

Banco Bilbao Vizcaya Argentaria, S.A. ("**BBVA**") is a duly authorized bank that has been registered in the Special Register of Banks and Bankers of the Bank of Spain under number 3; its coding number is 182.

1. Introduction

The European regulation that governs the actions of investment firms (the "**Entities**") in relation to executing orders for financial instruments (Directive 2014/65/EC, Delegated Regulation (EU) 2017/565/EC and other implementing regulations referred to as "**MiFID 2**") requires that said firms adopt and enforce a policy that enables them to offer their clients (the "**Clients**") the best possible result in the firms' order execution service. Consequently, investment firms must apply an order execution policy (the "**Order Execution Policy**") or reception and transmission of orders policy (the "**Reception and Transmission of Orders Policy**"), where the Entity directly executes orders from its Clients in an Execution Venue or where the Entity executes its Clients' orders by transmitting them to other Entities (the "**Intermediaries**") for final execution.

This document summarizes the most relevant aspects of BBVA's Order Execution Policy and in its Reception and Transmission of Orders Policy (collectively the "**Execution Policy**" or the "**Policy**").

BBVA makes available to its Clients the latest information regarding execution quality at the Execution Venues and Intermediaries stated in Annex I of this document, which can be found via the following link: <https://www.bbvacib.com/rts28#regulation>

The Policy updates and amends BBVA's order execution policy and its Reception and Transmission of Orders Policy, which were in force until July 19, 2019 under MiFID 2, and any other version thereof previously published by BBVA from time to time until January 18, 2021. .

This document includes terms with capital letters, the meaning of which, unless otherwise indicated, shall be construed in accordance to MiFID 2.

2. Scope of the Execution Policy

The Policy is of general application to Retail and Professional Clients, with some specificities according to the Client classification and instrument typology, as explicitly set out in this document.

BBVA does not undertake any obligation to provide best execution in relation to any order if the instructing party is an Eligible Counterparty.

The Execution Policy is applicable when (i) BBVA receives an order from a Client to execute their orders on financial instruments on Execution Venues; (ii) in other cases when BBVA transmits the Client order to an Intermediary, which in turn executes the order on an

Execution Venue; or (iii) when BBVA deals on own account in financial instruments, and considers that the Client legitimately relies on BBVA to protect his or her interests in relation to the determination of the pricing or other elements of the transaction.

BBVA will also apply the Policy in relation to orders instructed by BBVA on behalf of the Client pursuant to discretionary portfolio management contracts.

BBVA applies the Policy to the Financial Instruments referred throughout this document (hereinafter, also referred to as the "**Instruments**" or the "**Financial Instruments**"), as described below. Paragraph 3.2.4 of this document ("Financial Instruments traded Over the Counter") sets forth how this Policy shall be applied when BBVA deals on own account with its Clients.

3. General principles

3.1. General Principles of best execution

BBVA will take all sufficient steps to obtain the best possible result when executing its Clients' orders. The Execution Policy is intended to define the strategy followed by BBVA to achieve this goal.

The fulfillment of the execution criteria set out in these Policies must be achieved in general, albeit not for every order received by BBVA from its Clients. In other words, BBVA has no obligation to obtain the best possible result when executing each and every individual order received from its Clients. It must instead apply the general criteria in the Policy to all orders from its Clients to obtain the best result possible on an ongoing basis.

To achieve the best results, some of the Clients' orders may be executed outside Regulated Markets or other Trading Venues¹ (orders regarding OTC Instruments); this includes executing an order against BBVA's own account. When executing these orders outside Trading Venues, BBVA will check the price suggested to the Client for fairness by collecting market data and, to the extent possible, comparing it with similar or comparable products. BBVA will require the Clients' prior express consent to execute their orders outside Trading Venues. BBVA may obtain this consent from the Client either in the form of a general agreement or in respect of individual transactions.

In the cases mentioned above, the execution may involve the additional risks such as, among others a counterparty², liquidity³ and/or settlement⁴ risk. Upon request from its Clients, BBVA will provide additional information on the consequences of this type of execution.

¹As per MiFID 2, "**Trading Venues**" are Regulated Markets, Multilateral Trading Facilities and Organized Trading Facilities.

² This risk arises when the counterparty against whom the Client's order was executed fails to comply, or complies late, with their payment and/or delivery obligations for the Instrument agreed.

