as of this date, it fully complies with the provisions regarding risk management. The Institution continues to work on improvement projects in measurements and limits, process automation, and methodological refinement.

Methodological Framework

BBVA Mexico's balance sheet is categorized for risk purposes as follows:

- **Market Risk, associated to:**
  - **Trading and investment portfolios:** Tradable financial instruments, repos, and derivatives for trading purposes.
  - **Structural balance sheet:** Financial instruments for collection or sale, principal and interest collection, and hedging derivatives for interest rate and foreign exchange rate risk, as well as other banking balance sheet positions such as loans, deposits, issuances, among others.

- **Credit Risk, derived from portfolios of:**
  - **Business & Corporate:** Traditional credit, SMEs, and investment exposures in issuances as counterparties in derivative financial instruments.
  - **Consumer:** Credit cards and financing plans.
  - **Mortgage:** Mortgage loan portfolio.

- **Liquidity Risk**, linked to banking business, on- and off-balance sheet positions, including loans, traditional deposits, investments in securities, derivatives, wholesale funding, among others.

In addition, where a contractual obligation exists, the monitoring and control of liquidity risk in the banking business includes liquidity that may be required by its subsidiaries, entities belonging to the same financial group, or relevant related parties, and the liquidity that the banking business itself may require from any of the aforementioned entities or related parties.

ESG Risks

BBVA Mexico considers the financial implications, risks, and opportunities associated with climate change based on a climate risk assessment developed at the corporate level by BBVA and applied locally. This assessment is integrated into the Institution's risk management and credit decision-making processes.

The ESG assessment is conducted through sector analyses, questionnaires, internal tools, and the application of sector policies, as well as restriction or exclusion criteria where applicable. Results are incorporated into credit decisions through mitigants, specific conditions, reinforced monitoring, or, if necessary, the rejection of operations. Management and supervision are carried out through the Risk Area and local committees, in alignment with BBVA's corporate governance.

Socio-environmental criteria are applied proportionally to the relevance of each client and operation, considering the sector, product type, and risk materiality. This approach does not constitute a general exclusion mechanism but rather a support model to identify risks and define mitigation measures. The evaluation includes the use of the BBVA Environmental and Social Framework, controversy analysis in the wholesale segment, and, for specific project finance and infrastructure operations, the application of the Equator Principles.

Climate risks and opportunities are assessed using metrics defined through ESG questionnaires, which gather information such as greenhouse gas (GHG) emissions, financed emissions, carbon intensity, climate targets, physical and transition risks, and decarbonization actions. This analysis is complemented by internal indicators such as the TRI (Transition Risk Indicator), HTR (High Transition Risk), HMM (High Market Misalignment) and HPR (High Physical Risk).

BBVA Mexico calculates financed emissions by locally applying BBVA's corporate methodology, aligned with the Partnership for Carbon Accounting Financials (PCAF) standard. The calculation is governed and executed at the holding level, while BBVA Mexico participates as a local Service Line Owner (SLO), ensuring data quality, performing validations and adjustments, and utilizing the results for risk management. The PCAF methodology is based on identifying relevant credit and investment exposures, segmenting the portfolio by PCAF asset classes, and proportionally assigning GHG emissions to financed clients based on the outstanding balance. This process utilizes internal information from the Unique Data Model (CDD/C360), financial data (IFRS 9), sector classification through NACE/CAMN codes, and an internal transition risk taxonomy, as well as specialized external information including PCAF databases and providers such as S&P Trucost. PCAF complies with the methodology established by the GHG Protocol. Additionally, the process incorporates data from corporate tools like PACTA, which provides production data to improve the accuracy and the data quality score of financed emissions.

The assessment of social risks is managed by the Risk Area through Credit Risk teams, which locally apply the policies and methodologies defined at the corporate level by BBVA. For high-complexity operations and corporate clients, BBVA Mexico implements due diligence processes for environmental risk management, focusing on supporting clients in complying with applicable environmental standards, identifying risks, and defining mitigation measures.

In specific project finance operations, BBVA Mexico applies the Equator Principles as a reference framework to identify, assess, and mitigate environmental and social risks. Furthermore, in the wholesale segment, environmental and social controversy analyses are considered alongside a client reputational risk assessment. These processes are complemented by formal training for risk, business, and control personnel.

