

Responsible Banking Report 2017

BBVA Compass



Creating Opportunities

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Executive Summary



Letter from the CEO

Dear Stakeholders,

When I moved to the United States to begin my position as President and CEO of BBVA Compass, I knew I was joining a team that was building steady and solid momentum in the U.S. banking industry. BBVA Compass serves a market that holds massive potential for the bank. That potential lies not only in organic growth, which we have aimed to achieve, but also in the willingness to embrace innovative changes for a transparent banking experience.

Two years into my experience working with a team staunchly dedicated to its craft, it is more than apparent that BBVA Compass is on the right path toward creating ample opportunities for clients in every segment it serves. Every area of the bank works tirelessly each day to contribute to our mission of bringing the age of opportunity to everyone. Our Corporate Responsibility and Reputation team leads by example in this area, maximizing its efforts and reaching new milestones throughout 2017. I continue to be amazed by our team's efforts including our keystone \$11 billion commitment for lending, investments and services supporting low- and moderate-income individuals and neighborhoods.

BBVA Compass made this pledge in 2014, and over three years, the bank has already reached \$2 billion in community development lending, surpassing its five-year commitment. That's just one example as we have surpassed or met annual goals in all six of the commitment's categories. One of the categories that also stands out is small business lending. Small businesses are the cornerstone of thriving communities and contribute to economic prosperity across the board. In year three of our commitment, we are more than halfway to our goal of \$6.2 billion, with \$3.6 billion in lending as of 2017.

Our Corporate Responsibility and Reputation team's work and enthusiasm sends a ripple effect throughout our entire organization. BBVA Compass embeds its mission into every product and service it offers its clients. One of the biggest

achievements the bank saw in 2017 was the launch of its new Express Personal Loan (EPL). With this ground-breaking product, BBVA Compass intends to become a key player in the \$1.3 trillion online consumer loan marketplace. With EPL, BBVA Compass has taken another step forward in its digital transformation, building the technology in-house with an eye toward disrupting the disruptors.

Even with industry leading concepts baked into EPL, this product was developed with the ultimate goal of achieving excellence in customer experience and creating instant opportunities. EPL can help the consumers looking to stay in full control of their financial future. With competitive interest rates and potentially same day decision-making, customers can consolidate debt or fund bigger purchases like home repairs. EPL is one of many ways BBVA Compass is hoping to further contribute to their journey.

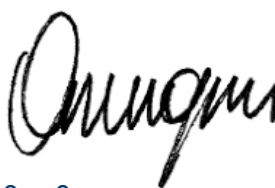
In recognition of our efforts to help our customers reach their financial goals, BBVA Compass was recently highlighted as a leader in Financial Fitness by Javelin Strategy & Research in its 2017 Online Banking Scorecard. The independent research firm selected BBVA Compass for its notable online banking experience that guides customers on a financial journey.

Javelin also recognized the bank as a leader in what has been deemed a critical category in their Mobile Banking Scorecard last year: ease of use for its mobile banking app. This particular “Ease of Use” category was the most heavily weighted category in the study, reflecting its higher impact on consumers’ overall satisfaction. As such, the bank was one of only three financial institutions given the “Leader” designation in that area.

As part of a global entity, BBVA Compass creates opportunities that extend to other parts of the world as well. Tuyyo, powered by the bank’s remittance entity, BBVA Transfer Services, launched in October, disrupting the \$600 billion annual global remittance market. The digital money transfer tool focuses on the world’s biggest remittance corridor: U.S. to Mexico. BBVA Compass understands the need for services like Tuyyo, that can provide convenient solutions for people in unique situations.

It’s no secret that BBVA Compass is leveraging its digital capabilities to live the brand mission and bring about the age of opportunity. However, our digital transformation isn’t the end of our customer-facing operations. The bank’s digital focus is designed to amplify its efforts for its clients, not minimize its interactions. At the end of the day, we are people serving people. I said this after my first month at BBVA Compass, and I still firmly believe that today.

Whether we are serving our communities at volunteer events, making loans for low-income housing facilities, or creating an industry-leading product for top-of-the-line customer service our mission remains the same. Opportunities arise every day. It’s up to us as a bank to continue to deliver them to the people we serve.

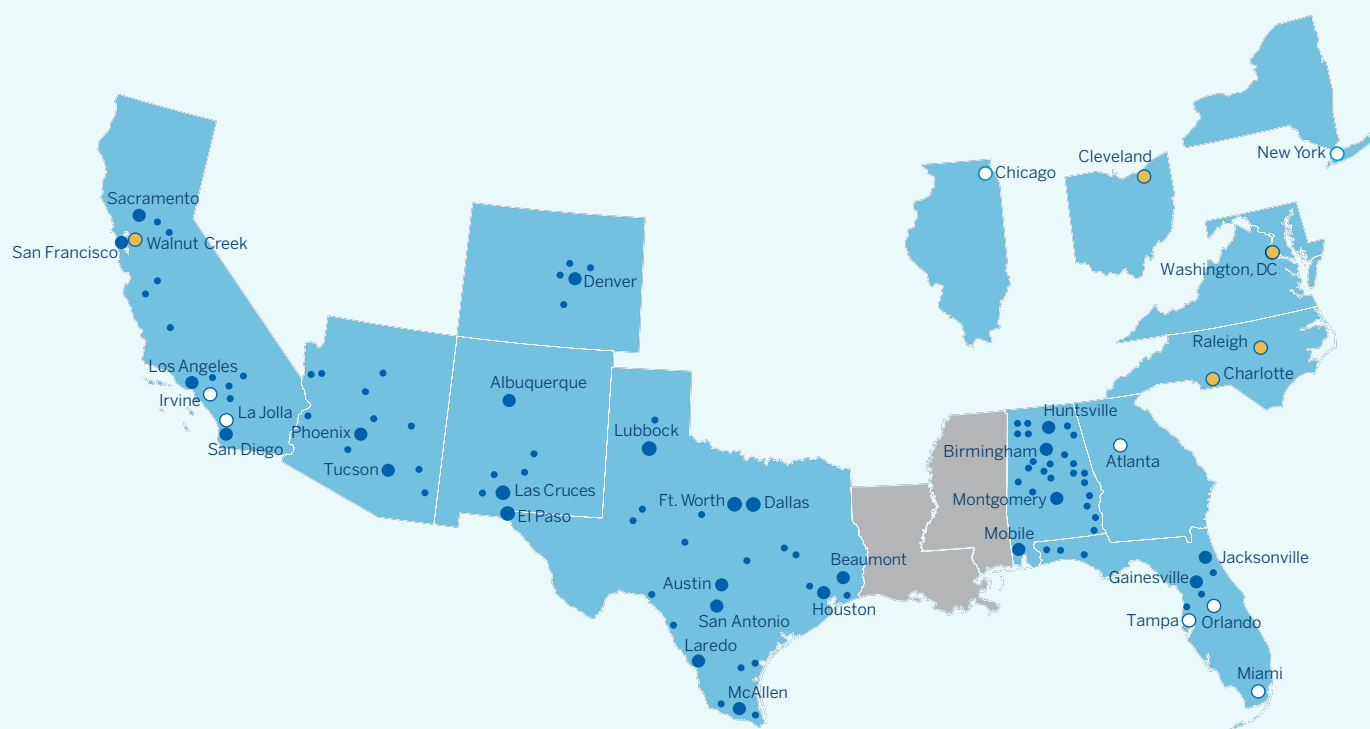


Onur Genç

BBVA Compass CEO, BBVA U.S. Country Manager

Company Profile

bbvacompass.com



Branches by State

Alabama	89	Florida	45
Arizona	63	New Mexico	18
California	61	Texas	336
Colorado	37	Total	649

- Branches
- Commercial Loan Office
- Commercial Loan/Private Client Office

About BBVA Compass

Headquartered in Houston, Texas, BBVA Compass Bancshares, Inc. is a Sunbelt-based bank holding company whose principal subsidiary, BBVA Compass, operates 649 branches, including 336 in Texas, 89 in Alabama, 63 in Arizona, 61 in California, 45 in Florida, 37 in Colorado and 18 in New Mexico. BBVA Compass ranks among the top 25 largest U.S. commercial banks based on deposit market share and ranks among the largest banks in Alabama (2nd), Texas (4th) and Arizona (6th).

In 2017, BBVA Compass adjusted the management structure to align with three primary operating segments — Commercial Banking and Wealth, Retail Banking, and Corporate and Investment Banking. We offer customers unique, industry-leading products and services, with a focus on providing customers with financial solutions to fit their lives. These

products and services include traditional credit and deposit products, Small Business Administration (SBA) loans, treasury management, leasing, accounts-receivable purchasing, asset-based lending, international services, insurance, interest-rate protection and investment products, specialized investment-portfolio management, traditional trust and estate services, investment advisory services and financial counseling.

BBVA Compass has been recognized as one of the leading small business lenders by the SBA and ranked 6th nationally in the total number of SBA 7(a) loans originated in fiscal year 2017. BBVA Compass was recognized as a leader in Financial Fitness by Javelin Strategy & Research in its 2017 Online Banking Scorecard, spotlighting the bank for providing an exceptional online banking experience. Additional information about BBVA Compass can be found under the Investor Relations tab at bbvacompass.com, by following @BBVACompassNews on Twitter or visiting newsroom.bbvacompass.com.

BBVA Compass Bancshares, Inc. is a wholly owned subsidiary of BBVA Group (NYSE: BBVA) (MAD: BBVA). BBVA is a customer-centric global financial services group founded in 1857. The Group has a strong leadership position in the Spanish market, is the leading financial institution in Mexico, has leading franchises in South America and the Sunbelt Region of the United States, and is the leading shareholder in Garanti, Turkey's largest bank based on market capitalization. Corporate responsibility is at the core of our business model. BBVA fosters financial education and inclusion, and supports scientific research and culture. We operate with the highest integrity and a long-term vision based on best practices.

BBVA Compass Data (USD in thousands)	
Revenues	\$3,376,142
Operating costs	\$1,169,517
Employee wages and benefits	\$1,131,971
Payments to providers of capital	\$304,103
Payments to government	\$475,704
Employees	10,554
Branches	649
Number of suppliers	1,928
Charitable Contributions	\$11,025
Employee donations	\$1,109
Employee volunteer hours	113,609

The data in the adjoining table are intended to be an at-a-glance snapshot of BBVA Compass Bancshares' activity during calendar year 2017. Also available at <http://bbva.investorroom.com/annual-financial-statements>.

Number of Employees and Branches by State		
	Employees	Branches
Alabama	3,575	89
Arizona	778	63
California	563	61
Colorado	275	37
Florida	437	45
New Mexico	120	18
Texas	4,443	336
Other*	363	—
Total	10,554	649

* Includes employees located in states where BBVA Compass does not have a retail branch network.

Key Responsible Business Indicators

The BBVA Compass management approach is called responsible banking. This means we seek out a return adjusted to principles, and we operate with strict legal compliance and best practices to create long-term value for all stakeholders. This commitment is reflected in the bank's Corporate Social Responsibility or Responsible Banking Policy (CSR Policy). The mission of this policy is to manage the responsibility for the bank's impact on people and society, which is key to the delivery of BBVA's Purpose. All our business and support areas integrate this policy into their operational models.

Our management approach is built on these four pillars of BBVA's responsible banking model:

- Balanced relationships with customers, based on transparency, clarity and responsibility.
- Sustainable finance to combat climate change, respect human rights and achieve the UN Sustainable Development Goals (SDGs).
- Responsible practices with employees, suppliers and other stakeholders.
- Community investment to promote social change and create opportunities for everyone.

Each of our material topics, outlined in our materiality analysis, can be linked to our commitment to responsible banking. We are focused on ensuring stakeholders understand our commitment, so we measure the perception of our reputation among customers, employees and society as a whole.

Awards

BBVA Compass earned the following awards and recognitions in 2017:

- Corporate Equality Index Perfect Score – Human Rights Campaign
- Gold status for workplace health – the American Heart Association
- Lender of the Year – San Antonio Small Business Administration
- #2 mobile banking app – S&P Global Market Intelligence
- Most Powerful Women in Business (Rosilyn Houston) – Black Enterprise
- North Texas Top Financial Executive (Key Coker) – D Magazine
- Region VI Highest Unit Volume 7(a) Lender (Texas and New Mexico) – Small Business Administration
- Top 50 companies for diversity – Diversity Inc.
- Top Houston women in banking and finance (Dorothy Marchand) – The Women's Resource of Greater Houston
- Women to Watch (Rosilyn Houston, #10) – American Banker

Stakeholders

BBVA Compass is committed to developing positive and engaging relationships with our key stakeholders. We work diligently to earn the trust of these stakeholders through consistent feedback and transparency, demonstrated, in part, through the pages of this report. The Disclosure Committee, formed at the direction of the CEO and CFO, is responsible for oversight of the report. This feedback enables us to focus on the most important strategies and to be responsive as stakeholder needs and concerns evolve. BBVA Compass stakeholders are people, institutions and organizations whose interests intersect with the bank's, including customers, employees, suppliers, community organizations, investors and regulators.

2017 Stakeholder Engagement

Customers

Working with the Reputation Institute, BBVA Compass conducted market surveys of our customers. The survey responses and the analyses allow us to manage our reputation and identify threats and opportunities based on perceptions of corporate responsibility, product offerings, fair treatment of employees and much more.

Similar to years past, customers ranked their most important issues in 2017 as products, governance and performance. The Reputation Institute also surveyed customers' views on BBVA Compass' corporate responsibility and reputation. According to the RepTrak study, BBVA Compass ranks highly among customers for both performance and citizenship.

