

Principles of Responsible Behaviour for Suppliers

Appendix in the Supplier Certification Policy

Banco Santander's mission is to help people and businesses prosper. Therefore, the Bank must be responsible for everything it does along the value chain.

By fulfilling its mission, Banco Santander will not only grow as a business but will also help society to face the main global challenges. Economic and social progress go hand in hand. The value the Bank creates must be translated into benefits for all.

This document establishes the minimum principles of ethical, social and environmental conduct that Banco Santander expects from all its suppliers; these are aligned with the ten principles of the Global Compact.

Banco Santander requires all suppliers to comply with applicable legislation in the countries in which they operate. It also expects suppliers to adopt the necessary policies and procedures to ensure compliance with the principles detailed in this document.

Santander will work with suppliers to comply with the principles cited in this document. If, despite this, the supplier does not comply with these principles, the Bank will take the appropriate measures to review the terms of the contract, or even proceed to terminate the contract.

These principles apply to all suppliers providing services for or on behalf of Banco Santander.

Banco Santander will periodically review these principles and carry out ad hoc reviews when necessary.

Santander reserves the right to request policies, procedures or any other supporting documents from the supplier to ensure compliance with these principles. The Bank may also require an audit to be carried out if it deems it appropriate to do so.

ETHICS AND CONDUCT

From an ethical perspective, commercial transactions should generate favourable economic conditions for all parties involved and relations should be based on the principle of fair and honest treatment.

All actions by suppliers with the Santander Group must be subject to the principles of transparency and honesty in any relationship they have with the public administration and private individuals, rejecting any actions associated with bribery, influence peddling or any form of corruption in both the public and private sectors. They shall refrain from actions such as offering, giving or receiving commissions, gifts (with the exception of those that conform to social customs) or advantages of any kind that could be considered acts of corruption.

In addition, suppliers shall take all necessary measures to avoid conflicts of interest. The supplier shall avoid any relationship with Group management or any other person with decision-making or influence in relation to a contract or transaction that they are negotiating in their capacity as suppliers for the Santander Group.

The compliance function, especially in the area of the prevention of money laundering, financing of terrorism, other serious crimes and the mandatory international sanctions programmes at Santander Group, carries out periodic reviews and checks on the suppliers providing services to the Group, both globally and in different geographical areas, to assess potential impacts in the event that any supplier may incur or be affected by any such illegal behaviour or activities.

The Bank also expects its suppliers to have internal ethical policies, standards or procedures that include at least compliance with local laws, anti-corruption measures and initiatives to ensure business integrity (undue payments, conflicts of interest, fraud, gifts and protection of trademarks and intellectual property, etc.).

SOCIAL

Human rights

Banco Santander expects its suppliers to work to support and respect the protection of human rights in accordance with the United Nations Universal Declaration of Human Rights, the Fundamental Conventions of the International Labour Organization (ILO) and the United Nations Guiding Principles on Business and Human Rights. This means that suppliers shall:

- Prohibit forced labour and ill-treatment of their employees. This includes a ban on all trafficking in human beings.
- Ensure the absence of child labour.
- Allocate a living wage sufficient to meet the basic needs of their employees and ensure compliance with the regulations in force in the countries where they operate.
- Ensure that working hours are not excessive and that the maximum working day complies with national legislation.
- Respect their employees' freedom of association.

Health and Safety

Suppliers must comply with health and safety requirements to provide their employees with a safe and appropriate working environment.

Diversity and Inclusion

Suppliers must undertake to treat all their employees fairly and equally and not to discriminate on the basis of birth, race, sex, religion, opinion or any other personal or social condition or circumstance.

ENVIRONMENT

Banco Santander is firmly committed to environmental protection and the transition to a low carbon economy. Santander therefore invites all suppliers to join it in this commitment:

Banco Santander mantiene un fuerte compromiso con la protección del medioambiente y en la transición hacia una economía baja en carbono. Por ello, Santander invita a todos los proveedores a sumarse a este compromiso:

- Having a sustainability or environmental policy that is aligned with the size and operations of the company and that addresses the prevention, mitigation and control of environmental impacts.
- Implementing environmental management systems.
- Setting targets for reducing emissions and consumption.
- Promoting continuous improvement.

Whistleblowing channel

In order to increase the transparency and integrity of the supply chain, Banco Santander has created a complaints channel for suppliers through which they can report inappropriate conduct by Group employees in the framework of the contractual relationship between the supplier and Santander.

Data confidentiality and protection

It is paramount to adequately protect and manage the information and data derived from the contractual relationship with Santander Group, and suppliers may be required to take special measures to guarantee their confidentiality and secrecy, especially when they are of a personal nature.