



Canal Abierto



#yourconductmatters

1 CANAL ABIERTO

1.1. What is the Canal Abierto?

The Canal Abierto is the tool that Santander Group has to report any conduct which may breach the General Code of Conduct or violate our corporate behaviours or the ethical principles in force.

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 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 which breaches 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 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 in line with the responsible banking strategy, 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 <https://santander.cf.ethicspoint.com> (computers) or <https://santander.cf.navexone.eu> (mobile) or call the 24x7 phone by calling:

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
Poland	800 005 052	Netherlands	0800 3510021
Portugal	800 180 555	Norway	800 62 420
Spain	900 997 965	Sweden	020-12 70 06
Belgium	0800 74 418		

2.2. What type of situations should I report?

Through the Canal Abierto you can report conduct which breaches the applicable regulations, the General Code of Conduct or the corporate behaviours of Santander Group.

No commercial complaints or queries can be made through the Canal Abierto.

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 internal 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.

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. Depending on the selected category of breach and where it occurred, the information will be sent to the appropriate Group team for management and investigation.

Later, if the Group team needs further information about the reported situation, you will receive a message through the online platform where your notification was registered. Enter your username and password to respond.

You can use this platform at any time to access and check the status of your notification and to supply new information. The platform will be your mean of communication with the team managing and investigating your notification.

2.8. How long will the investigation phase take?

The length of the investigation will depend on the reported breach and the details you have provided. If the team appointed to manage and investigate the reported situation 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 did not 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 team appointed to manage and investigate it.

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. However, you will be informed about the completion of the report (e.g. when there is not enough information to proceed with the investigations).

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) and to the people in the Group responsible for managing and investigating the reported situation, depending on the type of breach and the place where it occurred. 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 is strongly committed to the responsible banking strategy and, as a result, promotes a positive work environment dominated by business ethics, accountability, and transparency.

To uphold these principles, it is essential that you collaborate by reporting any situations you become aware of in the Group and which seem to breach the 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.

At the mere hint of suspicion, speak up.

4.3. I'm not sure whether what I've seen or hear constitutes a breach of the internal regulations or unethical conduct, but I don't think it's quite right. What should I do?

Report it. When you access the Canal Abierto, a form will help you to prepare and submit your information. It is better to report a situation which proves to be harmless than to allow a possible instance of misconduct to go undetected because you were not sure whether it was in fact misconduct.

4.4. 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.

4.5. 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 your communications through the Canal Abierto will be anonymous unless you say otherwise.

4.6. If I don't have access to the internet, can I still report a situation?

You can report a situation through the Canal Abierto using any computer with an internet connection.

If you don't have access to a computer or are not comfortable using one, you can report the situation over the phone by calling the Canal Abierto's 24x7x365 phone line.

