

CORPORATE CULTURE POLICY

General Policy

Santander Group

This document is a translation of an original text in Spanish. In case of any discrepancy between both texts, the Spanish version will prevail.

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1 INTRODUCTION

This policy establishes the guidelines and required standards to embed a healthy culture throughout the Santander Group (the Group). This policy must be read and understood, together with the Corporate Frameworks, and other applicable regulations of conduct in the Corporation and the subsidiaries; with special attention to the Responsible Banking Framework and the General Code of Conduct.

2 DEFINITION AND SCOPE

Belonging to a large international group provides a competitive advantage and adds value to each of the units that comprise it. Santander will only achieve sustainable commercial success by managing the business in a responsible way. By being Simple Personal and Fair and helping people and businesses prosper, we will be responsible and earn people's lasting loyalty. Therefore, 'How' we do things is as important as what we do and it is our Corporate Culture that sets out how we ensure we do not simply meet our legal and regulatory requirements, but we exceed expectations by being simple, personal and fair in all we do.

Our Corporate Culture is formed from the shared values and ethical standards we hold ourselves accountable to in line with our code of conduct, balancing our responsibilities as a bank for earning both the trust and lasting loyalty of our people, customers, shareholders and communities. This policy must be observed by all employees, entities and subsidiaries of the Group across all business areas and countries in which it operates.

3 SCOPE OF APPLICATION

This [policy/procedure] is prepared by Banco Santander, S.A., in its condition of parent company of Santander Group, resulting directly applicable to the Corporate Center, and is provided to the entities comprising the Group as a reference document, establishing the rules to be applied to the subject to which it refers.

Group entities are responsible for their own internal regulations, and for developing and approving in their respective governing bodies their own internal regulation that allows the application within its scope of the provisions contained in the Group regulation, with the absolutely essential adjustments, if any, to make them compatible and meet regulatory requirements or the expectations of their supervisors. Such approval must contain the prior validation of the Corporation.

4 ELEMENTS WHICH CONSTITUTE THE SANTANDER CULTURE

The Santander Group Culture is structured on three levels:

- a) **Common Minimum Standards.** These elements are the backbone of our culture. They have been formed through a bottom-up process and apply to the entire Group. These elements cannot be changed.

- b) **Mandatory global initiatives** to be implemented in the Group that can be adapted and managed at local level.
- c) **Local initiatives**, developed with autonomy within the Corporate Culture Policy and with respect for the Corporate Frameworks (Compliance and Conduct, Risk, Brand and Communications, Responsible Banking, Human Resources, etc.).

The details of these three elements are listed here:

4.1 Common Minimum Standards

These elements are the backbone of our culture and apply to the entire Group. These elements cannot be changed.

3.1.1 The Santander Way¹

- **Purpose (Why):** *Our purpose is to help people and businesses prosper.* It is the Group's cornerstone and is the same for all entities. It cannot be adapted.
- **Group Aim:** *To be the best open financial services platform by acting responsibly and earning the lasting loyalty of our people, customers, shareholders and communities.* Our Aim is what the Group aspires to achieve. It is linked to our purpose and is determined and achieved through the development and execution of its strategic planning at any given time. The Group's aim and that of Group Companies in countries must take into account four stakeholders (people, customers, shareholders and communities) when developing and communicating the strategy and culture; and while defining the Key Performance Indicators (KPIs).
- **Our How: (Simple Personal and Fair)**
 - i. How we achieve our goals is as important as achieving them at all. We must live three core values in everything we do. Those values are **Simple, Personal and Fair (SPF)**. The words can be translated without altering their meaning. Each Group company can define what Simple, Personal and Fair means for each of its four stakeholders (People, Customers, Shareholders and Communities), in accordance with the Corporate Culture of the Group. It is simultaneously a declaration of the Group's ambition and desire to improve. In other words, it should be treated as a goal and not as something that has already been achieved or consolidated.
 - ii. In order to live our values of Simple, Personal and Fair and become a diverse and inclusive organization² we expect colleagues to display great behaviours. **Corporate behaviours** have been defined, supporting appropriate conduct and ethical standards. These may change over time if needed after discussion and evaluation. The eight