³Liquidity risk refers to the inability to execute the order in full and/or that the order's execution price is consistently and negatively impacted.

⁴ This Risk arises from an unforeseen event stops or delays the order's settlement.

In addition, BBVA may execute fixed income and equity Instruments' subscription orders on the primary market⁵. Orders instructed to BBVA for execution on a primary market will be executed according to the terms and conditions established by the issuer, the agreements reached between BBVA and the Client and the specific instructions given by the Client.

BBVA may internalize orders from its Clients on some Instruments, executing them against its own account on an occasional basis, to the extent that it considers the best possible result may be obtained for its Clients, or in an organized and systematic fashion, when BBVA supplies Instrument quotes to its Clients, acting in its capacity as Systematic Internalizer⁶.

BBVA will not apply fees to Clients in a way which discriminates unfairly between Execution Venues.

BBVA will inform its Clients of any major difficulty in the proper execution of their orders, when it becomes aware of them.

3.2. Factors that determine best execution

In order to obtain the best possible result for its Clients, the following factors will be taken into account:

- the Instrument's price;
- costs (including, among others, the execution and clearing/settlement costs);
- Instrument liquidity (i.e. volume of orders available in each Execution Venue for the Instrument in question and its market depth);
- The volume of the order (number of Instruments included in the order);
- probability of execution and settlement;
- speed of execution (ability to complete the transactions quickly);
- settlement characteristics; and
- any other consideration that is relevant to execute the order.

In determining the relative importance of these factors, the following criteria will be taken into account: the characteristics of the Client, including the categorization of the Client as Retail or Professional; the characteristics of the order; the characteristics of the Instruments covered by the order; and the characteristics of the Execution Venues on which the order can be executed.

The best possible result when executing orders from Retail Clients will be determined in terms of total consideration, considering as a whole the price of the Instrument and the costs

⁵ The subscription of Instruments on the primary market refers to the initial acquisition of securities following their issue, whether via the direct transfer of the securities between the Client and issuer, or indirectly via allocation to the BBVA account as Intermediary between the Client and issuer.

⁶ The following website includes a list of the Instruments in which BBVA may act as Systemic Internalizer when executing Client orders against its own account: <https://www.bbvacib.com/global-markets/regulation/documentos#regulation>

associated with the execution, which will include all expenses that shall be charged to the Client as a direct consequence of the execution of the order.

3.2.1. Equity Instruments, ETF and warrants

The best possible result in the execution of orders from Retail Clients for equity Instruments, ETFs and warrants will be determined, in the following order, based on:

- the price of the Instrument and service costs (including, among others, the clearing and settlement costs), in terms of total consideration;
- the liquidity of the Instrument (i.e. volume of orders available in each Execution Venue for the Instrument in question and its market depth);
- the volume of the order (number of Instruments included in the order);
- probability of execution and settlement;
- speed of execution (capability to complete the transactions quickly);
- settlement characteristics; and
- any other relevant consideration to execute the order.

The best possible result in the execution of orders from Professional Clients for equity Instruments, ETFs and warrants will be determined, in the following order, based on:

- the price of the Instrument;
- the service costs (including, among others, the execution, clearing and settlement costs);
- the liquidity of the Instrument (i.e. volume of orders available in each Execution Venue for the Instrument in question and its market depth);
- the volume of the order (number of Instruments included in the order);
- probability of execution and settlement;
- speed of execution (ability to complete the transactions quickly);
- settlement characteristics; and
- any other relevant consideration to execute the order.

3.2.2. Fixed income Instruments

The best possible result in the execution of orders from Retail Clients for fixed income Instruments is determined, in the following order, based on:

- the price of the Instrument and service costs (including, among others, execution, clearing and settlement costs), in terms of total consideration;
- the liquidity of the Instrument (i.e. volume of orders available in each Execution Venue for the Instrument in question and its market depth); and
- the volume of the order.

The best possible result in the execution of orders from Professional Clients for fixed income Instruments is determined, in the following order, based on:

- the price of the Instrument;
- the liquidity of the Instrument (i.e. volume of orders available in each Execution Venue for the Instrument in question and its market depth);
- the costs attached (including, among others, the execution, clearing and settlement costs); and
- the volume of the order.

