

GENERAL CODE OF CONDUCT

Open Digital Services, S.L.

Santander Group

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1. INTRODUCTION

This document includes the behaviors and values of conduct that must be followed in a mandatory way by all the people who form Santander Group and consequently Open Digital Services, S.L (hereinafter “ODS”).

All professionals who make up the staff, members of senior management and members of the administrative bodies of the companies that make up Santander Group must know and comply with this Code. This does not change your duty to comply with other codes of conduct specific to your activity.

The Code acts, on the one hand, as a mechanism for the prevention of the risks to which we are exposed; and on the other, it is a defense tool against breaches of our regulations.

2. DEFINITIONS AND SCOPE

For the application of this Code, the following definitions shall be considered:

- **Professionals:** Employees.
- **Conflict of Interest:** Generally, a conflict of interest occurs when one or more persons and/or entities, and/or units or businesses have interests that may be potentially adverse to those of another person, entity, unit or business, as well as when there is a duty of care or trust with respect to third parties with interests in the entity. Likewise, it can occur when a situation or circumstance may adversely influence the performance of the duties and responsibilities assigned to a person within the Santander Group entities.
- **Related party:** A natural or legal person with whom the professionals or directors of Santander Group maintain an economic or family relationship (ascendants, descendants and collaterals, as determined by applicable local law), with significant influence on their role or decision-making in the Group.
- **Family:** For the purposes of this Code, an immediate family member means your spouse or person with a relationship of similar affection, your parents, your children, your siblings, grandparent and the partners of these people. It is also understood as other relatives beyond the immediate ones, your uncles, your nephews or your cousins and the partners of these people.
- **Friendship relationship:** Any kind of close friendship relationship between a member of the management staff and you that could result in a favor deal.
- **Inside information:** Information on securities or financial instruments admitted to trading on or in the process of being traded on an organized market or system of contracting, or to issuers thereof, which has not been made public and which, if so, could influence their listing.
- **Financial information:** Financial information refers to all of our accounting and economic information that we present to our clients, auditors and that we also provide to supervisory bodies.
- **Santander Group or the Group:** Group of entities that make up Banco Santander S.A. as parent entity, and the dependent entities over which it has direct or indirect control. For clarity, it is composed by Banco Santander, S.A, a parent entity, including Santander España, an organizational unit, which are part of the said entity, and any other unit or subsidiary of the Santander Group.
- **Corporation:** All governing bodies, organizational structures and employees empowered by Banco Santander S.A. who exercise supervision and control throughout the Group, including those functions typically associated with the relationship between the parent entity and the subsidiaries.

- **Subsidiary:** entity that is part of Santander Group or an entity controlled directly or indirectly by Banco Santander, S.A.

3. SCOPE OF APPLICATION AND TRANSPOSITION IN SUBSIDIARIES

The General Code of Conduct has been elaborated by Banco Santander, S.A., as the parent entity of the Santander Group, and has been adapted locally by ODS to adapt it to the characteristics and particularities of said entity, considering the type of business and size of the same. The Code is directly applicable to ODS and has the validation of the ODS head company to the adaptations made.

4. MAIN CONTENT OF THE GENERAL CODE OF CONDUCT FOR EMPLOYEES

4.1. OUR CORPORATE CULTURE

A strong and inclusive culture: The basis for building a more responsible entity.

- **The Santander Way:**

The Santander Way is our way of doing business. It is:

- **our mission:** to help people and companies progress,
 - **our vision:** to be the best open platform for financial services; and
 - **our way of working:**
 - Simple: We offer accessible services and products.
 - Personal: We deal with people and that is why we treat them uniquely. We offer you the products and services that best suit your needs.
 - Fair: We promote fairness, transparency and deliver on our promises. We build good relationships with the various stakeholders because we understand that what is good for them is good for us as well.
- To be a simple, personal and fair entity, we have established our **corporate behaviors** that are summarized in **T.E.A.M.S.** and guide how we should all act and behave:
 - **Think customer:** I take care of the relationship with my customers and give my best to get their trust and loyalty.
 - **Embrace Change:** I face new challenges and look for new ways to do things as an opportunity to grow.
 - **Act Now:** I take the initiative responsibly. I manage risks by always making things simple.
 - **Move together:** I promote collaboration and work with my colleagues to achieve common goals.
 - **Speak Up:** I express my ideas and concerns and scale any problems or risks to create an environment of respect and trust. I feel comfortable receiving and giving feedback.