Employees

BBVA Compass seeks feedback from employees through a detailed biannual survey of employees' perceptions along with additional polls and surveys including the 2017 Internal Reputation Survey conducted by the Reputation Institute. More than 700 randomly selected employees participated in the survey from across the organization, representing both sales network employees and corporate services employees.

Employees ranked being a good place to work, leadership with a clear vision and a relatable workplace culture as their top issues.

Community

The Corporate Responsibility and Reputation (CRR) team made a concerted and systematic effort to gather feedback from non-profit organizations in 2016. We collected 416 community-needs assessments with community-development leaders and key stakeholders across seven states. We also surveyed our grantees in 2017 to better understand their values and needs.

The results of the bank's needs-assessment survey align with external reputation surveys, such as the Edelman Trust Barometer and GlobeScan, finding that a bank's reputation is based first and foremost on ethics and customer focus.

BBVA Compass is focused on offering products and services that are responsive to local needs, particularly in low- to moderate-income (LMI) communities. Our key responsibilities also include communicating transparently and clearly to ensure that customers can make more informed financial decisions, along with promoting financial literacy. Building lasting, long-term relationships and avoiding opportunistic short-term customer relationships are also essential.

Regulators

As a responsible financial institution, BBVA Compass is committed to effective implementation and compliance with regulations.

As previously reported, BBVA Compass received its most recent Community Reinvestment Act (CRA) Performance Evaluation conducted by the Federal Reserve Bank of Atlanta, in 2016. The BBVA Compass CRA rating improved to Satisfactory from the previous rating received in 2014.

We believe the improved rating was the result of our concerted effort to focus more strategically on those initiatives that qualify for CRA credit. In 2017, we continued to deliver on our pledge of \$11 billion in lending, investments and services supporting LMI individuals and neighborhoods over five years (see page 22 for more details on the CRA program).

Investors

As a wholly owned subsidiary of BBVA Group, BBVA Compass is responsible for supporting the overall business strategy of the global organization and is aligned with the Group's sustainability priorities and goals.

BBVA Compass also supports BBVA Group shareholders through the U.S.-based Investor Relations department, which communicates on Securities and Exchange Commission (SEC) filings such as the Form 10-K, along with governance information.

Materiality Analysis

In 2017, BBVA Compass undertook a new materiality analysis. This process included a systematic review of the material issues that provided a broad information base that is more easily externally verifiable and objective, ensuring a comprehensive overview.

During this process, analysis was conducted on the current and emerging issues from the perspective of different stakeholders and BBVA's strategy. We used the E-Revalue data analysis platform Datamaran, in addition to sources used in previous years.

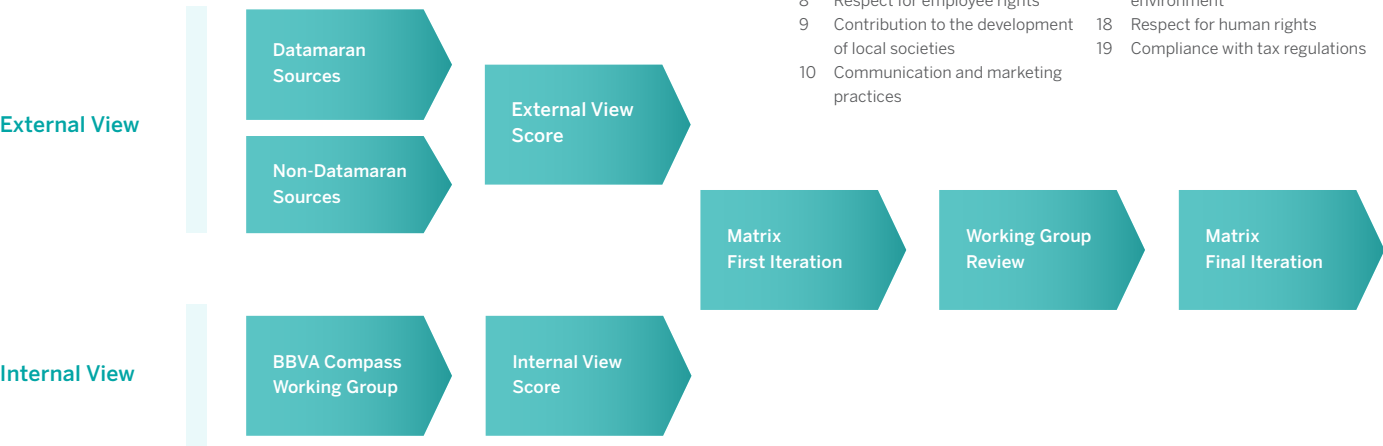
The latest materiality exercise included the following improvements:

- Expanding the scope of data and stakeholders from prior years;
- Relying on a comparable, replicable, objective and traceable methodology;
- Including strategic business themes through both financial and non-financial issues; and
- Establishing a clear link between each source and the stakeholder groups.

The process also included an assessment of the issues by BBVA Compass in order to represent the strategic goals and build a materiality matrix that takes into account views of both the external and internal stakeholders.

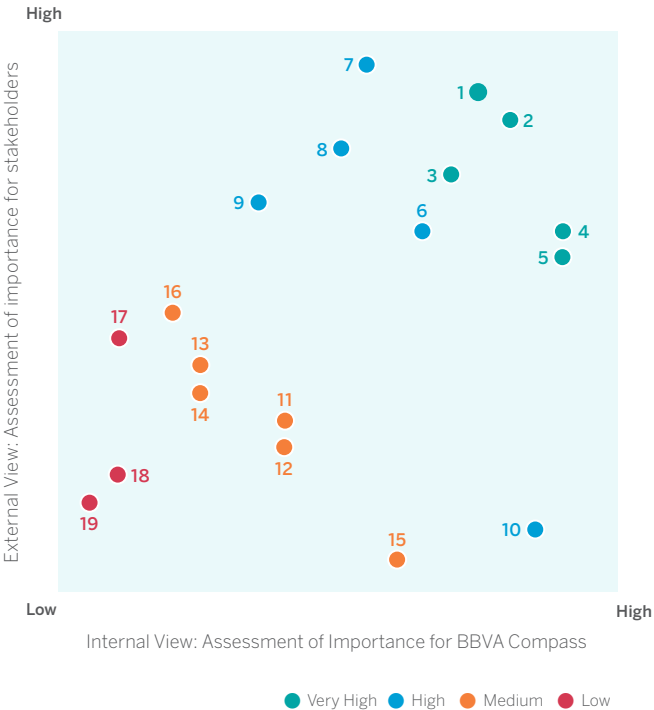
The sources are split into two main categories: external stakeholders and internal stakeholders.

The graph below summarizes those sources and how they were used for the final output.



The matrix below shows the importance of issues on a four-level scale: very high, high, medium and low.

The analysis of material issues for BBVA Compass shows that the following five issues have a very high priority 1) Good corporate governance; 2) Security, privacy & customer protection; 3) Quality and fair products that respond to customer needs; 4) Customer service quality and 5) Digital process



- | | |
|---|---|
| 1 Good Corporate governance | 11 Diversity and Work/Life Balance |
| 2 Security, privacy & customer protection (including big data) | 12 Employment quality (temporary, outsourcing, relocations...) |
| 3 Quality and fair products that respond to customer needs | 13 Remuneration of top management and members of the Board of Directors |
| 4 Customer service quality | 14 Financial Education |
| 5 Digital process (using technology to deliver a good customer service) | 15 Responsible procurement/ outsourcing |
| 6 Talent attraction, development and retaining | 16 Solvency and financial management |
| 7 Ethical Conduct | 17 Eco-efficiency and the environment |
| 8 Respect for employee rights | 18 Respect for human rights |
| 9 Contribution to the development of local societies | 19 Compliance with tax regulations |
| 10 Communication and marketing practices | |

Material Issue	Corresponding GRI Topics	Aspect Boundary within BBVA Compass Bancshares	Aspect Boundary outside BBVA Compass Bancshares
Good corporate governance	Anti-corruption	BBVA Compass Bancshares	Communities where we operate
Security, privacy & customer protection	Customer privacy	BBVA Compass Bancshares	Communities where we operate
Quality and fair products that respond to customer needs	Anti-competitive behavior	BBVA Compass Bancshares	Communities where we operate
Customer service quality	Economic Performance	BBVA Compass Bancshares	Communities where we operate
Digital processes	Socioeconomic compliance	BBVA Compass Bancshares	Communities where we operate

BBVA Compass continues to report on several topics that are important to the organization and our stakeholders, but do not rise to the level of ‘material topics.’

Strategy

Purpose & Values

Our global purpose is to bring the age of opportunity to everyone, and it’s a vision that guides everything we do. BBVA Compass wants to help people and companies make the best financial decisions using advanced technology and sound advice. Throughout our organization, this purpose drives the way we approach our commitment to our employees, customers, shareholders and the communities in which we operate.

Our purpose ties directly to the material topics, which in turn tie back to the service of our customers. Earning our customers’ trust is at the center of everything we do, from establishing strong corporate governance and security to ensuring customer privacy and protection; from our quality and fair products to our quality customer service and streamlined digital processes. We manage these topics through extensive corporate programs and systems as directed by our executive committee.

BBVA Compass has established a core set of Values and Behaviors to help us work better together, become more engaged, and deliver exceptional results for the bank and its clients.

Our values, defined below, are what drive our actions as a bank:

The customer comes first. This is our primary focus. This means that we are empathetic: we factor in the client’s point of view by putting ourselves in their shoes from the beginning, so we can understand their needs better. It means that we have integrity: everything we do is legal, publishable, and morally acceptable by society because we always put the customer’s interests first. And it means we meet their needs: we are fast, agile and decisive when it comes to solving a customer’s problems and we do everything possible to overcome any obstacles in our way.

We think big. We never want to settle for what’s expected, and we welcome new and unconventional ideas. This means that we are ambitious: we set aspirational goals to have a real impact on people’s lives. It means we break the mold: we question everything we do and always look for new ways to succeed. And it means we amaze our customers: we strive to excel in everything we do and give people an experience they won’t get anywhere else.

We are one team. Nobody succeeds on their own. We want our people to say I am committed: to their role, their goals and to being empowered and responsible for achieving them. We want them to say I trust others: working generously and collaboratively across barriers and hierarchies is the only way to get things done.

2

Corporate Governance



Good corporate governance is at the center of the trust BBVA Compass earns every day from our stakeholders. Customers, employees, community members and investors can be confident that we have the systems, training and culture in place to support good decision making.

CEO's Direct Reports

Office of the CEO



Onur Genç
BBVA Compass CEO
BBVA U.S. Country
Manager

New Core Competencies



Rosilyn Houston
Chief Talent &
Culture Executive



Jorge A. Ortiz Costa
Head of Engineering

Execution and Performance



Cagri Súzer
Head of Retail
Banking



Rafael E. Bustillo
Chief Operating
Officer



Michael W. Adler
Head of U.S.
Corporate &
Investment Banking

Risk and Finance



Kirk Presley
Chief Financial
Officer



Javier Hernández
Chief Risk Officer

Strategy and Control



B. Shane Clanton
General Counsel &
Secretary



Celie Niehaus
Chief Compliance
Officer



Alvaro Aguilar
Director of Strategy
& Planning, Head of
Data for U.S.



J. Reymundo Ocañas
Director of Corporate
Responsibility &
Reputation

BBVA Compass Bancshares, Inc. is governed by a Board of Directors that consists of both executive and non-executive directors. Manolo Sánchez served as the non-executive Chairman of the Board until November 2017, when Terry Strange assumed the position. Onur Genç served as both a Board Member and Chief Executive Officer of BBVA Compass Bancshares, Inc. Good corporate governance is one of BBVA Compass' material topics.

Seven of BBVA Compass Bancshares, Inc.'s 11 directors are outside, independent directors. At BBVA Compass Bancshares, an outside director is defined as a director who is not, and within the preceding fiscal year has not been, an officer or employee of BBVA Compass Bancshares or any affiliate of BBVA Compass Bancshares. A director is not considered to be independent if he or she does not meet several criteria including, among others, that he/she has been, within the past three years, an employee of BBVA Compass Bancshares.

or any of its affiliates or an immediate family member is, or has been within the past three years, an executive officer of BBVA Compass Bancshares or any of its affiliates. Detailed information about BBVA Compass Bancshares, Inc.'s Board of Directors and the bank's corporate governance structure can be found by visiting: bbva.investorroom.com/company-officers/. Committees and members can be found at: bbva.investorroom.com/board-committees.

Board of Directors

J. Terry Strange* (Chairman)
William C. Helms (Vice Chairman)
Eduardo Aguirre, Jr.*
Shelaghmichael Brown*
Fernando Gutiérrez Junquera
Charles E. McMahan*
Jorge Sáenz-Azcúnaga
Guillermo F. Treviño*
Lee Quincy Vardaman*
Mario Max Yzaguirre*
Onur Genç

* Outside, independent Directors

Members of the Board of Directors can be reached by writing such Director(s), c/o BBVA Compass Bancshares, Inc., Attn: Shane Clanton, General Counsel and Secretary, 15 South 20th Street, Birmingham, Alabama 35233-2000

Compliance System

The Group's compliance system is part of the foundation upon which BBVA consolidates its institutional pledge to conduct all operations and businesses in accordance with strict codes of ethical conduct.

The Compliance Unit, in line with the principles set forth by the Bank for International Settlements (BIS) and the reference regulations in this area, continues to organize its activity around the development and implementation of policies and procedures; communication and training; and the identification, assessment and mitigation of potential compliance risks, which affect the following issues:

- Prevention of money laundering and terrorist financing (PML & TF)
- Conduct with customers
- Conduct on securities markets
- Conflicts of interest
- Prevention of corruption and bribery

BBVA Group operates a global model of compliance risk assessment and management associated with these matters. It is a concept that evolves over time, strengthening its

foundation and anticipating new developments and initiatives that may arise in this field.

