

BBVA

Creando Oportunidades

Action Plan on Human Rights 2021-22 &2023

July 2023



• Introduction

This document contains a detailed explanation of the Human Rights due diligence process carried out in 2020 and 2021, as well as an assessment of the results of the 2021-2022 Human Rights Action Plan that arose from said process.

In addition, the results of the process have been reviewed and the plans updated in 2023.



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- 02 Context and background
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 - Identification and evaluation
 - Prevention and mitigation
 - Grievance mechanisms
- 04 Track implementation: Track implementation: Action plan on Human Rights 2021-2022

- 05 Good Practices
- 06 2023 Review: due diligence process and update of the Action Plan

Appendix 1 Internal taxonomy on Human Rights

01

BBVA and human rights: our journey

2002

Publication of the Code of Conduct
UN Global Compact members

2005

Publication of the 1st Rules of Conduct in Defense

2008

Signing up to the Principles for Responsible Investment of the United Nations (UN-PRI)

2012

Signing up to the Thun Group of Banks
Publication of Responsible Procurement Policy
Publication of the Social Housing Policy

2017

1st Global due diligence process in human rights
Publication of the Code of conduct for suppliers

2019

Expansion of scope of Sector Norms and the scope of the Rules of Conduct in Defense

2021

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

2004

1st Spanish bank to sign up to the Equator Principles

2007

Publication of BBVA's Commitment to Human Rights

2011

Launch of the Diversity Plan

2014

Review of the Rules of Conduct in Defense

2018

Updating of the BBVA's Commitment to Human Rights
Publication of the Action Plan on Human Rights 2018-2020
Publication of BBVA Sector Norms for environmental and social due diligence

2020

Update of the CSR policy
Update of commitment towards human rights "BBVA and Human Rights"
Publication of the Environmental and Social Framework for due diligence in the mining, agribusiness, energy, infrastructure and defence sectors*
Updating the Code of conduct for suppliers
General procurement principles

2022

Approval of the new Sustainability General Policy
Approval of the new General Policy of privacy and data protection

(*) Sustituye a Normas Sectoriales y Norma de actuación en materia de defensa.

02

Context and background

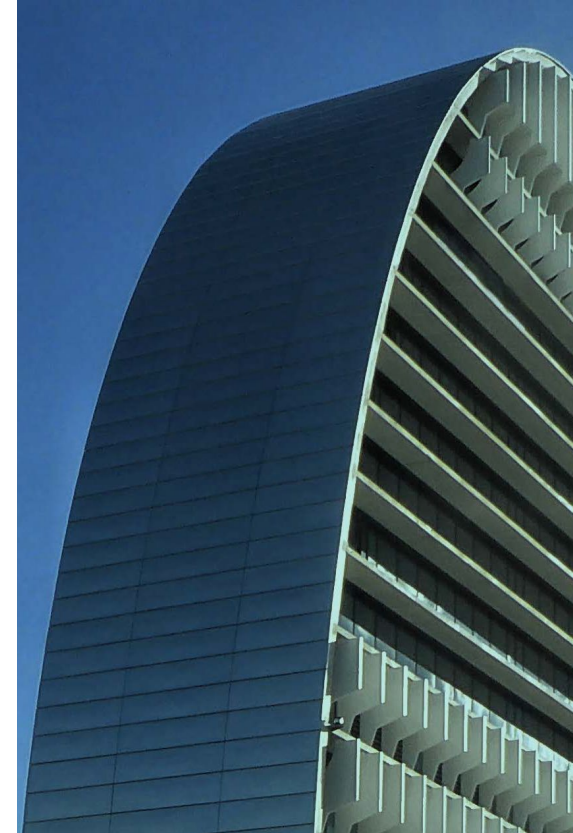
In the current context and for an institution such as BBVA, with more than 81 million customers and 110,000 employees in more than 25 countries and with operations in a wide range of sectors, human rights is particularly relevant.

BBVA is committed to compliance with the applicable laws and respect for internationally recognised human rights.

BBVA's commitment to human rights is part of the **General Policy on Corporate Social Responsibility** and is aligned with the **BBVA Code of Conduct**


This commitment takes as its point of reference the **UN Guiding Principles on Business and Human Rights**

This commitment applies to the relations that BBVA establishes with its stakeholders and the sites where it carries out its business and activities.

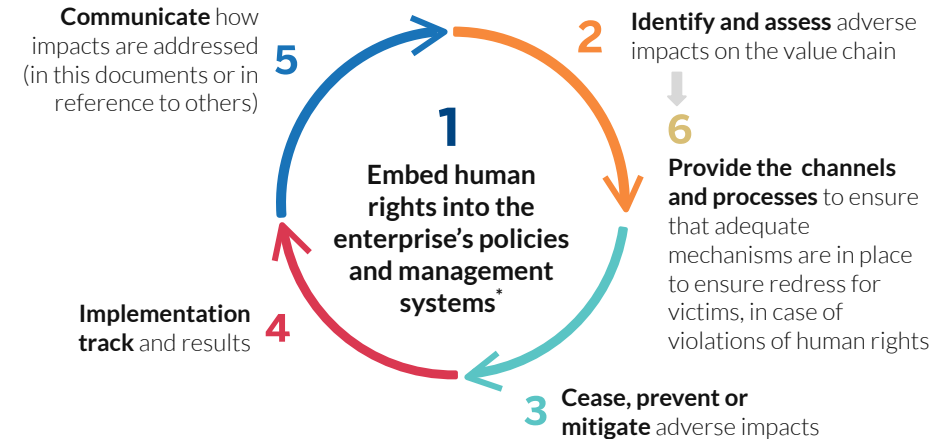


Context and background

One of the challenges in human rights management is the integration, identification and assessment of the impacts of our entity on human rights. In order to emphasise this point, a global due diligence process was conducted in 2018. The UN Guiding Principles on Business and Human Rights were used as a reference point, according to which companies should activate due diligence processes:

Likewise, the **OECD Due Diligence Guide for Responsible Business Conduct(2011)**  has been taken into account to design and manage this process based on these measures:

DUE DILIGENCE PROCESS & SUPPORTING MEASURES



(*) As mentioned above, the BBVA's commitment to human rights is part of the Sustainability General Policy of BBVAy and is aligned with the BBVA Code of Conduct.

Update of the due diligence process in 2021

In line with the UN Guiding Principles on Business and Human Rights, due diligence should be "an ongoing process, as human rights risks may change over time, depending on how companies' business activities and operational context evolve". BBVA has therefore conducted a new human rights due diligence in 2021 with the same objective as the previous process: to prevent, mitigate and remedy potential human rights impacts.

As part of a preventive approach, the potential impacts of the business have been identified and improvements have been identified within the business to endeavour preventing and mitigating these impacts, with appropriate channels and procedures made available to those affected to ensure that in the event of a breach, the appropriate mechanisms are in place to ensure the necessary remedial action is taken.

The objectives of this exercise were:

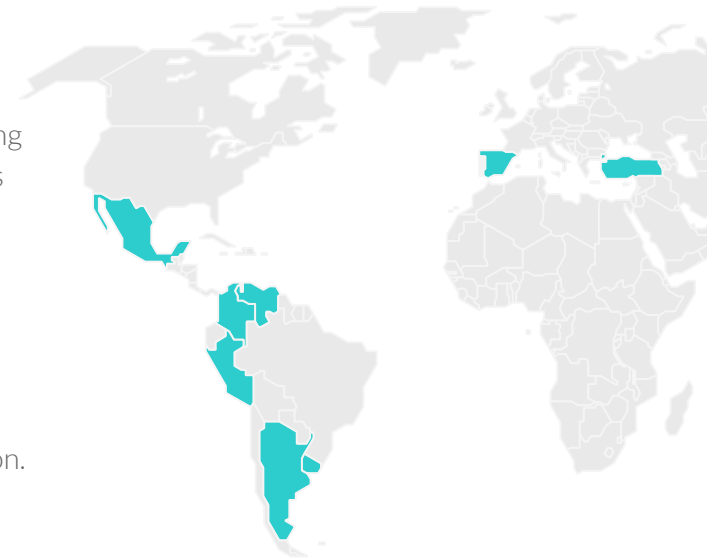
- Continue to integrate the growing expectations of investors and civil society in this area.
- Update and inclusion of new topics for the identification and assessment of the impacts analysed in the previous exercise.
- Assessment of the adequacy of grievance mechanisms and measures to manage these impacts-(in line with the UN Guiding Principles on Business and Human Rights).
- Renewal of the Human Rights Action Plan to prevent and/or mitigate potential negative impacts.
- Alignment of the process with the current Non-Financial Risk Model and future regulatory obligations so that the due diligence process is a continuous and dynamic process. Additional information about the Non-Financial Risk Model can be found in [BBVA Annual Report 2022](#). 

