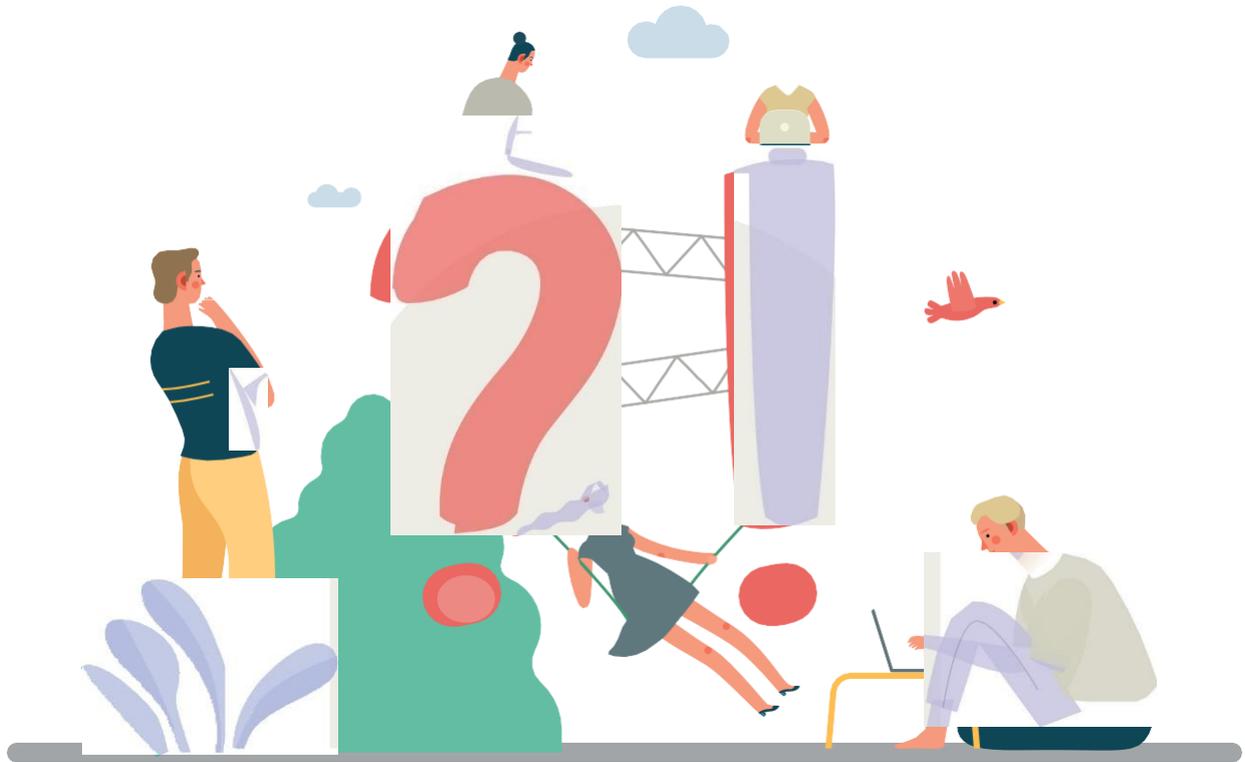


# Open Digital Services

## FAQs

### Canal Abierto



## 1. Canal Abierto

### I. What is Canal Abierto?

Canal Abierto (also referred to as "Open Channel" or the "Channel") is a platform provided by Open Digital Services (hereinafter referred to jointly as "**ODS**") for individuals who want to confidentially and anonymously report conduct that contravenes the law or internal regulations, breaches the General Code of Conduct or that infringes corporate behaviour or leadership principles, provided that such conduct takes place within a professional capacity. Any individual reporting such conduct via the Channel is protected against retaliation and is afforded the guarantees and rights established in the policy and procedure governing it.

### II. What are its features?

The fundamental features of the Channel are the following:

- Open Door Policy: any employee, provider, customer or third party (members of the Board of Directors, interns, among others) related to ODS can access the Channel.
- The Channel access platform is managed by an external provider (NAVEX) and report management will be handled internally by the corresponding teams.
- Any retaliation or negative consequence for whistleblowing, except for the implementation of appropriate disciplinary action if the internal investigation determines that the complaint was made in bad faith, is strictly forbidden.

### III. Why is the Channel necessary?

- ODS launched the Channel in order to detect and act on any conduct that breaches the General Code of Conduct or that is contrary to our 13 leadership principles, corporate behaviour and our culture, as well as to foster an environment in which individuals can speak plainly and be genuinely heard.
- Furthermore, the applicable legal regulations require the availability of specific communication channels to report inappropriate practices relating to accounting or auditing, internal control or undue influence on internal or external auditors, as well as infringements against the prevention of money laundering and financing of terrorism regulations.
- Equally, an effective reporting system reinforces our commitment to promoting an ethical and honest culture aligned with the responsible entity strategy, to which the Santander Group, and, thus, ODS, are firmly committed.

## 2. Reporting

### I. How do I access it?

The Channel allows individuals to report any inappropriate conduct confidentially and anonymously through the online platform.

You can access it via the Open Digital Services website in the "Canal Abierto" area or, if you are an employee, through the ODS intranet or via the url:

[ods.ethicspoint.com](https://ods.ethicspoint.com)

## II. What types of situations should I report?

Conduct contrary to applicable legal regulations or the General Code of Conduct, as well as ODS's leadership principles or corporate behaviour, which has occurred in a professional capacity, may be reported via the Channel, in accordance with Section 1.2 of the Canal Abierto Policy.