In addition to the aforementioned factors, BBVA may take into account factors such as the speed of execution, settlement and clearing of the order, as well as any other relevant consideration for the execution of the Clients' orders.

3.2.3. Units in Undertakings for Collective Investment Vehicles (UCIs)

BBVA provides the Reception and Transmission of Orders (RTO) service for shares and units in UCIs⁷. The transaction will be registered in the UCI's unit-holder or shareholder register by the relevant management company or the UCI's administrator. The best result is obtained because:

- The price is the share's or unit's net asset value (NAV) calculated by the UCI's management company or administrator as per the regulations on UCIs;
- There are no other costs relating to the order's execution except for costs listed in the prospectuses (e.g. subscription or redemption fees);
- The speed of execution is determined directly by the UCI's management company or administrator when it assigns the NAV to the Client's order, calculated as per the UCI's specific regulations, depending on when the Client's subscription or redemption order takes place, and in accordance with the cut-off times defined in the UCI's prospectus and, for foreign UCIs, in the marketing memorandum. When buying into foreign UCIs, the cut-off times set by the companies which market the UCIs must also be taken into account;

⁷Except for listed UCIs (e.g. ETFs and SICAVs) to which the general principles of this Policy apply.

- The UCI's management company or administrator carries out the subscription or redemption transactions within the timeframes laid down in the UCI's prospectus; and
- BBVA makes sure that, if the UCIs issue different classes of shares and/or units, the selected classes will be those defined by the management companies for the relevant service type so that the best possible class is selected for the Client in terms of fees, transaction volume and minimum amounts, and class requirements established in the fund's prospectus.

3.2.4. FX Forwards

BBVA may provide the service of execution of orders for unlisted currency futures, within the framework of certain services or specific operations agreed with the client. In these cases, the best possible result in the execution of the orders will be determined taking into account that:

- The price of the instrument must be a fair price calculated by BBVA, by gathering market data to estimate the price of said product and, where possible, it must be compared with the price of similar or comparable products. Unless BBVA and the Client expressly agree otherwise, the fees, exchange rates and / or strike prices of unlisted currency futures may include a margin applied by BBVA, to compensate BBVA for the risks undertaken, the costs incurred and services provided. Said margin will be calculated taking into account, among other factors, the credit risk that BBVA assigns to the client, the guarantees provided (if applicable), the size of the transaction, the market conditions of the relevant currency pair in the time of contracting (such as the price, liquidity and volatility of similar instruments) and BBVA's profit margin.

Therefore, different clients could obtain different prices for unlisted currency futures, with the same characteristics.

- The execution center will always be Banco Bilbao Vizcaya Argentaria, S.A;
- The maturity, currency pair and the rest of the terms of the executed unlisted currency futures will be those agreed between BBVA and the client.

3.2.5. Financial Instruments traded Over the Counter (OTC)

When dealing on own account in Derivative Financial Instruments and fixed income Financial Instruments⁸ BBVA will apply the best execution regime when it considers that the Client legitimately relies on BBVA to protect his or her interests in relation to the pricing or other elements of the transaction. BBVA will determine, based on the following considerations⁹, those cases in which it considers that the Client legitimately relies on BBVA when dealing in a

⁸ Appendix I, Section A, point 3 of Directive 2014/65/EC.

⁹ The criteria that BBVA will follow to determine whether a Client legitimately relies on BBVA follow those established in the European Commission working document ESC-07-2007 regarding MiFID implementation.

Financial Instrument:

- Which party initiated the transaction (the Client or BBVA). If the Client initiates the transaction, the Client is less likely to rely on BBVA to protect their interests.
- The market practice. For example, if the common market practice consists in asking for quotes to several Entities (practice known as “shop around”) when dealing this Instrument, BBVA will assume that the Client is less likely to rely on BBVA to protect their interests.
- The level transparency of the prices. If there are market prices published for the relevant Instrument and the Clients can have access to them, BBVA will assume that the Client is less likely to rely on BBVA to protect their interests.
- The information BBVA provides about its services, and the terms of the agreements between the Client and BBVA.

Following from the analysis above, BBVA may determine, particularly when dealing Professional Clients, that certain Clients are not legitimately relying on BBVA when trading bilaterally and, as such, this Policy does not apply to them.

