

## **Executive summary of the Santander Group's Corruption Prevention Policy**

This document is an executive summary of the Santander Group's Corruption Prevention Policy for the purpose of informing our stakeholders. Santander Group publishes an executive summary because the full Corruption Prevention Policy includes sensitive information regarding the group's internal procedures and controls in place to prevent these risks materialising.

The Santander Group's Corruption Prevention Policy, which is applicable internally, details the control procedures and mechanisms in place to prevent the occurrence of incidents related to this area within the Group.

The Corruption Prevention Policy is the responsibility of the Santander Group's Compliance and Conduct Function and its content is subject to regular review, with any changes or modifications deemed appropriate.

### **I. Introduction:**

The Santander Group is firmly committed to fighting any kind of Corruption in the public and private sectors.

In this regard, the Santander Group has a Corruption Prevention Policy that fully strengthens this commitment and represents a complete rejection of corrupt practices ("zero tolerance").

### **II. Scope:**

The Santander Group's Corruption Prevention Policy was drawn up by Banco Santander S.A. as the parent company and is implemented at the subsidiaries that make up the Group with any adjustments that may have been strictly necessary to make it compatible and comply with local legal or regulatory requirements.

### **III. Control guidelines for the prevention of corruption:**

This policy sets out the main guidelines for preventing corruption, which complement the principles and guidelines of conduct established in the General Code of Conduct, in line with the highest international and national standards in this area.

These guidelines mainly concern the appropriate procedures and control mechanisms to ensure compliance with the anti-corruption rules, which comprise:

- Rules of conduct for employees with regard to gifts and invitations to third parties (including public officials), and the existence of records of gifts and hospitality received or offered by employees under the conditions set out in the policy itself.
- The policy sets out the guidelines and measures for control and prevention relating to relations with third parties, highlighting the obligation to maintain due diligence processes that determine the identity and reputation of these third parties, as well as the obligation to maintain payments and accounting controls to ensure that the payments made comply with the terms of the contract signed with the third party and are made and recorded in the correct manner for accounting purposes.

In relation to facilitation payments or "*Facility payments*" the policy expressly prohibits them on the grounds that, although such payments are customary and socially accepted in some countries, they can be considered acts of corruption.

#### **IV. Canal Abierto:**

The existence of a whistleblowing channel called the *Canal Abierto*, through which employees can confidentially and anonymously report to the Compliance Function any breaches of the Corruption Prevention Policy of which they become aware of in the course of their professional duties.

#### **V. Training and awareness:**

Anti-Corruption mandatory training and raising-awareness initiatives, which include the main warnings and criteria for preventing inappropriate conduct by employees, specifically stating that if there is any doubt as to whether a particular action is acceptable or not, the Compliance function must always be consulted.

#### **VI. Breach of the Policy:**

The legal risks associated with corruption are extraordinarily serious, both for the Group and for the people who can perform these practices. For this reason, in the event of non-compliance with this Policy, employees may not only be faced with labour and disciplinary sanctions such as dismissal, but also with administrative or criminal penalties in accordance with applicable law.