Regarding climate scenario analysis, BBVA uses climate alignment tools such as PACTA in admission processes and strategic analysis, managed from the holding level. BBVA Mexico utilizes these results as input for risk evaluation in its local operations.

BBVA Mexico participates in the disclosure of climate-related risks to investors and other stakeholders through consolidated reports such as the Pillar 3 Report, aligned with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). In the 2024 Pillar 3 Report, BBVA refers to the use of PCAF-aligned methodologies for measuring financed emissions and climate risk metrics, such as financed emissions intensity per drawn amount (tCO2/M€). BBVA Mexico provides information from its portfolios to these consolidated calculations, although it does not publish PCAF metrics independently, and contributes to the achievement of climate-related targets defined at corporate level through its local operation. BBVA México provides relevant information to these indicators when applicable, although it does not publish them independently.

Physical risks associated with climate change are integrated into the comprehensive risk management framework through the local application of methodologies, metrics, and models defined at the corporate level by BBVA. Scenario modeling and stress testing for physical risks are developed and quantified in a consolidated manner from holding level, and their results are used for internal risk management, decision-making, and monitoring relevant exposures. In response to identified risks, the Institution integrates physical risks into credit analysis and applies sector policies and ESG criteria defined at corporate level.

BBVA México locally applies an exclusion list of non-sustainable activities defined in the BBVA Environmental and Social Framework, which includes exclusions required by laws, treaties, and sanctions regimes, as well as exclusions based on BBVA's values and principles. Additionally, it includes exclusions aligned with international standards such as OECD Guidelines, the Universal Declaration of Human Rights, the UN Global Compact, and UN Security Council sanctions. These exclusions are integrated into risk analysis and management processes in accordance with corporate guidelines.

Financing under the Equator Principles

Energy, transport, and social service infrastructures drive economic development and job creation; however, they may also generate environmental and social impacts. Therefore, BBVA evaluates the financing of these projects using the Equator Principles as a reference framework in order to minimize and, to the extent possible, avoid negative effects on the environment, and thus maximize their economic, social, and environmental value.

Since 2004, BBVA has adhered to the Equator Principles (EP), a framework that establishes standards for managing environmental and social risks in project finance. These principles are based on the International Finance Corporation (IFC) Performance Standards and the World Bank Group Environmental, Health, and Safety Guidelines.

The EP apply to all industrial sectors and to five types of financial products defined in their terms: (I) project finance advisory services; (II) project finance; (III) project-related corporate loans; (IV) bridge loans related to projects; and (V) project-related refinancing and acquisition finance. Each project is subject to an environmental and social due diligence process, as well as the evaluation of potential human rights impacts.

As a first step, projects are categorized based on their risk level:

- **Category A:** Potentially significant adverse social or environmental impacts that are irreversible or unprecedented.
- **Category B:** Potentially limited adverse impacts, generally site-specific, largely reversible and easily addressed through mitigation measures.
- **Category C:** Minimal or no adverse impacts.

The evaluation of the documentation provided by the client and independent advisors makes it possible to verify compliance with the requirements defined in the EP, according to the project category. Financing agreements include environmental and social commitments that the client must comply with. At BBVA, the implementation of the EP is integrated into internal processes for structuring, approving, and monitoring transactions.

In 2025, there were no projects in Mexico that required an evaluation under the Equator Principles.

Due Diligence Processes

BBVA conceives due diligence as a continuous, proactive, and integrated process aimed at identifying, preventing, mitigating, and accounting for adverse impacts—whether actual or potential—arising from its activities and business relationships.

In recent years, BBVA implemented the 2021-2024 Human Rights Action Plan, establishing a solid foundation of commitments and procedures to address potential negative impacts on its stakeholders. Continuing this process, and with the ultimate goal of fully embedding due diligence into its management model, BBVA is advancing the structured integration of social factors—clients, employees, suppliers, and society—as risk vectors within its general non-financial risk management framework, ensuring their systematic consideration in identification, assessment, control, and monitoring processes.