This management approach is built on the following basic pillars:

- A suitable organizational structure with a clear assignment of roles and responsibilities throughout.
- Policies and procedures that clearly define positions and requirements to be applied.
- Mitigation processes and controls applied to enforce these policies and procedures.
- A technology infrastructure focused on monitoring and designed to guarantee the above objective.
- Communication, training systems and policies implemented to raise employee awareness of the applicable requirements.
- Metrics and indicators that allow the supervision of the global model implementation.
- Independent periodic review of effective model implementation.

Standards of Conduct

One basic element in BBVA Compass' compliance system is the Code of Conduct, updated in 2015 and available on the bank's investor relations website (bbva.investorroom.com).

BBVA Compass employees are bound by two Codes of Conduct, one from BBVA Compass, and one from BBVA Group. The BBVA Compass Code of Conduct defines the fundamentals of ethical conduct and the operating guidelines for preserving one of the principal sources of value creation for the organization. The BBVA Group Code of Conduct is applicable to all entities and employees. Both the BBVA Compass and the BBVA Group Codes of Conduct publicly reflect the sum of pledges made by BBVA Compass to our direct stakeholder groups and to the communities where we operate. All active BBVA Compass employees are annually required to acknowledge that they have read, understand, and agree to abide by the Codes of Conduct.

In addition to the BBVA Compass and BBVA Group Codes of Conduct, we have the following important policies, guidelines, and governing bodies in place to manage commitments in various operating areas regarding ethical conduct and controls:

- Corporate Integrity Management Committee
- Capital Markets Code of Conduct for BBVA in the U.S.
- BBVA Group Policy on Conduct in the Securities Markets

International Principles

Active participation in international principles, such as the Equator Principles and the UN Global Compact, are key elements of the bank's commitment to the material topic of good corporate governance. BBVA Group is a signatory of the Equator Principles and has an active role in the association of signatory entities, promoting the inclusion of prior informed consent. In addition, as a member of the United Nations Global Compact Network, BBVA maintains a constant contact and exchange of experiences with other companies, subject matter experts, non-profits, educational institutions, and professional associations that form part of the Network.

Working with the Thun Group, BBVA actively collaborates with banks around the world on how to apply the United Nations Guiding Principles on Business and Human Rights to the practices and policies of financial institutions and in different banking businesses. Periodically, the Thun Group publishes the industry conclusions. BBVA also promotes a dialogue with non-governmental organizations (NGOs) on its fiscal responsibility and participates in meetings with investors and interest groups to follow up on issues related to human rights. Finally, BBVA has open listening channels to identify, classify, and manage any issue related to human rights that may arise and is revealed by an association, NGO or customer in any medium outside of our official channels.

Social, Environmental & Reputational Risks

Managing risk is an inherent part of our business and our role in the financial services industry. The BBVA Compass Board of Directors is responsible for the ongoing monitoring and evaluation of risks and opportunities, including social and environmental factors. A detailed review of key risk factors is included in the Form 10-K, found on bbva.investorroom.com/sec-filings.

The BBVA Compass management team evaluates social and environmental factors using the bank's established comprehensive set of policies and procedures. This framework helps BBVA Compass thoroughly and consistently evaluate risks and ensure responsible investment and lending. The policies include the U.S. Operations Credit Risk Framework, Environmental Site Assessment, and others, in addition to external principles such as the Equator Principles and Principles for Responsible Investment.

BBVA Compass follows the "Internal Control Model" established by BBVA Group, which is based on operational risk management best practices. It is organized around three

lines of defense (3LoD), as well as a governance system called Corporate Assurance. More detail on this model can be found on page 92 of the BBVA Group Report.

Data Privacy

BBVA Compass is committed to compliance with all applicable federal and state privacy laws and regulations. This topic is related to our material issue of "Data Privacy." Examples of such laws and regulations include, but are not limited to, Regulation P, the Affiliate Marketing Rule and the Right to Financial Privacy Act. Regulation P implements portions of Title V of the Gramm-Leach-Bliley Act. It governs the way financial institutions handle nonpublic personal information about consumers and requires institutions, under certain circumstances, to notify consumers about its privacy policies and practices.

The affiliate marketing provision of the Fair and Accurate Credit Transaction requires, with some important exceptions, that an entity may not use "eligibility information" received from its affiliate to market to a consumer unless the consumer was notified that such marketing may occur, was given an opportunity to "opt out" of such marketing and has not opted out.

The Right to Financial Privacy Act is largely procedural and requires government agencies to provide notice and an opportunity to object before a financial institution can disclose personal information requested by a federal government agency.

BBVA Compass consolidated the affiliate-marketing opt-out notice with its Regulation P notice (collectively referred to as the "Privacy Disclosure"). The Privacy Disclosure is provided to consumers at account opening, is available online and in branches, and is mailed to customers annually.

To help prevent unauthorized access to customer information, BBVA Compass uses physical, electronic, and procedural safeguards. We periodically test and update those safeguards to help ensure the protection and integrity of our customer information. BBVA Compass also trains and regularly educates our employees about the importance of maintaining confidentiality and the proper handling of customer information. All of our employees are governed by a Code of Conduct that authorizes access to customer information for business purposes only and includes strict standards for maintaining confidentiality.

In addition, the bank maintains a Customer Information Disclosure Event Plan in case there is an unauthorized or unintentional disclosure of customer information. If BBVA Compass becomes aware of an unauthorized disclosure of customer information, the Event Team meets to evaluate the situation and direct subsequent notifications and activities. In

2017, BBVA Compass did not experience any security breaches, computer-system breaches, or losses relating to technology failure, cyberattacks, or other information substantiated by external regulators or governmental authorities.

Anti-Corruption

BBVA Compass' business processes are designed to prevent corruption, and our Code of Conduct outlines the bank's expectations. BBVA Compass employees are continually trained to identify and prevent corrupt activities, including Foreign Corrupt Practices Act Training, "Know the Code" Training, and the Bank Secrecy Act and Anti Money Laundering Training. Employees receive the training relevant and necessary to their job responsibilities. In the September 2017 meeting of the Board of Directors, in-person FCPA/Anti-Corruption training was given. At the time, there were 10 members of the board, and all 10 members were present.

In 2017, BBVA Compass provided Foreign Corrupt Practices Act training to 5,048 employees, Know the Code training to 10,066 employees, and Bank Secrecy Act and Anti-Money Laundering training to 10,211 employees.

Number of BBVA Compass Employees Trained in 2017			
	Secrecy and Anti Money Laundering	Foreign Corrupt Practices Act	Know the Code
Alabama	3,500	1,236	3,484
Arizona	757	405	753
California	550	351	488
Colorado	266	142	275
Florida	418	238	404
New Mexico	119	83	111
New York	17	66	209
Others	321	48	127
Texas	4,263	2,479	4,215
Grand Total	10,211	5,048	10,066

3

Financial Solutions



BBVA Compass sets a new standard in customer experience. We aim to exceed expectations across our lines of business, from personal, small business and commercial to global wealth banking services.



Senior Branch Associate Nino Ivanovich, assists customer Drew Schnackenberg at the Biltmore Branch in Phoenix, Arizona.

Consumer Banking

Retail Banking Transformation

BBVA Compass made a concerted, strategic effort to evaluate and update our systems and processes from top to bottom to provide our customers with a seamless, best-in-class customer experience. This transformation is closely aligned with our material topics: quality and fair products that respond to customer needs, customer service quality and digital processes.

Supporting initiatives are focused on:

- Meeting customer needs by offering more product options and enhanced digital delivery methods.
- Streamlining our origination processes to ensure consistency of results and client experience
- New ways to share the products and services we offer to solve our clients' financial challenges
- Delivering consumer lending products to assist our clients in improving their monthly cash flow

Our programs make banking a one-stop shop.

We serve our customers by offering:

Convenience — BBVA Compass offers our customers convenience through its mobile banking app, which helps customers manage money on the go, including depositing a check with a smartphone, checking balances, transferring money, paying bills and even paying people.

Checking and Savings — BBVA Compass offers a range of account services that allow customers to track and maintain better control of spending, making it possible to save for the important things in life.

Credit Solutions and Mortgages — Recognizing the importance of home ownership to many of our customers, BBVA Compass helps guide our customers through the process and provide pre-approvals that make sense for families. Our products are designed to help first-time homebuyers, even those who have struggled with credit.

Second Chance Banking — BBVA Compass wants to help customers who have had financial troubles to repair their credit and get back on track. Our second chance banking services include checking and savings accounts along with credit opportunities to help people start over.

Financial Education — BBVA Compass wants our customers to make informed decisions to effectively manage their money. We provide tools and information, including the Financial Fitness Center, which is online at bbvacompass.com/moneyfit. The site offers advice on mortgages, smart budgeting, saving for major expenses, building better credit and much more.

Commercial Banking

BBVA Compass offers commercial banking clients a unique combination of local relationships and specific industry expertise, supported by the bank's global capabilities and financial strength. This unique strategy allows us to compete effectively with banks of all sizes. BBVA Compass provides financing for plant and facility expansions, equipment purchases, acquisitions, working capital, and other commercial needs.

We can offer a wide range of commercial banking solutions including treasury management, foreign exchange, interest rate derivatives, bond issues, syndicated loans and mergers and acquisitions. BBVA Compass also has the financing capacity to handle the largest of projects, both domestic and international.

Small Business Banking

Small businesses are the engine of growth and opportunity for our economy. BBVA Compass helps small and micro-businesses thrive by offering a comprehensive suite of services that meet their unique needs.

Serving more than 177,000 small and micro-businesses through its 649 branches, dedicated business specialists, and emerging digital channels, BBVA Compass is committed to meeting the financial needs of small businesses in the communities we serve. Our commitment to this important segment is reflected in the \$2.6 billion portfolio of small business loans. BBVA Compass is a nationally recognized SBA Preferred Lender and ranked sixth nationally in number of SBA 7(a) loans originated in the most recent SBA fiscal year.

Education Opportunities

As part of our focus on being a trusted partner of small businesses, we offer educational opportunities and an online resource center to help them grow. In 2017, we hosted a series of educational seminars in addition to BBVA Compass Center for Financial Education small business workshops, featuring topics such as financial fundamentals of running a small business and access to capital, among others. We also partnered with organizations to offer two online webinars designed to give small business owners anytime access to valuable insight on topics important to small businesses.

Wealth & Private Banking

Global Wealth Management Overview

BBVA Compass Global Wealth offers clients and their families a holistic, customized advisory approach to wealth services. Through a broad array of tailored advice, traditional banking, risk management, investment solutions, trust and fiduciary services, our team of experts offers experience and leadership to address clients' needs and help them reach their goals.

Global Wealth Segments

Private Banking

Serving thousands of clients, dedicated private bankers will coordinate a team of seasoned professionals to address clients' needs in the areas of financial planning, investment management, trust services, credit, insurance and traditional bank services. Private Banking offices are located in 23 cities (Irvine, Fresno, and Walnut Creek, Calif.; Scottsdale and Prescott, Ariz.; Denver, Colo.; Dallas, Ft. Worth, Austin, Georgetown, San Antonio, Houston, and Beaumont, Texas; Birmingham, Dothan, Mobile, Montgomery, and Huntsville, Ala.; Pensacola, Orlando, Jacksonville, and Miami, Fla. and Chicago, Ill.).

International Private Banking offices, offering services to nonresident aliens and select foreign nationals, are located in seven cities (San Diego, Calif.; El Paso, Houston, San Antonio, Laredo, and McAllen, Texas; and Miami, Fla.).

Asset Management

Our team of portfolio managers works closely with clients to develop custom, discretionary asset-management strategies; to assess each client's risk tolerance, tax concerns, existing holdings, personal preferences and any other restrictions or conditions that affect their holdings.

Trust

Our trust department can partner with clients and their attorneys to leverage their assets for the health, education, maintenance, and support of their families.

Private Client Services provides a full range of personal trust and wealth services designed to help clients manage their assets, protect their wealth, and provide support for family members in the event of death, disability, or incapacity. Services include custom trust, charitable trust, endowment, foundation and lifetime giving programs.

Corporate Trust Services provide a full range of trustee, custodial, escrow, and investment management solutions to businesses, foundations and other institutions looking to protect and grow their resources.

Customer Experience

The quality of customer interactions with the bank is central to the our material topic of customer service quality and customer experience is increasingly facilitated by our digital processes, another material topic.

Client Experience Initiatives

In the fall of 2017, we introduced the Responsiveness Pledge, centered around the most critical relationship building block: trust. Every single team member in the bank pledged the following: "I will always do my best to demonstrate thoughtfulness by responding in a timely, appropriate manner." Every employee understands that, no matter their role, they play an important part in providing excellent service to our clients and that their actions have an effect on others.

We place a premium on positive, regular communication with our clients, so we rolled out an application that allows client-facing team members to send a variety of customized ecards directly to customers. Thank you notes, anniversary greetings, birthday wishes, and more express how much we appreciate our customers every day.

Serving Customers and Meeting their Needs

Our customer experience team provides weekly insights from clients' comments to help the bank better understand customer pain points. In addition, feedback from monthly customer surveys is communicated throughout the bank, from executive management to entry-level team members in our retail branches.

We are focused on anticipating and meeting clients' needs. Sharing client feedback — both positive and negative — with all levels of our team is the only way to ensure we can do that, and this information continues to drive improvements to the business and our customer-facing technology.

