

USE AND OPERATION OF CANAL ABIERTO

Procedure

Santander Consumer Finance, S.A.

TABLE OF CONTENTS

1	Introduction	3
2	Description of the process for managing communications through Canal Abierto	3
3	Resolution of queries and training on the use of Canal Abierto	13
4	Ownership, interpretation, effective date and review	13
5	Version control	15

1 INTRODUCTION

1.1 Objectives

This procedure governs the use and operation of Canal Abierto, in accordance with applicable law and regulations. This document should be read in conjunction with the provisions of Santander Consumer Finance, S.A. General Code of Conduct, the Canal Abierto Policy, the Canal Abierto Management Guide and the Internal Investigations Guide.

1.2 Definition and scope

Canal Abierto is the preferred channel that Santander Consumer Finance, S.A. makes available to employees, managers, members of the management bodies and third parties (vendors, customers, shareholders, etc.) for reporting any suspected breach or non-compliance as described in section 1.2 of the Canal Abierto Policy and Appendix I of this Procedure, which also defines the key terms to be taken into account when interpreting this procedure.

This procedure governs Canal Abierto at Santander Consumer Finance, S.A.

1.3 Scope of application and transposition at subsidiaries

This procedure has been drawn up by Santander Consumer Finance, S.A. as the parent company of Santander Consumer Finance Group, and is directly applicable to it. Its approval must be validated by Banco Santander, S.A.

In addition, this procedure is also provided to the various companies that make up the SCF Group as a reference document, in the sense that it provides a broad framework that can be applied locally. The SCF Group companies are responsible for drawing up and having their governing bodies approve their own set of internal regulations broadly consistent with the SCF Group regulations, subject to any changes that may be strictly necessary to ensure compatibility and compliance with local law and regulatory requirements and their supervisors' expectations.

Approval of local documents that develop this document must be previously validated by Santander Consumer Finance, S.A.

2 DESCRIPTION OF THE PROCESS FOR MANAGING COMMUNICATIONS THROUGH THE CANAL ABIERTO

The use and operation process for Canal Abierto has the following phases:

2.1 Sending and receiving reports

Reports may be submitted via Canal Abierto through any of the following channels, which are managed by an external service provider:

- By calling the telephone number indicated for each country:

Austria	0800 068783	Denmark	80 83 01 99
Canada	8442521050	Finland	0800 413840
Italy (incl. San Marino, Vatican City)	800 761 691	France	0 800 99 07 29
Belgium	0800 74 418	Netherlands	0800 3510021
Portugal	800 180 555	Norway	800 62 420
Spain	900 997 965	Sweden	020-12 70 06

- By entering the EthicsPoint platform at the following URL:
- <https://santandercf.ethicspoint.com> (laptop version) or <https://santandercfmobile.ethicspoint.com> (mobile version)

Or by sending a letter to Regulatory Compliance SCF at the following postal address:

Regulatory Compliance SCF
 Edificio Pinar, Planta Baja
 Avenida de Cantabria, s/n,
 28660 Boadilla del Monte Madrid, Spain

The reporter may also ask to meet face-to-face with the designated managers of Canal Abierto. The meeting will be attended by two team members and will be held within seven days of the request received from the reporter.

Appendix II also lists some of the channels established by external bodies for reporting conduct that may constitute serious or very serious criminal or administrative offences or infringements of European Union law.

If the report is not sent anonymously, the identity of the reporter will never be revealed and action will be taken as needed to keep the confidentiality of the information disclosed and to protect the rights of the reporter.

When the communication is made verbally, the reporter will be advised that their report will be recorded or transcribed, and will likewise be informed that their data will be processed in accordance with applicable law and regulations. Without prejudice to the rights conferred on reporters by applicable data protection law and regulations, the reporter will be offered the opportunity to review the transcript so that they may verify, rectify if necessary, and accept it by signing.

If a communication submitted via Canal Abierto is received by any person other than those designated to manage the channel, that person must respect the absolute confidentiality of the information received and forward the communication without delay to those responsible for Canal Abierto.