- In addition, we have our own way of managing risks, **Risk Pro**, a solid, joint and attentive management in which the entire team collaborates, from the staff of the branches to the Board of Directors.

The Santander Way is the cornerstone for creating a more responsible entity.

4.2. A TOOL FOR YOUR DAY TO DAY

You are the speaker of ODS and consequently the Santander Group. Your conduct makes us the simple, personal and fair entity for which we work every day.

4.2.1. WHAT IS THE CODE OF CONDUCT

This document includes the behaviors and values of conduct that we must follow in a mandatory way all the people who form Grupo Santander.

We will build a fair and ethical Santander Group with your exemplary behavior on a daily basis. This Code is a tool in which you can support yourself on your journey toward progress and transformation of society and companies. The Code acts as a mechanism for the prevention of the risks to which we are exposed.

4.2.2. WHO MUST COMPLY WITH IT

This Code applies to each member of the ODS team¹. Everyone must know and comply with this Code. This does not change your duty to comply with other codes of conduct specific to your activity.

4.2.3. WHAT HAPPENS IF IT IS BREACHED

Failure to comply with any provision of this Code or its implementation regulations may involve disciplinary measures, in addition to administrative or criminal measures if any.

In the day to day of your work there may be situations in which you do not know how to act. If you need advice or have questions regarding any section of the Code, please contact Governance, Risk & Compliance.

If you identify breaches or irregularities, speak clearly: You must tell your responsible or responsible: Governance, Risk & Compliance or People & Culture. We also listen to you through the Open Channel (at point 5. we explain in detail how to do it).

4.3. WE COUNT ON YOUR COMMITMENT

Our customers trust Grupo Santander because we trust you.

4.3.1. THE KEYS THAT GUIDE YOUR GOOD WORK

As a professional at Santander Group, make sure you have the necessary knowledge and be aware of the responsibilities required by your position; perform your duties with impartiality, judgment and diligence. You are part of our team; therefore, it is important that you commit and comply with the following:

- Comply with external and internal regulations that affect your activity.

¹ All staff professionals, members of senior management and members of ODS governing bodies

General Code of Conduct

- Act impartially and honestly, and not engage in illegal or unethical activities as defined in this General Code of Conduct.
- Inform your responsible person, People & Culture and Governance, Risk & Compliance as soon as possible if you are involved in criminal or administrative proceedings conducted by authorities or bodies that supervise the activity of our companies. You will have to report whether you are presumed responsible, witness or even if your participation is not related to your professional performance.
- Always act in our interest and not benefit personally from the business opportunities of Santander Group.
- Prioritize the work you perform in Santander Group and not provide professional services (paid or not) to other competing entities regardless of the nature of your relationship with them. To do so, you must have the express authorization of your manager, People & Culture and Governance, Risk & Compliance.
- Notify your controller, People & Culture and Governance, Risk & Compliance if you engage in any other professional activity for your own account or for any company or entity, whether or not competitor, when there may potentially be any conflict of interest arising from your own account or from the performance of said company or entity as supplier of the entity or in situations of similar nature.
- When you are involved in transactions on behalf of the entity, take into account the external, internal, rules and rates that determine the prices and conditions of the different products and services we sell.
- It respects internal procedures, especially those relating to the exercise of powers and the application of risk limits.
- Take care of the means we put at your disposal.
- You must train and learn to develop as a professional. In addition, it is mandatory that you attend training or information sessions that have this character, and in particular those that we organize related to the Code of Conduct.
- Respect the rights of association, association and collective bargaining.
- Follow occupational safety and hygiene standards to prevent and minimize occupational risks. In this way, you take care of yourself and the rest of your companions.

At Santander, we comply with the applicable Environmental, Social and Governance (ESG) regulations and contribute to several of the United Nations Sustainable Development Goals.