Transparent Clear and Responsible Communication

Transparent, Clear and Responsible (TCR) communication with our clients is a key component of our overall commitment to help our clients make knowledgeable decisions about their finances. We've spent the last several years looking at the ways we can apply TCR across our communication channels, becoming a bank that leads by simplicity in explanation. By communicating clearly about our products, services, and their terms, we support our clients in making informed financial decisions.

TCR Education

We understand that the concepts of TCR come into play at the true beginning of any milestone within a product's life cycle. So in 2017, we engaged:

- 23 team members in TCR and Advertising Code training for Legal, Compliance and Product Managers
- 19 team members in TCR in Scrum training for Product Owners
- 24 team members in TCR in Scrum training for Designers

Each of these hands-on training events included practical exercises to help team members incorporate the TCR principles in their everyday activities, including product design and development of marketing material. These TCR workshops have already borne fruit. Across Online Banking, we streamlined disclosures and simplified their presentation on-screen, and we modified legal disclosures in plain language.

Additionally, we added a video highlighting the tenets of TCR to Retail new-hire training so that every Retail new hire going forward will be educated on the principles.

TCR Measurement

To help us gauge our success in incorporating these changes, we polled clients in Q3 and Q4 2017. In Q3 2017, 62 percent of clients said online banking options and transactions were made available to them easily and efficiently, while in Q4 2017 that increased to 70 percent. In Q3 2017, 68 percent of clients responded that their banking information is clearly presented in online banking, while in Q4 2017 that percentage increased to 77.

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Corporate Responsibility & Reputation



BBVA Compass is fully invested in supporting our communities. Our innovative and strategic investments support economic growth and upward mobility as we continue to complete our five-year, \$11 billion commitment.



Letter from Executive Vice President, Director of Corporate Responsibility & Reputation

Dear Stakeholders,

Throughout the year, BBVA Compass undertakes initiatives that make its employees proud to come to work every day. In this same letter last year, I talked about our pride in our past and our future. This year, I'd like to talk about what we are doing today to ensure the bank is capitalizing on opportunities to help both our clients and the communities we serve. Responsible business is woven into the fabric of our organization and is evident in the outcomes we achieved this year as noted in this report.

For example, the same digital capabilities that have positioned us as a leader in the banking industry's digital transformation and disruption have also given us a platform to provide our clients unparalleled transparency and control, helping them make better choices through transparent, clear and responsible product information and providing more tools and channels to manage their daily financial lives.

This year, for the first time, the bank brought its social entrepreneurship accelerator program, BBVA Momentum, to the U.S. Its goal is to help social entrepreneurs — those who are changing the world through their work — scale up and increase the positive impact their enterprises are making. Chad Houser of Dallas-based Café Momentum, a restaurant training platform for juvenile offenders, won the top prize of \$50,000 for the program's inaugural U.S. season, which started in June 2017 with a class of 20 social entrepreneurs in Texas, selected to join the inaugural class.

The digital age has brought a wide range of opportunities, but it has also presented some challenges for underserved communities. As part of our commitment to those communities, we have worked to impact dozens of families in the Rio Grande Valley through a special pilot for broadband access, where the country's digital divide is the widest. After our initial funding, the City of Pharr, Texas, announced the creation of the Pharr Life Net pilot program, which subsequently gave 50 families broadband access, bilingual training and technical support. The bank also offered to make its online financial education program available to the students and parents involved.

BBVA Compass' corporate responsibility efforts focus on all aspects of community needs, especially when our communities find themselves in particularly dark times. Soon after Hurricane Harvey left Houston damaged in its wake, the bank's foundation announced a \$250,000 donation to the American Red Cross and the Hurricane Harvey Relief Fund to aid disaster recovery efforts in Texas. The bank also raised nearly \$150,000 in customer and employee contributions online and in its branches, and matched that with another \$150,000 in foundation donations. We also provided relief to customers who suffered this disaster in the form of waived fees, payment deferrals and special rates for loans in support of rebuilding their homes and their businesses.

BBVA Compass remains committed to its long-standing efforts to invest in community development, especially to provide more affordable housing, to help entrepreneurs find success and to improve the quality of life in the low to moderate income communities we serve. Couple that with our efforts in education, the arts and more, demonstrates we remain committed to our passion and our mission: To usher in a new age of opportunity for all.

It's our responsibility, and it's not one we take lightly.

J. Reymundo Ocañas

Corporate Responsibility & Reputation — EVP, Director

Community Reinvestment Act Program Overview

BBVA Compass is dedicated to strengthening its local communities, guided by the principle that we are in business to create opportunities for everyone. Our purpose to create opportunity contributed to the deliberate focus on Community Reinvestment Act — qualified Community Development activities during 2017. These efforts are all connected to our material topics of good corporate governance, security, privacy and customer protection, quality and fair products that respond to customer needs, customer service quality and digital processes.

To ensure that adequate resources are dedicated to strong CRA performance, in 2015 BBVA Compass launched a five-year, \$11 billion commitment to products and services for LMI communities. We have implemented a set of strategies designed to inspire innovation, leadership and ambition in the products and services provided to LMI communities across our seven-state footprint.

Our management approach to executing on this commitment included creating new teams to address governance, mortgage lending, small business lending, community development lending, community development investing, charitable contributions, retail services and volunteerism. We have set goals, developed innovative products and services, built relationships and measured results in LMI communities.

Corporate Responsibility and Reputation leads BBVA Compass' strategy and delivery system for the CRA program. Because it is housed in the Office of the CEO, oversight of the CRA program is managed at the highest level in the institution. We engage all levels of bank leadership, creating a culture of ownership of CRA performance through highly informed and engaged managers and employees. Our CRA program reinforces compliance and governance as it ensures that all areas of the bank are focused on progress toward CRA goals and are capturing all related activities. Our goal is to achieve an Outstanding CRA rating by being bold and creative in generating opportunities in housing, workforce training, education and jobs in communities that need it most. The result has been a substantial increase in Community Development (CD) activity since our last CRA exam cycle. By

the end of 2017, we almost quadrupled CD lending, more than tripled CD investments and more than doubled our grants and contributions.

The CRA Program Strategic Plan is focused on:

1. **Internal Culture Shift:** We set forth objectives and communication structures that engage all levels of leadership in the management of CRA performance and institutionalized community development goals and values across each region and department.
2. **External Capacity-Building:** We focused resources and expertise on building the capacity of local and national community partners who strive to increase our impact in LMI communities.
3. **Responsiveness:** In an effort to respond effectively to community-identified needs, we developed more systematic methods to garner feedback and prioritization from local leaders.
4. **Anchor Investments:** We strategically invest in large-scale projects that amplify impact and serve LMI communities for many years.
5. **Small Business Platform:** BBVA Compass excels at lending to small businesses. In 2017, we leveraged our small business expertise with the clear intention of building small business capacity throughout our footprint.
6. **Capacity Building for Community Development Financial Institutions (CDFIs):** A key strategy for bringing needed capital to LMI communities is strengthening both the operational and capital capacity of CDFIs. This six-point community development strategy translated into community development leadership roles for the bank, driving higher Community Development performance and noteworthy success toward the bank's five-year community commitment.

This six-point community development strategy translated into Community Development leadership roles for the bank, driving higher Community Development performance and noteworthy success toward the bank's five-year community commitment.

\$11 Billion Commitment Update

Through 2017, year three of the \$11 billion commitment, we have achieved progress toward our goals in all commitment categories. BBVA Compass reached \$2 billion in community development lending, surpassing our five-year commitment, and \$700 million investments toward our \$900 million commitment. At the end of the three-year mark, we have surpassed or met annual goals in all of the six commitment categories.

BBVA Compass Community Commitment					
	5-Year Commitment	2015 Results	2016 Results	2017 Results	Total Commitment To Date
Small Business Lending	\$6.2 billion	\$1.1 billion	\$1.2 billion	\$1.3 billion	\$3.6 billion
Community Development Lending	\$1.8 billion	\$0.6 billion	\$0.8 billion	\$0.6 billion	\$2.0 billion
LMI HMDA Lending	\$2.1 billion	\$0.7 billion	\$0.6 billion	\$0.5 billion	\$1.8 billion
Investments	\$0.9 billion	\$0.2 billion	\$0.3 billion	\$0.2 billion	\$700 million
Total	\$11 billion	\$2.6 billion	\$2.9 billion	\$2.6 billion	\$8.1 billion

BBVA Compass tailors our loan products to the distinct needs of very small businesses. While our Small Business Segment serves companies with annual revenues up to \$5 million, the existing client base is highly concentrated in the micro-segment, defined as companies with up to \$1 million in annual revenues. Micro-lending is a primary component of our strategy, and the bank supports this focus by assigning a management team to work closely with the retail lines of business. Each year, approximately

two-thirds of CRA-reportable small business loans are made to businesses with revenues of \$1 million or less.

Lending

Access to credit is essential for healthy communities, whether for housing, small business, or to support community development activities such as affordable housing, health care, economic development and revitalizing or stabilizing communities. Across the Sunbelt, our three primary lending avenues supporting CRA performance are Home Mortgage Disclosure Act (HMDA)-responsible mortgage lending, small business lending, and community development loans.

Small Business Lending

Small business lending is the cornerstone of BBVA Compass' CRA-qualified lending, and the high volume of small and micro-loans is reflective of our intense focus on meeting the credit needs of small businesses. Our small business lending performance, including significant SBA lending, demonstrates service to small- and micro-enterprises. As in the two prior years, we surpassed our annual commitment in 2017 for CRA-reportable small business loans.

2017 Small Business Lending	
Commitment	\$1,210,000,000
2017 Actual	\$1,298,821,000
Percent of Commitment	107%
Number of loans	24,300

BBVA Compass continues its long-standing commitment to the U.S. Small Business Administration's capital access programs and as an SBA National Preferred Lender, we play a significant role in helping small businesses overcome economic challenges and position themselves for future growth. Through the SBA's 504 Loan program, we work with Certified Development Companies (CDCs), nonprofit corporations set up to contribute to the economic development of their communities to provide growing businesses with long-term, fixed-rate financing for major fixed assets.

BBVA Compass also provides SBA Express loans to benefit small business borrowers that are not yet qualified for a traditional bank loan. SBA Express loans are responsive to the need for access to credit by very small businesses. BBVA Compass is regularly recognized as one of the leading small-business lenders by the SBA, ranking in the top 10 as an SBA 7(a) lender for the number of loans originated and total dollar volume. The SBA San Antonio District Office announced BBVA Compass as the 2017 District Small Business Week 7(a) Lender of the Year.

BBVA Compass serves small businesses comprehensively, with a suite of training tools and activities for entrepreneurs in addition to its tailored loan products. We made a major commitment to capacity-building for small business through the development of a state-of-the-art, proprietary curriculum in partnership with EverFi, an education technology company. In addition to providing in-person and online workshops offered in our Center for Financial Education, we also created a website called Bright Ideas for Business, filled with on-demand webinars and other educational resources for small businesses.

Home Mortgage (HMDA) Lending

While BBVA Compass has a primary focus on small business lending, there is a strong belief that smart mortgage lending helps build strong neighborhoods. Accordingly, we are committed to investing in communities and helping more people achieve the dream of homeownership, and remain in their homes. Although HMDA lending is not a predominant delivery channel for BBVA Compass, it remains an important source of credit to serve the needs of LMI consumers.

Our strategies include hiring additional Community Development Mortgage Banking Officers, building relationships with realtors and builders serving the LMI market, collaborating with non-profit organizations and local government, conducting hundreds of Homebuyer Workshops and modifying the affordable home purchase product called HOME (Home Ownership Made Easier).

The enhancement of the HOME product, our down payment assistance program that allows the bank to pay certain closing fees up to \$4,500, has contributed to our success in HMDA lending. The number of loans originated under the HOME program during 2017 comprised 43 percent of the total of all mortgage loans made by the bank.

HMDA and Down Payment Assistance 2017 Performance

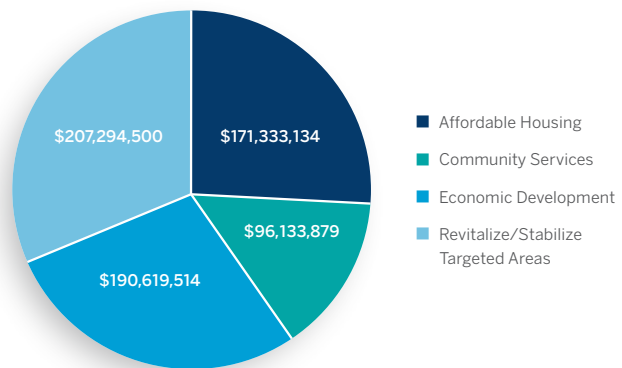
	HMDA LMI Loans*	Down Payment Assistance
Commitment	\$410 million	\$5 million
2017 Actual	\$498 million	\$4.5 million
Percent of Commitment	122%	91%
Number of Loans	2,863	1,242

* HMDA LMI Loans include all HMDA-Reportable originations & loan purchases from LMI Geographies and LMI Borrowers not in LMI Geographies.

Community Development Lending

BBVA Compass has increased our CD lending, and by year end 2017, already surpassed our five-year commitment. We have placed increased emphasis on innovation and leadership, resulting in high-impact projects responsive to community needs for housing, jobs, revitalization, or stabilization of targeted areas, and community services such as health care or social services that benefit LMI people and neighborhoods across our markets. CD loans totaled more than \$665 million for the year.

2017 Community Development Lending by CD Purpose



Investments

BBVA Compass' Community Giving Program aligns with our purpose: To bring the age of opportunity to everyone. Our national contributions in 2017 included more than \$6.1 million in CRA-qualified grants and contributions to more than 500 community partners. By providing innovative leadership and meaningful financial support, we seek opportunities to create strong small businesses, quality affordable housing, and vibrant communities. More than just providing financial resources, we stay abreast of advances in community development and work with partners to create programs to transform the banking industry and the communities it serves. More than just providing financial resources, the bank stays abreast of the most important advances in community development and takes a leadership role in working with partners to create programs that have the power to transform the banking industry and the communities it serves.