Reports submitted via this channel must contain the following information so that the matter may be assigned to the right team for handling the investigation:

- Identity of the reporter (when the report is submitted confidentially but not anonymously). First name(s), surname(s) and an email address should be provided.
- Identity of the person being reported (where applicable).

- Description of the events being reported, indicating (if possible) the dates on which they took place.
- Evidence/elements substantiating the irregular conduct being reported.

Once the communication has been received, regardless of the channel used (face-to-face meeting, platform or telephone), it will be logged in Canal Abierto, assigned an ID code and recorded on the EthicsPoint platform securely and with access restricted to authorised persons only.

2.2 Acceptance for processing

Regulatory Compliance SCF will receive the communications and conduct a preliminary assessment in order to confirm they fall within the scope of Canal Abierto, as described in section 1.2 of the Canal Abierto Policy. It will also send an acknowledgement of receipt to the reporter within a maximum period of five calendar days.

Once the preliminary analysis has been performed, the investigator shall, within a period not exceeding five business days from the date on which the matter was submitted to Canal Abierto, issue a decision on whether or not to accept the report for processing. This decision will be notified to the reporter within three days of making the decision, unless the communication was made anonymously or the reporter chose not to receive further communications regarding the complaint.

For clarification purposes, reports made via Canal Abierto relating to the following matters will not be accepted for processing:

- Events or circumstances that do not concern any of the matters described in section 1.2 of the Canal Abierto Policy or 1.2 of this procedure, or reports based solely on opinions or subjective assessments unrelated to the purpose of this channel.
- Communications describing events or circumstances that are clearly unfounded or not credible.
- Communications that fail to provide any new information regarding previous reports.
- Communications presenting reasonable suspicion that a criminal offence was committed in obtaining the related information. In this case, the report will be considered inadmissible and the matter will be referred to Legal Affairs so that it may send the Public Prosecutor's Office a detailed account of the facts that are considered to constitute a crime, unless its analysis of the communication concludes that no such criminal conduct took place.

If this occurs, the case will be shelved and the reasons for the decision reached will be logged in Canal Abierto.

The decision to close the case will not preclude a subsequent investigation if further information is received in accordance with the provisions of the Canal Abierto Policy.

If commercial grievances or claims are received from third parties, Regulatory Compliance SCF will inform the reporter that this is not the right channel and that he/she may forward their communication to the competent function (customer service, the relevant purchasing function, or shareholder and investor relations). The contact persons at these units will be identified for these purposes.

2.3 Investigator

If the report is accepted for processing, Regulatory Compliance SCF shall refer the matter to the competent investigating functions, which will be the following:

- When the communication refers to breaches of legal obligations related to equal opportunities, respect for people, work-life balance, prevention of occupational risks or collective rights, the matter will be referred to People & Culture SCF, which shall then conduct an investigation and propose a decision and any further measures deemed appropriate, complying with the provisions of the Collective Bargaining Agreement or applicable regulations.
- When the communication refers to behaviours not aligned with the Group's corporate behaviours, it will be sent to People & Culture SCF, so that it may decide on whether to involve People & Culture in investigating, handling and issuing a decision on the matter.
- Reports relating to money laundering or the financing of terrorism (ML/FT), sanctions, or bribery and corruption, will be referred to the SCF Financial Crime Compliance (FCC) function, and where they relate to specific securities market regulations, they will be referred to Regulatory Compliance SCF, which will be respectively responsible for conducting the investigation, with the support of People & Culture SCF to the extent that such communications concern employees.
- Communications regarding matters that are not contemplated in the previous points will be managed by Regulatory Compliance SCF, with the support of People & Culture SCF if the matter concerns employees.

Depending on the circumstances, Legal Affairs SCF and Security and Intelligence corporative, among others, may provide any support deemed necessary when investigating the incident. In particular, if the communication or report concerns People & Culture SCF, Compliance SCF or Financial Crime Compliance SCF, the part of the investigation concerning that function will be handled instead by Legal Affairs SCF.

Likewise, it is recommended that Internal Audit SCF be involved when the aspects reported may have a relevant impact on the unit's governance, internal control and risk management systems, which should be considered by the Person in charge of the Investigation.