BBVA understands risk as the possibility that an internal or external event may affect the achievement of its strategic objectives or generate adverse impacts on people, the environment, or stakeholders. Within this framework, it applies specific risk assessment processes, including the Operational Risk Assessment and the Non-Financial Risk Assessment—which incorporates the Climate Risk Assessment—to identify emerging risks, including climate change.

These processes are complemented by monitoring and measuring the effectiveness of the actions adopted, through non-financial risk management indicators, risk limits defined in BBVA's global catalog, as well as internal review mechanisms and reporting to governing bodies. This integration ensures that due diligence is not an isolated exercise but an integral part of the corporate risk management system.

Furthermore, the double materiality analysis of BBVA and BBVA Mexico reinforces this approach by incorporating the perspective of relevant impacts, risks, and opportunities for both BBVA and its stakeholders.

BBVA is progressively integrating the essential elements of due diligence into its risk identification, management, and prevention processes. The following section describes the main elements of this risk management approach and their integration into the BBVA corporate framework, with references to the relevant sections of this Report.

Integration into Governance, Strategy, and Business Model

BBVA's general risk management and control model covers financial and non-financial risks, including climate, operational, and reputational risks, among others. Under the supervision of the Board of Directors and the Risk and Compliance Committee, the process includes the identification, assessment, mitigation, and monitoring of risks and impacts.

In line with the evolving regulatory environment, BBVA is moving toward a more comprehensive integration of social risks as a subcategory within the compliance, talent and culture, and operational risk blocks.

Stakeholder Collaboration

BBVA maintains a continuous dialogue with its stakeholders to anticipate expectations and manage reputational risks through:

- Formal dialogue mechanisms with stakeholders: employees, clients, suppliers, investors, and society (Stakeholder Engagement).
- Customer service and grievance channels. (Customer Service).
- A Whistleblowing Channel, accessible to employees, suppliers, and third parties (Whistleblowing and Inquiry Channels).
- Internal channels for employees, such as the Employee Service Center (SAE).

Identification and Assessment of Adverse Incidents

BBVA has additional management processes and systems that constitute comprehensive control frameworks, actively contributing to the identification, assessment, and mitigation of ESG risks and impacts, notably:

- ESG assessment and monitoring of clients, based on the Environmental and Social Framework, the Equator Principles, and the ESG controversy management procedure.
- Anti-corruption and anti-bribery programs, as well as anti-money laundering and counter-terrorist financing (AML/CTF) controls (Business Conduct).
- Supplier assessment (Supplier Relationship Management).
- Cybersecurity risk management and the responsible use of data and accessibility (Privacy and Data Protection; Accessibility).
- Double materiality analysis to identify and prioritize the most relevant issues from both impact and financial perspectives (Materiality Methodology).

Adoption of Measures to Address Adverse Incidents

In line with the strategic priority of promoting sustainability as a growth driver and the General Sustainability Policy, the Bank develops initiatives and action plans aimed at generating positive impacts and strengthening the resilience of its operations against ESG risks. These actions are detailed throughout this Non-Financial Information Statement and include measures in areas such as climate change, own workforce, consumers and end-users, and business conduct, among others.

Monitoring Effectiveness and Communication

All risks are managed under a control framework described in the "Risk Management" section of the Consolidated Management Report. This framework establishes mechanisms for monitoring, reporting, and escalation to the competent governing bodies, ensuring homogeneous and coordinated oversight across all BBVA areas.

Additionally, during 2025, BBVA was not notified of any claims filed to the National Contact Points (NCP) in the countries where it operates. In 2024, reports received through this channel showed no evidence of human rights violations attributable to BBVA entities. For more information, see the Whistleblowing Channel section within the Business Conduct chapter of this report.

BBVA's internal processes, actions, and policies address risks associated with human trafficking and forced labor, child labor, freedom of association and collective bargaining, equal pay, and discrimination.

5.4 Compliance

Compliance System

The Compliance function is governed by the BBVA Mexico Compliance System and Charter, which integrate the necessary elements to prevent and manage risks associated with anti-money laundering (AML), conduct with customers, corporate compliance, personal data protection, and conduct within the Securities Market. This framework establishes the ethical behavior guidelines expected at BBVA.

Its implementation is based on compliance programs that include proper risk identification, the design of policies and procedures, communication and training actions, and a governance model that oversees its application and helps mitigate potential risks in daily activities.