In the cases where BBVA considers that the best execution regime applies to OTC transactions, as per the section above, the best execution obligations shall be applied in accordance to the principle of fairness of the price offered to the Client.

BBVA will consider prices offered to Clients to be fair when they have been calculated pursuant to standard market valuation methods, applying potential adjustments determined on the basis of internal methodologies internally approved for the relevant type of client and transaction, and adding the relevant costs and expenses. To the extent possible, BBVA will compare the prices offered to its Clients with the prices observed in the market for similar or comparable Instruments.

3.3. Costs and expenses that BBVA may pass onto clients

BBVA may pass on the following costs and expenses, among others, to the Client depending on the nature and characteristics of the order in question:

- BBVA's execution fees;
- expenses arising from the service of transmission of orders;
- the fees and royalties charged by the markets, Intermediaries and the settlement systems;
- postage, telex, fax and Swift expenses, if any;
- if messenger systems are used, the expenses generated shall be passed on, provided they are used at the Client's request;

- transport and insurance expenses, when the transaction requires the physical transport of securities;
- notary expenses, expenses for deeds and any other justified external charge.

BBVA's Clients can find more information about the expenses and rates that may apply to a certain order on the BBVA website (www.bbva.es).

4. Selecting Execution Venues and Intermediaries

4.1. Selection of Execution Venues

4.1.1. Fixed income Instruments, equity Instruments, ETFs and warrants

In addition to the factors stated in section 3, for the selection of the Execution Venues, the following factors (in this order) will be taken into account to obtain the best possible result: the reliability of clearing and settlement systems; the reliability of the connection infrastructure with the Execution Venues; the degree of automation of the operative of the Execution Venues; the risks associated with operating with the relevant clearing houses; and any other aspects that may affect execution, settlement and clearing of the order.

4.1.2. Derivative Financial Instruments traded on Regulated Markets

BBVA will execute orders regarding Derivative Instruments listed in the available Regulated Markets, provided that BBVA is a member thereof. Given the nature of the transactions and since there are no alternatives in terms of execution, BBVA will assume that these markets consistently allow for the best possible result.

4.2. Choice of Intermediaries

BBVA has established agreements for the provision of the Reception and Transmission of Orders service with a number of Intermediaries, including Intermediaries belonging to the BBVA group, in order to meet its best execution obligations in the provision of this service.

In cases where a Client order is transmitted to an Intermediary, BBVA will require the order-execution services of that Intermediary to carry out the execution of the order in the relevant Execution Venue. In such cases, BBVA acts as the transmitter of the order to the

Intermediary, which will be ultimately responsible for executing the order in the appropriate Execution Venue pursuant to the Intermediary's execution policy.

For the election of an Intermediary, it must meet the following requirements:

- To have access to the Execution Venues that BBVA considers relevant for service provision to its Clients. This requirement will consider access to these venues as well as whether this access is direct or indirect, and the availability of Financial Instruments in the Execution Venues.
- To have settlement and clearing agreements and be a member of central counterparties or clearing and settlement systems at the relevant Execution Venues.
- To achieve systematically the best possible result in the execution of clients' orders. To this end, the data on the quality of execution published by each Intermediary will be reviewed every year.

BBVA will assess the level of service provided by each Intermediary on the basis of these criteria to then select the Intermediaries for its Clients' orders.

Annex I hereto, contains a list of Intermediaries used by BBVA for each type of Instrument. This list will be updated and available on the BBVA website (www.bbva.es) and in all its branches.

4.2.1. Equity Instruments, ETF and warrants

In addition to the factors mentioned in the previous section, the following factors will be considered, in this order, when selecting Intermediaries with a view to achieving the best possible result for Clients:

- Their capacity to execute Client orders transmitted to the Intermediary;
- Their global offer to access to Execution Venues;
- Their systems reliability;
- The technology used to execute orders;
- The risks associated to the transactions; and
- Any other relevant consideration to the execution, settlement and clearing of the order.

4.2.2. Fixed income Instruments

No Intermediaries are used to execute Clients' orders regarding fixed income Instruments.