Depending on the circumstances, the assistance of an external advisor may be sought.

If the events reported are particularly complex or serious, or affect more than one of the matters listed above, an investigation team may be set up, consisting of representatives of all or some of the functions mentioned in the preceding paragraphs and headed up by a coordinator from Regulatory Compliance SCF. The coordinator will be in charge of overseeing the investigation and will be directly responsible for the investigators and will ensure the proper management and implementation of all actions to be carried out as part of the investigation. The involvement of a representative of Legal Affairs SCF will be required whenever the investigation concerns a member of the board of directors of Santander Consumer Finance, S.A.

2.4 Investigation

The investigation will include all action aimed at substantiating the circumstances of the report received and confirming whether they constitute any of the breaches provided for in section 1.2 of the

Canal Abierto Policy.

a. Interview with the person under investigation

Whenever possible, an interview will be held with the persons under investigation, in which they will learn about the report brought against them and will be asked to give their version of the events and to provide any evidence that they consider pertinent. This interview will always be carried out by two people from the function tasked with the investigation, except in cases involving minor breaches of corporate behaviours.

In this interview, the persons under investigation will be given a brief explanation of the report brought against them, although without ever revealing the identity of the reporter or allowing them to access the report submitted. They will then be able to raise any arguments or claims they see fit to make, in accordance with the safeguards provided for in paragraph 2.7 of this procedure.

The interview may be documented by recording it, for which the interviewee's permission will be required. If it is not recorded, a written record will be made indicating those present, the matters addressed and the conclusions, which will be shared with the interviewee for his/her review and agreement, either at that moment or subsequently by email.

b. Access to electronic devices

If the need arises to gain access to the employee's electronic devices, this will be carried out in accordance with the internal cybersecurity policy for the protection of SCF, as well as the guide on digital rights in the workplace.

The information contained in the electronic devices of the employees, where such devices are owned by the Bank, will be accessed while guaranteeing the right to privacy of the employee concerned, respecting legality, equality, proportionality and workers' privacy. Only information that is strictly necessary and relevant for the successful outcome of the investigation will be collected.

2.5 Outcome of the investigation and action taken

The internal investigations must be completed within 60 days, which may be extended for a further 30 days only upon justifiable grounds if the case is particularly complex. In such case, the Person Responsible for Managing Canal Abierto will be informed.

Once the investigation has been completed, Regulatory Compliance SCF or, as the case may be, People & Culture SCF shall close the case by drawing up a report detailing the outcome and including the following minimum information:

- A description of the facts reported in the communication received.
- The action taken in order to substantiate such facts.
- The conclusions reached during the investigation.

In any case, the report will focus on the evidence collected during the investigation and should avoid any findings or conclusions based on personal opinions.

In order to ensure the confidentiality of the investigation, the report will be shared on a strictly "need to know" basis to those persons genuinely entitled to hear about the facts investigated or who have a role in making decisions regarding the outcome of the investigation.

The report shall include, in line with the provisions of paragraph 2.2 of the Policy:

- A proposal for a decision to close the report with no further action to be taken, due to a failure to substantiate the circumstances reported or failure to prove that the person under investigation was responsible. This proposal will be notified to the reporter or, where appropriate, to the person concerned.

In this case, the reporter will be entitled to the protection provided for in the Canal Abierto Policy and in this procedure.

- A proposal to assess the action to be taken, if the report is considered founded, in accordance with the provisions of the Canal Abierto Policy.

In view of the file, the People & Culture SCF function shall decide, in accordance with its disciplinary powers, and in compliance with the current labour regulations laid down in the collective bargaining agreement, on the corresponding measure to be implemented, or propose its adoption to the competent bodies in the case of more serious situations.

People & Culture SCF may also choose to take further non-disciplinary action, such as coaching, training, awareness-raising or any other measures considered appropriate.

In exceptional and very serious cases, People & Culture SCF may take the precaution of suspending the employment relationship, while never breaching the relevant time frames provided for in applicable labour law.