Furthermore, as part of BBVA Mexico's commitment to respecting the dignity and rights of all individuals and contributing to the holistic development of the communities where it operates, its actions are guided by several international human rights mechanisms. These include the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the Global Compact.

The aforementioned Charter includes the following elements that define the Compliance Division's framework of action within BBVA Mexico:

Code of Conduct

On December 11, 2025, the Board of Directors approved the new version of the BBVA Code of Conduct, which sets forth the guidelines for action and ethical behavior expected from everyone at BBVA, within the framework of the corresponding annual review.

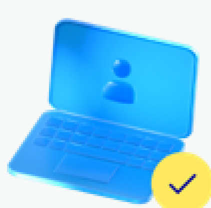
The BBVA Code of Conduct represents an ethical commitment to its main stakeholders, seeking to promote principles of integrity throughout the organization to maintain the highest standards of honesty. Strict rules of conduct are established for BBVA Mexico's activities, based on four key pillars:

Conduct with the customer	Conduct with our colleagues	Conduct with the company	Conduct with society

100% of employees have been enrolled in a course on the Code of Conduct, achieving a 98% accreditation rate. The course remains available on Campus BBVA for new hires.

Whistleblowing and Inquiry Channels

BBVA makes available to all its employees, customers, and suppliers the Inquiry and Whistleblowing channels to report potential breaches of the Code of Conduct, internal regulations, or any practice contrary to current applicable legislation. These channels are available 24/7, 365 days a year.



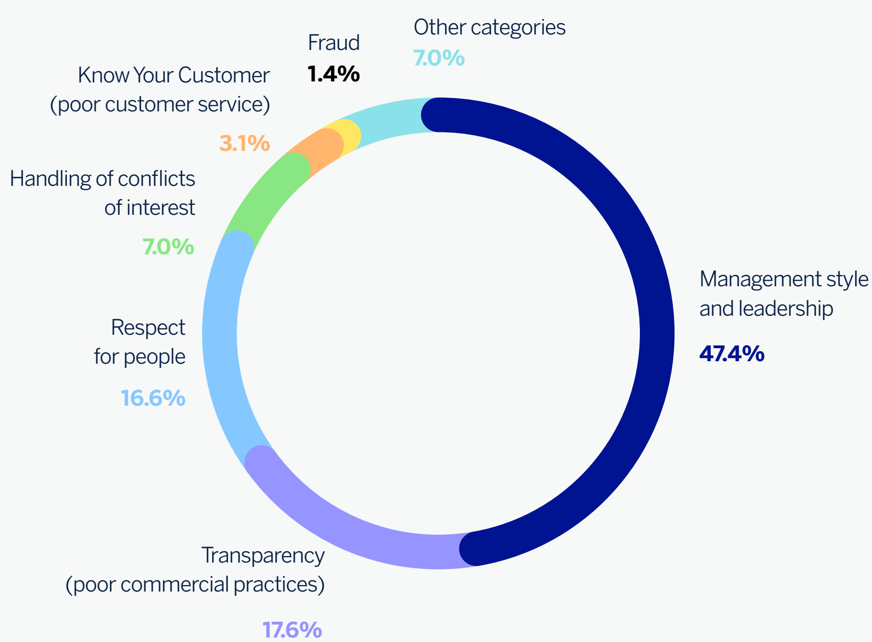
Whistleblowing Channel:
https://www.bkms-system.com/bbva

Inquiry Channel:
https://www.bkms-system.com/consultas

During 2025, there was an 8% increase compared to the previous year in the number of communications received, demonstrating that BBVA employees continue to trust the Whistleblowing Channel as an effective means to report misconduct.

+8% in reports received through the Whistleblowing Channel, reflecting growing employee confidence in the system.

A total of 2,283 communications were received through the Whistleblowing Channel. Of these, 491 lacked sufficient information to launch an investigation or did not represent a breach of the Code of Conduct. While 1,792 communications were admitted and an investigation was initiated.



Should any evaluated situation require disciplinary action, it would be determined in accordance with BBVA's disciplinary regime and applicable legal terms.

