

GENERAL HEALTH, SAFETY AND WELLBEING 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 defines the general principles of Santander regarding Health, Safety and Wellbeing, based on recognized best practices according to relevant international guidelines and initiatives on the subject (see Annex I), oriented towards ensuring the highest health, safety and wellbeing of its employees, promoting healthier lifestyles and creating long-term value for its employee base and for society.

This policy develops the provisions of the Corporate Human Resources Framework and the Corporate Responsible Banking Framework, and is complemented by other Group's policies, including the Human Rights policy, the Corporate Culture Policy, the General Sustainability Policy, all publicly available.

2 DEFINITIONS AND SCOPE

The following definitions must be taken into account when applying this policy:

Healthy workplace: According to the World Health Organization, a healthy workplace is where the management team and the employees cooperate in developing continuous improvement processes to protect and promote Health, Safety and Wellbeing.

Health: a person's mental or physical condition. In a positive sense, health is a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity.

Occupational health: an area of public health aimed at promoting and maintaining the highest degree of physical, mental and social well-being of workers in all occupations.

Occupational safety: an area of public health aimed at the anticipation, recognition, evaluation and control of hazards arising in or from the workplace that could impair the health and well-being of workers.

Wellbeing: the state of being comfortable, healthy, and/or happy.

3 SCOPE OF APPLICATION AND TRANSPOSITION BY SUBSIDIARIES

This policy 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 CRITERIA

The principle and criteria established in this policy aim to provide a healthy and safe working environment for all employees, contractors, customers and visitors to our premises.

4.1. General Criteria

Relevance of health, safety and wellbeing across Santander Group-wide and full staff. The Santander Group recognizes that the health, safety and wellbeing of our employees is key for them, for their families and to create a sustainable, competitive, and productive working environment.

Our people is our most valuable asset and looking after their health, safety and wellbeing is a positive business investment. This is also part of our commitment to becoming the best bank to work for.

It is also everyone's responsibility at Santander to help create such an environment, take ownership of their own safety and to report any deviations from internal regulations.

Alignment with the strategy. Health, Safety and Wellbeing must be integrated into the human resources and business strategies of every country and division, as well as globally.

Implementation. In order to facilitate the implementation of this policy the Health, Safety and Wellbeing Group function will draw up and share Global Guides developing in detail specific aspects of this document. Such Guides will include concrete operational recommendations aimed to support local teams in the implementation process.

Sufficiency of Resources and accountability. Taking in account the principle of proportionality and compliance with national Health and Safety regulations, it is necessary to ensure that adequate functions are in place for an effective management and monitoring of Health, Safety and Wellbeing.

Subsidiaries will ensure full accountability for the management of Health, Safety and Wellbeing activities in the existing teams responsible for those within Human Resources, and may consider

taking, if convenient, to allocate these responsibilities to a specialized function to facilitate coordination and effective interaction, both at local level and with the Group.

A routinely monitor and review our performance striving has to be established for continual improvement.

Legality: The activities described in this Policy should be carried out in strict compliance, with no exception, with the relevant legislation in each country where the Group operates, which should always prevail.

4.2. Specific Criteria.

In addition to the general criteria described above, the following guidelines must be taken into account when managing the specific areas of activity for Health, Safety and Wellbeing:

4.2.1 Occupational Health and Safety

- **Safety management system.** An Occupational Health and Safety management system will be developed and maintained with the goal of keeping risks under control and devote adequate human and material resources for its deployment.
- **Planning activities.** Entities included within the scope of application of this policy should manage health hazards, and should plan all Health and Safety activities to mitigate risks and reduce them to acceptable levels when their total elimination is not possible.
- **Disclosure and training to the stakeholders.** All stakeholders (incl. external providers operating under Santander's mandate) should have information, instruction and training adequate to their role, regarding health, safety and risk management.
- **Risk Assessment.** Risk assessment reviews will be carried out covering the risks affecting our employees in a holistic way. This includes aspects such as psychological risks, health, safety, ergonomics and other risks beyond those incurred within our premises, such as those related to teleworking, flexible working and working from home.
- **Emergencies.** Emergency and evacuation protocols in case of fire or other dangerous events will be designed, in order to protect the employees, visitors or contractors.

- **Time-dependent health emergencies.** To the extent that is considered in local law, response procedures for time-dependent health emergencies (e.g. heart attack, choke, stroke) taking place within our premises will be established.
- **Safety representatives.** Health and safety representatives will be nominated, appointed and trained in adequate number and according to local regulations, involving them in national Health and Safety Forums and periodic local Health and Safety Committee meetings (where available).
- **Medical health surveillance.** Regular surveillance of the health status of Santander employees will be conducted, in agreement with local law and regulations. Collaboration with public health surveillance systems will be assured, in accordance to national health and GDPR regulations.
- **Inspection.** Periodic inspections will be executed that ensure we provide safe premises, safe systems of work, and properly maintained equipment and facilities.
- **Monitoring.** Root causes of accidents should be investigated at work and managed accordingly, in order to prevent recurrence.
- **Absenteeism.** Trends in absenteeism will be analysed in order to promote measures aiming to reduce its impact on the employees and the organization.
- **Employees with disabilities.** The work environment will be adapted through the provision of reasonable adjustments to employees with disabilities and special needs.
- **Travel safety.** Information for employees travelling on duty to other locations regarding safety and personal security will be provided.

4.2.2 Wellbeing

- **Awareness.** Campaigns and health programs for prevention of the most prevalent diseases (e.g. cardiovascular, stroke, hypertension, obesity, diabetes, pulmonary obstructive chronic disease, neurodegenerative diseases) will be organized.
- **Health promotion.** Health and Wellbeing among the employees will be promoted through engaging activities that facilitate the change of behaviours and the adoption of healthy habits. This includes the promotion of adequate nutrition, physical activity, mental wellness, self-care, and health awareness.
- **Special needs.** The health of new and expectant mothers, employees with disability and other special groups will be taken into account with specific measures.

- **Listening.** A regular, active listening process on Health and Wellbeing will be maintained, incorporating it into internal surveys and reviews (e.g. Annual Engagement Survey).
- **Research and innovation.** We will encourage the participation on research or innovation projects along with universities, research centres or professional associations in order to enhance knowledge on Health, Safety and Wellbeing globally and in the communities where we operate.

5 OWNERSHIP, INTERPRETATION, DATE OF VALIDITY AND PERIODIC REVIEW

- The Approval of this document corresponds to Human Resources Committee.
- The interpretation of this document corresponds to the Health, Safety and Wellbeing function.
- This document will take effect on the date of its publication. Its contents will be subject to periodic review, and any changes or modifications considered appropriate will be made in due course.

6 CONTROL OF THE DOCUMENT

Version of the document	Person responsible for the custody	Approval Governing Body	DATE
Version 1.0	P. Marina Losada	HRCO	04 04 2022

Version of the document	Comments
Version 1.0	First version of the policy

7 ANNEX I: MAIN CONVENTIONS AND STANDARDS ON WHICH THIS POLICY IS BASED

- United Nations Sustainable Development Goals (SDG)
- World Health Organization Resolution WHA 72(9) WHO Global Strategy on Health, Environment and Climate Change.
- International Standards Office ISO 45001 on Occupational Health and Safety.
- to ISO 45003:2021 Occupational health and safety management — Psychological health and safety at work — Guidelines for managing psychosocial risks
- Council Directive 89/391/CEE on the introduction of measures to encourage improvements in the safety and health of workers at work.