The Person Responsible for Managing Canal Abierto will send the file to Legal Affairs SCF when she believes that it could result in legal action, or be reported to the competent authority, entity or body for further handling, possibly including the Public Prosecutor's Office, especially where the events could be indicative of a crime, or the European Public Prosecutor's Office where the events could affect the financial interests of the European Union.

In any case, Legal Affairs SCF will immediately refer the case to the Public Prosecutor's Office, without having to first finish the investigation, when the Person Responsible for Managing Canal Abierto, at the proposal of the investigation team, sends the file to the Public Prosecutor because they believe that there is reasonable evidence that a crime has been committed, unless the analysis concludes that no such criminal conduct took place.

Once the investigation has been completed, and in view of the facts reported and the conclusions reached, the investigator reserves the right to modify the event classification proposed by the reporter so that it fits the definitions, in the event of any mistake made by the reporter in classifying the report.

2.6 Breaches to the Code oversight

The purpose of this section is to set out a process that ensures appropriate oversight by the governing bodies of the implementation and application of the Code of Conduct at Santander Consumer Finance Group through the reporting of breaches of the Code and its implementing regulations to the Board Audit and Risk Committees, within the scope of their respective responsibilities.

In particular, this process addresses the following points:

- Means for identifying breaches of the Code of Conduct.
- Record of breaches of the Code of Conduct and system for classifying them.
- Stakeholders and their roles and responsibilities in the process.

- Interrelation with other internal processes of the Group.

Means for identifying breaches of the Code of Conduct:

Breaches of the Code of Conduct and its implementing policies can be identified through the following means:

- Canal Abierto (SCF Group's ethical channels).
- Reports by SCF Group employees to their People & Culture managers.
- Breaches detected by control areas and reported to People & Culture SCF for the appropriate disciplinary action to be taken.
- Results of SCF Group internal audits providing evidence of specific breaches of the Code of Conduct, reported and handled by People & Culture SCF.
- Checks by the various areas of the SCF Group (Cybersecurity, Costs, etc.) in the course of their normal activity, in which incidents are escalated to People & Culture SCF for handling and sanction, if appropriate, by a disciplinary procedure.
- Breaches detected by People & Culture SCF within the framework of their activities.

Record of breaches of the Code of Conduct and system for classifying them:

Following identification through the means outlined above, breaches of the Code of Conduct, both potential and actual, will be compiled in a single record which will be reported to the governing bodies of each of the SCF Group's local units at least once a year for the purpose of overseeing adequate implementation of the Code of Conduct at local level, as part of their responsibilities.

This single record, containing the classification of the breaches of the Code of Conduct, will be drawn up by Regulatory Compliance SCF and People & Culture SCF, taking account of the taxonomy set out in the Canal Abierto Policy.

The single record held by each local unit will be consolidated at the corporate level so that, during the first half of the year, a global report can be presented to the audit and board risk committees by the Regulatory Compliance SCF and People & Culture SCF departments, containing comprehensive, consistent and complete information on compliance with the Code of Conduct within the SCF Group.

Stakeholders and their roles and responsibilities in the process:

Compliance and People & Culture at each local unit will collect the information in the following way:

- Each local Compliance function will identify as potential and real breaches of the Code of Conduct, the cases accepted for processing and being managed by its particular Canal Abierto, for the purpose of determining the number of reports received through local channels, the classification of these cases and the number of cases substantiated and subject to disciplinary measures.
- The People & Culture teams will identify breaches of the Code of Conduct other than those received through Canal Abierto by the means outlined above.
For these purposes, the People & Culture teams will identify the incidents determined to constitute real or potential breaches of the Code of Conduct that they have dealt with and if appropriate, subjected to disciplinary action.

Consolidation of the information:

- The local working group:
To ensure that the information collected for reporting to local governing bodies is consistent, the local People & Culture teams will send the local Compliance teams information about the Code of Conduct breaches that they have handled and Compliance will ensure that the classification criteria are uniform and consistent with the Canal Abierto Policy, and that there is no double counting with respect to the information collected by the local ethical channel.
- Global:
The local Compliance departments will provide Regulatory Compliance SCF and People & Culture SCF with the local records that they have submitted to the unit's governing body, for consolidating and reporting at the global level.