¹ More information in Annex I – The Santander Way

² More information in Annex III - Diversity and Inclusion Principles

corporate behaviours are: Support People, Actively Collaborate, Bring Passion, Show Respect, Truly Listen, Keep Promises, Talk Straight, and Embrace Change. See Annex II - Corporate Behaviours for more detail. The behaviours are a common base in every subsidiary. It is mandatory for all Group Companies to apply the agreed behaviours. Group Companies may apply additional behaviours if deemed necessary or appropriate given local market or cultural conditions. Any proposal to apply additional behaviours must be validated by Corporate Centre prior to implementation.

- iii. In addition to the behaviours, we expect that leaders³ at Santander to leader according with the defined Leadership Commitments (see Annex VI – Leadership Commitments). We have focused on just four behaviours that are business critical priorities for Santander in order to become the best open financial services platform. Every leader in Santander commits to being a responsible leader by:
- a) Being open and inclusive... promoting diversity.
 - b) Inspiring and executing transformation... having a clear strategic vision and delivering sustainable outcomes.
 - c) Leading by example... by always being SPF
 - d) Encouraging the team to prosper... supporting the team to develop and make impact.
- iv. Finally, to be Simple Personal and Fair, we expect all colleagues to embed a strong risk culture, which is known as risk pro⁴. Our risk culture is based on everyone’s personal accountability for managing risk, regardless of their level or role. All employees have to be aware of and understand the risks they deal with in their day-to-day activities and be responsible for identifying, managing and reporting them, taking into account the approved risk appetite and limits. Santander Risk Culture is universal and uniform throughout the organisation and encompasses all types of risks (financial and non-financial), irrespective of which organisational unit is responsible for their management and control. It fosters an environment of effective communication by means of transparency and open dialogue, continuous debate and challenge should be promoted in risk decision-making processes. The development, communication and embedding of risk pro across all units and levels of the organisation is built upon a set of processes included in all elements of the employee lifecycle. Further information is detailed in Annex IV - Risk Culture: Processes and Responsibilities.

³ In this context, a leader will be anyone who identifies itself with the behaviors and wants to lead the change and, in particular, those at management positions.

⁴ Named “I AM Risk” in UK and USA

The behaviours, leadership commitments and risk culture must be included at the heart of all processes for managing people (employee lifecycle): recruitment and hiring, performance management, training, career development, remuneration, recognition, etc.

3.1.2. Stakeholders and virtuous circle

The Group has four key stakeholders: employees, customers, shareholders and communities. They are listed precisely in this order, as the engagement and success of our people lead to satisfied customers who, in turn, generate returns for shareholders, and allow us to continue to invest in our communities, creating a virtuous circle.

3.1.3. Santander Brand

The Santander brand reflects the Group's corporate culture. It must be conveyed in a coherent and consistent manner throughout the world to all our stakeholders. The brand strategy and marketing plans of all the Group's units must be coherent with the position of the Santander brand and help to enhance it as a distinctive sign of the Group. The Brand and Communication Framework establishes the common principles and guidelines for action in this regard and applies to the entire Group.

3.1.4. Measurement, monitoring and disclosure

- Culture in the Group (including risk culture) has to be measured in a systematic and uniform manner. Such measurement should indicate both its degree of integration in the organisation and how it has evolved over time. This includes measuring SPF perception across the four key stakeholders, global engagement survey and NPS (Net Promoter Score).
- There are certain Group and local targets/KPIs associated with the Group aim. Group KPIs are public and are reported to the market at least once a year and are mandatory for Group subsidiaries to apply. Group subsidiaries may additionally apply local KPIs that are deemed appropriate in the local market.

