



FAQ

# Canal Abierto

#yourconductmatters

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## 1 CANAL ABIERTO

### 1.1. What is the Canal Abierto?

The Canal Abierto is the means that Santander Group has to report, confidentially and anonymously -if so wished-, any conduct in breach of legal or internal regulations, breach of the General Code of Conduct or contrary to our corporate behaviours, provided that it takes place in the professional sphere, without the person who reports such breaches through Canal Abierto being subject to reprisals, among other guarantees and rights of the reporter that are included in the Policy and Procedure that regulates the Channel.

### 1.2. What are its characteristics?

The Canal Abierto's key characteristics are as follows:

- Open door policy: This channel can be used by any active employees, suppliers, customers, shareholders, member of the Board of Directors, intern, or any third party related to Santander Group.
- The Canal Abierto's access platform and call centre will be managed by an external provider (NAVEX); any reported situations will be handled and investigated by the corresponding internal teams.
- The strict prohibition of reprisals or any type of negative consequence for having reported a situation, except for any disciplinary measures which may have to be applied if the internal investigation determines that the situation was reported in bad faith.

### 1.3. Why is the Canal Abierto needed?

- Santander Group has rolled out the Canal Abierto with a view to detecting and acting on conduct in breach of legal or internal regulations, breach of the General Code of Conduct or violates our corporate behaviours and ethical principles, while fostering an atmosphere where you can speak up and be truly listened.
- Additionally, the legal regulations which apply to Santander Group demand that the Group has specific reporting channels in place to notify misconduct in terms of serious or very serious criminal or administrative offences or breaches of European Union Law, accounting or auditing, internal control or inappropriate influence on external auditors, as well as any breaches of the regulations on anti- money laundering and the financing of terrorism.
- Furthermore, an effective communication system such as the Canal Abierto reinforces our commitment to promoting an ethical and honest culture, to which Santander Group is strongly committed.

## 2 REPORTING – General

### 2.1. How can I access the channel? Can I use the internet or phone line interchangeably?

Yes. The Canal Abierto allows for confidential or anonymous reporting via the phone and the online platform.

Go to the web <http://www.canalabierto.ethicspoint.com> or call the 24x7 phone by calling: 900-99-0011 with the code of prompt dial 844-742-7329. You can also request a face-to-face meeting.



### 2.2. What type of situations should I report?

Through the Canal Abierto you can report conduct which breaches the applicable legal regulations, the General Code of Conduct or the corporate behaviours of Santander Group that take place in the professional sphere, in accordance with paragraph 1.2 of the Canal Abierto Policy.

No commercial complaints or queries, as well as communications that lack credibility, are based on mere subjective opinions or unsubstantiated rumours, will be accepted through this channel.

### 2.3. What information shall I be requested when I report an irregularity?

When you access the Canal Abierto, you need to provide your personal and contact details unless you wish to report anonymously. You will also need to identify the unit where the events took place and the date on which they occurred. It is also important that you identify the people involved as either the person responsible for or the witnesses to the events. The more information you provide, the easier it will be to investigate and resolve the facts.

### 2.4. Why should I report what I know?

Santander Group promotes ethics, responsibility, and transparency. With initiatives such as the Canal Abierto, it fosters an environment in which to speak out. This is key to detecting and preventing conduct which may harm the Group's employees, customers or other third parties, as well as the Group itself

### 2.5. Where do the notifications go? Who may have access to them?

Any incidents directly reported through the Canal Abierto go to a secure EthicsPoint server (NAVEX), which is not part of Banco Santander, S.A.'s website or intranet. This information is accessed by specially appointed external staff who receive and analyse it for subsequent management and investigation by the right team at Santander Group, in accordance with the type of breach in question or the entity where the incident occurred.

All employees who are informed of the situations reported through the Canal Abierto are obliged to keep the identity of the person reporting the presumed irregularity strictly confidential.

In case you receive a communication that is subject to the Canal Abierto and you are not authorised to handle it, please note that you should immediately forward it to Regulatory Compliance, which coordinates the management of the Canal Abierto.

### 2.6. Do I need to supply evidence of the situation I wish to report?

Even though this is not mandatory, you can include any documents, images, videos or any other information you may have about the reported situation. This will be extremely useful for its management and investigation.

### 2.7. How is my notification handled after I have sent it? What are next steps?

After you report the situation online or over the phone, the incident is registered in EthicsPoint's secure server and will be received by Compliance who will designate the person in charge of the investigation.