5.5 Business Conduct

Anti-corruption and Bribery

BBVA Mexico has an Anti-corruption Program based on the General Anti-corruption Policy, approved by the Board of Directors. This Policy establishes the principles governing BBVA's actions in strict adherence to applicable regulations and gives rise to various internal provisions. The Program is mandatory for all members of BBVA Mexico, including its subsidiaries, as well as for third parties with whom it maintains a relationship, such as suppliers and business partners.

As part of the continuous strengthening of the program, throughout the year, the use of corporate disclosure tools aimed at preventing and managing integrity risks was promoted:

- Conflicts of Interest: A tool that enables the identification, analysis, management, monitoring, and proper documentation of potential conflicts of interest that may arise within BBVA Mexico, thereby mitigating situations that could represent a detriment to the Institution.
- In 2025, functionality was incorporated to declare Outside Professional Activities, with the purpose of reinforcing the preventive management of potential conflicts of interest arising from such activities performed by BBVA Mexico employees, as well as protecting institutional integrity and mitigating reputational risks.
- Gifts and Events: A mechanism that ensures the traceability, supervision, and proper authorization of gifts and events involving employees, in strict adherence to corporate values and BBVA Mexico's General Anti-corruption Policy.

Additionally, the culture of integrity was strengthened through mandatory anti-corruption training programs. We offer all employees a regulatory course, updated every three years, and its completion is required for 100% of the workforce.

47,115 employees trained on the principles and guidelines established in BBVA Mexico's General Anti-corruption Policy.

Anti-Money Laundering and Counter-Terrorist Financing (AML/CTF)

Strategies

BBVA Mexico's commitment to anti-money laundering (AML) and counter-terrorist financing (CTF) is a priority objective. To preserve the well-being of the communities where it operates, the Institution actively works to protect its customers, employees, and the Bank itself through timely and effective management of risks associated with AML/CTF, including emerging risks linked to organized crime, drug trafficking, and terrorism.

Functions

The primary functions regarding AML/CTF include:

1. Establishing policies, standards, and procedures within the control and governance framework set by the Institution.
2. Defining criteria to mitigate the risk of products and services being used for criminal purposes.
3. Designing strategies to prevent, detect, and report operations involving resources of illicit origin (money laundering).
4. Implementing an organizational structure with sufficient resources and clearly defined responsibilities.
5. Developing a regulatory framework with a special emphasis on Know Your Customer (KYC) identification and due diligence measures.
6. Implementing monitoring and screening measures for customers and transactions to detect suspicious activities and report them to the competent authority.
7. Collaborating with government agencies and strengthening the international sanctions program.
8. Serving as an internal advisory body within BBVA on AML/CTF matters.
9. Executing annual communication and training plans for employees, designed in coordination with the Association of Mexican Banks (ABM), based on each group's level of risk exposure.