Notwithstanding the above, the local Compliance and People & Culture teams may share with their corporate counterparts the Code of Conduct breaches that they have identified, so that the corporate teams can review and analyse the information and challenge anything about which they have doubts.

Interrelation with other internal procedures of the SCF Group:

The information obtained by identifying Code of Conduct breaches serves to establish synergies that reinforce other SCF Group processes by bringing transparency and completeness to the implementation of the Code of Conduct, its implementing policies and compliance with the corporate behaviours.

The process for identifying Code of Conduct breaches interrelates with the following procedures:

- Prior:
 - o Procedure for analysing the application of malus and clawback clauses to members of the identified staff who may be disciplined for breaches of the Code of Conduct.
 - o Identification by the local governing body of trends, concentrations and action plans to mitigate possible risks that have been identified and that could affect the local unit due to their severity or recurrence.
- Subsequent:
 - o Disciplinary procedures that enable the audit and board risk committees to be informed about the main breaches, trends and possible risks arising in relation to the Code of Conduct.

2.7 Reporting and escalation

On an annual basis, Regulatory Compliance SCF will inform the SCF Compliance Committee of the assessment of the Canal Abierto metrics. Cases that are considered to pose a relevant risk to the Bank will be reported to the SCF Compliance Committee. Cases related to money laundering and the financing of terrorism and/or sanctions are excluded, and will be governed instead by prevailing legislation and internal regulations on this matter, although statistical data on this type of communications may still be collected.

Lastly, the reporter and the person under investigation will be informed of the outcome, provided that such communication does not compromise the confidentiality of the reporter, the result of the investigation, and, where appropriate, whether measures have been taken, taking into account the right to privacy of the parties involved.

If sending the information or communication to the person under investigation could reveal the identity of the reporter, all necessary steps must be taken to protect their anonymity. Should this prove impossible, the right to confidentiality of the reporter when reporting in good faith shall prevail over the right of the person under investigation to receive information on the case.

Where the incident relates to accounting or auditing matters, in accordance with SOX regulations, and where the investigation concludes with a finding that a breach did take place, Regulatory Compliance SCF will submit that finding to the audit committee, which will then decide on the action to be taken.

Regulatory Compliance SCF will submit to the audit committee any incidents received in other SCF Group geographies that relate to accounting or auditing practices or events that have previously been submitted to the local audit committee.

Regulatory Compliance SCF shall report regularly to the audit committee, within its remit, and to the board risk committee on the management of Canal Abierto and on any notable changes or developments.

For the purposes of the procedure for applying malus and clawback clauses and the remuneration policy of SCF Group, People & Culture will be informed of any reports concerning members of the identified staff, on completion of the investigation and confirmation of the responsibility of the member concerned.

2.8 Safeguards and rights of both the reporter and the person under investigation when handling the case

The safeguards and rights of the parties involved are as provided for in sections 2.2 and 2.3 of the Canal Abierto Policy.

2.9 Mechanisms for preventing conflicts of interest

The following mechanisms have been put in place to prevent conflicts of interest from arising:

- Reports are received through an external online and telephone platform that ensures the integrity of the information received and keeps a record of all accesses to such information by the investigation team.
- Reports are received by a single control function. Regulatory Compliance SCF receives all communications through Canal Abierto and then relays them, or otherwise involves, the related area in accordance with the provisions of section 2.3.
- Identification and profiling of those persons at Regulatory Compliance SCF and People & Culture SCF who have access to the communications management platform.
- There is a mechanism for identifying communications involving any person at Regulatory Compliance SCF who has authority to handle and investigate communications received through Canal Abierto. Such communications are automatically forwarded to the Person Responsible for Managing Canal Abierto for investigation and management.

- The investigation is entrusted to functions or profiles not affected by any conflict of interest due to the subject matter of the communication, when any of the functions involved in the process have reason to believe that another function may encounter a conflict of interest. In the event of any disagreement between functions, and if that disagreement cannot be resolved by the persons responsible for each function, the case will be entrusted to and resolved by a third function.