3.1.5. Effective Communication

- a) Culture within the entity should be promoted via transparency and open dialogue throughout the organisation, both between the Board of Directors and the entity's management as well as between the entity's management and the rest of employees, in a bidirectional way. All employees should become participants and conveyors of the Group's culture encouraging an environment where people can "Speak up" and challenge without fear. Therefore, mechanisms and tools should be established to allow open and effective communication, such as Canal Abierto.
- b) This process is managed through an annual communication plan with focus on the key drivers used to convey and strengthen the Corporate Culture.

4.2 Mandatory global initiatives to be implemented in the Santander Group that are adapted and managed at local level.

In addition to the Common Minimum Standards there are global initiatives that help build Santander's culture for all subsidiaries to implement. Each subsidiary can determine how to implement these initiatives based on their local context and situation. They must be led locally by Country Heads.

The Responsible Banking Forum decides if a given initiative needs to be global to ensure the overall best interests of the Group and regulatory requirements. Subsidiaries can decide how to adapt initiatives locally and ultimately must have the validation of the Corporate Centre in line with Group culture governance. Global initiatives that can be adapted locally include:

- a) Local Culture Governance: this can be developed locally and may include steering or working groups to support the local culture programme aligned with the Group.
- b) Local volunteering initiatives: We encourage our people across the Group to participate in corporate volunteering activities by offering them a certain number of monthly/annual work hours they can allot to giving back to communities. This is crucial in our purpose to help people and businesses prosper. More details in Annex V - Corporate Volunteering Standards.
- c) Local KPIs. As outlined in section 3.1.4 – Governance and measurement.

Examples of global culture initiatives by quadrant:

- People: Diversity & Inclusion, FlexiWorking, BeHealthy, Santander Week, StarmeUp, Employee Value Proposition and MyContribution.
- Customers: customer loyalty strategy, digital transformation, financial inclusion.
- Shareholders: Simple, Personal and Fair financial reporting standards.
- Communities: Santander Universities, volunteering.

4.3 Local Initiatives

Local initiatives can be developed with autonomy within the Corporate Culture Policy and with respect for corporate frameworks already defined in other functions (Compliance and Conduct, Risk, Brand and Communications, Responsible Banking, Human Resources, etc.). These initiatives should be shared with the Risk Management Office and/or via Responsible Banking Forum, when correspond, to encourage best practices sharing and learning from each other.

5 GOVERNANCE

The promotion of culture (including risk culture) is the responsibility of the highest bodies in the organisation. The statutory bodies are primarily responsible for monitoring its internal and external cascade, without prejudice, to the collaboration required from other governance bodies.

In each Santander subsidiary, the Board (or main Governing Body) should ensure that oversight of embedding the common minimum standards receive continuous attention in their agenda setting, with explicit delegation to the highest executive and their teams.

The Board is the highest governance body for corporate culture and it is advised by the Responsible Banking, Sustainability and Culture Committee (RBSCC) in culture matters.

For Risk Culture, the Board may delegate oversight of risk culture and progress to the Board Risk Committee as an independent risk control and supervision body. This body may be assisted by other lower level committees at executive level in order to carry out more efficient oversight to ensure that risk culture is adopted at all times and at every level.

The Group's Responsible Banking Forum, which supports the RBSCC on environmental, social and governance (ESG) criteria including culture, provides direction, approval and oversight to help ensure the shaping of a consistent corporate culture and its integration throughout the Group.

For Risk Culture, the Board may delegate oversight of risk culture and progress to the Board Risk Committee (BRC) as an independent risk control and supervision body. This body may be assisted by other lower level committees at executive level in order to carry out more efficient oversight to ensure that risk culture is adopted at all times and at every level.

Each subsidiary is required to identify a senior local Responsible Banking representative and governing body to focus on developing, implementing and measuring the actions they have in respect of culture (including risk culture). The local Governance applicable to culture is for each subsidiary to determine, however the overall outcomes must be consistent with the required standards of the Group.

Other suggested elements of the local culture governance in a subsidiary are: an action plan with a summary of all Global and local initiatives; a communication plan; the definition of a short list of KPIs to follow progress. Group subsidiaries should submit details of the above-mentioned elements to the Corporate Centre upon request from the Responsible Banking Forum.