Update of the due diligence process in 2021

This comprehensive due diligence process carried out in all the **global areas** of BBVA has been replicated in **Spain, Mexico, Turkey, Argentina, Colombia, Peru, Uruguay and Venezuela**. Five priority issues were selected for each mentioned country based on prioritisation of severity of impact and country analysis of the most frequent issues based on social and government practises, as well as assessments from interviews with management and global risk control specialists (RCS).

IDENTIFICATION AND EVALUATION

Taking as a starting point the issues discussed in the previous due diligence process, and incorporating analyst and investor recommendations and expectations, and other emerging themes, an internal taxonomy of **28 human rights issues has been drawn up** covering such important issues as forced labour, child labour, freedom of association and collective bargaining, equal pay and discrimination.



 More information on these 28 issues in **Annex 1 “Internal Taxonomy of Human Rights”**

Update of the due diligence process in 2021

These **28 issues** were divided into **6 thematic blocks**:



01 Employment conditions:

which includes issues related to recruitment and fair pay, labour rights and relations, and health and safety.



02 Projects and products:

which covers the human rights impact of lending activity, with a focus on in large corporate clients. in certain sectors with a great environmental or social impact.



03 Supply chain:

which brings together aspects of fair contracting conditions, supplier monitoring and responsible purchasing policies.



04 Customer well-being:

prioritising aspects such as accessibility and service as well as security and respect.



05 Respect for communities:

from a dual perspective encompassing both environmental protection and inclusive business.



06 Cross-cutting issues:

including data protection issues and the impact of new technologies on human rights.



Update of the due diligence process in 2021

For each of these 28 identified issues, a risk assessment has been made to identify the most salient issues .
This assessment has been carried out through:

INHERENT RISK

on the basis of two parameters, namely the severity of the **impact** and the **frequency** of occurrence of each issue.

Specifically in the case of **impact**, the evaluation has taken into account these 3 parameters:

- **Scale**, understood as severity of the impact caused by the occurrence of the issue.
- **Scope**, as number of people impacted by the occurrence of the issue.
- **Irremediability**, that is the ability to remedy the damage caused by the occurrence of the issue.

In the **frequency** index , the degree of exposure of the entity, sector and/or country, that a human right is violated, has been measured. That is, the probability with which an issue can occur in these areas.

- Institution factor: Frequency with which an issue could occur on an institutional level
- Sectoral factor: Frequency related to the level of probability of an issue occurring in the sector
- Country factor: Frequency related to the level of probability of an issue occurring in the country.
- Occurrence: Frequency factor that measures the number of times an issue has occurred in the past two years (2020/2021), or the equivalent of two years in a company.

For this purpose, public information on the sector, the country and the company as well as various international frameworks were used, in particular the UN Guiding Principles on Business and Human Rights.

Update of the due diligence process in 2021

RESIDUAL RISK

to assess the mitigating aspects that BBVA has at its disposal to manage each issue based on 4 criteria:

1. Policies,
2. Procedures/controls,
3. Grievance mechanisms and,
4. Monitoring indicators.

Meetings have been held with the global areas responsible for each issue in order to analyse the effectiveness of these mitigating factors and agree on action plans.

This identification and assessment phase considered potential negative impacts on stakeholders such as employees (with a focus on women), suppliers or subcontractors, customers, and indigenous peoples and local communities.

Due Diligence assessment methodology

	INHERENT RISK	MITIGATING EFFECTIVENESS	RESIDUAL RISK
Low	Impact: <ul style="list-style-type: none"> • Scale • Scope • Irremediability 	<ol style="list-style-type: none"> 1. Policies 2. Procedures / Controls 	Risk following the application of mitigating measures in the BBVA Group
Medium - Low		<ol style="list-style-type: none"> 3. Grievance mechanisms 	
Medium	Frequency: <ul style="list-style-type: none"> • Entity • Sector • Country • Occurrence 	<ol style="list-style-type: none"> 4. Monitoring indicators 	
Medium - High			
High			

Update of the due diligence process in 2021

Subsequently, the global risk control specialists (RCS) conducted a review of the results of the assessment as well as the adequacy of the mitigation action plans under the current non-financial risk model. This cross-checking process had a **twofold objective**: on the one hand, a gradual **alignment of both models** (human rights due diligence and the Non-Financial Risk Model) and on the other hand, to achieve greater systematisation of the process.

PREVENTION AND MITIGATION

The results of the overall due diligence process determined that there is, in general, a medium-high level of effectiveness of management and mitigation measures for each of the issues. The residual risk is therefore low to medium-low for all taxonomy issues.

However, several aspects were detected in which continue advancing in the four areas which are reflected in this **2021-2022 Action Plan**:

- Greater integration of human rights impacts into existing management frameworks
- Larger involvement of the stakeholders
- Improvement of public information and dissemination related to human rights
- Strengthen the monitoring of relevant processes in the management of Human Rights.



Update of the due diligence process in 2021

Management framework. One of the areas of improvement detected has been the reinforcement of the management, monitoring and control structure for human rights risks. In 2021, the alignment with the **Non-Financial Risk Model** was reinforced, and a six-monthly monitoring system of the progress of the 2021-2022 Action Plan will be implemented. Work will also begin in 2022 on integrating the management of these risks into the regular Non-Financial Risk processes.

Stakeholders. Active participation of key stakeholders in the due diligence process has been identified as an area to be strengthened. In 2022, BBVA has carried out an active process of participation of these groups with the holding of face-to-face workshop under Chatham house rules at its headquarters as well as other remote engagement sessions with key representatives of its stakeholders.

Public information and dissemination. BBVA has the will to publish consistent, reliable and standardised disclosure of key environmental, social and governance (ESG) issues related to its business. In addition to the GRI, BBVA publishes information on human rights according to two of the most advanced standards on the market: Measuring Stakeholder Capitalism of the International Business Council (IBC) of the World Economic Forum (WEF) and the Sustainability Accounting Standards Board (SASB). BBVA is thus responding to the expectations of analysts, investors and other stakeholders.

Processes. Action plans have been set up in each of the 6 thematic blocks:

Update of the due diligence process in 2021

Processes:

01 Employment conditions

In 2021, the commitment to non-discrimination among employees was reinforced. The non-discrimination variable was included in the Group's existing internal data analytics models that contribute to the selection or recruitment processes. In addition, work has started on comprehensive guidelines for digital disconnection, which will include explicit measures on the right to digital disconnection. The guidelines apply to all geographies and communication and awareness campaigns are conducted for all employees.

02 Projects and products

In the field of BBVA's [Environmental and social framework](#), an Engagement Plan has been developed in 2021 for customers who, could potentially be non-observance with any of the requirements of the aforementioned framework. This plan specifically sets out the human rights aspects.

03 Supply chain

In 2021, a pilot was launched to strengthen the integration of ESG and specifically human rights issues in the supplier assessment process and to reinforce the fact that we have a responsible supply chain. In 2022, a pilot was carried out to begin to integrate Human Rights in the audits carried out on suppliers.




Update of the due diligence process in 2021

Processes:

04 Customer well-being

In 2021, a Vulnerable Client Protection Framework began to be developed to implement criteria and best practices to adequately protect vulnerable clients.

05 Respect for communities

A comprehensive sustainable mobility framework is planned to be launched in 2022, so that the geographical areas where BBVA is present can draw up local plans, which will contribute to reducing the environmental footprint in places and local communities where BBVA is present. Further information on Management of direct environmental impacts can be found in [BBVA Annual Report 2022](#). 