2.10 Data protection when handling reports

Only the following types of data may be collected when a report is received:

- First name(s) and surname(s) of the persons involved in the communication and their job titles.
- Information about the reporter (first name(s) and surname(s), job title, telephone number and email address), in case the reporter wishes to identify him/herself.
- Details of the allegedly criminal or irregular conduct being reported.
- Such supporting documents as may be needed in order to investigate the reported conduct.

All personal data provided when submitting the report will be treated in accordance with applicable data protection regulations, for legitimate and specific purposes in relation to the investigation that may ultimately take place as a result of the report submitted. Such personal data may not be used for incompatible purposes and must be adequate, relevant and limited in relation to the permitted purposes.

Once the incident has been substantiated, the absence of bad faith in reporting the incident confirmed, and measures put in place to ensure that the identity of the reporter is not revealed, the person who has been reported will be informed of the accusations brought against them, in compliance with Article 11 of Organic Law 3/2018, of 5 of December, on the protection of personal data and digital rights. They will also be informed of their rights in accordance with data protection regulations. This will not apply where the communication relates to money laundering or the financing of terrorism and/or sanctions, which will be governed instead by Law 10/2010 of 28 April and its implementing regulations, on the prevention of money laundering and the financing of terrorism and specific law and regulations on sanctions. The person who has been reported will also be given an estimate of how long it will take to process their case. In any case, Santander Consumer Finance, to ensure the confidentiality of the information received, assures the reporter that in general the person under investigation may exercise their rights only to the extent permitted in view of the circumstances and may only do so in respect of their own personal data subject to processing. Under no circumstances may the personal data of the reporter be disclosed when the person under investigation exercises such rights.

If it is not possible to adopt measures to ensure the confidentiality of the reporter's personal data in the event of communication to the person under investigation, the right of the reporter will prevail, in accordance with Article 31.2 of Law 2/2023, of 20 of February, on the protection of persons reporting regulatory breaches and efforts to combat corruption.

If there is a risk that such notification could compromise the investigation, the investigation may be postponed until that risk no longer exists. In any event, the period for informing the person under investigation shall not exceed one month from the time the incident is registered in the system, unless the person under investigation has not been duly and/or sufficiently identified, or where the initial

communication to the person under investigation could compromise the outcome of any resulting investigation, in which case the communication may be postponed until that risk no longer exists. Any such postponement may not exceed the term of sixty (60) calendar days from submission of the communication.

The foregoing shall not apply to communications of conduct or events that fall outside the scope of Canal Abierto, or that are not substantiated, or to reports of suspected money laundering or the financing of terrorism and/or sanctions, which will be governed instead by current legislation and internal rules and regulations.

The personal data included in the report may be disclosed not only to the company or companies to which the person under investigation and/or reporter belong, but also to supervisory bodies, courts and other authorities as a result of any investigation that may be carried out. Therefore, it is possible that the reporter may be summoned to appear in court.

Santander Consumer Finance shall ensure that all necessary technical and organisational steps are taken to ensure the security of the data collected and protect them from any unauthorised disclosure or access. Specifically, Santander Consumer Finance Group has taken steps to ensure the confidentiality of all data and will ensure that the data are not disclosed to the person under investigation during the investigation. The fundamental rights of the person will be respected in all cases, without prejudice to any action that the competent judicial authorities may see fit to take.

Personal data relating to communications received and internal investigations will be retained only for as long as is necessary and in order to comply with applicable legislation. In no event may the data be retained for a period exceeding ten years.

Regulatory Compliance SCF anonymises the communications received via Canal Abierto, keeping personal data valid for three months from the closure of the communication on the EthicsPoint platform.

The data subject may at any time exercise the rights of access, rectification, deletion, limitation of processing and opposition, as well as any other rights recognised by the applicable data protection regulations. To do so or to consult any matter relating to the processing of your personal data, you can send a written communication to the address scbuzondpo@santanderconsumer.com, specifying "Canal Abierto" in the subject line, as well as the company to which the request is addressed.