The commitment to corporate social responsibility that we have assumed at Santander Group promotes improving the quality of life of professionals and their families. We work to create a safe work environment compatible with personal development, while helping professionals to reconcile work requirements as best as possible with their personal and family lives. Likewise, we believe that the occupational safety and health of our professionals is essential to achieve a comfortable and safe working environment, being a priority objective the permanent improvement of working conditions. And finally, we encourage an open, transparent and constructive dialog with representative workers' organizations to consolidate the objectives of social peace and job stability.

It is necessary that as a professional of Santander Group you are part of our team, and fulfill in your work with these commitments and apply our corporate behaviors and the Risk Pro, as an essential part of the implementation of the Santander Way.

4.4. CANAL ABIERTO. WE LISTEN TO YOU.

We want you to speak loud and clear, as it generates trust and team.

4.4.1. WHAT IT IS AND HOW IT WORKS

At Santander Group, we strive to defend an open and honest working culture. We foster an ethical, responsible and transparent environment in which people speak out and express themselves freely. To make sure this is the case, we have the Canal Abierto.

The Canal Abierto is our internal information system, designed to help people express themselves and speak clearly, strengthening the culture of information and compliance in Santander Group. It is hosted on a platform managed by a provider external to the Group, specified in the internal regulations on the use and operation of the Canal Abierto. An external company receives communications to ensure your confidentiality and anonymity.

Through the Canal Abierto you can communicate suspicions about behaviors that take place in the professional or work environment related to:

- possible suspicions of a criminal offense,
- Possible breaches of the General Code of Conduct,
- possible breaches of external and domestic regulations (including regulations on the prevention of money laundering and terrorist financing);
- financial and accounting irregularities
- Serious or very serious criminal or administrative offenses or an infringement of European Union law; or
- possible breaches of our corporate behaviors.

Communications are transferred confidentially (and if you want anonymously) to Governance, Risk & Compliance.

Any professional of Santander Group, supplier, client or third party that relates to us, can access the Canal Abierto.

Reprisals or threats of retaliation for having made a communication are prohibited. This prohibition shall not prevent us from taking disciplinary action when the internal investigation determines that the communication has been malicious and/or formulated in bad faith.

In the management and processing of communications received through the Canal Abierto, the rights and guarantees of the people involved in communication are protected.

If you know, suspect or believe that there is some conduct that takes us away from being an ethical, responsible and fair entity, raise your hand and communicate.

You have at your disposal the Canal Abierto Policy and the procedure of use and operation of the Canal Abierto to know in more detail the criteria and management principles that regulate our channel.

Santander Group actively promotes the communication of any irregularity. Canal Abierto is the preferred channel for the communication of the most serious conduct, such as those that may constitute serious or very serious criminal or administrative offenses, or infringements of European Union law. These behaviors may also be communicated through the external channel established by the Independent Protection Authority, as

well as through the external channels established by other bodies, included in the Canal Abierto Policy for purely exemplifying purposes.

- **I would feel more at ease communicating the situation in person. Is it possible?**

Yes, you can request a face-to-face meeting with those responsible for the Canal Abierto to Governance, Risk & Compliance. This meeting will have the same guarantees as any other type of communication with the Canal Abierto, including the sending of a letter by post for compliance, as provided for in the Policy and the Procedure.

- **I am not sure whether what I have experienced is a situation that is the subject of communication through the Canal Abierto. What should I do?**

Access the Canal Abierto and communicate it, even if it is a mere suspicion.

4.5. THE CODE IN PRACTICE. WE ARE A BENCHMARK OF CONDUCT.

We do not want to impose rules, we want you to want to comply with them.

4.5.1. YOUR RELATIONSHIP WITH YOUR COLLEAGUES

4.5.1.1. We offer equal opportunities and do not discriminate

We select professionals based on their talent, training, skills and experience. Personal merits and achievements are the only factors that influence our decision. When you participate in selection, recruitment or professional promotion processes, be guided by the principle of equal opportunities and non-discrimination on the basis of sex, sexual orientation or condition, race, religion or belief, political ideas or membership or non-union membership, disability, origin, age, language, etc. civil status or social status.

When it comes to decision-making, it acts with objectivity, tolerance and promotion of diversity with the sole objective of identifying the right people for the position.

Please note that we do not offer positions or employment contracts to public authorities or officials who are involved (or have recently been involved) in matters that directly affect our interests.