Relevant 2025 Policies, Programs, and Initiatives

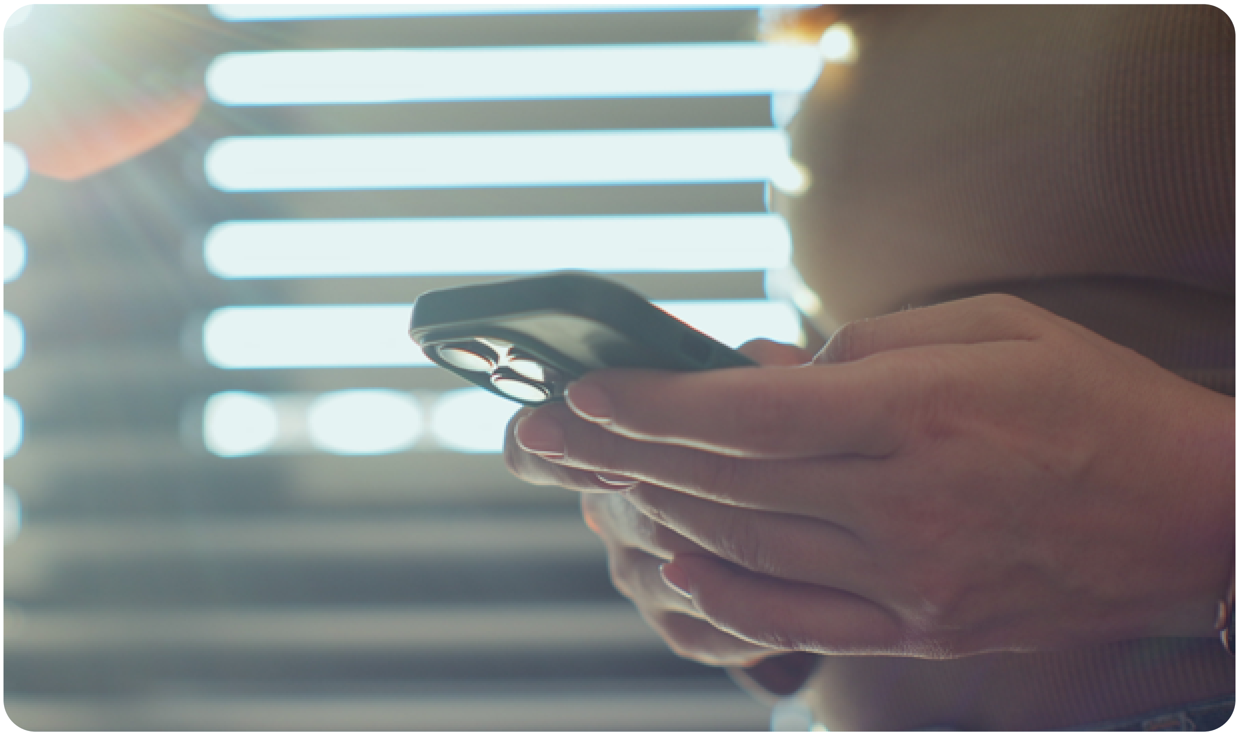
During 2025, two regulatory extensions issued by the Global AML Unit were integrated through adhesion and transposition processes into the internal AML/CTF regulatory framework:

- AML Corporate Training Procedure: Establishes the principles for the development and implementation of the AML/CTF training program for BBVA employees.
- Global KYC Program: An initiative aimed at strengthening the customer experience and the proper management of AML/CTF risks. BBVA Mexico, acting as an anchor country, participates in the design and implementation of the components necessary for its operation.

AML/CTF Training

The training of employees, members of the Board of Directors, and executives in AML/CTF includes the dissemination of customer and user identification and knowledge policies, as well as the criteria, measures, and procedures necessary for proper compliance with applicable legal provisions and their updates.

AML/CFT Training	2023	2024	2025
Participants in training activities	42,969	45,814	44,180
People who received specialized training (including the AML/CFT staff)	384	408	382
Management Committee and Board of Directors	31	31	31



Privacy and Data Protection

For its business operations, BBVA considers data to be a critical and strategic asset, especially in an environment characterized by technological transformation, operational complexity, and regulatory evolution.

Consequently, BBVA Mexico has a General Privacy and Data Protection Policy that establishes the general principles and basic management and control guidelines regarding the processing of personal and corporate data, in compliance with current regulations.

This policy is updated annually and applies to all BBVA Mexico entities over which the Bank has management control. It extends to all data of natural and legal persons—customers, non-customers, employees, shareholders, suppliers, partners, etc.—for which any processing operation is conducted.

In 2025, the corresponding annual review was carried out, involving various executive areas within their respective scopes of authority. The BBVA Mexico Audit Committee is the body responsible for establishing and approving this General Privacy and Data Protection Policy. Updates are communicated through relevant channels based on the stakeholder group, notably via notifications on the Internal Regulation Portal, email, and mandatory enrollment requests for training on this subject.

During 2025, at a global level, BBVA Mexico continued to strengthen its data management model through:

- A data protection governance structure involving all levels of the organization.
- Periodic assessments to verify compliance with policies, standards, and procedures associated with the processing of personal data.
- Continuous training programs to raise awareness among BBVA Mexico employees regarding the strategic and regulatory importance of data protection.

5.6 Supplier Relationship Management

BBVA Mexico's supply chain is composed of domestic and international suppliers of diverse sizes and economic sectors, with a predominance of those operating within the country. These include hardware and software providers, consulting services, outsourced services—such as cleaning and security—civil works, advertising and marketing agencies, licensing, and event organization services.