4.2.3. Derivative Financial Instruments traded on Regulated Markets

Altura Markets, S.V., S.A. is the preferred Intermediary to execute transactions in Derivative Instruments Traded on Regulated Markets because it meets the requirements mentioned in section 4.2 above. These are the key factors for selecting this Intermediary:

- The technological and operational integration of its systems with BBVA's systems;
- Greater control over compliance and the applicable regulations since BBVA has a stake in Altura Markets, S.V., S.A.;
- Access to Execution Venues which BBVA regards as relevant to execute its Client orders;
- Administrative and operational (middle and back-office) services;
- Capacity to execute the Client orders with a positive track record;
- Additionally, the use of a different Intermediary would result in a significant increase in fixed costs, which could have an impact on the service provided to the Clients.

5. Specific execution instructions from Clients

Any specific instruction from a Client with regard to an order or aspect of an order may prevent BBVA from adopting the expected measures under the Policy to obtain the best possible result when executing and/or transmitting the order to an Intermediary.

BBVA reserves the right to admit orders with specific instructions.

6. Review of the Policy

BBVA will monitor the effectiveness of the Policy in order to identify and, where appropriate, correct any deficiencies in applying the Policy.

BBVA will also periodically check whether the Execution Venues and Intermediaries involved, as well as the relative importance assigned to each factor of execution or any other aspect of the Policy, make it possible to systematically obtain the best possible result for its Clients.

This review will be conducted at least once a year and, additionally, whenever there is a major change affecting the ability of BBVA to continue offering its Clients the best possible results under the Policy.

BBVA will analyze the quality of the execution of orders through the systems dedicated to such purposes.

BBVA will inform to any Clients with a stable business relationship with the bank of any major change to the Execution Policy, as relevant.

For each Instrument, BBVA will publish annually the list of the top five Execution Venues where BBVA executes its Clients' orders and the top five Intermediaries it transmits orders to. This information will be published on BBVA´s website (www.bbva.es).

BBVA will also make information on its Execution Policy available to its Clients through the BBVA website (www.bbva.es) or at any of its branches.

7. Acceptance of the Policy

BBVA will provide a summary of this Policy to all Clients who are provided with investment services that entail the execution of Instruments subject to this Policy

Any order instructed to BBVA by any of its Clients after January 18, 2021 entail the acceptance by the Client of this Execution Policy.

8. Governance model and Policy Supervision

This Policy will be subject to the Group's Internal Control Model. The control functions will ensure that the necessary aspects are included in the design of the measures, mechanisms and controls to allow monitoring and verification of compliance and proper application of this Policy, ensuring that said measures, mechanisms and controls are preferably automatic. In particular, they will periodically verify the effectiveness of such measures, mechanisms and controls, so that BBVA's execution and reception and transmission of orders systems and procedures make it possible to obtain, in general, the best possible result for its Clients.

BBVA has an internal governance framework that provides for the quarterly presentation of the results of the quality of order execution internally and decision-making in this area, if applicable.

Annex I

Annex I contains the list of Execution Venues used by BBVA to execute its Clients' orders.

BBVA may use all Execution Venues listed on Annex I to execute orders from Professional Clients.

BBVA does not use the Execution Venues identified with an asterisk (*) to execute orders from Retail Clients.

1 Execution Venues for orders regarding transferable securities

Equities¹, ETFs and warrants

¹ Shares, certificates, units in listed mutual funds and similar Instruments

Execution Venues of which BBVA is a Member

- BATS & Chi-X Europe (Cboe Global Markets Inc.) BATE, CHIX, CHIC*
- Börse Berlin AG - Equiduct Trading - EQTA, EQTB
- Santiago Stock Exchange. XSGO
- Colombia Stock Exchange. XBOG
- Lima Stock Exchange (SAA). XLIM
- Bolsa Mexicana de Valores S.A. de C.V. XMEX
- Borsa Istanbul Group. XIST
- Euronext (Euronext N.V.): Amsterdam, Lisbon, Paris. XAMS, XLIS, XPAR
- London Stock Exchange (London Stock Exchange Plc) SEAQ, SETS, IOBE, LSE, XLON
- Milan Stock Exchange (Borsa italiana S.p.A) MTAA, ETFP, XAIM, MTAH
- SIBE Spanish Stock Exchange Interconnection System (Sociedad de Bolsas, S.A., BME Group). XBAR, XMAD, XBIL, XVAL, XLAT, MABX, XMCE
- Turquoise (Turquoise Global Holdings Limited) TRQX*
- XETRA German Stock Exchange (Frankfurter Wertpapierbörse) XETA, XETB, XETR, XFRA