06 Cross-cutting issues

One of the action plans to be highlighted is that preparatory work has begun to launch a privacy policy for the entire BBVA Group in 2022.

There will also be a global personal data protection monitoring tool, including indicators on the number of complaints and grievances related to the protection of personal data.

As a final result of the whole process, **25 action plans** have been developed with the involvement of the entire organisation. Specifically, the action plans are the responsibility of **14 business areas** or global management areas.




Update of the due diligence process in 2021

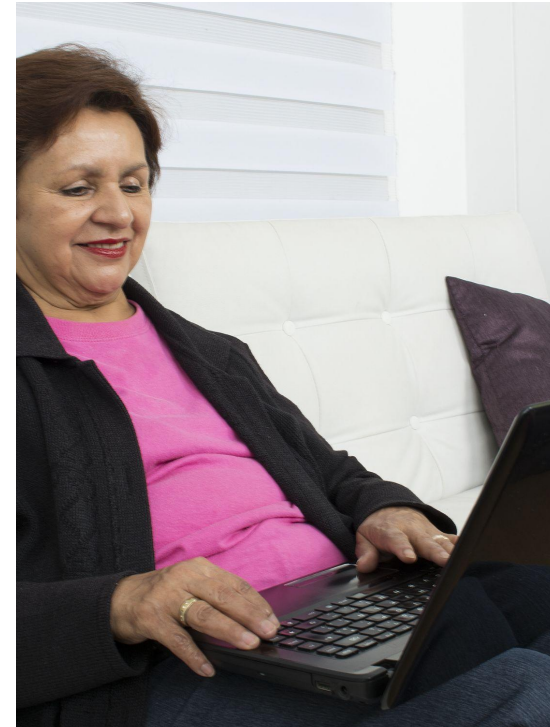
GRIEVANCE MECHANISMS

Grievance mechanisms play an essential role in the responsibility to respect human rights for BBVA. They are an early warning and risk repair system.

In this due diligence process, the main complaint channels available at BBVA were analysed, i.e.:

- The BBVA Whistleblower Channel in the framework of our [Code of Conduct](#) 
- Employee service channel
- Customer service channels
- Customer ombudsman
- Shareholder and Investor service
- Supplier support channel

These channels were assessed against the criteria for effectiveness set out in Article 31 of the UN Guiding Principles on Business and Human Rights: legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on stakeholder engagement and dialogue.



Update of the due diligence process in 2021

Grievance mechanisms include the BBVA Whistleblower Channel, which allows any stakeholder to confidentially and, if they wish, anonymously report conduct directly or indirectly related to human rights.

No violations of human rights by the entities belonging to the Group as of December 31, 2021 have been detected in the complaints received through this channel. Additional information in [BBVA Annual Report 2022](#). [↗](#)



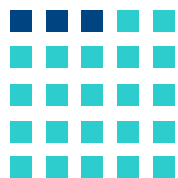
04 Track implementation: Action plan on human rights 2021-2022

As a result of the due diligence process in 2021, two types of plans were included in the action plan: structural plans (of a more cross-cutting nature) and plans related to each of the six thematic blocks mentioned above.

Some plans derived from the "Action Plan 2018-2020" and have been consolidated as continuous lines of work.







25 action plans

3 structural plans and 22 specific plans to mitigate the issues identified in the internal human rights taxonomy



14 leading areas of these plans globally

According to the 6 thematic blocks, the following 22 specific action plans have been developed:

	PLANS
 Employment conditions	8
 Projects and products	2
 Supply chain	3
 Customer well-being	5
 Respect for communities	1
 Cross-cutting issues	3

04 Track implementation: Action plan on human rights 2021-2022

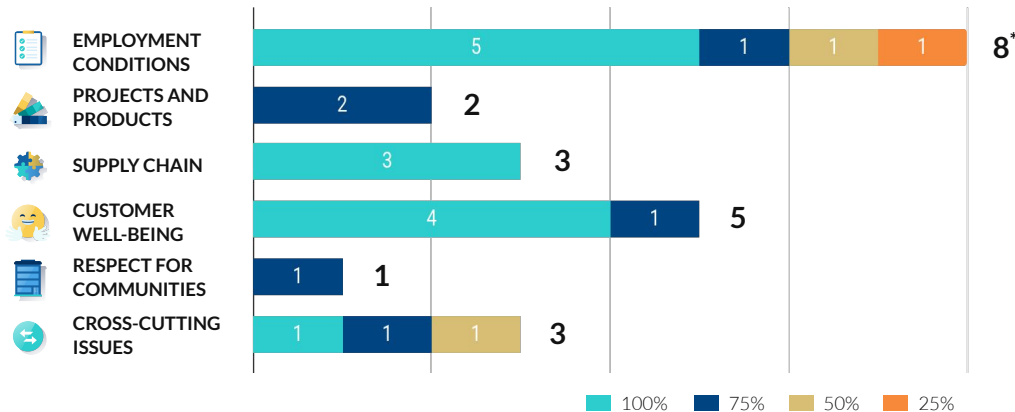
At the end of 2022, the status of the plans was as follows:

STRUCTURAL



Compliance with 25% is associated with the "Integration of the due diligence process of Human Rights in the annual processes of evaluation of Non-Financial Risks (NFR). The complexity of this process and the need for additional IT developments have meant an estimated delay until the end of 2023 and the beginning of 2024.

By thematic blocks, the degree of compliance with the specific plans has been:



The plan "draw up global guidelines to standardise sexual harassment and gender-based harassment protocols, and workplace protocols, adapting them to local legislation" is linked to the negotiation of the Equal Treatment and Opportunities Plan that was delayed due to union elections in 2022.



All plans that have not been 100% fulfilled by the end of 2022, will continue in 2023.

In some cases, the plan has been updated, such as "the creation of a global category that integrates local complaints linked to human rights issues in customer service channels." Given the complexity derived from the different regulatory contexts local authorities, it has been decided to continue with this plan but starting from a local identification of the claims associated with human rights in the customer service channels.

Below is the detail of all of them as well as their degree of performance.

Structural Action Plans

→ Action from the Action Plan 2018-2020

▶ Plan in progress with continuity in 2023

✓ Plan completed

01 HUMAN RIGHTS MANAGEMENT FRAMEWORK

- **Integration** of the human rights due diligence process in the annual Non-Financial Risk (NFR) assessment processes. ▶
- **Regular control mechanisms:** Implementation of a six-monthly monitoring system of the status of the action plans. ✓

 **Lead:** Non-Financial Risks and Responsible Business

 **Revised Implementation date:** 2021-2023

DEGREE OF PERFORMANCE:

02 TRANSPARENCY AND PUBLIC INFORMATION

- **Alignment:** Incorporation of new human rights metrics in the Group's Annual Report in line with reporting standards and guidelines (e.g. GRI, SASB and WEF-IBC). ✓
- **Stakeholder engagement:** Consultation on the outcome of due diligence process with key stakeholders. ✓

 **Lead:** Finance and Responsible Business

 **Implementation date:** 2021-2022

DEGREE OF PERFORMANCE:

03 GRIEVANCE AND REMEDY MECHANISMS

- **BBVA Group Code of Conduct Whistleblowing Channel:** identification of complaints directly or indirectly connected to human rights. ✓
- **Other mechanisms:** creation of a global category that integrates local complaints linked to human rights issues in customer service channels. ▶

 **Lead:** Responsible Business, Compliance, and Clients Solutions

 **Revised implementation date:** 2021-2023

DEGREE OF PERFORMANCE:





Employment conditions

Fight against discrimination

→ Action from the Action Plan 2018-2020

▶ Plan in progress with continuity in 2023

✓ Plan completed

01 COMMITMENT TO THE GLOBAL MANAGEMENT OF LABOUR ISSUES →

- Creation of a holding area for labour affairs, Labour & Employment Counselling & Relations, in order to have better coordination and management at global level. ✓

 **Lead:** Talent & Culture

 **Implementation date:** 2021

DEGREE OF PERFORMANCE: 

02 COMMITMENT TO EMPLOYEE DIVERSITY →

- Gender:** Country and area specific targets and plans with quarterly tracking of global metrics. ✓
- LGBTI:** Implementation of an guidance and coaching guide for employees in transition and their colleagues. ✓
- Disability:** White Paper for the treatment of people with intellectual disabilities, etc. and pilot with people from this group (Spain). ▶

 **Lead:** Talent & Culture

 **Revised Implementation date:** 2022-23

DEGREE OF PERFORMANCE: 

03 COMMITMENT TO NON-DISCRIMINATION BETWEEN EMPLOYEES

- Recruitment or selection processes:** Inclusion of the non-discrimination clause in the Group's existing internal data analytics models. ✓

 **Lead:** Talent & Culture

 **Implementation date:** 2021

DEGREE OF PERFORMANCE: 





Employment conditions

Fight against discrimination

→ Action from the Action Plan 2018-2020

▶ Plan in progress with continuity in 2023

✓ Plan completed

04 EQUAL TREATMENT AND EQUAL OPPORTUNITIES →

- **Equal Treatment and Opportunities Plan:** ▶ (scope: Spain) covering different processes (recruitment, training, career development, remuneration) and issues (culture, work-life balance, pregnancy and maternity protection, sexual harassment and gender-based violence).