In the event that the Group team in charge of the investigation needs further information about the reported situation, you will receive a message through the online platform where your notification was registered. Enter your user name and password to respond.

You can use this platform to access and check the status of your notification and to supply new information.

In the event that you have chosen to send your communication by means of a face-to-face meeting



with the Canal Abierto managers, please note that they will subsequently include it in the EthicsPoint platform, so that it has all the guarantees of the Canal Abierto, and therefore the above paragraphs will apply.

### **2.8. How long will the investigation phase take?**

Cases received through Canal Abierto must be processed within a maximum of 60 days from receipt of the communication unless the case is especially complex or there are valid reasons to justify extending this deadline by a further 30 days.

If the person in charge of the investigation deems it necessary to gather further information, they will contact you through the Canal Abierto's online platform.

### **2.9. Should I be worried about reprisals for reporting through the Canal Abierto?**

Santander Group does not tolerate any type of reprisals or threats to the people who, in good faith, use the Canal Abierto to report a fact they become aware of. If the company verifies that an employee was not to observe this commitment, he/she may be subjected to the appropriate measures, including disciplinary penalties.

### **2.10. For how long will I be able to access the notification I submitted through the Canal Abierto's online platform? If my notification is closed, can I still access it?**

You can access your notification until it is closed by the person in charge of the investigation.

### **2.11. Will I be informed of the investigation's result? How?**

Enter your username and password in the Canal Abierto's online platform to view any updates to and the status of your notification.

At all events, since this is confidential information you will not receive any details about the resolution to the reported situation or the potential disciplinary measures, if any, which may have been taken.

## **3**

## **SECURITY AND CONFIDENTIALITY OF REPORTING**

### **3.1. Every time we report a situation from a Group computer a log is generated and archived in the Bank's servers. Can I be identified as the person who reported the situation?**

The Canal Abierto system uses the EthicsPoint website and does not generate or keep any type of internal connection log with IP addresses. As such, no information will link your computer to the Canal Abierto.

Please bear in mind that you can also access the Canal Abierto through a call centre or from a different computer outside the Group's network using the Canal Abierto's web address.

### **3.2. Is the free phone line also confidential and anonymous?**

Yes. You will be asked for the same information you would have to supply if you were reporting the situation online. The operator will input your answers to the Canal Abierto's online platform. This type of reporting is under the same security and confidentiality measures as if you were reporting directly through EthicsPoint's website.



## 4 TIPS AND BEST PRACTICES

### 4.1. Confidentiality or anonymity?

In confidential reporting, you provide details about your identity solely to the people specifically appointed by the external provider to receive your notification (over the phone or online), as well as to the person in charge of the investigation. Your identity may be disclosed to other people when you have given prior consent thereto as part of the internal investigation.

If you are reporting anonymously, we may not have sufficient information to conduct a full investigation. As such, it is important that you supply as many details as possible about the situation or behaviour in question. Please bear in mind that you can access the platform and check for messages requesting further information for the internal investigation.

### 4.2. I'm aware that some people are involved in unethical conduct but it does not affect me.

#### Why should I bother to report this?

Santander Group promotes a positive work environment dominated by business ethics, accountability and transparency.

To uphold these principles it is essential that you collaborate by reporting situations you become aware of in the Group and which breach the legal or internal regulations or Santander's corporate behaviours.

Reporting this type of situation is vital to detect and prevent conduct which may harm not only the Group, but also its employees, customers and other related third parties.

### 4.3. What happens if I remember something important about the incident once I have reported it? And what if the entity wishes to ask me further questions?

When you report a situation through the Canal Abierto's website or the call centre, you receive a unique username and have to enter a password. You can then use these credentials to access to your original notification to the Canal Abierto (either online or over the phone), if you wish to add new details or answer questions requested from a member of the team of Group investigators.

### 4.4. Is my notification followed up on as securely as it was initially reported?

All communications made through the Canal Abierto are as confidential as the initial notification.

Also, if you prefer to report the situation anonymously, all of your communications through the Canal Abierto will be anonymous unless you say otherwise.

### 4.5. When the case is closed, will I be able to give my opinion on the management procedure of my communication?

Yes, the last feedback message provided by the research team through the platform will be accompanied by a link to access a confidential survey (and anonymous, if you have chosen this option when submitting your initial communication) in which you can assess how your communication has been managed and provide suggestions for improvement. Please note that you will need to log in to your case in order to see the link to the survey.

