

Culture report 2019

Let's continue
working for a
better world

#TheRightWay

[santander.com](https://www.santander.com)



Our approach to responsible banking

“ By delivering on our purpose, and helping people and businesses prosper, we grow as a business and we can help society address its challenges too. Economic progress and social progress go together. The value created by our business is shared – to the benefit of all.

Communities are best served by corporations that have aligned their goals to serve the long term goals of society. ”

Ana Botín, Group Executive Chairman



By being responsible, we build loyalty



... Santander treats me responsibly

In our day-to-day businesses, we ensure that we do not simply meet our legal and regulatory requirements, but we exceed people's expectations by being Simple, Personal and Fair in all we do.

I'm loyal to Santander because...

... Santander acts responsibly in society

We focus on areas where, as a Group, our activity can have a major impact on helping people and businesses prosper.

Our progress in 2019

The Santander Way is our global culture approved by the Group Board in 2015, aligned to the Group Strategy and complementing the Responsible Banking ambition. It is defined in the Corporate Culture Policy, which was updated and approved in December 2019. This policy sets minimum standards across the Group, providing a consistent framework to develop coherent initiatives and measure their impact.

Cultural transformation is a journey and takes time to truly embed. Since 2015, a common language and behaviours have resulted in Santander values –Simple, Personal and Fair– permeating across all units, and significant progress is being made, both globally and locally.

In 2019, we developed and published our first Culture Thematic report based on 2018 initiatives to provide greater details of our initiatives and good practices.

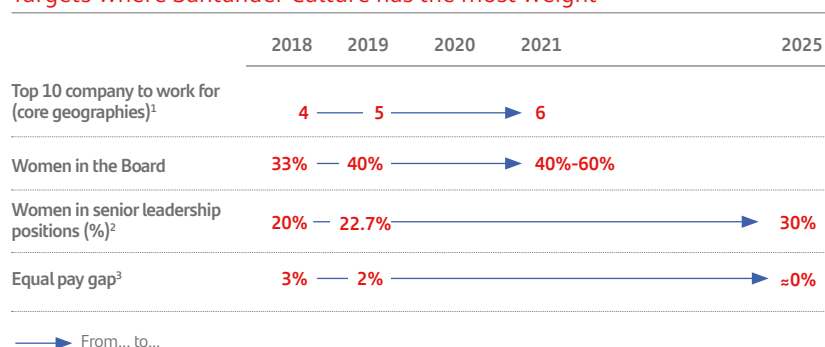
In 2019, the Culture Thematic report provides a summary of the progress made against the Global 2019 Culture plan – created in collaboration with multiple stakeholders – as well as an overview of the holistic cultural initiatives that have been implemented during this year.

The document covers global actions. Countries' initiatives are updated on a bi-annual basis and will be available in the 2020 Culture Thematic report.

Our external commitments

In 2019, we set 11 targets which are aligned with our culture and reflect our commitment of building a more responsible bank

Targets where Santander Culture has the most weight*



* We report our progress against all targets in our [annual report](#)

1. According to a well-known external source in each country (Great Place to Work, Top Employer, Merco, etc.).

2. Senior positions represent 1% of total workforce.

3. Calculation of equal pay gap compares employees of the same job, level and function.

During 2019, our main achievements have been:

- Board approval of [global minimum standards for parental leave](#): a primary maternity leave of at least 14 weeks and a secondary leave of at least 4 weeks
- Launched our new, [global Leadership Commitments](#)
- The development and launch of [guidelines with a common definition and vision of Flexiworking](#)
- The adoption of methodology to include [Responsible Banking](#) within the [Executive Remuneration Framework](#)
- The launch of our [Global Simplification Initiative](#)
- Update of our [Diversity and Inclusion Principles](#)
- We achieved the first position in the [Bloomberg Gender-Equality Index](#) for the third consecutive year and we have been named as a [Leader in Diversity 2020](#) by the Financial Times
- Development and approval of [Global Minimum Standards](#) for our Ethical Channels
- Development of [improved criteria](#) for supplier selection and onboarding
- We have been recognised as the [Most Sustainable Bank in the World in 2019](#) by Dow Jones Sustainability Index
- We have been included in [Great Place to Work](#) list of the 25 best companies to work for in the World

Culture report 2019

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Overview

The Santander Way is our strong global culture. It includes our purpose, our aim, and how we do business. It is the bedrock of our bank, a responsible bank. Our culture is fully aligned to our corporate strategy and based on four key stakeholders: our people, our customers, our shareholders and the communities in which we operate.