4.5.1.2. An inclusive and respectful work environment

We want to make Santander Group a safe environment in which all people can show you how you are and have the same opportunities. We do not tolerate that any professional, supplier or client, be discriminated against on the basis of sex, sexual orientation or condition, race, religion or belief, political ideas or union membership, disability, origin, age, language, language, etc. civil status or social status. Therefore, we will not allow anyone to make comments or actions that could destroy this culture of respect to which we aspire. We expect tolerant and exemplary behavior on your part.

Abuse, intimidation, harassment, both work and sexual harassment, disrespect, behavior that could violate the dignity of people, especially those that negatively concern the visible or invisible personal characteristics of any professional related to us, are prohibited.

If you witness any of these behaviors during the performance of your professional activity, communicate it on the spot. Enter the Canal Abierto or contact your manager directly (if possible), Governance, Risk & Compliance and/or People & Culture.

4.5.1.3. How to prevent a conflict of interest with family or friends

- **What do we mean by family?**
 Immediate Relative is your spouse or person with a similar affective relationship, your parents, your children, your siblings, grandparent and the partners of these people.
 It is also understood as other relatives beyond the immediate ones, your uncles, your nephews or your cousins and the partners of these people.
- **What do we mean by friendship relationship?**
 It is any kind of close friendship between a member of the management staff and you that could result in a favor deal.

Do not participate in transactions made by our entities in which you have any interest or have any person linked to you.

Do not participate in or influence procedures for contracting products or services with companies or persons with whom you have any economic or family relationship.

Do not provide favorable treatment or special working conditions to people with whom you have a friendly, family or financial relationship.

Refrain from influencing any process of hiring, promoting or improving the working conditions of a person with whom you have a family or friendship relationship.

To prevent possible situations of conflict of interest with other professionals of the Group with whom we have a family relationship, please note that:

- If you are directly hierarchically or functionally dependent on an immediate family member or other family member, we will transfer one of you to another unit within one year. We will take the same measure if you have a hierarchical dependency, indirectly, with an immediate family member.
- If the dependency, hierarchical or functional, with another family member is indirect, your case will be analyzed by the Governance, Risk & Compliance and People & Culture functions to ensure that there are no potential conflicts of interest. We will take the same measure when you have a functional dependency, indirectly, with an immediate family member.
- If you belong to the corporate segment Promontorio, Faro or Solaruco, your family relationships will be analyzed on a case-by-case basis by the functions of Governance, Risk & Compliance and People & Culture, even if you do not have hierarchical/functional dependence on those relatives.

In addition, if you have a family relationship with any Santander Group executive member whose ability to influence your employment situation is significant, it is necessary to communicate this by both parties to the employee manager, Governance, Risk & Compliance and People & Culture, this will help ensure that the recruitment processes are, and will be, effective and effective. promotion or improvement of working conditions (including wages) are meritocratic and free of conflict of interest.

4.5.2. YOUR RELATIONSHIP WITH SANTANDER

4.5.2.1. How to prevent a conflict of interest with Santander

You can hire any of the products or services we offer in accordance with the usual market terms or in accordance with the general conditions set for our professionals.

You may not acquire or lease (directly or through persons linked to you) assets or assets of Santander Group or vice versa (we will not be able to acquire or lease assets or goods belonging to you or to persons linked to you). There are two exceptions:

- when acquired or leased through a public bidding process, or
- When authorized by Governance, Risk & Compliance and People & Culture.

In such cases, Governance, Risk & Compliance and People & Culture shall ensure that transactions are conducted with transparency and equality for other interested persons, are conducted in accordance with market conditions and do not constitute a conflict of interest or insider use.

If you want to invest in businesses in which we have an interest, we participate directly (co-investment) or even in which we have opted out, you will need to obtain prior authorization from your manager and Governance, Risk & Compliance. This authorization shall be granted once they have established that there is no conflict of interest at present or in the future. Until you get both written authorizations, don't start the investment process. See the Conflict of Interest Policy for more details.

4.5.2.2. How to treat confidential information and personal data

You must always observe the maximum confidentiality in relation to the information that we have not made public, as well as with respect to the personal data to which you have access for the performance of your professional activity, or consequently thereof, even if you stop working with us.