Lead: Talent & Culture

Revised Implementation date: 202-232

DEGREE OF PERFORMANCE:

05 COMMITMENT TO WORK/LIFE BALANCE →

In the framework of the global *Work better, enjoy life* programme:

- **Post-pandemic models:** flexibility and remote working. ✓
- **Global guidelines for work disconnection:** ✓ with express measures on the right to digital disconnection. The guidelines apply to all geographies and communication and awareness campaigns are conducted for all employees.

Lead: Talent & Culture

Implementation date: 2022

DEGREE OF PERFORMANCE:

06 FAIR AND DECENT WAGE CONDITIONS

As part of the *Living Wage* project:

- **Annual review of BBVA's wage gap** in the main geographical areas. ✓
- **Update of the living wage metric** in accordance with the World Economic Forum (WEF) standard. ✓

Lead: Talent & Culture

Implementation date: 2022

DEGREE OF PERFORMANCE:





Employment conditions

Fight against discrimination

→ Action from the Action Plan 2018-2020

▶ Plan in progress with continuity in 2023

✓ Plan completed

07 MATERNITY / PATERNITY RIGHTS

- Increase in the number of paternity leave days to reach a global minimum (Scope: Mexico and Turkey). ✓
- Awareness-raising campaign for employees to take their paternity leave. ✓

 Lead: Talent & Culture

 Implementation date: 2021-2022

DEGREE OF PERFORMANCE: 

08 COMBATING HARASSMENT, INTIMIDATION, DEGRADING TREATMENT AND VIOLENCE AT WORK

- Draw up global guidelines to standardise sexual harassment and gender-based harassment protocols, and workplace harassment protocols, adapting them to local legislation. ▶

 Lead: Talent & Culture

 Revised implementation date: 2021-2023

DEGREE OF PERFORMANCE: 



Projects and products

→ Action from the Action Plan 2018-2020

▶ Plan in progress with continuity in 2023

✓ Plan completed

09 INTEGRATION OF HUMAN RIGHTS IN DIFFERENT CORPORATE CUSTOMER RELATIONSHIP PROCESSES (including modern slavery, forced labour and child labour) →

Updating of the **Environmental and Social Framework**:

- Review of activities of excluded sectors to decide on extending them and to determine sectors most at risk so as to establish additional measures in the relationship with big corporate customers in these sectors. ✓
- Pilot project to extend scope to the Corporate Banking area in the energy, mining, agribusiness and infrastructure sectors. ▶
- Developing an Engagement Plan with clients which do not meet any of the requirements of the Framework. This protocol specifically sets out the human rights compliance requirements. ✓

 **Lead:** Sustainability

 **Revised implementation date:** 2021-2023

DEGREE OF PERFORMANCE: 

10 PRIOR CONSULTATION PROCESSES IN COMMUNITIES AND THEIR SOCIAL AND ENVIRONMENTAL IMPACT →

Within the framework of the **Equator Principles**: ▶

- Review by NFR (Non-Financial Risks) of Equator Principles metrics in order to improve the quality and traceability of information and public information (including indicators related to prior consultation processes with communities).

 **Lead:** Sustainable Finance Corporate & Investment Banking

 **Implementation date:** 2021-2022

DEGREE OF PERFORMANCE: 



Supply chain

→ Action from the Action Plan 2018-2020

▶ Plan in progress with continuity in 2023

✓ Plan completed

11 FAIR AND RESPECTFUL CONDITIONS



- **Assessment of current conditions** offered to suppliers and contractors in order to ensure responsible terms and conditions. ✓

Lead: Legal Services and Responsible Business

Implementation date: 2021-2022

DEGREE OF PERFORMANCE:

12 INTEGRATING THE HUMAN RIGHTS VARIABLE IN THE PROCUREMENT AND MAINTENANCE OF SUPPLIERS AND CONTRACTORS (including modern slavery, forced labour and child labour)

- **Responsible supply chain programme:** pilot to strengthen the integration of ESG and specifically human rights issues into procurement processes. ✓
- **Internal audits:** Integrating human rights into supplier audits. ✓

Lead: Non-Financial Risks and Responsible Business

Implementation date: 2022

DEGREE OF PERFORMANCE:

13 NON-DISCRIMINATION OF WORKERS OF SUPPLIERS AND CONTRACTORS



- **Inclusion of a specific section on respect for and non-discrimination against the employees of suppliers and contractors in next review of the Code of Conduct of the BBVA Group.**

Lead: Compliance

Implementation date: 2022

DEGREE OF PERFORMANCE:





Customer well-being

Accessibility and Service

→ Action from the Action Plan 2018-2020

▶ Plan in progress with continuity in 2023

✓ Plan completed

14 ELIMINATION OF THE GENDER VARIABLE IN THE DEVELOPMENT OF ADVANCED ANALYTICS MODELS WITH HIGH IMPACT ON PEOPLE'S LIVES



- Inclusion of the concept of discrimination within the Governance Framework of Advanced Analytical Models. ✓
- Development of Fairness Guide. ✓
- Continuous review process for new models and review plan for models older than 1 year to eliminate the gender variable in models with high impact. ▶



Lead: Data, Client Solutions, GRM and Responsible Business



Implementation date: 2021-2022

DEGREE OF PERFORMANCE:

15 DIGITAL ACCESSIBILITY TO FINANCIAL PRODUCTS AND SERVICES FOR VULNERABLE GROUPS AND COMMUNITIES

- **Creating a process for new designs** and global application developments to be accessible. ✓
- **Awareness raising and training plan** to responsible teams on accessibility issues. ✓
- **Accessibility guides.** ✓



Lead: Client Solutions and Responsible Business



Implementation date: 2021-2022

DEGREE OF PERFORMANCE:





Customer well-being

Customer protection and security

→ Action from the Action Plan 2018-2020

▶ Plan in progress with continuity in 2023

✓ Plan completed

16 TRANSPARENT, CLEAR AND RESPONSIBLE (TCR) PRODUCT AND SERVICE INFORMATION (including Marketing & Advertising)

- **Global integrity and customer plan:** ✓
Establishment of integrity red lines and indicators with retail customers, and controls to facilitate their implementation.
- **Vulnerable client protection framework:** ✓
Development of criteria and good practices to adequately protect clients in vulnerable situations (including aspects of information protocols).

Lead: Client Solutions, Compliance and Responsible Business

Implementation date: 2021-2022

DEGREE OF PERFORMANCE:

17 PROMOTING FAIR TREATMENT OF CUSTOMERS

- **Recovery and debt collection processes:** ✓
integrating the human rights variable into the Retail Credit Risk Management Policy.

Lead: Global Risk Management

Implementation date: 2021

DEGREE OF PERFORMANCE:

DEGREE OF PERFORMANCE :100%

18 AVOID EXCESSIVE AND DISCRIMINATORY ABUSE OR USE OF SECURITY FORCES

- **Security forces evaluation processes:** ✓
Regular analysis and monitoring of the actions of (external) security forces on BBVA Group premises, with a focus on possible human rights violations against customers and employees. Reporting revisions in evaluation reports.