3 RESOLUTION OF QUERIES AND TRAINING ON THE USE OF CANAL ABIERTO

Regulatory Compliance SCF will resolve any doubts or queries raised by employees regarding the use and operation of Canal Abierto. It will also work alongside People & Culture in designing and overseeing training and awareness plans related to the use and operation of Canal Abierto by employees.

4 OWNERSHIP, INTERPRETATION, EFFECTIVE DATE AND REVIEW

4.1 Ownership of the procedure

Regulatory Compliance SCF is responsible for drawing up this procedure.

This Procedure has been approved by the Board of Directors of Santander Consumer Finance, S.A. on the proposal of the Santander Consumer Finance, S.A. Compliance Committee. Any changes made to

this document after the date of approval must be approved by the Santander Consumer Finance, S.A. Executive Committee.

4.2 Interpretation

Regulatory Compliance SCF is responsible for interpreting this procedure.

In the event of any conflict between the Spanish and English versions, the Spanish version will always prevail.

4.3 Validity and review of the policy

This procedure will take effect on the date it is published. Its content will be reviewed regularly and any pertinent changes or amendments will be made.

5 VERSION CONTROL

ID	Owner	Maintained by	Validated by	Approved by	
				Committee	Date
SCF1	Pedro Elejabeitia	Diego Martín	Corporate Compliance	SCF Compliance committee	4 Oct 2021
SCF2	Pedro Elejabeitia	Diego Martín	Corporate Compliance	SCF Executive Committee	12 Jun 2023
SCF3	Ignacio Lence Asenjo	Diego Martín	Corporate Compliance	SCF Board of Directors	XX – XX - 2025

ID	Commentary
SCF1	Procedure in accordance with the Canal Abierto Policy approved in November 2020, in order to avoid duplication between the two documents
SCF2	Updated in accordance with Law 2/2023 on the protection of reporters.
SCF3	Inclusion of a new section that regulates the breaches of the Code of Conduct oversight. References to guides applying to the Group units Participation of Internal Audit in certain investigations Update of contact mechanisms related to the treatment of personal data Updating function Names

APPENDIX I: TYPES OF CASES THAT MAY BE REPORTED THROUGH CANAL ABIERTO AND DEFINITIONS

Category			Sub-category	Definition
General Conduct	Code of		Marketing of products and services	Marketing products or services without fulfilling the obligation of treating the customer fairly by acting honestly, impartially and professionally.
			Conflicts of interest/activities outside the Group	Situations where the personal or financial interests of an employee, or of their direct relatives or any person with whom the employee has a significant relationship, interferes in any way with their ability to serve the best interests of the Group, its customers or other stakeholders.
			Gifts and hospitality	When employees abuse their position at Santander by offering, delivering, promising, requesting or accepting any type of gift, benefit, consideration or hospitality in order to obtain personal benefit for themselves or a third party, thereby affecting their impartiality.
			Corruption and bribery	Acts of corruption may arise when individuals abuse their position of power or responsibility for personal gain. Bribery relates to acts whereby a person receives a financial or other benefit to encourage them to perform their duties or activities improperly or a person receives a reward for having already done so. This would include an attempt to influence a decision-maker by granting some additional benefit to the decision-maker, beyond that which can be legitimately offered. Bribery in which a national or international public official is involved.
			Anti-money laundering and terrorist financing, and sanctions	Money laundering is: (i) converting or transferring assets, knowing that such assets derive from a criminal activity, or from involvement in a criminal activity, with the aim of concealing or disguising the illegal origin of the assets or of helping the people involved to avoid the legal consequences of their actions; (ii) concealing or disguising the nature, origin, location, availability, movement or real ownership of assets or rights over assets, knowing that such assets derive from a criminal activity, or from involvement in a criminal activity; (iii) acquiring, owning or using assets, knowing that, when they were received, such assets derived from a criminal activity, or from involvement in a criminal activity; (iv) engaging in any of the activities mentioned above, colluding to perform this type of activity, attempting to engage in them and helping, encouraging or advising a third party to engage in or facilitate this type of activity.
			Market abuse (insider trading)	Engaging in trading based on inside information.