Private capital investments fuel some of the most important and enduring community assets. BBVA Compass' strategic focus on long-term investments in high-impact affordable housing has provided critical resources that can serve LMI areas in our footprint into the future, through the Low Income Housing Tax Credit (LIHTC) program and CDFIs. Together, grants and major investments exceeded \$218 million during 2017.

BBVA Compass is focused on producing CD loans and investments, prioritizing the markets with the greatest need. Some markets pose challenges due to a lack of available tax credits, lack of CDFI partners, and/or extrinsic conditions including lack of government support in various markets. To address these challenges, the team has built relationships with government agencies, nonprofit organizations, and other intermediaries to help build capacity for current and new community development talent in those markets.

CD Capital

Through the dedicated Community Development Capital team, BBVA Compass makes investments and loans to projects financed by LIHTC, which provides tax incentives to encourage individuals and corporations to invest in the construction, rehabilitation and preservation of affordable rental housing for low-income households. We apply innovation and leadership to the bank's CD loans and investments, and we are charged with establishing a strong pipeline of real estate projects that provide affordable housing and stabilization for LMI families and communities across our seven-state footprint.

We maintain active relationships with nonprofit and for-profit developers and offer both debt and equity, allowing us to offer streamlined financing for community partners. The efficiencies of providing both equity and debt centrally allow us to take a leadership role in moving high-impact projects toward fruition. During 2017, we produced more than \$149 million in equity and \$135 million in loans to support affordable housing.

CD Finance

Through the dedicated Community Development Finance team, BBVA Compass provides capital through innovative investments that increase the flow of capital into LMI communities. We provide debt and equity capital for CDFIs, private equity real estate funds and other community development qualified investment tools.

CDFIs provide working capital in low- to moderate-income communities where access to such capital is limited based on conventional underwriting standards. The equity-equivalent investments are unsecured and offered at a below-market interest rate to support the viability of and strengthen CDFIs. Through these investments and partnerships, we are able to target underserved communities and promote economic growth in financially challenged markets.

We also focus on building the capacity of nonprofit investment partners by providing hands-on technical assistance, as well as technical assistance grants through the BBVA Compass Foundation. We have strategically partnered with 20 CDFIs to support access to capital and provide technical assistance to build capacity so that CDFIs can deliver financial services effectively. During 2017, this effort contributed \$26.8 million toward the three-year total of nearly \$57 million in equity to support CDFIs and their community development mission.

Access to Financial Services

BBVA Compass has developed new retail services and partnerships to better respond to the specific needs of LMI customers, including our award-winning mobile banking app to enhance the affordability and accessibility of our core banking products.

We are devoted to providing a variety of services that promote financial health and security across all of the markets we serve. To accomplish this, we are using data to inform branch and ATM network optimization, as well as retail banking product and service development. ATM availability and thoughtful branch enhancements have been priorities in making services more accessible to LMI communities. Our partnership with La Michoacana Meat Market, a chain of specialized grocery stores with a strong presence in LMI neighborhoods, is a strategy to increase banking accessibility.

The bank's digital banking tools also enhance the affordability and accessibility of core banking products for the under-banked, under-served and low- and moderate- income communities. Specifically, our mobile banking app can be accessed in Spanish, the primary language for customers in many LMI communities in our footprint. The app allows for real-time updates on account balances so customers can better track availability of funds and set threshold alerts for low balances to help avoid overdraft charges.

BBVA Compass combines research and knowledge to test innovative ways of increasing financial inclusion, modifying and enhancing our retail products and services to meet the comprehensive needs of LMI customers. The mobile application's range of features, including the ability to send low-cost remittances overseas, extends online services to LMI customers who may not have a home computer with access to the Internet.



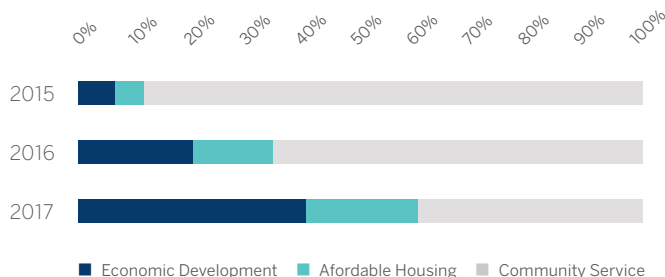
Community Development Services

The BBVA Compass Volunteer Program is strategically aligned with CRA Program Administration and the BBVA Compass Foundation in order to connect employees to volunteer opportunities for greater impact. By coordinating the Volunteers Program with the BBVA Compass Foundation, we help to maximize employees' impact in our communities.

BBVA Compass shifted our volunteer focus during 2017 to three areas: adult financial education, support for entrepreneurship and small business through education and training, and homebuyer education. BBVA Compass employees across every department and market participated in serving LMI communities through volunteer activities, from teaching financial education to sharing expertise on nonprofit boards. Lenders, retail tellers, bank presidents and managers work together to serve our communities.

Evidence of the bank's success in refocusing volunteer activities is apparent from the change in distribution across community development categories during 2017 compared to the prior two years; the bank devoted almost 6,000 hours to activities that benefit small businesses and support economic development.

Community Development Service Activities



Community Advisory Board

The Community Advisory Board (CAB), is a team of executives from local, state and national community-based organizations and advocacy groups, affordable housing organizations and community development financial institutions. The CAB is a formal component of the bank's efforts to understand community needs, in order to align its goals, products, services and activities to best meet the needs of local communities across the footprint. The CAB also provides feedback to senior management about the bank's Community Reinvestment Act Program and helps the bank identify opportunities for community development loans and investments. The CAB meets three times a year and has been instrumental in helping BBVA Compass effectively serve our local communities and achieve the Community Commitment goals.

Corporate Citizenship

Program Overview

BBVA Compass is focused on creating opportunities for everyone. BBVA Compass targets its efforts on creating impactful, social progress. The Corporate Citizenship team is focused on charitable giving, employee volunteerism, sustainable practices, and diversity and inclusion.

Social Impact Programs

BBVA Momentum

BBVA Momentum is a global accelerator program that has been serving social entrepreneurs — those who are hoping to change the world through their work — since 2011. First launched in Spain and Mexico, the program has since expanded to Turkey, Columbia and the United States.

BBVA Momentum's goal is very simple: to create opportunities for social entrepreneurs to scale up their businesses and make a positive impact on the lives of more people.

This seven-month intensive program gives participants access to online and in-person training, strategic support, potential access to funding, networking opportunities and visibility. Before 2017, the program had already driven the expansion of 114 companies with high social impact in Spain, Mexico and Peru. Together, those companies employ 3,200 people, and their activities have benefited more than a million people.

The BBVA Momentum USA inaugural class pitched their enterprises to a panel of judges for a chance to win up to \$50,000. The judges — venture capitalists, The University of Texas at Austin McCombs School of Business educators and BBVA Compass executives — selected the most sustainable ideas with the highest social impact to receive cash awards. Three social entrepreneurs were awarded prizes: Chad Houser of Dallas-based Cafe Momentum, a restaurant training platform for juvenile offenders, won the top prize of \$50,000; Margo Baines of Houston-based Chicks With Class, which offers etiquette programs and empowerment workshops for children, was awarded \$25,000 for second place; and Andy Lovley of Dallas-based Education Opens Doors, a college and career-readiness empowerment program that focuses on middle and high school students, received \$5,000 for third.



Opportunity Fellows Program

The Opportunity Fellows Program, an innovative leadership program for the CDFI industry, challenges a diverse cohort of CDFI leaders to learn about facilitating and leading systemic change (i.e., change in practices, norms and values) within their own organizations and in the communities they serve.

with the goal of ensuring equitable investment in underserved and disenfranchised communities. This program also includes experiential leadership development from world-class trainers and robust interactions with industry and community leaders.

Through the eight month-long Opportunity Fellows Program, participants develop the knowledge and skills to:

- Create opportunities for critical but constructive dialogue that challenges people’s values, beliefs and behaviors related to diversity, inclusion and equity;
- Evaluate organizational structures, policies and practices that either enable or discourage inclusion and equitable investment;
- Develop actionable frameworks and processes for facilitating systemic change within their organizations and the CDFI industry to promote equitable investment.

Center for Financial Education

In 2016, BBVA Compass partnered with EverFi to launch the new Center for Financial Education (CFE) platform. This suite of comprehensive financial education courses is designed to instill knowledge and influence lasting behavior change. CFE is a community-based effort designed to provide access to financial education for individuals and families.

This innovative, multi-platform curriculum is taught by BBVA Compass experts in no-tech, low-tech and high-tech environments. We offer courses on adult personal finance education, homebuyer education, and small business financial education in both English and Spanish. In 2017, the bank educated 24,452 children, adults and small businesses through this program.

Financial Education Programs (Number of beneficiaries)	
	2017
EverFi	24,452
Money Smart	4,967
Teach Children to Save	5,028
Get Smart About Credit	—
Junior Achievement	15,014
NBA Cares	556
Total	50,017

Community Giving

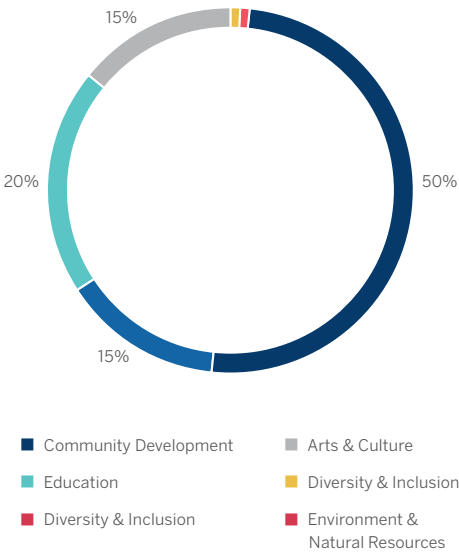
BBVA Compass’ community giving is focused on strengthening communities, especially those with vast low-income populations. Our programs include foundation grants, corporate sponsorship, disaster relief and in-kind donations to nonprofit organizations. In 2017, the BBVA Compass Foundation invested more than \$8.9 million to nonprofits across the country.

BBVA Compass Foundation

The BBVA Compass Foundation’s localized giving approach impacted 628 unique organizations in 2017. Local market executives, who served on Community Relations Committees, reviewed grant applications from organizations within their markets. The committees selected non-profit organizations that are working to address critical, localized needs, as identified by responses to the 2016 Community Needs Assessment.

The Foundation focuses on providing grants to organizations that support community development, education, arts and culture, health and human services, diversity and inclusion, and environment and natural resources. The Foundation strives to allocate its funding of those six focus areas as shown below:

For more information on the Foundation, visit bbvacompass.com/foundation.



Project Blue Elf

In 2017, BBVA Compass celebrated its fifth year engaging low-income students in holiday-themed activities. Project Blue Elf, a program of the BBVA Compass Foundation, sends employee volunteers into schools as Blue Elves to gift each student with a toy. Students listened to Blue Elves read *The Gingerbread Man* story and received their very own gingerbread

man cookie to decorate with frosting and candy. Cookie decorating provided an opportunity for volunteers to truly interact with students and spread holiday cheer.

Blue Elves unveiled the toys, kept secret until the end of the program, and distributed them to students, as parents and administrators shared stories of appreciation.

A new element of this year's program was giving each student a \$25 voucher to open a savings account at their local BBVA Compass branch, reinforcing the bank's commitment to supporting families in reaching financial independence and maintaining that independence through generations. Overall, Project Blue Elf reached 5,600 students in 32 different schools across the bank's seven-state footprint.



BBVA Compass volunteers come together for Project Blue Elf at KIPP NEXUS, BBVA Opportunity Campus, in Houston, Texas.

Disaster Relief

2017 was wrought with natural disasters in the U.S. with millions of people facing damage from historic hurricanes, causing billions of dollars worth of damage and taking many lives, including some in BBVA Compass key markets.

Hurricane Harvey

Hurricane Harvey, which ravaged the Texas Gulf Coast in three waves beginning on August 25, registered as a Category 4 storm on the Saffir-Simpson Hurricane Scale. It caused \$125 billion worth of damage, including the complete destruction of more than 200,000 homes and one million vehicles, and it left many without power and water for weeks. More than 80 deaths were attributed to the storm.

BBVA Compass responded by offering payment-deferral programs to flood victims, rallying volunteers to help rebuild the community, and providing financial assistance to the relief efforts. The BBVA Foundation donated \$250,000 to the American Red Cross and \$150,000 to the Greater Houston Community Foundation's Hurricane Harvey Fund to support

temporary shelter and assistance to displaced individuals. These donations marked one of the biggest philanthropic responses to a natural disaster since BBVA Compass was formed in 2007.

“People have suffered greatly, and this is a time when we all must come together to put the pieces of our communities back together again” – Onur Genç, Chairman & CEO, BBVA Compass

Hurricane Irma

Days after Hurricane Harvey began, Hurricane Irma swept through southern Florida. This second Category 4 storm caused 6.5 million people to evacuate, displaced 77,000 people due to property damage, and 75 Floridians were killed due to the storm.

BBVA Compass Foundation donated \$30,000 to American Red Cross to help the Irma relief efforts and the affected BBVA Compass employees in the market.

Hurricane Maria

In 2017, New York employees initiated their own effort to collect and ship up to 200 pounds of items directly to our Atento call center partners in Puerto Rico.