Lead: Engineering (Security)

Implementation date: 2021

DEGREE OF PERFORMANCE:

DEGREE OF PERFORMANCE :100%



Respect for communities

 Action from the Action Plan 2018-2020

 Plan in progress with continuity in 2023

 Plan completed

19 MITIGATION OF DIRECT ENVIRONMENTAL IMPACT AND EFFICIENT RESOURCE MANAGEMENT

- **Global Eco-efficiency Plan 2021-2025:** environmental action plan focused on reducing the direct environmental impacts of the BBVA Group, which establishes, for each of the geographical areas, year-on-year targets for reducing the carbon footprint, the use of renewable energy and waste management, among others. 
- **Global framework for sustainable mobility:** design of a global framework for the sustainable mobility of employees' journeys to work, so that each geographical area of the BBVA Group can draw up local plans to reduce the environmental footprint in local places and communities where BBVA is present. 

 **Lead:** Real state and Services

 **Revised implementation date:** 2021-2023

DEGREE OF PERFORMANCE: 



Cross-cutting issues

→ Action from the Action Plan 2018-2020

▶ Plan in progress with continuity in 2023

✓ Plan completed

20 COMBATING CORRUPTION, BRIBERY, TAX FRAUD AND MONEY LAUNDERING (including financing of terrorist groups)



- ▶ **Fiscal strategy (approved by the Board):** Update to include a reference to the importance of ESG factors.
- ✓ **General Policy for the Prevention of Money Laundering:** Include an express mention of the defence of human rights.

Lead: Tax & Compliance

Revised implementation date: 2021-2023

DEGREE OF PERFORMANCE:

21 DATA PROTECTION AND PRIVACY OF OUR STAKEHOLDERS

- ✓ **Adoption of a Global privacy policy** approved by the Board of Directors.
- ✓ **Global monitoring tool** with indicators for the protection of customers' personal data.

Lead: Compliance, Data and Engineering

Implementation date: 2022

DEGREE OF PERFORMANCE:

22 ENSURE HUMAN RIGHTS ARE TAKEN INTO ACCOUNT IN OWN-ACCOUNT INVESTMENT AND/OR MERGERS & ACQUISITIONS PROCESS



- ▶ **Inclusion of ESG and human rights criteria** specifically in the due diligence of Mergers & Acquisitions (M&A) transactions.

Lead: Merger & Acquisition and Responsible Business

Revised implementation date: 2022-23

DEGREE OF PERFORMANCE:



05

• Good practices

This section of the Plan includes three BBVA Group best practices from among the thematic blocks that make up the taxonomy of human rights.

LIVING WAGE PROJECT

In 2017, Mexico launched an initiative that established a minimum wage to improve the quality of life of its employees, with the aim of having well-paid employees and supporting the family economy.

Subsequently, in order to implement this good practice in the rest of the countries in which BBVA operates, a study was carried out with the following objectives:

1. Establish a minimum wage in BBVA sufficient to cover the total basic food basket in each country*.
2. Analyse the levels of income inequality of employees – between higher income earners and lower income earners – in order to reduce the gap at the extremes.

*The total basic food basket is composed of a minimum food basket made up of a set of basic foodstuffs sufficient to satisfy energy and protein needs, plus the inclusion of non-food goods and services (clothing, transport, education, health, etc.)

CASE STUDY



Employment conditions Fight against discrimination



Specific actions carried out in BBVA

- **Identification of the value of the basic basket** total individual and total basic basket per household in each country. This task was developed in collaboration with BBVA Research, due to the difficulty in finding a benchmark with a comparable methodology across countries.
- **Annual monitoring of the minimum wage and the pay gap** by extremes in all the countries where BBVA operates.
- **Setting up local action plans** with the aim of increasing the minimum wage and reducing the gap between extremes .



Achievements

Actions have been carried out in those countries where it was necessary to reduce the gap at the extreme end or to make the BBVA minimum wage cover the cost of the total basic food basket.


Good practices

CASE STUDY

Projects and products

ENVIRONMENTAL AND SOCIAL FRAMEWORK

In sectors that are particularly relevant due to their potential social and environmental impact, BBVA has specific guidelines for action, complementary to the risk appetite perspective, which restrict participation in certain activities. These guides were initially contained in the “Sector standards” published in 2018.

In 2020, BBVA published the first version of the **Environmental and social framework**  (the "Framework") for due diligence in the mining, agribusiness, energy, infrastructure and defence sectors, replacing the Sectoral Standards and the Defence Performance Policy.

The development of the framework took into account market trends in sustainability, international regulations, international standards (including the Sustainable Development Goals, the Paris Agreement, the UN Guiding Principles on Business and Human Rights and the recommendations of the Task Force on Climate-related Disclosures -TCFD-), best practises and the demands of our stakeholders.



Specific actions carried out in BBVA

- **Incorporation of general exclusions** relating to human rights, in funding to big corporate clients or projects where there is evidence of:
 - violations of applicable human rights laws and regulations
 - employment of child or forced labour
 - resettlement or violation of the rights of indigenous or vulnerable groups without their Free, Prior and Informed Consent (FPIC)
- **Developing an engagement Plan** with customers who, a priori, could potentially be non-observant with any of the requirements of the Framework (including human rights requirements).



Achievements

- Support from an external analyst for the implementation of this Framework.
- First financial entity to receive the AENOR certificate for the Tax Compliance Management System in Spain, which recognizes aspects such as the establishment and supervision of tax policies and strategies, as well as the robustness in the design and implementation of the BBVA Group's tax management and control system.
- Customer stock review within the implementation of the Framework with the following results: more than 300 customers assessed and 18 with whom an engagement plan has been or will be initiated (7 of them with human rights-related breaches).

Good practices

CASE STUDY



Cross-cutting issues

RESPONSIBLE TAXATION

BBVA understands responsible taxation as a materialisation of its commitment to the communities in which it operates. Based on this commitment, and in accordance with our Fiscal Strategy, BBVA aligns its fiscal contribution with value creation and its taxation contributes to the achievement of the United Nations Sustainable Development Goals (SDGs) and **protection of Human Rights**.

Taxation is linked to Human Rights, insofar as and through redistributive action of the States, it makes it possible to provide underprivileged with means for them to effectively exercise their rights. Further, this respect for these rights is relevant in the application of tax legislation and in the relationship with the tax authorities.



Specific actions carried out in BBVA

- **Assessment of the adaptation of the Tax Strategy**, approved by the Board of Directors, with a commitment to protect human rights also in the tax area. This action will run from 2022-2023.
- **Transparency on overall tax contribution** of the Group with the publication of an annual report since 2012 using PwC's Total Tax Contribution (TTC) methodology.
- **Internal schemes to ensure that the payment of taxes** takes place in the jurisdictions that are responsible for its collection, aligning our contribution with the effective implementation of our economic activity.
- **Active participation in initiatives** committed to spreading best practice in tax transparency (such as the European Business Tax Forum etc.).
- **Active dialogue** with local tax administrations as well as with various NGOs also committed to human rights.



Achievements

- Top score (100) in the Dow Jones Sustainability Index in the "Tax Strategy" section for 4 consecutive years.
- First financial entity to receive the AENOR certificate for the Tax Compliance Management System in Spain, which recognizes aspects such as the establishment and supervision of tax policies and strategies, as well as the robustness in the design and implementation of the BBVA Group's tax management and control system .
- BBVA's inclusion as a best practice in the CSR Europe report . "A Blueprint for Responsible and Transparent Tax Behaviour" in the "Public transparency and reporting" area.

BBVA

Creando Oportunidades

2023 review: Action plan on human rights

July 2023



06

• A continuous process: 2023

As part of our **General Sustainability Policy**, which provides the framework for our commitment to Human Rights, in 2023 we have continued to work on the continuous due diligence process under the **United Nations Guiding Principles on Business and Human Rights**, as well as the **OECD Due Diligence Guidance for Responsible Business Conduct** to design and manage this type of process.

Structured around this guide and with a view to extending the Action Plan to 2023, we have made progress with:

1. Integrating Human Rights, policies and management systems. In this case, preparatory work has been undertaken to integrate this Human Rights due diligence process into the annual Non-Financial Risk Assessment (NFR) processes.

