

Banco Santander, S.A. Hong Kong Branch

(A public limited liability company incorporated in Spain)

ENVIRONMENTAL, SOCIAL AND CLIMATE CHANGE RISK MANAGEMENT DISCLOSURE

For the year ended 31 December 2024

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I. INTRODUCTION

Sustainable Banking in Santander follows a top-down approach. Strategy, governance, risk management and targets/metrics are originated at headquarters' Board level, cascading down to the entire organization, as disclosed in Santander Annual Report.

This document aims to explain how "ESCC" risk management is locally executed in Banco Santander S.A., Hong Kong Branch.

II. STRATEGY

Responsible and Sustainable Banking in Santander is at the centre of the Group's strategic agenda, and it comprises several initiatives, projects and working streams. Santander's Hong Kong Branch fully aligns with this strategic agenda for achieving the purpose of promoting sustainable and inclusive growth by focusing on three strategic pillars:

- Support Climate Transition - Deliver our Net zero ambition by 2050 helping our customers in their transition to a sustainable and low carbon economy by originating EUR 220 Bn green finance before 2030.
- Contribute to generating positive society return.
- Embed ESG and Climate Change risk management across the organization by incorporating ESCC in behaviours, policies, processes, and governance. As such we have developed our key "ESCC Policy" which focuses on how we plan to achieve our ambitious targets with a focus on the main carbon-intensive industries (O&G, Power, M&M & Soft Commodities) and includes criterion to:
 - Cut financing to clients engaged in coal mining and/or producing energy from coal fired plants (more than 10% of its revenues) by 2030; and
 - Limiting exposure to unconventional O&G activities; conflict minerals, deforesting or biodiversity harmful activities or protected areas.

In terms of execution of the Group strategy, Santander Asia follows two main lines of action:

- Onboarding new clients fully aligned with our ESCC Policy and increasing coordination with Global ESG Solutions team to grow local origination of sustainable finance in accordance with EU and internal taxonomies.
- Developing a dedicated local ESCC Risk team. This team coordinates the application of different policies and assesses how clients/ESG sensitive, or related transactions are aligned to Santander Group commitments and policies. It also conducts regulatory self-assessments and gap analysis to ensure Santander policies adhere fully to Local law and regulations.

III. GOVERNANCE

In Santander Hong Kong Branch, the **Executive Committee ("ExCo")** acts as the Branch main governance body. Its powers refer to decision-making and monitoring regarding businesses, strategy, governance, risks, finance, accounting, workforce decisions, technology systems, operational matters, and escalation to Group when deemed appropriate.

The ExCo is informed and reviews the most relevant elements of Santander Group sustainability agenda and discusses strategic impact on Santander Hong Kong's business. In March 2025, the Risk team presented an "Sustainability Strategy Santander Asia 2025", which outlines the main elements of Responsible and Sustainable Banking at Santander, assesses its impact in Hong Kong Branch operations and proposes lines of actions to locally execute Group's agenda, commitments, and policies. In addition, a sustainability working group is established to drive ESG business & portfolio growth and mitigate transition risks.

APAC SCIB Executive Risk Forum ("ERF") is the highest Risk decision forum in Santander's APAC region. It is chaired by the Regional CRO and includes all the ExCo members. This decision body concentrates all sanctioning authorities related to Risk Management. Some of these authorities have been further delegated in other forums. ERF main authorities include:

- Ensure the effectiveness of the Risk governance, Risk control environment and Risk function in general (**Risk Governance & Organization**).
- Define Risk Appetite, Strategy and Management Limits (**Risk Appetite and Strategy**).
- Discuss, approve, or reject client and business proposals that imply any form of risk taking with potential financial impact for the Branch and/or Region (Credit, Market, or Investment risk). For every business proposal exceeding delegated risk authorities, the ERF shall escalate for further advice to Global Forums (**Risk Underwriting**).
- Oversee and monitor the evolution of SCIB Asia and its Branches Risk profile considering all Risk Factors (Credit, Market, ESG, Non-Financial) (**Risk Oversight and Monitoring**).
- Approve management and mitigating actions as well as build provisions when deemed necessary according to Group's Policies and regulations applicable (**Risk Mitigation**).

Given the increase on Santander Asia business activity as well as the continuous demands and developments in Risk management at the group, in March 2024 a new Risk governance structure was approved in Santander Asia. Under the new governance ERF has delegated some of its underwriting authorities onto the Risk Proposal Forum (RPF) and monitoring and oversight onto the Risk Control Forum (RCF).

The ERF keeps direct authority to approve the most relevant topics like the Risk Strategy, Risk Management Limits for risk typology and the approval and review of annual limits for all the clients. In approving the Risk Strategy and Clients risk appetite, the ERF is informed and discusses ESCC implications at both portfolio and client-individual level.

The risk oversight activity is developed at the **RCF** (organically subordinated to the ERF). Chaired by the CRO and composed by all the Risk Management Heads, this forum receives monthly updates of the Branch Risk Profile, and it develops in-depth analysis of certain topics including ESCC and ESG related areas interest (e.g.

policies, controversies, results of clients annual E&S assessments) which have been subject of presentations or commentary in this forum.

This Forum has reviewed and approved the local transposition of 1) E&S Risk Management Policy (that sets out the principles and criteria that apply across the Group when financing E&S sensitive sectors) and 2) Environmental and Social Risk Screening Policy (sets out roles & responsibilities in assessing ESCC Risks).