BBVA Compass Foundation donated \$7,000 to the Joey Serralta Foundation to help pay for the plane fuel to transfer goods to Puerto Rico for Disaster Relief.

Employee Involvement Programs

The BBVA Compass Volunteers program is an employee service organization dedicated to financial education and CD activities. This program offers employees, and their friends and families opportunities to donate their time and talents supporting our communities, enhancing community cohesion and improving financial health. Employees sign up for volunteer events, record hours and track results through the Volunteer Connection platform.

In February 2017, BBVA Compass hosted its fourth annual Volunteer Summit. More than 120 BBVA Compass employees gathered in Houston to kick off the Year for Volunteerism. The majority of attendees held a volunteer chapter officer position earned through a nomination and voting process. The two-day summit focuses on engagement, hands-on interactive training from internal and external content experts, CRA training from the Federal Reserve Bank and networking. Officers also share

best practices with each other and set their volunteer goals for the upcoming year. The summit also serves as a time to recognize these employees who dedicate time to volunteer in their communities.

In 2017, we continued to focus on adult financial education, encouraging our volunteers to deliver quality volunteer service and make an impact that aligns with our banking expertise. We created a new program focused on providing financial education aligned with the National Financial Education Months of April, May and June. In April, we focused on providing Personal Finance Education; in May, providing Small Business Education, and in June, on providing Homeownership Education. Using our Center for Financial Education curriculum, volunteers partnered with community development organizations and our own subject matter experts to provide high-quality workshops throughout our footprint. The results of Financial Opportunity Months are shown below.

April – Financial Literacy Month	May – Small Business Month	June – Homeownership Month
68 Workshops	109 Workshops	83 Workshops
606 Volunteer Service Hours	1,400 Volunteer Service Hours	1,285 Volunteer Service Hours



BBVA Compass Volunteer, Daniel Morales, at KIPP Nexus teaching financial education in Houston, Texas.

In 2017, more than 4,000 employees self-reported over 113,000 hours of volunteer service to nonprofit organizations and public school districts across our footprint.

We continued the Cause Card program, rewarding volunteers who logged more than 16 hours per quarter. Funded by the BBVA Compass Foundation, Cause Cards are electronic gift cards that can be donated to charities through Volunteer Connection. A total of 1,866 cards totalling \$55,121 in donations were redeemed in 2017.

BBVA Compass Charity

The Employee Giving Program includes BBVA Compass Charity – an entity that enables employees to share a portion of their earnings with qualified 501(c)(3) non-profit organizations.

BBVA Compass’ employee giving is managed through our Volunteer Connection platform. Through Volunteer Connection, employees have the ability to search or add any 501(c)(3) non-profit organization that they can donate to through a one-time transaction or payroll deduction. Donations are automatically paid on employees’ behalf on a monthly basis. The Volunteer Connection site allows charities to sign up for ACH payments, as well as provides live customer support for our employee donors.

In 2017, close to 3,000 employees contributed \$1.1 million through the BBVA Compass Charity Program either through payroll deduction or credit card transactions.

BBVA Compassion

In 2017, a number of BBVA Compass key markets were affected by hurricanes Harvey and Irma, as well as the wildfires in California. Because these events impacted a number of employees, the BBVA Compass Charity Board decided to create a support fund to provide financial relief to team members dealing with catastrophic events or personal hardships.

The BBVA Compassion Team Support Fund is administered through BBVA Compass Charity and allows team members to make tax-deductible donations to a fund used to help other team members. Eligible full/part-time employees can receive up to two grants during their tenure with BBVA Compass, with each grant capped at \$5,000 (or as otherwise determined by the BBVA Compass Charity Board).

5

Talent & Culture



BBVA Compass employees are the heart of everything we do. We recognize the value and contributions of each employee. We invest in training and leadership development to support professional growth and opportunity.

Recruitment, Training & Development

Virtual Employment Campus and Employee Referral Site

BBVA Compass capitalizes on BBVA's interactive careers site at careers.bbva.com where job seekers can view job opportunities throughout the global footprint and formally express interest in an open position. The Employee Referral Site is another useful resource, allowing current BBVA Compass team members to proactively refer external candidates for open positions.

Targeted Recruiting

In addition to the usual internal and external recruiting portals, BBVA Compass uses three targeted recruiting portals — Diversity, Military and University — that encourage partnerships with community agencies and resources for identifying specific talent. These portals not only allow for targeted recruiting campaigns but also let Talent & Culture track campaign results and career progression of employees hired through those recruiting efforts. The portals have been included on the websites of several community agencies, schools and universities.

Internal Careers Site

BBVA Compass is committed to filling vacancies with internal candidates whenever possible. The Internal Careers Site allows employees to browse and apply for current vacancies throughout the bank and set up personalized career interest parameters to be notified when applicable vacancies become available. The Internal Careers Site streamlines the job application process and shortens the time it takes to fill vacancies with qualified internal candidates.

In 2017, almost 48 percent of open positions were filled with internal talent.

People Management Model

The People Management Model is a global initiative designed to give people more control over their careers and more flexibility in their choices for advancement. It emphasizes accountability, education, personal growth, and the setting and achieving of ambitious goals.

As part of that, employees are encouraged to add information continually to their online employee profile, including work skills, educational backgrounds and relocation preferences. That information becomes an internal database that helps Talent & Culture identify internal candidates who are well suited for job vacancies.

Nondiscrimination and Equal Opportunities

BBVA Compass embraces Equal Employment Opportunity. BBVA Compass has a firm and unwavering policy to provide equal employment opportunity without regard to age, citizenship, color, disability, ethnic origin, gender, gender identity and expression, marital status, nationality, national origin, race, religion, sexual orientation, genetic predisposition, protected veteran status, or any other status or other classification protected by federal, state or local law. This policy includes all job groups, classifications and organizational units.

BBVA Compass, from time to time and in the ordinary course of its business, may receive claims, including litigation, alleging violations of employment laws. As of December 31, 2017, BBVA Compass was not involved in any regulatory actions related to alleged employment discrimination and working conditions that were material to our financial position. Furthermore, BBVA Compass has a firm commitment to equal employment opportunity and nondiscrimination, as evidenced by widely disseminated policies prohibiting discrimination in all aspects of the employment relationship.

Employees have numerous avenues to raise complaints, including through management, the Office of General Counsel and Corporate Talent & Culture or by anonymous reporting through telephone hotlines. While we do not prohibit freedom of association, as of December 31, 2017, there were no BBVA Compass employees covered by collective bargaining agreements. We have not identified any operations where the right to exercise freedom of association and collective bargaining may be at significant risk. BBVA Compass complies with the U.S. federal law, the Worker Adjustment and Retraining Notification Act (WARN), which requires a minimum of 60 days' notice of any action that will cause at least 50 employees or 33 percent of the workforce to lose their jobs.

Leadership & Employee Development

Campus BBVA

Campus BBVA is a virtual learning platform that offers a sophisticated search engine, learning paths, communities and forums. Learning paths outline learning events based on employee roles or training initiatives, and communities and forums give employees the chance to interact with course instructors and each other on the platform.

Role Certification & Development

BBVA Compass offers a role certification program for Financial Sales Advisors (FSA) and Sales and Service Advisors (SSA), allowing FSAs and SSAs to demonstrate proficiency in their current role and identify areas for development.

The certification includes an online assessment to gauge knowledge and a manager observation to allow team members to demonstrate their ability to apply knowledge and skills to client interactions. Role certification is mandatory for FSAs and SSAs who have been in their role for six months and is a consideration for advancement opportunities.

In 2017, nearly 65 percent of those eligible, or 521 team members, successfully completed online role certification.

Retail Leadership Development Program

In 2017, BBVA Compass introduced the Retail Leadership Development Program for team members who aspire to become Branch Retail Executives (BREs) and/or Client Experience Managers (CEM). This program provides a customized training curriculum to help team members learn new skills and core competencies, while providing career growth opportunities.

During the 12-week BRE and 8-week CEM Program, participants engage in learning activities designed to develop the professional knowledge and skills necessary to prepare them for future BRE/CEM leadership roles. In addition to completing learning activities, participants also apply the knowledge and skills acquired through in-branch observation, coaching and mentoring. Program components include management, consumer sales, small business sales and operations.

LEAP (learning, evaluation, application, and placement) Program

The LEAP program completed its eighth consecutive year in 2017. Through extensive exposure to consumer and commercial banking, business development, engineering, risk management and other support areas, recent college graduates get a thorough overview of the entire bank. This broad perspective, along with extensive job preparation and skills training, assists successful participants in becoming future leaders of BBVA Compass.

The core of the program is the rotation through the lines of business — part of the application phase — which allows the associates to begin contributing right away and get a sense of what it would be like to work in a particular department.

Since its inception, program graduates have continued to contribute to BBVA Compass’ success.

Internship Program

Twenty college students from across the country joined BBVA Compass’s rigorous internship program in the summer of 2017, looking for an opportunity to hone their skills and get much needed work experience. The 10-week program placed interns full time in Birmingham, Houston and Dallas.



LEAP Associates attending Orientation at the retail headquarters in Birmingham, AL.

Employee Training

In 2017, BBVA Compass employees completed 540,706 training hours. We completed 76 percent of all training activities via e-learning/virtual delivery channels, with the remaining 24 percent completed in traditional classrooms.

2017 Employee Training			
	Number of Hours	% of Total Completions	Number of Completions
Training hours completed	540,706	100%	674,689
Live training	131,825	24%	17,279
Online training	408,881	76%	657,410
Employees trained in 2016	12,460		
Total investment in training (in dollars) ¹		\$3,774,047	
Training investment per employee		\$303	

¹ Total investment in training (in dollars) refers to the true expense of training materials, content development, etc. It does not include calculations for any expenses related to employee time, travel, etc.

Continuous Learning Requirement (CLR)

The Continuous Learning Requirement is a leadership-development strategy intended to ensure that all people managers remain focused on keeping their skills sharp. This program requires all people managers to complete a minimum of 12 hours of developmental training each year. In 2017, 2,375 people managers completed a total of 33,304 hours of learning.

Harvard ManageMentor

Harvard ManageMentor (HMM) is a collection of online learning modules developed by Harvard Business Publishing for management, persuading others, presentation skills, project management and more. All BBVA Compass employees have access to HMM. In 2017, they completed a total of 9,658

courses, totaling 26,252 hours of training. Among people managers and employees, *Hiring* was the most popular HMM course, with 1,023 individual completions in 2017.

Management Essentials

Management Essentials ensures that new people managers are trained on policies and procedures, with topics including time and attendance, performance management, and hiring and onboarding systems. Also included is an overview of the learning-management system and how to verify both individual training and team member training to review assigned job, development and compliance training. Newly promoted people managers are required to complete Management Essentials live webinars within 60 days of accepting their position and complete the associated HMM courses within 90 days of accepting their position.

BBVA Compass School of Management

In the summer of 2017, 35 senior BBVA Compass leaders participated in the BBVA Compass School of Management on the campus of the University of Texas (UT) at Austin. In partnership with the McCombs School of Business at UT, this comprehensive educational program explored advocacy and influence, leading high-performance teams, big data and change management.

Management Essential Mentoring Program and ONE Team Mentoring Program

The Management Essentials Mentoring program has allowed people managers to partner with mentors who provide guidance as they work toward their overall professional development. The program helps participants expand their network of business partners collaborate with, and learn from leaders across all lines of business. An online platform helps facilitate the professional relationship between mentors and mentees.

The ONE Team Mentoring program gives all eligible team members access to experienced BBVA Compass team members who can contribute to their professional development and career goals. This program uses an online platform to enable and facilitate professional relationships with mentors for 90 days.

In 2017, a combined 378 team members participated as either mentors or mentees.

Career Advancement

BBVA Compass is invested in each of our team members' futures. We want them to be knowledgeable, skilled and excited about the bank. To that end, we offer an array of training and development tools, like Management Essentials and mentoring programs.

Career advancement requires the involvement and commitment of both employee and manager: the employee to take advantage of training and development opportunities, and the manager to offer guidance, direction and inspiration, working together to define success.

Career advancement looks different than it did a generation ago. Instead of identifying and planning to follow a clear linear track, today's career advancement model is about enhancing skills and exploring opportunities in new and more challenging areas to gain experiences that will support growth. This includes lateral moves and/or entrances into different lines of business.

The ultimate goal is for team members to discover their passions, build their skills and create a unique path of success at the bank.

Diversity & Inclusion

At BBVA Compass, workplace diversity and inclusion is a priority. We appreciate and embrace the inherent uniqueness of everyone. We value our similarities and differences, including diversity of thought, and recognize that people have unique backgrounds, characteristics, experiences, ideas, beliefs, motivations and choices, all of which add value to our organization. In 2017, BBVA Compass earned a spot on Diversity Inc.'s list of the [Top 50 Companies for Diversity](#).

We foster a culture of inclusion, and we continuously explore ways to leverage diversity and inclusion to create an environment in which everyone feels welcomed, heard, valued and respected. We strive to attract, hire and retain talented people to help achieve our purpose by blending the best that each of us has to offer.

BBVA Compass received a perfect score of 100 percent on the 2018 Corporate Equality Index (based on 2017 data), a measure of workplace equality for lesbian, gay, bisexual, transgender and queer employees that serves as a benchmark for some of the country's largest and most influential workplaces.