Commercial relationships with suppliers are managed through ad hoc or recurring procurement, depending on the service requirement. These are formalized through legal contracts or general terms and conditions, depending on the amount and nature of the service, in accordance with applicable internal regulations.

BBVA has a Supplier Code of Ethics, which includes Mexico. This code defines minimum behavioral standards regarding ethical, social, and environmental aspects that suppliers must meet when providing products and services. It also reflects the commitment to preventing corruption.

In 2025, a communication regarding anti-corruption policies and procedures was sent to BBVA Mexico's suppliers.

494 domestic suppliers and 37 foreign suppliers were notified about anti-corruption policies and procedures.

The Supplier Code of Ethics is available for consultation [here].

Over 71 billion pesos, representing the total amount allocated to supplier payments.

BBVA Mexico Suppliers 2025

6,972 suppliers throughout the supply chain.

Geographic Location:

Mexico : 96.63%	United States : 1.10%
Spain : 1.31%	Other countries : 0.96%

Supplier Evaluation at BBVA Mexico

At BBVA Mexico, we foster business relationships based on responsibility, transparency, and strict adherence to the legal framework. For this purpose, we apply the Vendor Risk Management (VRM) Evaluation, a mandatory process aimed at identifying the risk level associated with each supplier and verifying their alignment with the Institution's ethical, regulatory, and sustainability standards.

Approval of this evaluation is a mandatory requirement to establish or maintain a business relationship with BBVA.

The assessment model involves a comprehensive analysis through the following modules:

Evaluation Modules

- Anti-corruption and Anti-money laundering (AML)
- ESG Reputational Risk
- Concentration and country risk
- Financial
- Legal
- Tax
- Labor
- Customer protection
- Personal data protection
- Sustainability

Once the risk analysis is completed, the decision is recorded in the procurement tools and is binding for all Procurement Units and BBVA Mexico subsidiaries. The results may be:

- Suitable: When the supplier meets the criteria required to work with BBVA.
- Not suitable: When the supplier does not meet the required standards.

2025 Supplier evaluation results:

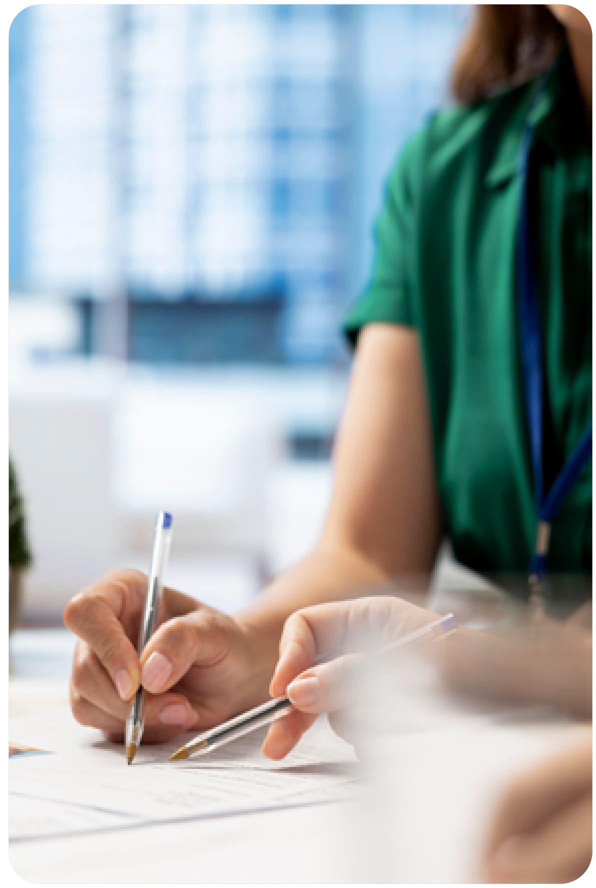
3,729 suppliers entered into BBVA Mexico evaluation process

3,083 suitable suppliers

646 not suitable suppliers

100% of purchases made from suppliers evaluated in 2025

2,637 suppliers evaluated under environmental and social criteria



Evaluation

In the Sustainability module, the evaluation is carried out through a questionnaire that includes environmental, social, and corporate governance (ESG) criteria. The scope of the evaluation is determined based on the size of the company and the legal nature of the supplier, ensuring a risk-based approach.