Additionally, a human rights perspective has been integrated into other existing processes (e.g. corporate rules on donations, contributions and sponsorships, etc.).



• A continuous process: 2023

2. Identify and evaluate the negative impacts of the value chain. Taking the internal taxonomy of 28 Human Rights issues as a starting point, we have compared the validity of the results obtained previously in terms of the assessment of inherent risk and residual risk through meetings with the global areas responsible for each issue in order to analyse the effectiveness of the mitigating factors (policies, procedures/controls, grievance mechanisms, and monitoring indicators).

Furthermore, we have analysed emerging issues that are potentially relevant in this process. To this end, we have taken recommendations made by various stakeholders into account (analysts, investors, civil society, etc.) as well as the expert opinion of the areas responsible for the plans.

Furthermore, the double materiality analysis performed in the framework of non-financial public information has included the result of the human rights due diligence process both in analysing the materiality of impact and in analysing the financial materiality.

Based on this analysis, we have identified the following emerging themes:

- Challenge of fostering generational diversity in teams.
- Integration of the just transition into our green transition plans.
- Consideration of "human trafficking" in key processes of our value chain.
- Incorporation of the migrant group.

• A continuous process: 2023

For these four newly identified topics, new mitigation plans are planned for 2023.

3. Stop, prevent or mitigate negative impacts.

4. Monitor implementation and results.

To implement these phases, the extent to which each of the action plans has been implemented has been subject to analysis (see details from page 19 to 29) and new plans have been proposed for 2023.

5. Report on how impacts are addressed.

The main objective of this document is to report on how these impacts are managed at BBVA.

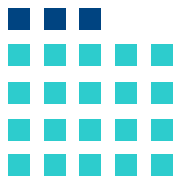
6. Have channels and processes in place that ensure that there are adequate mechanisms for ensuring reparation for victims, in case of infractions. This phase forms part of the assessment of the 28 internal taxonomy issues as part of the effectiveness of the mitigating factors on residual risk. It is also an integral part of phases 3 and 4.

Extension to 2023 of the 2021–2022 Human Rights Action Plan

The action plans are divided into the 6 thematic blocks of our internal taxonomy. In 2023, structural and specific plans remain in place for each issue identified. Existing plans have been passed over into 2023 as well as new ones having been rolled out.







23 action plans in total

3 structural plans and 20 specific plans to mitigate the issues identified in the internal human rights taxonomy




13 leading areas of these plans globally

According to the 6 thematic blocks, the following 20 action plans have been developed:

	PLANS
 Employment conditions	6
 Projects and products	3
 Supply chain	1
 Customer well-being	5
 Respect for communities	1
 Cross-cutting issues	4

Structural Action Plans

 Action set out in the 2020-21 Action Plan extended to 2023

 Plans launched with new actions

 New plans

01 HUMAN RIGHTS MANAGEMENT FRAMEWORK

- **Inclusion** of the Human Rights due diligence process in the annual Non-Financial Risk Assessment (NFR) processes.
- **Regular control mechanisms:** Monitoring developments of the proposed European Directive on sustainability and human rights due diligence.

 **Lead:** Non-Financial Risks and Responsible Business

 **Implementation date:** 2023-24


02 TRANSPARENCY AND PUBLIC INFORMATION

- **Alignment:** Incorporation of new human rights metrics in the Group's Annual Report in line with reporting standards and guidelines (e.g. GRI, SASB and WEF-IBC).

 **Lead:** Finance and Responsible Business

 **Implementation date:** 2023

03 GRIEVANCE AND REMEDY MECHANISMS

- **BBVA Group Code of Conduct Reporting**  **Channel:** Align the level of breakdown of currently reported complaints with the expectations of interest groups (eg discrimination or harassment, money laundering / insider trading, privacy/information security, etc.).
- **Other mechanisms:** Preliminary identification of categories of local complaints related to human rights issues in customer service channels. 

 **Lead:** Responsible Business, Compliance, and Clients Solutions

 **Implementation date:** 2023



Employment conditions

Fight against discrimination



Action set out in the 2020-21 Action Plan extended to 2023







Plans launched with new actions



New plans

01 COMMITMENT TO EMPLOYEE DIVERSITY

- **Gender:**
 - Launch of the "Yo soy Talento Femenino", a professional support programme for high-potential female employees. 
 - Implementation of specific plans by countries and areas with quarterly monitoring of global metrics to facilitate the public objective of a female presence in management positions coming to 35% by 2024.
- **LGBTI:** Launch of Report on the status of LGBTI members at Spanish companies. 
- **Disability:** White Paper for the liaising with peers with an intellectual disability, etc. and pilot with people from this group (Spain). 
- **Generational Diversity:** 
 - Publication of an internal guide to raise awareness amongst employees about the value of generational diversity.
 - Pilot launch of reverse mentoring, a programme for younger employees to mentor older employees on specific topics (technology, social media etc.).

 **Lead:** Talent & Culture

 **Implementation date:** 2023

02 EQUAL TREATMENT AND EQUAL OPPORTUNITIES

- **Equal Treatment and Opportunities Plan:** (scope: Spain)  covering various processes (selection, training, professional development, remuneration) and issues, such as culture, striking a work-life balance, pregnancy and maternity protection, gender violence and protocol for action against sexual harassment, harassment due to gender, sexual orientation, gender identity and gender expression.

 **Lead:** Talent & Culture

 **Implementation date:** 2023

03 COMMITMENT TO WORK / LIFE BALANCE

As part of the global *Work better, enjoy life* programme, initiatives in relation to:

- **Disconnection from work:** Strengthening awareness about disconnecting from work among employees. 
- **Greater respect for employees' time,** including (e.g. "Productive Afternoons" pilot). 
- **Improvement of employee health,** with actions such as: 
 - Workshops and presentations on topics of interest to employees
 - Support for initiatives to disconnect from work to promote emotional health, promoted by employees themselves
- With a new line of action in the framework of the "Good Manager Guide Programme": 
 - Inclusion in the Good Manager's Guide of the ability to generate and respect well-being in teams.

 **Lead:** Talent & Culture

 **Implementation date:** 2023



Employment conditions

Fight against discrimination



Action set out in the 2020-21 Action Plan extended to 2023



Plans launched with new actions



New plans

04 FAIR AND DECENT WAGE CONDITIONS

Within the framework of the *Living wage project*:

- **Update the minimum wage metric** that covers basic needs in line with the standard published by the World Economic Forum (WEF).



Lead: Talent & Culture



Implementation date: 2023

05 COMBATING HARASSMENT, INTIMIDATION, DEGRADING TREATMENT AND VIOLENCE AT WORK

- **Desarrollo de unas directrices globales** to standardise sexual harassment and gender-based harassment protocols, and workplace harassment protocols, adapting them to local legislation.





Lead: Talent & Culture



Implementation date: 2023

06 PROTECTION OF EMPLOYEES' HEALTH

- **Approval of a Standard on occupational health, safety and well-being at BBVA** to address this matter with global and standard criteria. 
- **Launch of global guidelines for psychosocial assessment**, anticipating the regulations in many regions to detect conflicts that may lead to psychosocial risks. 




Lead: Talent & Culture



Implementation date: 2023

Projects and products

 Action set out in the 2020-21 Action Plan extended to 2023

 Plans launched with new actions

 New plans


07 INTEGRATION OF HUMAN RIGHTS IN DIFFERENT CORPORATE CUSTOMER RELATIONSHIP PROCESSES (including modern slavery, forced labour and child labour)

- Update of the **Environmental and Social Framework**: with a focus on large corporate clients in certain sectors 
- Inclusion of trafficking in persons within the general exclusions of the sectors
- Strengthening the implementation of the **Global protocol for managing social and environmental disputes with a** focus on corporate clients and Human Rights. 