		<p>Recommending trades in the securities market based on inside information.</p> <p>Disclosing and using inside information illegally.</p> <p>Manipulating the market by trading or spreading fake news or rumours about people or companies in order to change or maintain the price of a security or financial instrument.</p>
	Antitrust	<p>Conduct that prevents, restricts or distorts free, effective competition to the detriment of the market, of the Group's customers and of anyone with whom a business or professional relationship is maintained. This conduct includes exchanging sensitive information with competitors, price fixing, fixing market share, and rigging bids and tenders.</p>
	Privacy/information security/confidentiality of information	<p>The privacy and protection of information involve refraining from disclosing information to third parties, e.g. personal data relating to customers or employees (salaries, leave, etc.), Santander's strategic/security-related information, or information relating to the entities with which Santander has a business relationship. These obligations remain in place even after the employment relationship has terminated; the confidential information may not be used to obtain financial benefit.</p>
	Insider fraud	<p>Fraud either attempted or perpetrated by one or more internal parties against the organisation, i.e. another employee or one of the Group's companies, including cases where an employee acts in collusion without external parties.</p>
	Cybersecurity	<p>Cybersecurity risks are: (i) unauthorised access to or misuse of information or systems (e.g. theft of personal information, M&A plans or intellectual property); (ii) financial fraud and theft (e.g. payments redirection, withdrawal of funds from customer accounts, credit card fraud and identity theft); and (iii) alteration of business activity (e.g. sabotage, extortion and denial of service).</p>
	Equal opportunities and non-discrimination	<p>Conduct that is not aligned with Santander's basic principles in relation to providing equal opportunities regarding access to employment and professional promotions, ensuring there is no discrimination at any time for reasons of gender or sexual orientation, race, religion, disability, origin, marital status, age or social condition.</p>
	Sexual or gender-based harassment	<p>Disrespectful behaviour or undesired conduct of a sexual nature that is bothersome and generates an intimidatory, offensive or hostile working environment.</p>

	Workplace harassment	Hostile or offensive treatment in the working environment that provokes an intimidatory, hostile, degrading, humiliating or offensive environment.
Fraud	External fraud	The type of fraud attempted or perpetrated by an external party (or parties) against the organisation of the customer under the bank's responsibility. There may be cases where an internal party is also involved in the fraud.
Accounting and auditing	Accounting and auditing	Alteration or falsification of financial information, inaccuracies in financial statements, intentionally false information, undue influence over auditors, questionable practices in accounting, auditing or internal financial controls.
Work issues and breach of corporate behaviours	Breach of corporate behaviours	Unprofessional conduct by work colleagues or management that is not aligned with the corporate behaviours of The Santander Way.
	Serious disrespect	Conduct that involves serious disrespect by co-workers or managers in the work environment.
	Breach of labour regulations	Any breach of the Group's internal (legal or conventional) regulations, policies or procedures that involves non-compliance with a labour obligation or any obligations categorised in the collective bargaining agreement currently in effect.
Other	Any breach of the Group's legal or internal regulations, policies or procedures in relation to functional or organisational aspects not mentioned in the categories above.	

APPENDIX II: EXTERNAL CHANNELS FOR REPORTING BREACHES COVERED BY THE MATERIAL SCOPE OF APPLICATION OF LAW 2/2023

- Channel established by the Independent Authority for the protection of Autoridad Independiente de Protección al Informante.
- Bank of Spain:
https://www.bde.es/bde/en/secciones/sobreelbanco/Transparencia/Informacion_inst/registro-de-acti/Canal_de_denuncias.html
- National Markets and Competition Commission (CNMC):
<https://sede.cnmc.gob.es/en/tramites/competencia/denuncia-de-conducta-prohibida>
- National Securities Market Commission (CNMV):
<https://www.cnmv.es/portal/whistleblowing/presentacion.aspx?lang=en>
- SEPBLAC:
<https://www.sepblac.es/en/obliged-subjects/formalities/suspicious-transactions-reporting/>