6 OWNERSHIP, INTERPRETATION, DATE OF VALIDITY AND PERIODIC REVIEW

6.1 Ownership

The Responsible Banking function is responsible for the elaboration of this policy.

This document must be approved by the Board of Directors of Banco Santander, S.A. Prior to its approval, the policy has been reviewed by the Responsible Banking, Sustainability and Culture Committee.

6.2 Interpretation

The Responsible Banking function is responsible for the interpretation of this policy.

6.3 Date of validity and periodic review of the policy.

This policy will come into force on the date it is published. Its contents will be reviewed on a regular basis, and any changes or modifications considered appropriate will be made.

This policy is published for general knowledge on the corporate intranet and on the website www.santander.com

7 ANNEX I: THE SANTANDER WAY



8 ANNEX II: CORPORATE BEHAVIOURS

Behaviour	What it means	Behaviour	What it means
<p>Show respect</p>	I show respect and I treat others as I would like to be treated, acknowledging and appreciating one another's differences	<p>Actively collaborate</p>	I actively encourage co-operation to find the best solution for my customers and colleagues.
<p>Truly listen</p>	I listen and have empathy, to understand other's needs	<p>Bring passion</p>	I bring passion and energy and I give my best to earn the lasting loyalty of my customers and colleagues
<p>Talk straight</p>	I talk straight and adapt to others and the specific context, speaking out constructively.	<p>Support people</p>	I give support to people in their development, providing feedback and appreciating their contribution
<p>Keep promises</p>	I keep my promises and I am consistent in everything I do	<p>Embrace change</p>	I embrace change, bringing innovative solutions and learning from mistakes

9 ANNEX III: DIVERSITY AND INCLUSION PRINCIPLES

- 1) Santander Group recognizes and supports all existing sources of diversity, both visible (gender, race, age, visible disabilities,...) and invisible (professional and life experiences, education, religion, values and beliefs, invisible disabilities, sexual orientation, personality,...).
- 2) We promote inclusive working environments in which all individual differences are valued, respected and enhanced. Having a diverse workforce is a competitive advantage that helps us to attain our business objectives, attract and retain the best talent and meet the expectations of our stakeholders.
- 3) Banco Santander is committed to offering Equal Opportunities to all. Leaders and employees are selected, remunerated and promoted based on meritocracy without any type of discrimination.
- 4) The Group's people's management policies, processes, systems and tools do not entail any bias that may give rise to situations of discrimination of any kind.
- 5) Our customers are diverse (in terms of gender, race, age, beliefs, abilities, sexual orientation....) and having a diverse workforce will help us to better understand their needs. The new kind of digital customer we are targeting will also require us to have diverse profiles.
- 6) Our products reflect the diversity of our clients and are accessible to all.
- 7) We comply with the prevailing international and local diversity, inclusion and equal opportunities legislation in each country.
- 8) Leaders and managers of the Group play an active role in diversity management.
- 9) We are committed to achieving pay equality for the whole of our workforce, comparing employees in the same job, level and function. The process is properly monitored to correct any detected pay inequality

These general principles are underpinned by the Santander Group's conviction that diversity and inclusion management is a fundamental issue linked to cultural transformation, the strategic vision of the company and the Santander Way.

10 ANNEX IV: RISK CULTURE: PROCESSES AND RESPONSIBILITIES

The development, communication and integration of risk pro/I AM Risk across all units and levels of the organisation, is built upon a set of key processes, which form part of the employee's life cycle. These processes include:

a. Selection and recruitment processes

Raising awareness of the importance of, and personal responsibility for managing risk in each new employee, through incorporation within selection materials and reinforcing such awareness once she/he has joined the Group through risk culture training in on-boarding programmes.

b. Risk training and development processes

To help embed a strong risk culture so it becomes part of everyone's day to day work, it is important to facilitate access to risk training and the Group uses the following approaches indicated below:

- Career and risk training plans for all employees.
- Training initiatives ensuring that all employees understand risk pro, the main risk types (financial and non-financial) and the basic aspects of risk management.
- Including a risk component in the training plans for all employees.