Commercial claims or queries, as well as insufficiently plausible reports that are based merely on subjective opinion or unsubstantiated rumour, will not be accepted through the Channel.

## III. What information will I be asked for when I submit my complaint?

Once you access the Channel, you must confirm your identity using your personal details and contact information, unless you wish to submit your complaint anonymously. Additionally, you must identify the department in which the to-be-reported facts occurred and the dates on which they took place. Furthermore, it is important that you identify the individuals involved, either as potentially responsible parties or as witnesses to the events. Providing more details will facilitate the investigation and resolution processes.

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

ODS promotes ethics, responsibility and transparency. Through initiatives such as the Channel, it seeks to foster a plain-speaking environment that is vital for the detection and prevention of harmful conduct against its employees, customers or other third parties, as well as itself.

## V. Where do the complaints submitted go? Who can access them?

Complaints submitted directly via the Channel enter a secure server managed by EthicsPoint (NAVEX) that is not part of the ODS website or intranet. These complaints are accessed by specifically designated individuals who are responsible for receiving and analysing them, in order to initiate their management and investigation according to the type of breach or the entity where the reported incident took place.

Individuals who have knowledge of the complaints reported through the Channel are required to keep the identity of the person making the complaint (hereinafter referred to as the "whistleblower") confidential.

If you have received any kind of communication relating to the Channel and you do not have management authorisation, you must immediately send it to the regulatory compliance department, which coordinates the management of the Channel.

## VI. Is it necessary to provide evidence of the situation I want to report?

Although it is not a mandatory requirement, if you have any document, image, video or any other information related to the complaint you are going to send via the Channel, you can include it and this would greatly assist the management and investigation process.

## VII. Once submitted, how will my complaint be handled? What process will you follow?

Once you send your complaint, whether via the online platform or by phone, it will be registered on the secure server of EthicsPoint (NAVEX) and received by the compliance department, which will appoint a person to be in charge of the investigation.

If the person in charge of the investigation requires more information about the situation you have reported, you will receive a message through the online platform on which your complaint has been registered. To reply, you can gain access it using your username and password.

If you have opted to send your report via an in-person meeting with Channel managers, they will subsequently include it in the EthicsPoint platform, in order to obtain all Channel guarantees. Therefore, the provisions of the previous paragraphs will apply.

Via this platform, you will be able to access and verify the status of the complaint reported, as well as provide new information.

### **VIII. How long will the investigation of my complaint take?**

Cases received via the Channel must be managed within a maximum period of 60 days as of receipt of the complaint, except for particularly complex cases or where there are valid reasons that justify extending this period for a further 30 days.

If the person in charge of the investigation considers that additional information is needed, they will contact you via the Channel platform.

### **IX. Should I be concerned about retaliation against making a complaint via the Channel?**

ODS does not tolerate any form of retaliation or threats against individuals who, in good faith, access the Channel to report an incident that they are aware of. If an employee has been verified to have not complied with this commitment, they will be subject to the applicable disciplinary measures.

### **X. How long will I be able to access my complaint for via the Channel platform? If my complaint has been closed, will I still be able to access it?**

You will be able to access your complaint until it has been closed by the person in charge of the investigation.

### **XI. Will I find out the outcome of the investigation of my complaint? How?**

By accessing the Channel platform with your username and password, you can view the updates and processing status of your complaint.

In any case, as this concerns confidential information, you will not receive details of the resolution regarding your complaint, nor about any potential disciplinary measures that, where appropriate, have been taken.

## **3. Security and confidentiality of complaints**

### **I. As all communications sent from a Group computer generates a log that is archived on the servers, would it be possible to identify me as a whistleblower?**

The Channel system, through the EthicsPoint website, does not generate or keep any internal connection log with IP addresses. Therefore, no information that links your computer to the Channel will be available. Don't forget that you can access the Channel via another computer outside the Group network using the Channel website address.

## **4. Tips and good practices**

### **I. Confidentiality or anonymity?**

In confidential complaints, you only provide your identity to the personnel specifically designated by the external provider to receive your complaint (via the online portal), as well as to the Openbank personnel in charge of its management and investigation, considering the type of breach and the location where it took place. With your previous express consent, your identity may be disclosed to other people within the framework of the internal investigation being conducted.

Furthermore, if the complaint is anonymous, we may not have enough data to carry out a complete investigation. In such cases, it is important that you provide as much information as possible about the situation or behaviour you are reporting. We would like to remind you that you will be able to access the platform to check if there are messages requesting additional information to help with the internal investigation.

### **II. I am aware of some people being involved in unethical conduct, but it does not affect me. Why should I make the effort to report it?**

ODS promotes a positive work environment where business ethics, responsibility and transparency are prioritised.

In order to continue maintaining these principles, your collaboration is essential in reporting situations that you become aware of in your professional activity that appear to be contrary to internal regulations, our leadership principles and corporate behaviour.

Reporting these types of situations is essential in the detection and prevention of conduct that could be harmful not only to ODS, but also to its employees, customers or other related third parties.

### **III. What if I remember something important about the incident after I submitted my complaint? What if the entity wants to ask me additional questions about my complaint?**

When you submit a complaint via the Channel, you will receive a unique username and be asked to create a password. You can use these login details to access the original complaint reported in the Channel, if you need to add details or reply to the questions asked by a person from the investigation team.

# Open Digital Services

Santander Group