

BBVA Occupational Health, Safety and Welfare Policy

BBVA, S.A.

Talent & Culture

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Occupational Health and Safety

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3. 1. Introduction

1.1 Management framework

This policy implements the principles of Human Resources and is integrated with and supplemented by other Group policies, including the Corporate Social Responsibility Policy and the Sustainability and Human Rights Policy.

1.2 Applicable external laws and regulations

- Law 31/95 of November 8, on Occupational Risk Prevention (*Ley 31/95, de 8 de noviembre, de Prevención de Riesgos Laborales*)
- Royal Decree 39/1997, adopting the Regulations on Preventive Services (*Real Decreto 39/1997, por el que se aprueba el Reglamento de los Servicios de Prevención*)

4.

5. 2. Purpose and scope

1. 2.1 Purpose

This policy (the "Policy") aims to improve working conditions by raising the standard of protection of the health and safety of employees in the workplace, thus complying with the provisions of Article 5 of Law 31/1995, of November 8, on Occupational Risk Prevention.

2. 2.2 Scope

The scope of this Policy is BBVA, S.A.

6. 7. 8.





10.11. 3. General principles

BBVA management considers one of its guiding principles to be the promotion of health, safety and welfare through ongoing improvement of working conditions. The bank accordingly assumes its obligations under Law 31/1995 of November 8, 1995, on Occupational Risk Prevention and its implementing regulations to be merely the minimum level of action in this domain. BBVA's commitment to prevention and its related responsibilities are the concern of all employees.

We can achieve this goal only through following this policy and complying with the rules and procedures at all organizational tiers and in all areas.

BBVA therefore:

- 1. establishes a risk prevention system based on effective means to achieve its goals and complies with current laws and regulations and other requirements adhered to by the bank;
- 2. commits to promote a genuinely preventive culture where employee health, safety and welfare are embedded in human resources and business strategies as an ongoing core goal on an equal footing with business quality, productivity and profitability;
- 12. embeds prevention in all its activities and decisions across technical processes, work organization and emerging work conditions, throughout all management tiers of the company, which must consider risk prevention in any activity conducted or ordered by them and in all decision-making;
- 5. undertakes to go beyond mere ex post corrective action in response to past materialized risks and design ways to identify, assess, avoid and prevent or at least mitigate all risks, even before they materialize;
- 6. implements initial and ongoing awareness-raising and training activities on occupational risk prevention and mitigation, encourages safe workplace behavior and urges all employees to become engaged with preventive action;



- 7. and encourages employees to raise questions about and become involved in occupational health and safety. BBVA has accordingly put in place an inclusive prevention model based on employees' entitlement actively to participate in all matters that may impinge on their occupational health, safety and welfare. The bank will take steps as needed to protect its employees and to provide them with the channels of representation required by law.
- 8. BBVA undertakes to implement action plans designed to continuously improve occupational health, safety and welfare in business management, quality, security, and the environment as a key variable for making progress in preventive management.
- 9. All activities must be implemented in a context of full respect for the social and environmental setting. We must aim to achieve the highest standards of occupational health, safety and welfare and environmental protection.
- 8. Working safely is a condition of employment. Any breach of external or internal regulations that may cause harm to health will qualify as a serious breach.
- 9. The bank will promote specific programs to improve the working environment and enhance protection standards.
- 10. The bank will promote the principle of equality between women and men, considering genderrelated variables in data collection and processing systems and in general research on the prevention of occupational risks, to detect and prevent situations where occupational harms may arise from an employee's gender.



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13. 4. Roles

Specific roles are described below

| Role | Duties |
|---|---|
| Head of Talent & Culture, Holding | In charge of the Policy. Submits for approval policy proposals to the corporate bodies where appropriate. Monitors the degree of implementation of the Policy and promotes action if it is not being properly implemented. |
| Head of Talent & Culture, Spain | Promotes and monitors compliance with the Policy in his/her area. Manages and organizes the resources available to T&C Spain to make it feasible to comply with the Policy. |
| Labor Relations Discipline Head Talent & Culture, Holding Discipline Leader A&ML Spain | Promotes the creation of the standards and procedures arising from this Policy as appropriate. Regularly reviews the adequacy of the Policy so that its provisions remain aligned with applicable regulations and the circumstances that prompted its adoption. Monitors the degree of implementation of the requirements of the Policy, takes action if not properly implemented, and reports accordingly. |
| Head of BEx T&C, Spain Head of Culture & Engagement | Manages and organizes the resources available in his/her own team to make it feasible to comply with the Policy. |
| Occupational Health Discipline Manager Senior Manager BEX- Occupational Risk Prevention | Updates the Policy in accordance with regulatory changes and recognized standards. Manages and organizes the resources available in his/her own unit to make it feasible to comply with the Policy. Regularly reports on the activities of his/her respective unit. |



14.5. Governance and oversight model

5.1 This Policy will enter into force on July 1, 2022, with the approval of the Head of Talent & Culture, Holding.

5.2 At least annually, or in any event that might require a change in this Policy, Labor Relations Discipline Head Talent & Culture, Holding, and Discipline Leader A&ML, Spain, as parties in charge, shall review the Policy and approve a new version, as appropriate.

5.3 Any breach of this Policy may, in the case of employees, lead to disciplinary sanctions.

15. 16. 17. Version history

| Date | Description of change | |
|------|---|--|
| 2011 | Original Policy | |
| 2015 | Policy reviewed and updated | |
| 2022 | Policy reviewed and updated in accordance with NRI. | |