The Risk Pro Banking School (RPBS), Academia and the other local risk schools, help to deploy a corporate risk strategy across the Group. This strategy is a crucial lever for disseminating risk culture to all employees.

c. Embedding risk culture in daily activities

Promoting an effective and open communication and collaborative culture is critical to ensuring all employees' suggestions about risk management are taken into account and positively assessed in order to help achieve advanced risk management and better decision-making. This will include promoting the use of whistle-blower channels, reporting illicit situations or breaches of the code of conduct, and/or reporting any risks which are not being correctly managed. Each Group employee has personal responsibility for managing their risks within their daily activities.

d. Reward and recognition processes

Risk is included within the Group's performance management and reward. These processes are intended to motivate employees to adopt behaviours which are conducive towards good risk practices within the Group via alignment of remuneration and performance evaluation schemes. These processes will be led by Human Resources and supported by the Control functions.

RESPONSABILITIES

In order to properly cover these processes, the risk culture is coordinated between the Responsible Banking function and the Risk Management Office area as follows:

Responsible Banking:

- Promote the implementation of mandatory common standards across the Group and their inclusion in the corporate culture of the geographies.
- Providing a comprehensive view of culture initiatives, their progress and sharing best practices of the four stakeholders.

Risk Management Office:

- Definition of strategic risk culture guidelines, included in Santander Culture.
- Escalating and reporting to the Board Risk Committee (BRC) and other governance bodies.
- Drive risk culture initiatives across countries and global businesses.
- Define and monitor appropriate metrics
- Liaison with local units, including the definition of the guidelines, monitoring and oversight of risk culture within the local units.

11 ANNEX V: CORPORATE VOLUNTEERING STANDARD

Santander's purpose is to help people and businesses prosper by operating in a way that is Simple, Personal and Fair. By promoting a Corporate Volunteering standard, the Group seeks to:

- Strengthen Santander's commitment to communities through the direct involvement of its employees within the Corporate Culture Policy;
- Increase employee's commitment to Santander and their sense of pride in belonging to the Group; and
- Develop and enhance our people's talent and skills (cooperation, teamwork, leadership and creativity).

Child and youth education is the central element of the Santander Group corporate volunteering scheme, which complements the work carried out to benefit higher education through agreements with universities. Within this area, there are three basic lines of action:

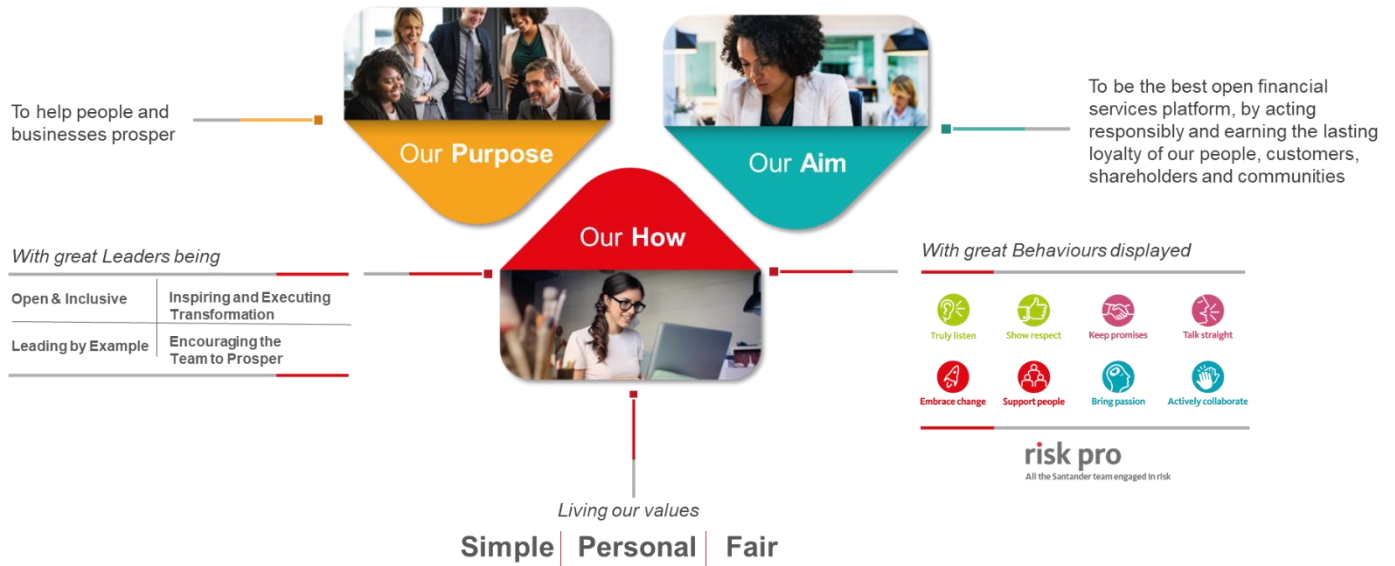
- 1) Preventing school dropout.
- 2) Improving the employability of young people at risk of social exclusion.
- 3) Promoting financial literacy.