Use personal information and data exclusively to carry out your work. Use only those data and information that are strictly necessary and make sure you have permission to do so.

When processing personal data, please ensure that the necessary technical and organizational measures are applied to enable us to guarantee at all times a level of security appropriate to the rights and freedoms of the data subjects.

Do not share personal data with third parties unless you have proof that there is a legal basis for doing so.

Never use the information you have access to for your functions for your own benefit or third parties.

When a judicial body, public administration or other competent authority requests information from you, decrees embargoes, provide only the data you ask for. If you have any questions about this situation, contact Governance, Risk & Compliance and Legal Advice.

4.5.2.3. Your conduct before the media and public appearances

Do not spread information, comments or rumors about us or about third parties to the media.

Channel any query from a journalist or a media outlet with Communication.

If you are offered to give a speech or if you are considering giving an interview on topics related to our corporate purpose or to your professional activity with us, ask for authorization from your manager, Governance, Risk & Compliance and Communication.

If you are going to participate in public forums, social networks or similar platforms where you may reveal certain political or ideological biases that compromise our neutrality, do not speak on our behalf, refrain from highlighting your status as a Group professional and make it clear that you are acting in a personal capacity.

4.5.2.4. Your conduct in the stock markets

If you conduct personal transactions in financial markets (including securities and other financial instruments), you always comply with our principles:

- Do not engage in operations for immediate profit or speculative or that require, because of their risk or volatility, a continuous monitoring of the market that could interfere with your work.

- Check with Governance, Risk & Compliance if you have questions about:
 - the speculative nature of your operations,
 - the privileged or relevant nature of an information, or - how to interpret this section.
- Never trade overhead or without sufficient provision of funds when making personal investments.
- Do not conduct transactions based on confidential information from customers or suppliers or on sensitive information from us that you have obtained during the course of your work.
- If you have privileged information, do not trade on securities or financial instruments that it affects, do not advise to trade other people and do not disclose that information, except in the strict exercise of your professional duties. In any case, communicate it to Governance, Risk & Compliance and indicate the source from which you obtained it.
- **What should I do if I receive privileged information?**
- If you have had access to privileged information, are not registered in the initiate list and are not part of the corresponding project or access to this information has been an error, contact Governance, Risk & Compliance.
- If you receive insider information in the performance of your work and authorized by the person responsible for the project in question, you do not need to contact Governance, Risk & Compliance, although we recommend that you ensure that you have been properly included in the appropriate initiate list.
- **What is Privileged Information?**
- Information on securities or financial instruments admitted to trading on or in the process of being traded in an organized market or system of contracting, or to issuers thereof, which has not been made public and which, if so, could influence their listing.

4.5.2.5. The competition we like: Fair and responsible

Compete fairly and effectively in the commercial activities with which you operate.

It promotes free and effective competition that benefits the market, customers and all those with whom you maintain business or professional relationships.

It complies at all times with the internal rules on the defense of competition that apply to each activity.

Report on any anti-competitive practices you detect when dealing with competitors. If you have any doubts or suspicions, consult Legal Advice or Governance, Risk & Compliance. For more details, read the Corporate Defense Policy carefully.

4.5.2.6. Cybersecurity: How to protect ourselves

Cybersecurity is the responsibility of all the people who form Santander Group. Our Cybersecurity Standards Policy for the protection of Santander Group regulates the proper use of computer systems and information technologies (e.g. computers, mobile phones, e-mail, Internet access, social networks, etc.). It also takes into account the risks that may arise.

As a professional at Santander Group, he complies with the cybersecurity practices indicated by our policy.

[opendigitalservices.com](https://www.opendigitalservices.com)

If, due to your job, you make specific use of our computer systems with special privileges (for example, you are a developer or system administrator), in addition to the Cybersecurity Standards Policy for the protection of Santander Group, you have to take special care in complying with the Cybersecurity Requirements Policy for Technical Users.

We must avoid malicious practices or inappropriate behavior that may cause severe breaches of security, such as use of unauthorized software, breaches by technical users, exfiltration or leakage of information.

