the Wolfsberg Group

Financial Institution Name: Location (Country) :

BANCO BILBAO VIZCAYA ARGENTARIA S.A SPAIN

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

	TY & OWNERSHIP	
1	Full Legal Name	BANCO BILBAO VIZCAYA ARGENTARIA S.A
2	Append a list of foreign branches which are covered by this questionnaire	London, Frankfurt, Brussels, New York, Taipei, Seoul, Paris, Hong Kong, Milán, Tokyo, Singapore, Portugal, Shanghai.
3	Full Legal (Registered) Address	Plaza de San Nicolás, 4- , 48005 - Bilbao
4	Full Primary Business Address (if different from above)	Calle Azul, 4, 28050, Madrid
5	Date of Entity incorporation/establishment	Founded in 1857
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	BBVA:SM Madrid, Barcelona, Bilbao, Valencia, London, Mexico, New York.
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	0%
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Name of primary financial regulator/supervisory authority	BANCO DE ESPAÑA
11	Provide Legal Entity Identifier (LEI) if available	K8MS7FD7N5Z2WQ51AZ71
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	None

14 14 a 14 b 14 c 14 d	Jurisdiction of licensing authority and regulator of ultimate parent Select the business areas applicable to the Entity Retail Banking	SPAIN
14 a 14 b 14 c 14 d	Select the business areas applicable to the Entity	
14 a 14 b 14 c 14 d		
14 a 14 b 14 c 14 d		
14 a 14 b 14 c 14 d		
14 b 14 c 14 d		Yes
14 c 14 d	Private Banking	Yes
14 d	Commercial Banking	Yes
	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 E	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 g 14 h	Broker/Dealer	Yes
14 ii	Multilateral Development Bank	No No
	Wealth Management	Yes
14 j 14 k	Other (please explain)	165
14 K	Other (please explain)	
15	Does the Entity have a significant (10% or more)	
	portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident	
	customers? (Non-resident means customers primarily	No
	resident in a different jurisdiction to the location	
	where bank services are provided)	
15 a	If Y, provide the top five countries where the non-	
	resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	10001+
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above	No
	Section are representative of all the LE's branches.	NO .
17 a	If N, clarify which questions the difference/s relate to	Please see annexes for all branches
	and the branch/es that this applies to.	THOUSE SEE SITISTICS FOR All STATISTICS
18	If appropriate, provide any additional	
	information/context to the answers in this section.	
2. PRODL	JCTS & SERVICES	
19	Does the Entity offer the following products and	
	services:	
19 a	Correspondent Banking	Yes
19 a1	IfY	
19 a1a	Does the Entity offer Correspondent Banking	
	services to domestic banks?	Yes
19 a1b	Does the Entity allow domestic bank clients to	
	provide downstream relationships?	Yes
19 a1c	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	Yes
	domestic banks?	100
19 a1d	Does the Entity offer Correspondent Banking	
ıs a iu	services to foreign banks?	Yes
19 a1e	Does the Entity allow downstream relationships	
10 4 10	with foreign banks?	Yes
19 a1f	Does the Entity have processes and procedures	
ısaıı	in place to identify downstream relationships with	Voc
	foreign banks?	Yes
40 -4	_	
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	N
	(MSBs)/Money Value Transfer Services (MVTSs)?	Yes
40 41	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	
19 a1h	With Middly Miv 105, or Payment delvice Frovider	
19 a1h		
	(PSPs)?	
19 a1h1	(PSPs)? MSBs	No.
	(PSPs)?	No No No