Each country will predetermine a certain number of monthly/annual hours that will be offered to employees to ensure that they can participate in corporate volunteering activities if they wish to do so. Employees are also encouraged to contribute their own ideas for volunteering activities.

An Executive Sponsor in each country is responsible for promoting volunteering in the Group. Their role is to determine which initiatives best match the corporate and local strategy. In order to measure the internal and external impact of corporate volunteering, every country must report on a series of basic annual indicators that will facilitate the role of the Commitment and Recognition teams, regardless of other indicators they choose for their local reporting:

- Number of individual volunteers who participate in volunteering activities (on-site, micro-donations, and online);
- Number of volunteering hours in activities proposed or disseminated by the Group and its value in the local currency;
- Number of projects;
- The impact of volunteering activities;
- Number of direct group beneficiaries to which the activities correspond (people with disabilities, youth, children, senior citizens, immigrants, indigenous people, etc.);
- Multiplier effect on families, social organizations, society in general, the environment and other, where possible;
- NGOs with which they collaborate (prior an assessment of suitability on those)
- Investment in volunteering (any economic contribution or in kind different from volunteering hours must follow the criteria established in the social purpose contribution process as detailed in the Group's Contributions for Social Purposes policy).

12 ANNEX VI: LEADERSHIP COMMITMENTS



Being a responsible leader in Santander I commit to...

Being open and inclusive

...promoting diversity

Embraces differences and promotes diversity, connecting & responding to real needs of employees, customers, shareholders and communities

- Collaborates: works with the team, and for the good of the wider team and Group
- Explores differences in perspectives and integrates them in the team
- Is open-minded, receptive and positively encourages people to speak up

Inspiring and executing transformation

...having a clear strategic vision and delivering sustainable outcomes

Looks into the future, lives digital, thinks big and listens to the market and customers, challenging ideas and taking actions fast to improve

- Defines and executes their plans and strategy with speed, quality and with lasting outcomes
- Mobilizes and accelerates change in a responsible way
- Innovates with an entrepreneurial mindset, not being afraid to fail, learning from setbacks

Leading by example

...by always being SPF

Leads others by being an example, lives SPF and the corporate behaviors

- Is consistent, lives the behaviours and Risk Pro at all times
- Instills trust, is humble, empathetic and expects the best in others
- Is emotionally intelligent: self-regulates and adjusts reactions to suit the situation

Encouraging the team to prosper

...supporting the team to develop and make impact

Continuously seeks out challenges for the team and self to achieve extraordinary results. Supporting people's career goals and professional development

- Recognizes and gives visibility to the team or area's achievements
- Challenges others to help them grow constantly and supports them during the process
- Gives opportunity for career development and enables new opportunities for self and team