4.5.2.7. Responsible use of personal social networks

Although the use of social networks is an individual responsibility, we remind you that your relationship with us can generate reputational, cybersecurity or other risks for the Group. Therefore, we recommend that you make conscious and responsible use of your profiles and the contents you publish on the networks.

Know the Policy on the Use of Social Networks by employees in a personal capacity and fulfill its basic principles.

• Am I able to comment giving my opinion in a post of our corporate profiles?

Of course, you can always express your opinion in your own publications or participating in ours, but you must do so individually, transparently and honestly, without disclosing confidential information, respecting intellectual property and, ultimately, complying with the principles of the Social Media Policy for professionals of Santander Group.

4.5.2.8. How to protect our assets

Protect and take care of our assets (properties, real estate, movable property, etc.) and do everything possible to prevent them from being damaged.

Use the assets properly, adjust to the purpose for which they have been delivered to you, and comply with the internal control procedures we establish to protect them. In particular, electronic devices (mobile phone, computer, etc.) that, being of professional use, can be inspected.

Do not make any disposition or lien on an asset if you do not have the authorization of your manager.

Do not dispose, transmit or hide assets that are owned by us to avoid liability to our creditors.

4.5.2.9. Financial information: Reliable and transparent

Financial information refers to all our accounting and economic information that we present to our clients, auditors and that we also provide to the supervisory bodies.

This information is the responsibility of all the people who work at Santander Group, therefore, we have to treat it and reflect it with rigor and reliability.

When dealing with information of this type, make sure that the data that is collected exists, is complete and follows the directions of the regulations.

Always keep in mind the internal control procedures that we establish and comply with their instructions.

When you detect non-compliance, communicate it to your manager or speak clearly through Canal Abierto.

4.5.2.10. Control of individual expenses

Due to your professional activity with us, you may incur individual expenses, for example, if you must travel for professional reasons, if you attend training, if allowances are contemplated, etc. In these cases:

- It justifies the liquidations of expenses truthfully and following the indications of the policy.
- If you're a manager, carefully review your team member's payouts and make sure they're correct before authorizing or rejecting them. Also, please note the Travel and Other Expenses Policy.

4.5.2.11. Consider intellectual and industrial property rights

In Santander Group we have intellectual property rights and/or use rights in relation to original works, courses, programs and computer systems; processes, technology, know-how and, in general, with the works developed or created in the Group, either as a result of their professional activity or that of third parties.

Use the above resources and knowledge only to carry out your professional activity in Santander Group and return all the materials when we ask for them.

Always use the name, image and brands of Santander Group properly and only while you develop your professional activity with us.

Likewise, it respects the intellectual and industrial property rights of third parties or companies. Do not use any information or material that belongs to you and that you have obtained as a result of a previous position with that entity or without your consent.

4.5.3. YOUR RELATIONSHIP WITH CUSTOMERS, SUPPLIERS AND INTERMEDIARIES

4.5.3.1. Marketing of products and services

It designs products and services in a way that adapts to the needs of our customers. Mitigate any conflict of interest that may occur.

It meets customer requests, incidents and claims fairly and diligently.

4.5.3.2. How to relate to suppliers and intermediaries

In our activity, we interact with many people differently. As a responsible entity, we seek partners, suppliers and intermediaries who are also responsible, who promote social responsibility, ethical business, human rights in the workplace and environmental sustainability. In turn, we ensure that your activity meets our values and ethical standards.

When dealing with suppliers and intermediaries, please consult the Purchase Management Conduct Policy and follow its instructions.

Make sure the selection process is fair, equitable and impartial.

Avoid conflicts of interest during the process. When faced with a potential conflict, consult Governance, Risk & Compliance.

4.5.3.3. Gifts and invitations with third parties

In your professional activity, do not request, accept, promise or offer to third parties payments, commissions, gifts, remuneration, invitations, etc. money on loan, or financial facilities, taking advantage of the position, you hold in the Group to obtain a profit of your own, except in the case of:

- low-value propaganda objects;
- reasonable invitations in customary, social and courtesy uses; or
- Occasional details, such as Christmas or wedding gifts, if they are not in cash and are within a modest and reasonable limit.

- invitations to sporting or cultural events sponsored by us under the conditions indicated by the policy on this matter.