19 a1i	Does the Entity have processes and procedures	
	in place to identify downstream relationships with MSBs /MVTSs/PSPs?	Yes
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	Yes
19 f	International Cash Letter	Yes
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	Yes
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	Yes
19 i3	Virtual Asset Service Providers (VASPs)	Yes
19 i4	eCommerce Platforms	Yes
19 i5	Other - Please explain	
19 j	Private Banking	Both
19 k	Remote Deposit Capture (RDC)	No
19 l	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	Yes
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	Yes
19 p1a	If yes, state the applicable level of due diligence	Identification and verification
19 p2	Wire transfers	Yes
19 p2a	If yes, state the applicable level of due diligence	Identification and verification
19 p3	Foreign currency conversion	Yes
19 p3a	If yes, state the applicable level of due diligence	Identification and verification
19 p4	Sale of Monetary Instruments	Yes
19 p4a	If yes, state the applicable level of due diligence	Identification and verification
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	BBVA accepts non account customers, as it acts as receiver for Tax and Social Security and other Spanish authorities, and clients can walk in and pay their duties. BBVA has no appetite for other type of walk-in customers. In the mentioned cases, the bank duly identifies the customers according to Spanish and European best practices.
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	No
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Please see annexes for all branches
21	If appropriate, provide any additional information/context to the answers in this section.	
3. AMI 4	CTF & SANCTIONS PROGRAMME	-
22	Does the Entity have a programme that sets minimum	
	AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	
22 b	Adverse Information Screening	Yes
22 c	Beneficial Ownership	Yes
22 d	Cash Reporting	Yes
22 e	CDD	Yes
22 f	EDD	Yes
22 g	Independent Testing	Yes
22 h	Periodic Review	Yes
22 i	Policies and Procedures	Yes
22 j	PEP Screening	Yes
22 k	Risk Assessment	Yes
22 I	Sanctions	Yes

22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	101-500
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	No
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
26 a	If Y, provide further details	Only one company 100% owned by the group, for back office and administrative tasks
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Please see annexes for all branches
29	If appropriate, provide any additional information/context to the answers in this section.	Clarification #24: It is composed of several policies reviewed on an ongoing basis. Not necessarily every year, but some with a higher frequency. Approved at the level required by internal governance
4. ANT	I BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 d	Third parties to which specific compliance activities	res
	subject to ABC risk have been outsourced	Yes
42 f	Non-employed workers as appropriate (contractors/consultants)	Yes
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	Regarding question 42F, It should be noted that BBVA does not provide training to all non employed workers but it does provide training to certain high risk non-employed workers such as agents. BBVA requires all its third parties to certify their commitment to comply with all applicable anticorruption laws.
5 AML C	TF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
40	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	Yes
48 a1	If Y, does the Entity retain a record of the results?	No
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Von
49 a 49 e	Prohibit dealing with another entity that provides services to shell banks	Yes Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
ı		
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes

49 i		
, , ,	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
491	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	5 years or more
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context to the answers in this section.	Clarification #48 a): BBVA Sanctions policies comply with OFAC regulations. Other AML policies are not gapped against US standards necessarily.
C AME OT	F & SANCTIONS RISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Client	Yes
54 b	Product	Yes
54 c	Channel	Yes
54 d		
55	Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes
	Does the Entity's AML & CTF EWRA cover the	
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes Yes
55 a 55 b 55 c	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes Yes Yes Yes
55 a 55 b	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes Yes
55 a 55 b 55 c 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes Yes Yes Yes Yes Yes Yes Yes Yes
55 a 55 b 55 c 55 d 55 e 55 f 55 g	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes Yes Yes Yes Yes Yes Yes Yes
55 a 55 b 55 c 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes Yes Yes Yes Yes Yes Yes Yes Yes
55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed	Yes Yes Yes Yes Yes Yes Yes Yes
55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes Yes Yes Yes Yes Yes Yes Yes
55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes Yes Yes Yes Yes Yes Yes Yes
55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 a 57 b	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes
55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 a 57 a 57 b 57 c	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
55 a 55 b 55 c 55 d 55 g 55 h 56 a 57 a 57 c 57 d	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
55 a 55 b 55 c 55 d 55 c 55 d 55 g 55 h 56 a 57 a 57 a 57 c 57 d 58	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
55 a 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 a 57 c 57 d 58 a 58 a	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
55 a 55 b 55 c 55 d 55 c 55 d 55 g 55 h 56 a 57 a 57 a 57 c 57 d 58	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes

58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
58 g	Has the Entity's Sanctions EWRA been completed in	163
59	the last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
61	If appropriate, provide any additional	
01	information/context to the answers in this section.	
7 KYC (CDD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	25%
67	Does the due diligence process result in customers receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes Vac
67 a5 67 a6	Adverse Information Other (specify)	Yes Lenght of the relationship and AML screenings
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes
68 a	If Y, is this at:	Title in various and in the contract of the first of the contract of the contr
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4 68 a4a	Other If yes, please specify "Other"	Yes Irregular operations
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
69 a	If Y, is this at:	A service of the second service of the second service of the service of the second service of the service of th
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

70 What is the method used by the Entity to screen for Adverse Media/Negative News? Combination of automated and manual Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?			
Accurace Media/Negative Neces? 71 Does the Entity have an Entity of Section of Price of Centrolled by PEPs? 72 at Section of Secti	69 a3	Trigger event	Yes
customers and commercial por PEPs or controlled by PEPs or PEP			Combination of automated and manual
71 at 2	71	customers and connected parties to determine whether	Yes
Yes		If Y, is this at:	
73 a			Yes
What is the method used by the Entity to screen PEPS One fire filty have policies, procedures an processes to review and escalate potential matches from screening extenses and connected parties to describe whether they are PEPs, or controlled by PEPs? **** **** **** **** *** *** *		KYC renewal	Yes
Does the Entity have policies, procedures and processes to review and scalation potential markets from coreving customers and connected parties to determine whether they are PEPs, or controlled by PEPs? I ISTO censes and connected parties to determine whether they are PEPs, or controlled by PEPs? I ISTO censes and the property of the processes of the processe		Trigger event	
to review and escalate potential matches from societing customers and comnected parties to determine whether they are PEPs, or controlled by PEPs? 74 a 1			Combination of automated and manual
rating (Periotic Reviews)? 74 a 1	73	to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74 al Lass ban one year 74 a2 3 3 - 4 years 74 a3 3 - 4 years 74 a4 4 5 Years Yes 74 a5 7 Tigger-based or perpetual monitoring reviews 74 a5 Tigger-based or perpetual monitoring reviews 75 Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews? 76 From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's PCC programme? 77 a Ams., defence, military 78 b Respondent Bankly PCC programme? 78 b Respondent Bankly PCC programme? 78 b Respondent Bankling Principles 2022? 78 c I Embassies/Consultates 78 c Grespondent Bankling Principles 2022? 78 c Embassies/Consultates 78 c Grespondent Bankling Principles 2022? 78 c Embassies/Consultates 78 c Gambling outsomers 79 c Gambling outsomers 79 c Gambling outsomers 79 c Gambling outsomers 70 c Gambling outsomers 71 c Gambling contomers 72 c Gambling contomers 73 c Gambling contomers 74 c Gambling contomers 75 c Gambling contomers 76 c Gambling contomers 77 c Gambling contomers 78 c Does risk-based approach 78 c Marijuan-related Entities 79 no Poblevatiction or prohibition 70 c Poblevatiction or prohibition 70 c Poblevatiction or prohibition 71 c Non-account customers 72 c Does risk-based approach 73 c Poblevatiction or prohibition 74 c Poblevatiction or prohibition 75 c Poblevatiction or prohibition 76 c Poblevatiction or prohibition 77 c Poblevatiction or prohibition 78 c Poblevatiction or prohibition 79 c Poblevatiction or prohibition 70 c Poblevatiction or prohibition 70 c Poblevatiction or prohibition 70 c Poblevatiction or prohibition 71 c Poblevatiction or prohibition 72 c Poblevatiction or prohibition 73 c Regulated charites 74 Nuclear power 75 Does restricted and need authorization to be clients 75 Virtual Assat Sarvice Providers 76 Does EDD require sentir business management and/ 77 Virtual Assat Sarvice Providers 78 Does EDD require sentir business management and/ 79 Office (specify) 70 Office (specify)	74		Yes
74 a 2 1 - 2 years Yes Yes 74 a 3 3 - 4 years Yes 75 a 4 5 From some Yes 76 a 4 7 a 5 Trigger-based or perpetual monitoring reviews Yes 77 a 6 Other (Please specify) 78 Does the Entity maintain and report metrics on current and past periodic or frigger event due diligence 79 From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's PCC programme? 78 From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's PCC programme? 78 Area, defence, millitary 78 EDD on risk-based approach FEDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banks 78 EDD or risk-based approach FEDD or		If yes, select all that apply:	
74 a.3 3 - 4 years Yes 74 a.4 5 Years or more 74 a.5 Triggar-based or perpetual monitoring reviews 75 Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews? 76 From the list below, which categories of customers or prohibited by the Entity's PCC programme? 76 Respondent Banks 77 Respondent Banks 78 Respondent Banks 79 Responden			
74 a.5 Syears or more 74 a.6 Other (Please specify) 75 Does the Entity maintain and report metrics on current and past periodic or trigger event the diligence reviews? 76 From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme? 78 From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme? 78 A. Arms, defence, military 78 B. Respondent Banks 78 Correspondent Banks FIEDD or risk-based approach For the determination and the Wolfsburg Correspondent Banks FOR CORRESPONDENT FOR CORRESP			
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Payment Transparency Standards?		ID OF FREE About to the MALESTAN CONTROL	1
	92		l Yes