Execution Venues of which BBVA is not a Member

- AQUIS*
- Athens Stock Exchange (Athens Exchange Group) XATH
- Australian Securities Exchange (ASX Limited) XASX
- Bolsa de Comercio de Santiago, Chile, XSGO
- Sao Paulo Stock Exchange. Brazil (BM&FBovespa). BVMF
- Euronext (Euronext N.V.): Brussels. XBRU
- Goldman Sigma X Multilateral Trading Facility*
- Hong Kong Stock Exchange (Hong Kong Exchanges and Clearing Limited) XHKG

- Indonesia Stock Exchange (Bursa Efek Indonesia) XIDX
- Instinet BlockMatch*
- ITG POSIT*
- Japan Stock Exchange (Japan Exchange Group, Inc.), Tokyo. XTKS
- JASDAQ - OTC Japan Securities Dealers Association (Japan Exchange Group, Inc.). XJAS
- Johannesburg Stock Exchange (JSE Limited) XJSE
- Luxemburg Stock Exchange (Bourse Group) XLUX
- Malaysia Stock Exchange (Bursa Malaysia Berhad) XKLS
- Nasdaq OMX A/S. Copenhagen, Helsinki, Stockholm. XCSE, XHEL, XSTO
- New Zealand Stock Exchange (NZX Limited) XNZE
- Osaka Securities Exchange (Japan Exchange Group, Inc.) XOSE
- Singapore Stock Exchange (Singapore Exchange Ltd.) XSES
- Smart Pool*
- South Korea Stock Exchange (Korea Exchange KRX) XKRX
- Taiwan Stock Exchange (Taiwan Stock Exchange Corporation) XTAI
- Thailand Stock Exchange (The Stock Exchange of Thailand) XBKK
- Toronto Stock Exchange (TMX Group Limited) XTSX
- UBS Multilateral Trading Facility*
- USA BULLETIN BOARD (.OB) (OTCBB) XOTC
- USA Pink Sheets (.PK) Market Makers (OTC Market Group) PINX
- USA. AMEX (American Stock Exchange) AMEX
- USA. NASDAQ (National Association of Securities Dealer Automated Quotation) XNAS
- USA. NYSE (New York Stock Exchange) XNYS
- Vienna Stock Exchange (Wiener Börse AG) WBAH
- Virt-X and SMI (SIX Swiss Exchange AG) XSWX, XVTX
- XONTRO (Deutsche Börse Group) FRAA, FRAB

Intermediaries

- Bank of America Merrill Lynch International Limited
- BBVA Valores Colombia S.A. Comisionista de Bolsa
- Casa de Bolsa BBVA Bancomer, S.A. de C.V., BBVA Bancomer Financial Group
- BBVA Continental Sociedad Agente Bolsa (Peru)
- GARANTI YATIRIM MENKUL KIYMETLER A.Ş.
- INSTINET Europe Limited
- JEFFERIES International Limited
- Morgan Stanley & Co. International PLC
- Sanford C. Bernstein Limited
- Scotiabank (Chile)
- Virtu ITG Europe Limited (VIEL)

Fixed income²

²Bonds and debt securities

Execution Venues

- Banco Bilbao Vizcaya Argentaria, S.A.
- SEND (AIAF electronic debt trading system, fixed income market-BME)

Intermediaries

- No Intermediaries are used

2 Execution Venues for orders involving Derivative Instruments³

³ Options, futures and swaps traded on a Trading Venue, and similar Instruments and related derivative trading

Execution Venues

The Execution Centers for orders on derivative financial instruments traded on a Regulated Market are those for which Altura Markets SV., S.A. provides access.

In addition, Banco Bilbao Vizcaya Argentaria, S.A. will act as the Execution Venue for options, futures and swaps contracts, as well as similar Instruments and other derivatives contracts, when BBVA provides its Clients with prices for such Instruments, acting in its capacity as Systematic Internalizer¹⁰.

Intermediaries

- Altura Markets S.V., S.A.

¹⁰ The following website includes a list of the Instruments in which BBVA may act as Systemic Internalizer when executing Clients' orders against its own account: <https://www.bbvacib.com/global-markets/regulation/documentos#regulation>