Please refer to the Policy on the Prevention of Bribery and Corruption (ABC Policy “Anti-bribery and Corruption”).

- **What should I do if a customer or supplier offers me tickets for a leisure or sporting event?**

Please refer to our ABC Policy in which we provide the criteria for accepting or not invitations from third parties. If you are still unclear, check with Governance, Risk & Compliance.

When you encounter such situations and have doubts about the suitability of accepting or offering a gift or invitation, consult Governance, Risk & Compliance. They are there to help you.

4.5.4. YOUR RELATIONSHIP WITH THE COMMUNITY IN GENERAL

4.5.4.1. We fight financial crime

Financial crime causes dangerous situations and serious losses for society, so we must contribute to its prevention and persecution.

All employees have the obligation to avoid and not facilitate in any case any type of crime, either through the facilitation of means or through the transmission of information to clients that could have a criminal use. In addition, we offer maximum cooperation to the authorities of the different countries in which we operate to fight financial crime, which we all have a responsibility to prevent, deter and detect. We have your unequivocal commitment to reduce the risk that the products and services we offer will be used in criminal activities or facilitate them.

The prevention of financial crime includes the fight against money-laundering, the financing of terrorism, non-compliance with international sanctions, bribery and corruption.

4.5.4.2. Political activities that affect our neutrality

We respect your right to free political association. However, you will need to make it clear that your participation is in a personal capacity and not involve the Group.

If you have been proposed to hold a public office and are considering accepting it, before making a decision, inform your manager and consult with People & Culture and Governance, Risk & Compliance. It is important that we make sure that there is no incompatibility, and that it will not compromise or your position in the Group.

4.5.4.3. Commitment to our tax obligations

We have zero tolerance for illegal tax avoidance. In all entities we comply with tax obligations and the principles that make up our tax strategy.

Avoid any practice that involves illegal avoidance of paying taxes in your professional activity. You must observe the applicable internal regulations.

4.5.4.4. How to relate to authorities

When you interact with public authorities or their representatives, you show an attitude of transparency, respect and collaboration.

4.6. BEHIND THE CODE OF CONDUCT. TEAMS INVOLVED.

Behind a great project, there is always a great team.

- **Governance, Risk & Compliance function:**
 - Executes, interprets and implements this Code;
 - Advises on the resolution of conduct related to this Code and internal regulations, as well as for the prevention of associated reputation risk;
 - Receive suggestions, queries and complaints related to the content of this Code, and
 - It designs training and awareness-raising actions on this Code.

- **People & Culture function.** Support Governance, Risk & Compliance in:
 - Communication of the Code;
 - design, organization and delivery of training activities on the subject;
 - attention to the consultations that professionals raise.

In addition, the People & Culture function organizes the disciplinary process.

The holder of the General Code of Conduct and who approves it is the ODS Executive Committee.

The IT, Cyber, Risk & Compliance Committee ensures compliance with the Code by our professionals.

5. RELATED INTERNAL REGULATIONS FOR MORE INFORMATION

- Canal Abierto Policy
- Corporate defense policy
- Conflict of interest policy
- Data protection policy
- Santander Group communication policy
- Policy of cybersecurity rules for the protection of Santander
- Cybersecurity Requirements Policy for Technical Users
- Personal social media policy for Santander professionals
- Policy of sanctions and financial countermeasures
- Bribery and Corruption Prevention Policy (ABC)

6. OWNERSHIP, INTERPRETATION, VALIDITY DATE AND PERIODICAL REVIEW

- Its initial approval, as well as any revisions from the date of approval to be made in this document, will be carried out by the ODS Executive Committee.
- Its interpretation corresponds to the role of ODS Governance, Risk & Compliance.
- In case of conflict between the Spanish version and the English version, the Spanish version shall always prevail.
- This document shall enter into force on the date of its publication. Its content will be subject to periodic review, making or where appropriate, changes or modifications that are deemed appropriate.

7. VERSION CONTROL

Version	Responsible for maintenance	Validation Committee	Approval	Date
1	Governance, Risk & Compliance function	IT, Cyber, Risk & Compliance Committee	ODS Executive Committee	03/12/2025

Version doc.	Comments
1	First version of document (Adaptation of Openbank's General Code of Conduct to ODS)