93	Does the Entity have policies, procedures and	
	processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	EU Regulation 847/2015
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	See annexes for branches
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	 TIONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	No
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Automated
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Both
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	FIRCOSOFT
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	<1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners (i.e. reference data)
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners (i.e. reference data)
106 с	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners (i.e. reference data)
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners (i.e. reference data)
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners (i.e. reference data)
106 f	Other (specify)	BBVA adheres to local AML screening requirements in the jurisdictions where it has presence.
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	Yes
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Please, see annexes for branches.
110	If appropriate, provide any additional information/context to the answers in this section.	#99 We have procedures to avoid prohibitions within jurisdictions where we have presence and from EU, UN, and OFAC, but cannot prevent local prohibitions in the rest of jurisdictions where our correspondent banks are established. #108: Repr office in Cuba with no banking activity, only institutional relations.
11. TRAINI	ING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 с	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to:	
112 a 112 b	Board and Senior Committee Management 1st Line of Defence	Yes
112 b	2nd Line of Defence	Yes Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	Yes
112 f	Non-employed workers (contractors/consultants)	Yes
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches	Yes

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
12 OLIALIT	Y ASSURANCE /COMPLIANCE TESTING	
12. QUALIT	Does the Entity have a program wide risk based	
	Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
13. AUDIT		
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Compenent-based reviews
122 b	External Third Party	Yearly
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e 123 f	Name Screening & List Management Reporting/Metrics & Management Information	Yes
123 f	Suspicious Activity Filing	Yes Yes
123 g 123 h	Technology	Yes
123 ii	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
14. FRAU 127	Does the Entity have policies in place addressing	Yes
128	fraud risk? Does the Entity have a dedicated team responsible	Yes
l	for preventing & detecting fraud?	100

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129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	
Declaration Statement		
Wolfsberg Group Correspondent Banking Due Difigence Questionnaire 2023 (CBDDQ V1.4) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Comptance Officer, Global Head of Financial Crimes Comptance OR equivalent)		
BANCO BILBAO VIZCAYA ARGENTARIA, S.A. (Financial Institution name) is fully committed to the fight against financial crime and makes		
every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.		
The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.		
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted is committed to adopting these standards.		
The Financial Institution further certifies it comples with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.		
The Financial Institution commits to file accurate supplemental information on a timely basis.		
I, SANTIAGO HERNÁNDEZ (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.		
I, EDUARDO GARDE (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this		
Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution. (Signature & Date)		
0 6 / 13 / 202 4 (Signature & Date)		
06/13/2024		