Workforce: Breakdown by Gender & Average Age in Years (Percentage)					
	Gender		Average Age		
	Males	Females	<30	30-50	>50
2017	40.6	59.4	18.7	55.5	25.8
2016	39.3	60.7	18.0	56.0	26.0
2015	39.3	60.7	21.1	54.2	24.7

Workforce: Breakdown by Employment Type & Gender (Percentage)			
	2017		
	Males	Females	Total
Full-time	41.2	58.8	100.0
Part-time	21.9	78.1	100.0
Temporary	100.0	—	100.0

New Hire Rate (Percentage)			
	Total	Males	Females
2017	20.9	23.2	19.4
2016	18.4	19.0	18.0
2015	24.7	26.5	23.6

Voluntary Turnover (Percentage)			
	Total Turnover	Males	Females
2017	16.3	15.5	16.8
2016	19.9	18.9	20.4
2015	19.9	19.5	20.1

Functional Distribution by Gender & Professional Category (AAP Categories)						
	2017		2016		2015	
	Males	Females	Males	Females	Males	Females
Senior-level Management	67.0	33.0	71.6	28.4	67.9	32.1
Middle Management	46.8	53.2	45.5	54.5	42.1	57.9
Entry-level Management	18.6	81.4	21.6	78.4	44.4	55.6
Professional	41.8	58.2	43.0	57.0	41.3	58.7
Technical	64.9	35.1	64.6	35.4	64.2	35.8
Sales	51.8	48.2	49.7	50.3	50.7	49.3
Clerical	16.1	83.9	16.0	84.0	16.2	83.8

Compensation & Remuneration

We work hard to provide competitive, fair compensation for team members based on their role, their performance, and marketplace dynamics. We also strive to recognize strong performers.

Our compensation plans, merit increases, and variable compensation programs are determined by several factors, including broader economic considerations and market trends in the financial services industry. Additionally, the regulatory environment is becoming a more prominent factor in our compensation decisions.

We regularly participate in external market surveys that analyze compensation data from across the financial industry to make sure we're competitive.

We also want to be flexible and allow managers to make key decisions about compensation. We're exploring new ways to ensure managers and their team members have more regular reviews and check-ins, so an individual's performance is always clear. That's why we've instituted quarterly performance reviews instead of annual ones, which remove the emphasis on one-time successes and instead focus on constant growth, regular feedback and consistent communication.

Employee Benefits

BBVA Compass is committed to providing a variety of benefit programs designed to meet employees' needs, including life insurance and retirement plans, as well as programs to support our employees' physical and financial health and overall

well-being. Benefit plans and programs cover full- and part-time employees. They include health insurance, vacation and paid time-off programs, savings and retirement plans, the Wellthy for Life wellness program, discounts on banking services, tuition assistance and scholarship programs for employees' dependent children.

ALEX® the Benefits Counselor

ALEX®, our virtual benefits counselor, plays a crucial needs-assessment role during benefits open enrollment. ALEX asks questions about employees and their families, then compares and contrasts the available options, recommending the one that may be the best fit for the team member. ALEX was so popular when he debuted in 2015 that he earned a long-term spot at the bank. ALEX is now available 24/7 to team members who want help understanding the bank's health and wellness benefits.

Wellthy Points and Health Reimbursement Account (HRA)

By completing designated wellness activities in the Wellthy for Life wellness program, employees were able to earn up to 1,000 "Wellthy Points" in 2017. These wellness activities include:

- Biometric testing
- Health assessment
- Healthy ranges for biometrics and labs
- Improvement in biometrics and labs
- Chronic care management
- Virgin Pulse (formerly Virgin HealthMiles)
- Wellness webinars
- Preventive wellness exam
- BBVA Compass-sponsored activities
- Wellness challenges
- Wellness workshops

For employees enrolled in the Choice 80/20 Health plan, each Wellthy Point earned equates to a bank-paid \$1 contribution to a Health Reimbursement Account (HRA). HRA dollars may be used to pay for eligible medical, dental, prescription and vision expenses, including copays, coinsurance and deductibles. Because unused HRA balances roll over from year to year, participants were able to add to any balance they carried over from 2016 and build on it. Team members enrolled in the Choice 80/20 High Deductible Health Plan (HDHP) could earn the same amount in their Health Savings Account (HSA), which also carries over from year to year.

As of Dec. 31, 2017, a total of \$2,245,000 HRA and \$985,912.15 HSR dollars had been funded.

Employees who are not enrolled in a health plan may also complete wellness activities and earn Wellthy Points, and they will retroactively receive HRA or HSA contributions for these completed activities should they enroll later in the year.

BBVA Compass Employee Health Center

In 2017, BBVA Compass offered access to an employee health center located less than a mile from the BBVA Compass Plaza in Houston. The center provides a variety of health and wellness services to employees, their spouses and children who are covered under the bank's health plan.

Retirement Benefits

Both full- and part-time BBVA Compass employees have the option of participating in the Compass SmartInvestor 401(k) Plan, which allows employees to defer a portion of their salary on a pre-tax basis. All employees are eligible to make salary deferrals under the Plan upon hire and eligible to receive employer contributions and matching contributions after one year of service. Employer contributions range from 2 percent to 4 percent of the employee's compensation based on years of service. The bank also matches employee contributions up to 4 percent of each employee's eligible pay after one year of service.

Total Compensation Statements

"Total Awareness + Total Understanding = Total Appreciation" is the tagline that describes Total Compensation Statements, a resource designed to help employees understand the full investment BBVA Compass makes on their behalf, beyond take-home pay. Total Compensation Statements, available on BBVAbenefits.us, break down employees' annual total compensation into several categories, including cash compensation, retirement benefits, bank-paid health and welfare benefits, and more.

Paid Time Off

BBVA Compass believes that regular times of rest and relaxation away from the job are crucial for health, well-being and job performance. Employees are encouraged to take advantage of annual paid vacation time.

Vacation Carryover Policy

Employees can carry over five vacation days to the following year, which allows flexibility when planning time off or looking ahead to major life events. Additionally, exempt team members enjoy a simplified vacation carryover process that does not require the submission of a formal request; the accrued time off remaining in the system at year-end automatically rolls over.

Paid Time Off for Community Service Policy

BBVA Compass is committed to giving back to the communities we serve, and our employees play a key role in that. Under our paid time off for community service policy, employees were encouraged to use up to 16 hours of paid time off in 2017 to participate in volunteer activities, community development or service activities that qualified for CRA.

Sick Leave

BBVA Compass provides 12 days of paid sick leave for employees annually to care for themselves or a family member. Additionally, because personal emergencies and other circumstances may cause people to be absent from work, employees can use up to four days of paid sick leave for these absences.



Expecting parent and BBVA Compass employee Claire Sands with her partner prepare their child's nursery at their home in Birmingham, Alabama.

Pregnancy and Family Leave

BBVA Compass updated its pregnancy and family leave policies in 2017.

Under the updated Pregnancy Leave program, BBVA Compass offers six weeks of paid pregnancy leave for recovery after giving birth or for a pregnancy-related disability.

The Family Leave Program, formerly called the Parental Leave Program, provides up to six weeks of paid time off for a new parent to bond with a biological, foster or adopted child and six weeks of paid time off to care for a family member.

Full- and part-time employees can participate in these leave programs after one year of continuous service.

Continuous Time Away

The continuous time away work-life balance and leave policy requires employees to remain away from job duties for at least five consecutive business days annually. Remaining continuously away from the job means that employees are not allowed to transact or otherwise carry out, either physically or through electronic means, their regularly assigned duties. Certain employees who work in identified high-risk areas or who are involved with high-risk responsibilities may be required to remain continuously away from their job duties for ten consecutive business days.

Strict adherence to this policy helps ensure that our organization remains in compliance with federal regulatory risk-management policies. It also provides employees a tangible benefit since regular times of rest and relaxation away from the job are crucial for their health, well-being and job performance.

Sick Pay, Short-Term Disability Benefits and Long-Term Disability Insurance

BBVA Compass employees accrue sick pay that can be used to help avoid an interruption in base pay if work is missed due to a medical necessity, personal emergency or other necessary absence. Short-term disability benefits are provided to eligible employees and long-term disability benefits may be available for employees who cannot return to work because of health problems.

Workforce Statistics - Number of Employees

2017	2016	2015
10,554	10,096	10,812

Average Length of Service of Workforce (Years)

2017	2016	2015
7.0	7.2	6.7

Employees by Professional Category (Percentage)

	2017	2016	2015
Senior-level Management	6.9	5.0	4.8
Middle Management	9.8	9.5	8.9
Entry-level Management	7.6	9.0	2.7
Professional	21.4	23.0	20.6
Technical	5.4	5.3	4.7
Sales	27.0	24.9	27.5
Clerical	21.9	23.3	30.8

5 Environment








BBVA Compass is committed to preserving our natural resources and minimizing the impact we have on the planet. We carefully measure and manage the environmental impact of our operations.

Eco-Efficiency Plan

BBVA Compass is aligned with the BBVA Group's commitment to mitigating the direct environmental impacts of our activity. Due to the nature of our business, these impacts are primarily from our buildings and offices. In 2017, BBVA Group continued work on its third Global Eco-efficiency Plan (GEP), focused on positioning the Group among the leading entities at a global level in terms of eco-efficiency. The GEP establishes the following strategic areas and global and US targets for the period 2016-2020, continuing on from the two previous plans that were begun in 2008 and 2012, respectively, and setting the following targets:

2016 – 2020 Global and US Targets

Vectors	Strategic Guidelines	Global Target	US Target
 Environmental Management and Sustainable Construction	% occupants in certified buildings	42%	18%
 Energy and Climate Change	Consumption per occupant (kWh/occup)	-5%	-24%
	% of clean energy	48%	1%
	CO _{2eq} emissions occupant per (tCO _{2eq} /occup)	-8%	-21%
 Water	Consumption per occupant (m ³ /occup)	-5%	-12%
	% occupants in buildings with alternative water sources	9%	N/A
 Paper and Waste	Paper consumption per occupant (kg/occup)	-5%	0%
	% occupants in buildings with separate waste collection	30%	9%
 Extension of the Commitment	Awareness campaigns for employees and supplier		

Energy & Scope 1 & 2 GHG Emissions¹

	2017	2016	2015
Diesel (liters)	32,592	43,419	37,057
Natural Gas (dekatherms)	17,382	18,763	23,535
Electricity (kWh)	121,255,542	127,741,503	134,694,510
Electricity savings from energy-efficiency projects	1,257,154	790,000	—
Scope 1 GHG emissions (metric tons CO _{2e}) ²	1,005	1,114	1,350
Scope 2 GHG emissions (metric tons CO _{2e}) ²	61,864	63,479	69,440

¹ Includes estimates using the average emissions factor by state for leased spaces where we lack metered data.

² The following gases are included in the GHG inventory: CO₂, CH₄, and N₂O. We followed the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard published by the World Business Council for Sustainable Development and the World Resources Institute for reporting the GHG inventory. We utilized the latest available emission factors for each fuel type and region and Global Warming Potential factors from the Second Assessment Report (SAR) published by Intergovernmental Panel on Climate Change to calculate Scope 1 and 2 GHG inventory.

During 2017, a number of the global goals have been achieved, including the percentage of people in certified buildings, buildings with alternative water sources and with selective waste collection, which increased to 42, 11 and 41 percent, respectively. In addition, during the GEP period (base year 2015), electricity consumption per person was reduced by 6.9 percent and CO₂ emissions per person in the Group by 2.5 percent.

BBVA Compass completed 117 energy-saving projects in 2017 that yielded \$143,029 in annual savings. Areas of focus included heating, ventilation and air conditioning (HVAC) replacement projects, lighting retrofits, roof replacements and other initiatives. We also partner with local utility providers to capitalize on potential rebate opportunities that saved the bank an additional \$24,000 in 2017.

We continued our work installing innovative control systems at new and majorly-renovated branch locations. This new system provides remote monitoring and control of the HVAC and lighting systems, including real time and historical kilowatt energy monitoring, fault detection and email notification for ATM lighting systems failures, and task tuning of the lighting system to adjust light levels provide optimal energy performance. With the lighting control functionality alone, we were able to reduce electricity usage for the interior lighting system by 90 percent through task tuning.

BBVA Compass participated in Earth Hour 2017 on the evening of Saturday, March 25 at 8:30 PM local time in several major areas of concentration including Houston, Dallas and El Paso, Texas and Birmingham, Alabama. This annual event raises awareness of energy consumption and working toward sustainable future by turning lights off for one hour.

We also partner with local municipalities to assist them with their sustainability efforts. In Austin, Texas, for example, we worked to implement comprehensive recycling programs in our owned locations. This effort ensured our Austin staff effectively recycles plastic, glass, cardboard and metal, in addition to our existing paper recycling efforts.

Technology vs. Travel

BBVA Compass continues to invest in technology with a goal of reducing business travel. We significantly increased the number of video conferences during 2017, while decreasing commercial air travel from the prior year. BBVA Compass remains committed to decreasing air travel, and we are diligently working to report a decrease for 2018.

Technology and Travel			
	2017	2016	2015
Videoconferences (n°)	102,811	60,892	13,656
Audioconferences (n°)	107,403	102,683	101,224
Air travel (km)	37,340,011	39,908,010	27,672,328
Air travel (CO2 in tons)*	4,572	4,263	4,263

* The following gases are included in the GHG inventory: CO₂, CH₄, N₂O, and HFCs. We followed the Greenhouse Gas Protocol the Corporate Value Chain (Scope 3) Accounting and Reporting Standard published by the World Business Council for Sustainable Development and the World Resources Institute for reporting the GHG inventory. We utilized the latest available emission factors for each fuel type and region and Global Warming Potential factors from the Second Assessment Report (SAR) published by Intergovernmental Panel on Climate Change to calculate GHG inventory.