 **Lead:** Sustainability

 **Implementation date:** 2023

08 PRIOR CONSULTATION PROCESSES IN COMMUNITIES AND THEIR SOCIAL AND ENVIRONMENTAL IMPACT



Within the framework of the **Equator Principle** 

- Strengthening the traceability of operations in aspects related to principles 5 "Stakeholder engagement" and 6 "Grievance mechanism" ([link](#))

 **Lead:** Sustainable Finance Corporate & Investment Banking

 **Implementation date:** 2023


09 ENABLING TRANSITION FINANCING TO INCLUDE A JUST TRANSITION PERSPECTIVE

- Inclusion of the just transition perspective in electricity and coal generation sectoral plans. 
- **Active participation in working groups** to create guides or standards for a better understanding of this factor. 

 **Lead:** Sustainability

 **Implementation date:** 2023

Supply chain

 Action set out in the 2020-21 Action Plan extended to 2023

 Plans launched with new actions

 New plans

10 INTEGRATING THE HUMAN RIGHTS VARIABLE IN THE PROCUREMENT AND MAINTENANCE OF SUPPLIERS AND CONTRACTORS (including modern slavery, forced labour and child labour)

- **Responsible Supply Chain Programme:** Consolidation of the sustainability/ESG module in procurement processes. 
- **Internal audits:** Extension of the on-site supplier audit pilot to other regions. 
- **Training for SME suppliers** within the framework of the global sustainability training programme, a programme under the UN Global Compact Spain, ICEX and ICO Foundation. 

 **Leader:** Purchasing and Responsible Business

 **Implementation date:** 2023



Customer well-being

Accessibility and Service



Action set out in the 2020-21 Action Plan extended to 2023



Plans launched with new actions



New plans

11 ELIMINATION OF THE GENDER VARIABLE FOR THE DEVELOPMENT OF ANALYTICS MODELS FOR FINANCIAL PRODUCTS

- Continuous review process in new models and plan to review models in place for more than 1 year.




Lead: Data, Client Solutions, GRM and Responsible Business



Implementation date: 2023

12 DIGITAL ACCESSIBILITY TO FINANCIAL PRODUCTS AND SERVICES FOR VULNERABLE GROUPS AND COMMUNITIES

- Creation of a global accessibility standard 




Lead: Client Solutions and Responsible Business



Implementation date: 2023

13 FACILITATING ACCESS TO FINANCIAL PRODUCTS AND SERVICES AMONGST VULNERABLE GROUPS AND COMMUNITIES

- As part of the inclusive growth strategy,  launch of specialised ranges of products and services for preferential assistance groups, including: low-income customers, entrepreneurs, young people, women, long-term migrants, people with disabilities.



Customer well-being

Customer protection and security

Action set out in the 2020-21 Action Plan extended to 2023

Plans launched with new actions

New plans

14 TRANSPARENT, CLEAR AND ACCOUNTABLE (TCA) PRODUCT AND SERVICE INFORMATION (including Marketing & Advertising)

- **Red lines of integrity in retail customers:** Offer criteria in case of doubts and queries to comply with the Red Lines of Integrity in retail customers".
- **Framework for the protection of vulnerable customers:** A pilot was organised in Colombia in which financial training actions were developed for customers in vulnerable situations. The protection of vulnerable customers will be included into the actions to be performed within the group's new Inclusive Growth strategy.
- **Advertising communication guidelines to avoid greenwashing and social washing:** Launch of advertising communication guidelines to bring public communications on ESG matters in line with the TCR Communication Principles to avoid Green & Socialwashing.

Leader: Compliance and Responsible Business

Implementation date: 2023

15 AVOID EXCESSIVE AND DISCRIMINATORY ABUSE OR USE OF SECURITY FORCES

- **Security forces evaluation processes:** Regular analysis and monitoring of the actions of (external) security forces on BBVA Group premises, with a focus on possible human rights violations against customers and employees. Reporting revisions in evaluation reports.

Lead: Engineering (Security)

Implementation date: 2023



Respect for communities



Action set out in the 2020-21 Action Plan extended to 2023



Plans launched with new actions



New plans

16 MITIGATION OF DIRECT ENVIRONMENTAL IMPACT AND EFFICIENT RESOURCE MANAGEMENT

- **Monitoring of the Global Eco-efficiency Plan 2021-2025:** environmental action plan focused on reducing the direct environmental impacts of the BBVA Group, which establishes, for each of the geographical areas, year-on-year targets for reducing the carbon footprint, the use of renewable energy and waste management, among others.
- **Global framework for sustainable mobility:** design of a global framework for the sustainable mobility of employees' journeys to work, so that each geographical area of the BBVA Group can draw up local plans to reduce the environmental footprint in local places and communities where BBVA is present.
- **Launch of a plan to manage and reduce BBVA's scope 3 carbon footprint:**  The entire scope of BBVA's carbon footprint measurement will be expanded in relation to scope 3, which until now covered waste management, business trips and employee travel to their work centres (central services). Subsequently, a reduction strategy with intermediate targets for 2030 will be developed as part of our commitment to Net Zero in 2050.



Lead: Buildings and Services



Implementation date: 2023



Cross-cutting issues



Action set out in the 2020-21 Action Plan extended to 2023



Plans launched with new actions



New plans

17 COMBATING CORRUPTION, BRIBERY, TAX FRAUD AND MONEY LAUNDERING (including financing of terrorist groups)

- **Fiscal strategy (approved by the Board):**
Updated to include the importance of ESG (Environmental, Social and Governance) matters.

 **Leader:** Tax & Compliance

 **Implementation date:** 2023

18 PARTICIPATION IN PROCESSES AND/OR ACTIONS DO NOT BREACH human rights (at the government level or through support for activities that incite violence and radicalisation, etc.)

- Approval and implementation of a global procedure for **adherence, monitoring and decoupling of Public Commitments related to Sustainability**, which includes those related to **Human Rights**.
- Inclusion of the Human Rights variable in internal regulations for the management of donations and contributions as well as in sponsorships.

 **Leader:** Sustainability

 **Implementation date:** 2023

19 ENSURE HUMAN RIGHTS ARE TAKEN INTO ACCOUNT IN OWN - ACCOUNT INVESTMENT AND / OR MERGERS & ACQUISITIONS PROCESS

- **Inclusion of ESG and human rights criteria** specifically in the due diligence of Mergers & Acquisitions (M&A) transactions.


 **Lead:** Merger & Acquisition and Responsible Business

 **Implementation date:** 2023


Cross-cutting issues

20 DATA PROTECTION AND PRIVACY OF OUR STAKEHOLDERS

- Approval of the Data Protection Standard for effective compliance with the Global Privacy Policy. 
- Analysis of the regulatory situation in the main regions. 

 **Lead:** Compliance, Data and Engineering

 **Implementation date:** 2023

 Action set out in the 2020-21 Action Plan extended to 2023


 Plans launched with new actions


 New plans

Appendix 1

Internal taxonomy on Human Rights


Detailed below are the **28 issues** evaluated in the internal taxonomy of human rights **grouped into 6 thematic groups.**

01  **Employment conditions**

02  **Projects and products**

03  **Supply chain**

04  **Customer well-being**

05  **Respect for communities**

06  **Cross-cutting issues**

For each issue, articles from both the **Universal Declaration of Human Rights (UDHR)** [↗](#) and the **Charter of Fundamental Rights of the European Union (CFR)** [↗](#) were analysed and allied.

Additionally, we studied SDGs that are potentially impacted by each issue and human right, using as a basis **The Human Rights Guide to the Sustainable Development Goals** [↗](#) from **The Danish Institute for Human Rights** or alternatively assessed internally.

Appendix 1

Internal taxonomy on Human Rights



EMPLOYMENT CONDITIONS



PROJECTS AND PRODUCTS



SUPPLY CHAIN



CUSTOMER WELL-BEING



RESPECT FOR COMMUNITIES



CROSS-CUTTING ISSUES

Discrimination

01

Employment and wage discrimination in selection, hiring, promotion, development and compensation processes:

- UDHR: Article 7. All are equal before the law and are entitled without any discrimination to equal protection of the law. All are entitled to equal protection against any discrimination in violation of this Declaration and against any incitement to such discrimination.
- CFR: Article 21. Non-discrimination.



Employment rights and relations

02

Extension of the working day and lack of disconnection from work:

- UDHR: Article 24. Everyone has the right to rest and leisure, including reasonable limitation of working hours and periodic holidays with pay.
- CFR: Article 31. Fair and just working conditions.