2019 highlights

86%
of our employees
feel proud to work for
Santander

6
countries
in top 3 for customer
satisfaction

126
meetings with ESG investors
and analysts, showing our
commitment to transparency
and communication

410,501
people helped
through corporate
volunteering
initiatives

1. What is Corporate Culture and why is it important?

Culture can be defined as how people naturally do things, aligned to their beliefs. It is what they determine as important and who and what they value.

Corporate culture refers to beliefs, values and behaviours that determine how an organisation's employees and management conduct their business and manage relationships with whom they have dealings within and outside. Corporate culture is often implied, not expressly defined.

Simply put, corporate culture is "the way we do things around here".

Studies in recent years show that employees are increasingly placing more and more importance on a company's ability to reflect their own values when choosing their place

of work. Customers choose brands that are socially and environmentally aware and responsible, and also align with their own values. Even shareholders are making decisions based on non-financial criteria that correspond with communities' perceptions of brands, derived from their treatment of social, governance and environmental issues.

With that in mind, it is not surprising to hear that a healthy corporate culture has a positive impact on businesses' performance. It has a direct impact on employees' perception of their workplace, through the value chain: from satisfying the needs of customers, to maintaining shareholder confidence, both of which drives loyalty, and ultimately benefits the communities where the business operates.

The last Group of Thirty (G30)^A report titled "**Banking Conduct and Culture: A Permanent Mindset Change**", is a 10 year review following the financial crisis looking at lessons learned. It underlines that embedding culture, reinforcing it at all levels of the Organisation, whilst also aligning conduct and risk management practices within everyday business. This is a constant and critical process if we are to see a return of trust in banking among stakeholders. According to this report, "as the banking industry reflects on the last decade, and culture and conduct efforts gain additional maturity, research has revealed eight key lessons":

- 1) Managing culture is not a one-off event, but a continuous and ongoing effort
- 2) Conduct and culture must be embedded from the top (Board) and throughout the firm
- 3) The scope of conduct management is shifting from misconduct to conduct risk management
- 4) Managing culture requires a multidisciplinary approach and alignment of multiple cultural levers
- 5) Diversity is essential to encourage a more diverse set of views and voices
- 6) Behaviours and outcomes should be measured
- 7) Regulation has a limited role in rule setting and mandating culture
- 8) Industry-wide dialogue and best practices sharing are important for a stronger and healthier banking sector

We have incorporated the G30 recommendations within our cultural transformation initiatives.

A. G30 is an international body of financiers and academics which aims to deepen understanding of economic and financial issues and examine the consequences of decisions related to these.

2. Our strong Corporate Culture - The Santander Way

At Santander we understand the importance of a healthy culture. By building loyalty and acting responsibly, we generate value for all our stakeholders. By focusing on how we do business, we have met the strategic targets we originally set in 2015 and have consistently delivered growth, profitability and a strong balance sheet.

As mentioned earlier, corporate culture can simply be defined as “the way we do things around here”. Santander’s corporate culture is based on “The Santander Way”. It defines our purpose, our aim and HOW we do business, by being Simple, Personal and Fair in everything we do. It is the bedrock of our bank, a responsible bank.

The Santander Way



Our culture is fully aligned to our corporate strategy and based on four key stakeholders, our people, our customers, our shareholders and the communities in which we operate.

We believe that by acting responsibly towards our people, we will build a strong team that is

willing to go the extra mile for our customers. This will enable excellent customer service and loyalty, generating predictable returns for our shareholders, enabling us to invest more to support communities and building employee’s pride in Santander. This is the virtuous circle of loyalty, which drives business success.