Green Product Standards

For the last decade, BBVA Compass has been working with our janitorial vendors to ensure all janitorial cleaning supplies and cleaning policies meet Leadership in Energy and Environmental Design (LEED) requirements for a “High Performance green cleaning program.” This includes our banking center drive-thru lanes, which are cleaned by waterless concrete and asphalt cleaners using natural agents. In addition, our pest-control and exterior landscape partners are contracted with integrated pest-control management techniques and other sustainable concepts in their scopes of work.

Consumption & Recycling

Water

In 2017, total water consumption for BBVA Compass’ properties was 1,186,310 cubic meters. This amount covers municipal water data only. About 28 percent of this amount is estimated for leased sites or those with shared utilities, based on extrapolated usage by square foot from similar buildings reporting actual meter readings.

Water Totals		
2017	2016	2015
1,186,310M ³	1,122,956M ³	1,052,830M ³

Solid Waste

In 2017, BBVA Compass’ national recycling program tracked of 1,468,187 kilograms of total waste, 1,089,256 kilograms of which was trash and 378,931 kilograms was recycled. As a financial service company, our most significant input material is paper. BBVA Compass consumed 599,331 kilograms of paper with 13 percent recycled input material, and we recycled 79,770 kilograms of paper in 2017. Recycled input material percentage is calculated by dividing paper purchased that contains some recycled material, as well as other sustainably sourced materials (which varies for different paper products) by total paper purchased for the year.

Also in 2017, BBVA Compass’ technology vendor reported that an estimated aggregate total of 31,940 kilograms of computer equipment was recycled on our behalf. Additionally, 177 printer cartridges were recycled.

2017 waste amounts capture approximately 42 percent of buildings within BBVA Compass footprint where the service provider manages waste pick-up. Most of the locations estimate the weight of waste pick-ups using the following assumptions based on the waste service provider’s experience with commercial bank branches employing fewer than 100 people:

- Trash dumpster — 50lbs/yards
- Cardboard dumpster — 50lbs/yards
- Single stream dumpster — 55lbs/yards
- Trash cart or toter — 0.54 lbs/gallon
- Single stream/comingle cart or toter — 0.47 lbs/gallon
- Cardboard-only cart or toter — 0.38 lbs/gallon

Waste Totals			
	2017	2016	2015
Recycled	378,931 kg	341,890 kg	368,398 kg
Waste	1,089,256 kg	1,085,074 kg	1,086,670 kg
Total	1,468,187 kg	1,455,069 kg	1,455,069 kg

9 Appendix

Trade Association Memberships & Other Reporting

National

- American Bankers Association (ABA)
- Bank Insurance & Securities Association (BISA)
- Consumer Bankers Association (CBA)
- Equipment Leasing and Finance Association (ELFA)
- Financial Services Roundtable (FSR)
 - BITS
- Institute of International Bankers (IIB)
- Insured Retirement Institute (IRI)
- Loan Syndications & Trading Association (LSTA) – Associate Member
- Mortgage Bankers Association (MBA)
- National Association of Government Guaranteed Lenders (NAGGL)
- Securities Industry and Financial Markets Association (SIFMA)

International

- Americas Society / Council of the Americas (AS/COA)
- Bankers Association for Finance and Trade (BAFT)
- Institute of International Finance (IIF)
- International Swaps and Derivatives Association (ISDA)
- Spain-U.S. Chamber of Commerce
- Trans-Atlantic Business Council (TABC)

State

- Alabama Bankers Association
- Arizona Bankers Association
- Florida Bankers Association
- Florida International Bankers Association (FIBA)

Significant Fines and Non-Monetary Sanctions

BBVA Compass accumulated no significant fines or nonmonetary sanctions for noncompliance with environmental laws and regulations in 2017. BBVA Compass has not recorded any fines or penalties for breaches of legislation related to environmental issues or the supply of products and services that might be significant in terms of the bank's equity, financial situation or consolidated results and that are not provisioned in our financial statements.

Additionally, BBVA Compass has not recorded any fines or penalties for breaches of legislation related to the supply of products and services that might be significant in terms of the bank's equity, financial situation or consolidated results and that are not provisioned in our financial statements.

In 2017, BBVA Compass did not experience any security breaches, computer system breaches, or losses relating to technology failure, cyber-attacks, or other information that were substantiated by external regulators or governmental authorities.

Procurement Model and Policy

BBVA Compass' procurement model follows the structure developed by the BBVA Group and is aligned to industry best practices. As a financial service company, our suppliers are primarily office supplies and business services. BBVA Compass manages the supply chain to deliver and sustain value across the organization by building and managing an external supplier network that meets the operational needs of the organization in a responsible manner and at minimal cost. This is achieved by adopting procurement best practices, by establishing partnerships across BBVA Compass to expand category coverage and by continuing to secure savings.

Report Criteria

BBVA Compass has developed and disseminated annual corporate responsibility reports annually since 2008. Our previous report was for the year ended December 31, 2016. This report, which covers the 2017 calendar year, includes information for the BBVA Compass Bancshares, Inc. portion of the U.S. business unit (including any leased facilities, subsidiaries, etc.). The BBVA Compass report is supplemented by the BBVA Group's 2017 Financial Report and by the information available via BBVA Compass' main website, bbvacompass.com, and its investor relations website, bbva.investorroom.com.

Additional Context

As of the publication date of this report, BBVA Compass is not aware of the need for restating any material from previously published reports. This report reflects BBVA Compass Bancshares, Inc. following the bank becoming an SEC registrant in January 2014. Prior reports focused on BBVA Compass Bank. In 2017, there were no pending or completed relevant legal actions against BBVA Compass related to anti-competitive behavior. There have been no significant changes during the reporting period regarding the organization's size, structure, ownership or supply chain.

GRI Standards Content Index

This report has been prepared in accordance with the Global Reporting Initiative Standards: Core Option. At the direction of the Disclosure Committee, BBVA Compass engaged global accounting firm, KPMG, to review the indicators in accordance with the GRI Standards disclosures as noted in the Content Index on pages 42-44. Also refer to the Independent Accountants' report on page 45.

Corporate Responsibility Contact Info:

If you would like to submit a question, opinion, inquiry or suggestion regarding the information contained in this report, please contact one of the following:

Department of Corporate Responsibility and Reputation

BBVA Compass
2200 Post Oak Blvd, 21st Floor
Houston, TX 77056
Tel: 713-831-7487

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bbvacompass.com
bbvacompass.com/compass/responsibility

Global Responsible Business Department
Ciudad BBVA – C/ Azul 4 – 28050 Madrid
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BBVA Compass GRI Indicators

Disclosure	Disclosure Description	Chapter	Externally Reviewed	Omission
General Disclosures				
102-1	Name of the organization.	About BBVA Compass	✓	
102-2	Activities, brands, products and services.	About BBVA Compass	✓	
102-3	Location of headquarters.	About BBVA Compass	✓	
102-4	Location of operations.	About BBVA Compass	✓	
102-5	Ownership and legal form.	About BBVA Compass	✓	
102-6	Markets served.	About BBVA Compass	✓	
102-7	Scale of the organization.	About BBVA Compass 10-K Financial Services	✓	
102-8	Information on employees and other workers.	About BBVA Compass Talent & Culture Diversity and Inclusion	✓	Total number of employees by contract, by region.
102-9	Supply chain.	Procurement Model and Policy	✓	
102-10	Significant changes to the organization and its supply chain.	Additional Context	✓	
102-11	The organization addresses the precautionary principle or approach.	Social, environmental and reputational risks International Principles	✓	
102-12	External initiatives.	International Principles Compliance	✓	
102-13	Memberships or associations.	International Principles Trade Association Memberships	✓	
102-14	Statement from Senior decision maker.	Letter from the Chairman	✓	
102-15	Key impacts, risks and opportunities.	Stakeholders Materiality Analysis	✓	
102-16	Values, principles, standards and norms of behavior.	Strategy	✓	
102-18	Governance structure.	Corporate Governance Stakeholders	✓	
102-40	List of stakeholder groups.	Stakeholders	✓	
102-41	Collective bargaining agreements.	Nondiscrimination and Equal Opportunities	✓	
102-42	Identifying and selecting stakeholders.	Stakeholders	✓	
102-43	Approach to stakeholder engagement.	Stakeholders	✓	
102-44	Key topics raised by stakeholder engagement and responses.	Stakeholders Materiality Analysis	✓	
102-45	Entities included in the consolidated financial statements.	About BBVA Compass 10-K	✓	
102-46	Defining report content and topic boundaries.	Materiality Analysis	✓	
102-47	List of material topics.	Materiality Analysis	✓	
102-48	Restatements of information.	Additional Context	✓	
102-49	Changes in reporting.	Report Criteria	✓	
102-50	Reporting period.	Report Criteria	✓	
102-51	Date of most recent report.	Report Criteria	✓	
102-52	Reporting cycle.	Report Criteria	✓	
102-53	Contact point for questions regarding the report.	CR Contact	✓	

BBVA Compass GRI Indicators

Disclosure	Disclosure Description	Chapter	Externally Reviewed	Omission
General Disclosures				
102-54	Claims of reporting in accordance with the GRI Standards.	BBVA Compass GRI Indicators	✓	
102-55	GRI Content index.	BBVA Compass GRI Indicators	✓	
102-56	External assurance.	Independent Accountants' Review Report	✓	
Management Approach				
103-1	Internal aspect boundaries for each material aspect.	Materiality Analysis	✓	
Economic Performance				
201-1	Direct economic value generated and distributed.	Community Reinvestment Program Overview	✓	
201-3	Coverage of the organization's defined benefit plan obligations.	Retirement Benefits 10-K	✓	
Indirect Economic Impact				
203-2	Significant indirect economic impacts.	Corporate Citizenship International Principles	✓	
Anti-corruption				
205-2	Communication and training about anti-corruption policies and procedures.	Anti-corruption	✓	Total number and percentage of business partners to whom anti-corruption policies and procedures have been communicated.
Anti-competitive Behavior				
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices.	Additional Context	✓	
Materials				
301-1	Materials used by weight or volume.	Solid Waste	✓	
301-2	Recycled input materials used.	Solid Waste	✓	
Energy				
302-1	Energy consumption within the organization.	Eco-Efficiency Plan	✓	Energy consumption reported in local units of measure or comparability with the US-based reporting context.
302-4	Reduction of energy consumption.	Eco-Efficiency Plan	✓	
Water				
303-1	Water withdrawal by source.	Water	✓	
Emissions				
305-1	Direct (Scope 1) GHG emissions.	Eco-Efficiency Plan	✓	
305-2	Energy indirect (Scope 2) GHG emissions.	Eco-Efficiency Plan	✓	
305-2	Other indirect (Scope 3) GHG emissions.	Technology v. Travel	✓	
Effluents and Waste				
306-2	Waste by Type and Disposal Method.	Waste Totals	✓	
Environmental Compliance				
307-1	Non-compliance with environmental laws and regulations.	Significant Fines and Non-Monetary Sanctions	✓	

BBVA Compass GRI Indicators (continued)

Disclosure	Disclosure Description	Chapter	Externally Reviewed	Omission
Employment				
401-1	New employee hires and employee turnover.	Diversity & Inclusion	✓	Regional and age group data not available.
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees.	Employee Benefits	✓	
Labor Management/Relations				
402-1	Minimum notice periods regarding operational changes.	Nondiscrimination & Equal Opportunities	✓	
Education and training				
404-2	Programs for upgrading employee skills and transition assistance programs.	Leadership & Employee Development	✓	
Diversity and Equal Opportunity				
405-1	Diversity of governance bodies and employees.	Diversity & Inclusion	✓	Governance bodies.
Freedom of Association and Collective Bargaining				
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk.	Nondiscrimination & Equal Opportunity	✓	
Customer Privacy				
418-1	Substantiated complaints concerning breaches of customer privacy and losses of data.	Data Privacy	✓	
Socioeconomic Compliance				
419-1	Non-compliance with laws and regulations in the social and economic area.	Significant fines and Non-monetary Sanctions	✓	



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Independent Accountants' Review Report

The Board of Directors and Management
BBVA Compass Bancshares, Inc.:

We have reviewed the disclosures identified with the symbol "√" (the Disclosures) included in the BBVA Compass GRI Indicators tables on pages 42 through 44 of the accompanying 2017 Responsible Banking Report of BBVA Compass Bancshares, Inc. (the Company) for the year ended December 31, 2017 (the 2017 Responsible Banking Report). The Company's management is responsible for preparing and presenting the Disclosures in accordance with the criteria set forth for each related disclosure in the Global Reporting Initiative Standards (GRI Standards). Our responsibility is to express a conclusion on the Disclosures based on our review.

Our review was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the review to obtain limited assurance about whether any material modifications should be made to the Disclosures in order for them to be in accordance with the criteria. A review is substantially less in scope than an examination, the objective of which is to obtain reasonable assurance about whether the Disclosures are in accordance with the criteria, in order to express an opinion. Accordingly, we do not express such an opinion. We believe that our review provides a reasonable basis for our conclusion.

The preparation of the Disclosures requires management to interpret the criteria, make determinations as to the relevancy of information to be included, and make estimates and assumptions that affect reported information. The selection of different but acceptable measurement techniques can result in materially different measurements. Different entities may make different but acceptable interpretations and determinations.

Based on our review, we are not aware of any material modifications that should be made to the Disclosures identified with the symbol "√" included in the accompanying 2017 Responsible Banking Report in order for them to be in accordance with the criteria as set forth for each related disclosure in the GRI Standards. The information for the years ended December 31, 2016 and 2015 were not reviewed by us and, accordingly, we do not express any form of assurance on them.

KPMG LLP

October 22, 2018

KPMG LLP is a Delaware limited liability partnership and the U.S. member firm of the KPMG network of independent member firms affiliated with KPMG International Cooperative ("KPMG International"), a Swiss entity.

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