03

Lack of fair and decent wage conditions:

- UDHR: Article 23.1.1. Everyone has the right to work, to free choice of employment, to just and favourable conditions of work and to protection against unemployment.
- CFR: Article 31. Fair and just working conditions.



04

Limitation of maternity / paternity rights, leave and similar:

- UDHR: Article 25. Motherhood and childhood are entitled to special care and assistance. All children, whether born in or out of wedlock, shall enjoy the same social protection.
- CFR: Artículo 33. Family and professional life. Artículo 34. Seguridad social y ayuda social.



05

Forced displacement or relocation of employees or improper restructuring of functions:

- UDHR: Article 23.1.1. Everyone has the right to work, to free choice of employment, to just and favourable conditions of work and to protection against unemployment.
- CFR: Article 15. Freedom to choose an occupation and right to engage in work.



Appendix 1

Internal taxonomy on Human Rights



EMPLOYMENT CONDITIONS



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CROSS-CUTTING ISSUES

Employment rights and relations

06

Limitations on union rights, freedom of association and collective bargaining:

- UDHR: Article 20.1. Everyone has the right to freedom of peaceful assembly and association.
- CFR: Article 12. Freedom of assembly and of association. Article 28. Right of collective bargaining and action.



07

Restriction of the right to free expression:

- UDHR: Article 19. Everyone has the right to freedom of opinion and expression.
- CFR: Article 11. Freedom of expression and information.



Health and safety

08

Harassment, intimidation, degrading treatment and violence at work:

- UDHR: Article 5. No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.
- CFR: Article 4. Prohibition of torture and inhuman or degrading treatment or punishment.



09

Lack of prevention of occupational accidents and illness, and protection of employee health (including mental and emotional health):

- CFR: Article 34. Social security and social assistance. Article 35. Health care.



Appendix 1

Internal taxonomy on Human Rights



EMPLOYMENT
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CROSS-CUTTING
ISSUES

Projects and products

10

Lack of consideration of human rights in relationships with corporate customers:

- Based on the European Union (EU) regulation related to human rights: Guarantee that companies fulfil their duty to respect human rights, the environment and good governance and do not cause or contribute to potential or actual adverse impacts on human rights, the environment and good governance through their own activities and business relationships.



11

Lack of prior consultation process in communities and its social and environmental impact (including issues related to respect for property rights, access to and use of land of individuals or groups):

- UDHR: Article 17. 1. Everyone has the right to own property alone as well as in association with others. 2. No one shall be arbitrarily deprived of his property.



Appendix 2

Internal taxonomy on Human Rights



EMPLOYMENT
CONDITIONS



PROJECTS AND
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ISSUES

Supply chain

12

Unfair and abusive contract conditions:

- UDHR: Article 23. 1. 1. Everyone has the right to work, to free choice of employment, to just and favourable conditions of work and to protection against unemployment.
- CFR: Article 31. Fair and just working conditions.



13

Employment discrimination of employees of suppliers and contractors:

- UDHR: Article 7. All are equal before the law and are entitled without any discrimination to equal protection of the law. All are entitled to equal protection against any discrimination in violation of this Declaration and against any incitement to such discrimination.
- CFR: Article 21. Non-discrimination.



14

Lack of human rights due diligence processes in the contracting and maintenance of suppliers and contractors:

- Based on the European Union (EU) regulation related to human rights: Guarantee that companies fulfil their duty to respect human rights, the environment and good governance and do not cause or contribute to potential or actual adverse impacts on human rights, the environment and good governance through their own activities and business relationships.



Appendix 2

Internal taxonomy on Human Rights



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Accessibility and service

15

Discrimination (including advanced analytics models) in credit admission, product and service suitability, and pricing in private customer processes based on gender, age, disability, illness or place of origin, especially for the most vulnerable people and/or groups:

- UDHR: Article 22. Everyone, as a member of society, has the right to the economic, social and cultural rights indispensable for his dignity and the free development of his personality.
- CFR: Article 36. Access to services of general economic interest.



16

Discrimination and exclusion of vulnerable groups and communities from financial products and services due to lack of physical or digital accessibility, or lack of adaptation for vulnerable groups (e.g. branches that have not been adapted, inaccessible communication and distribution channels), or lack of consideration of other factors such as level of financial education and the digital divide:

- UDHR: Article 22. Everyone, as a member of society, has the right to the economic, social and cultural rights indispensable for his dignity and the free development of his personality.
- CFR: Article 36. Access to services of general economic interest.



Customer protection and security

17

Information on banking products and services that is difficult to access, insufficient and/or difficult to understand or misleading. Misleading or unclear marketing or advertising:

- CFR: Article 36. Access to services of general economic interest



18

Harassment, intimidation and degrading treatment (in recovery and debt collection processes, for example):

- UDHR: Article 5. No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.
- CFR: Article 4. Prohibition of torture and inhuman or degrading treatment or punishment. No one shall be subjected to torture or to inhuman, degrading treatment or punishment.



19

Excessive use of the security forces at facilities:

- UDHR: Article 3. Everyone has the right to life, liberty and the security of person.
- CFR: Article 6. Everyone has the right to liberty and security of person. Article 31. Every worker has the right to working conditions which respect his or her health, safety and dignity.



Appendix 2

Internal taxonomy on Human Rights



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Respect for communities

20

Lack of consideration of prevention in the environmental impact of BBVA's direct activity (environmental footprint of buildings and facilities, etc.):

- UDHR: Article 25.1. Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control.
- CFR: Article 37. Environmental protection.



21

Withdrawal of commercial activities, basic services and abandonment of communities especially in rural areas and/or with more vulnerable populations:

- UDHR: Article 21.2. Everyone has the right to equal access to public service in his country. Article 22. Everyone, as a member of society, has the right to the satisfaction of economic rights.
- CFR: Article 36. Access to services of general economic interest.



Appendix 2

Internal taxonomy on Human Rights



EMPLOYMENT
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CROSS-CUTTING
ISSUES

Cross-cutting issues

22

Lack of communication and transparency on impact on human rights and progress with their protection:

- CFR: Article 27. Workers' right to information and consultation within the undertaking. Article 42. Right of access to documents.



23

Corruption, bribery, tax fraud and money laundering activities, including financing of terrorist groups:

- UDHR: Article 28. Everyone is entitled to a social and international order in which the rights and freedoms set forth in this Declaration can be fully realized. Article 29. These rights and freedoms may in no case be exercised contrary to the purposes and principles of the United Nations.



24

Participation in processes and/or actions that breach human rights at the government level or through support for activities that incite violence and radicalisation, etc.

- UDHR: Article 12. No one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honour and reputation. Everyone has the right to the protection of the law against such interference or attacks.
- CFR: Article 43. Ombudsman. Article 54. Prohibition of abuse of rights



25

Data protection and privacy breaches for employees, customers, suppliers, contractors and third parties:

- UDHR: Article 12. No one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honour and reputation. Everyone has the right to the protection of the law against such interference or attacks.
- CFR: Article 8. Protection of personal data



Appendix 2

Internal taxonomy on Human Rights



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ISSUES

Cross-cutting issues

26

Impact of the implementation of new technologies (e.g. blockchain, AI, internet of things, etc.) on human rights (focusing on customers and employees):

- UDHR: Article 7. All are equal before the law and are entitled without any discrimination to equal protection of the law. All are entitled to equal protection against any discrimination in violation of this Declaration and against any incitement to such discrimination.
- CFR: Article 21. Non-discrimination.



27

Lack of consideration of human rights in proprietary investment processes and/or mergers and acquisitions:

- Based on the European Union (EU) regulation related to human rights: Guarantee that companies fulfil their duty to respect human rights, the environment and good governance and do not cause or contribute to potential or actual adverse impacts on human rights, the environment and good governance through their own activities and business relationships.



28

Management of adequate, accessible grievance mechanisms and access to remediation (including whistleblowers):

- CFR: Article 47. Right to an effective remedy and to a fair trial



BBVA

Creando Oportunidades

Action Plan on Human Rights 2021-22 &2023

July 2023