- These policies have been embedded in Santander Asia credit and risk oversight processes and it is responsibility of ESCC Risk team to ensure they are applied properly.
- The local adoption of these policies implies that:
 - E&S considerations are included on client pre-assessment conducted for new client selection.
 - Clients' E&S qualitative reviews are included in credit rating papers.
 - ESG Risk Team green light is required for ESG certain transactions (usually subject to Equator Principles), and
 - Client's alignment to Santander Global E&S policies/commitments is assessed annually. This exercise is coincidental with the approval of credit limits and misalignment with group policies may impact the risk appetite with certain clients, via a global tiering exercise. This is a global exercise coordinated by global teams with direct participation of local ESG Risk responsible.

On a portfolio level, RCF is informed monthly about the "Branch Risk Profile". The Risk Oversight team, in coordination with its global peers, conducts a periodic & holistic exercise that assesses top risks and profiles different risks typologies (Credit, Market, Liquidity, Structural, Counterparty Credit risk, ESCC, Model, Macro, etc.). Accordingly, a set of ESCC-related metrics/KPIs are monitored monthly. Beyond this exercise, a specific "Climate Change Materiality Assessment" is conducted twice per year and presented to the ERF (applying Headquarters' defined methodology to local portfolios).

On a more technical level, clients' risk assessment is reflected in a credit rating paper, in which ESCC and ESG qualitative information is required. To this aim, **Local Rating Forum** is the body that ensures ESCC assessment is conducted and local ESCC Risk team is a member of this forum.

IV. RISK MANAGEMENT

Sustainability agenda, commitments, policies and ESCC risk management in general have been integrated locally into the risk management process following a client-centric logic and comprising the following steps:

1. Client Selection (Onboarding / KYC process)

Santander Asia operations are exclusively focused on Corporate and Investment Banking. This segment works following a client centric approach with low-moderate risk profile. Prospect clients are identified/selected and proposed to be included in the so-called "MRG closed List". The list is revised annually following budgeting exercise. New entrants are required to comply with certain criteria in terms of financial metrics and geographic fit. New prospects are decided locally and ratified globally. In discussing new prospects, a pre-screening is conducted. ESCC considerations and alignment with Santander commitments are considered as part of this exercise and it is for the local ESCC Risk team to validate that pre-assessment.

2. Risk Assessment (Rating)

There is mandatory ESCC section in Santander's Credit risk rating papers. Currently, this assessment is purely qualitative and has no impact in probabilities of default or final rating. Credit analysts are responsible for elaborating a discussion about clients' business, which includes an ESCC section. The local ESCC responsible (a member of the rating forum) is required to validate the information and analysis provided.

It is worth mentioning Santander Head Office is coordinating a working group to develop a methodology for quantitative rating specifically for Environmental, Social and Climate Change Risk, leveraging on data provided by external sources (S&P).

3. Risk Appetite and Management limits setting

Clients' limits are reviewed annually. Alignment with Santander E&S policies is a crucial part of this process. This assessment is performed following the ESCC Risk Management Policy (M&M, O&G, Soft Commodities and Power) by completing an industry specific questionnaire (responsibility of the Relationship Manager, 1LOD).

Assessments of corporate clients in other sensitive sectors are also conducted on ad-hoc basis driven by controversial/negatives news or ESG related issues, as well as the transition plan assessment (TPA) whenever the corporate clients' climate disclosure is not aligned with Santander's commitment (responsibility of the Relationship Manager, 1LOD). Management actions can be put in place, if necessary, after analyzing the case.

Final version needs to be reviewed and validated by the local ESCC risk team (2LOD), and it provides an opinion to summarize the ESG impacts and risks, and also the overall ESCC risk management strategy/disclosure.

All together the assessments are being sent to the Global team for final validation.

For industries for which Santander has set decarbonization targets, a tiering process is performed to define the maximum risk appetites. Tiering is a global exercise that is applied to all Santander SCIB clients that operates in industries where the group has set clear reduction targets following NZBA and based on an industry approach. Local ESCC Risk team participates in the tiering assessment process should there be any local transactions. The final decision lies within global Portfolio Alignment team, given the global nature of CIB clients. Clients are rated and then assigned to one of four possible tiers; logically weakest tier anticipates a reduced risk appetite being set on a global portfolio basis.

4. Transaction booking

ESCC considerations are included at transaction level in 2 ways:

- From Risk perspective, focus is set on project-related deals under the scope of Equator Principles IV (mainly Project-related Financing). Local ESCC Risk team pre-assesses the transactions under Equator Principles and conformity is required to obtain final approval from the Global Team.
- Secondly, "labelling" of sustainable financing (Green, Social or Sustainable linked) is undertaken. Santander has developed a Sustainable Finance and Investment Classification System ("SFICS") with the purpose to label transactions according to the European Union. Santander's (internal) taxonomy and other green and social criteria set out in international standards such as the ICMA Green and Social Bond Principles, the Climate Bonds Standard and the Febraban Taxonomy in Brazil to adapt it to our geographical and sectoral reach. To that effect, a "SCIB ESG Classification Meeting" assures

classification is properly applied across the Group; Local ESCC Risk team is an invitee to the meeting discussions whenever local transactions are involved.

5. Monitoring (both client level and portfolio)

Portfolio monitoring is embedded in local risk management through two basic tools: Branch Risk Profile and Client Materiality Assessment.

- For branch risk profile, ESCC monthly monitoring focuses on exposures subject to E&S policy, and concentration ratios are reported. The analysis lies on ESCC risk team, and it is integrated in the overall profile assessment of the branch. This exercise is presented once a month in the RCF and "key take aways" and an executive summary is made available for ERF Members.
- A client level Climate Change materiality assessment is conducted annually, following a corporate methodology that it is applied to local portfolios. The analysis is conducted by local ESCC responsible, and it is presented both to RCF.