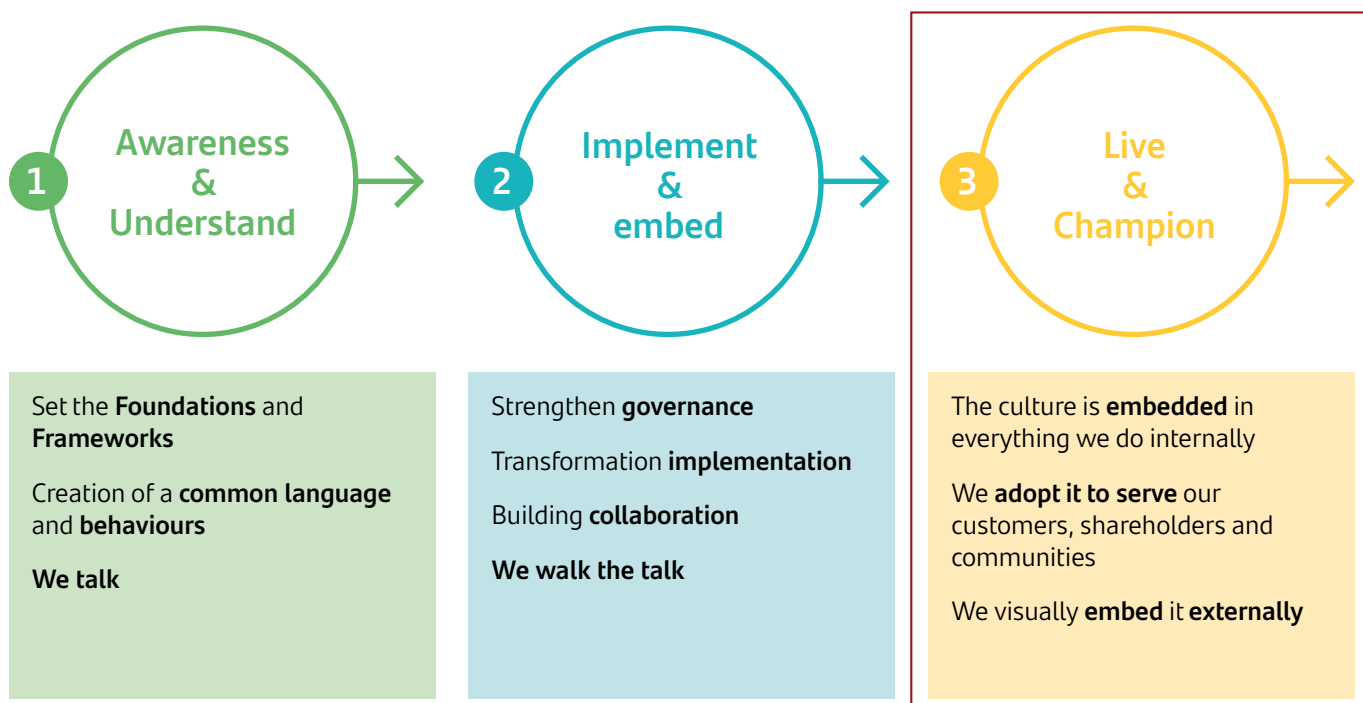
“ Just as important as what we do is how we do it ”

Ana Botín, Group Executive Chairman

Cultural transformation: a long journey

Cultural transformation takes time and The Santander Way journey started in 2015. During this time, consistency and engagement with our stakeholders has been paramount to embedding Simple, Personal and Fair in all we do.

Our culture transformation is a 3-phase journey ... we have moved into phase 3



Stage 1: Awareness and Understanding – setting the Foundations (2015 – 2016)

We engaged with our people in developing Simple, Personal and Fair and our corporate behaviours. The initial focus was on collaboration and creating a common language and behaviours so there was an understanding of the desired culture.

Stage 2: Implement and Embed (2016 -2018)

This phase continued embedding and building SPF and behaviours into every element of the employee lifecycle including the elements within senior leaders' performance management and reward. New initiatives were developed to reinforce the corporate behaviours such as StarMeUp, a recognition scheme aligned to the behaviours. The cultural governance was strengthened including the development of a Corporate Culture Policy. The focus was on displaying and recognising the corporate behaviours and building greater collaboration.

Stage 3: Live and Champion – embedding into everything we do (2019 onwards)

We are all ambassadors of our culture. SPF is well understood by all and behaviours are displayed and recognised at all levels in the organisation. Initiatives to continue strengthening the culture will be incorporated such as embedding leadership commitments and enhanced diversity and inclusion initiatives. Focus continues to embed SPF into all stakeholders, including customers, shareholders and the communities. The change is sustainable and is externalised and incorporated into our Responsible Banking ambitions.

Culture and Responsible Banking

Our corporate culture is an integral part of Santander's approach to Responsible Banking. We regularly analyse the most relevant social, environmental and ethical behaviour issues through our materiality assessment. As a result, from a Responsible Banking perspective we have identified two challenges.

Challenge I New business environment

Ensuring we have the **right culture, skills, governance, digital and business practices** to meet stakeholders' expectations

Challenge II Inclusive and sustainable growth

Supporting business to **create new jobs** and helping **people access finance**, supporting finance the **low carbon economy** and fostering sustainable consumption

The transformation of the world economy is unprecedented. The opening of new markets, the availability of global capital and advances in information technology and communications are changing the competitive environment of companies across the world. This new competitive framework requires companies to assume greater responsibilities, to innovate and to work in new ways.

Having a strong corporate culture is key to face this new and challenging environment and to ensure we still focus on doing the basics brilliantly.



Our culture at a glance

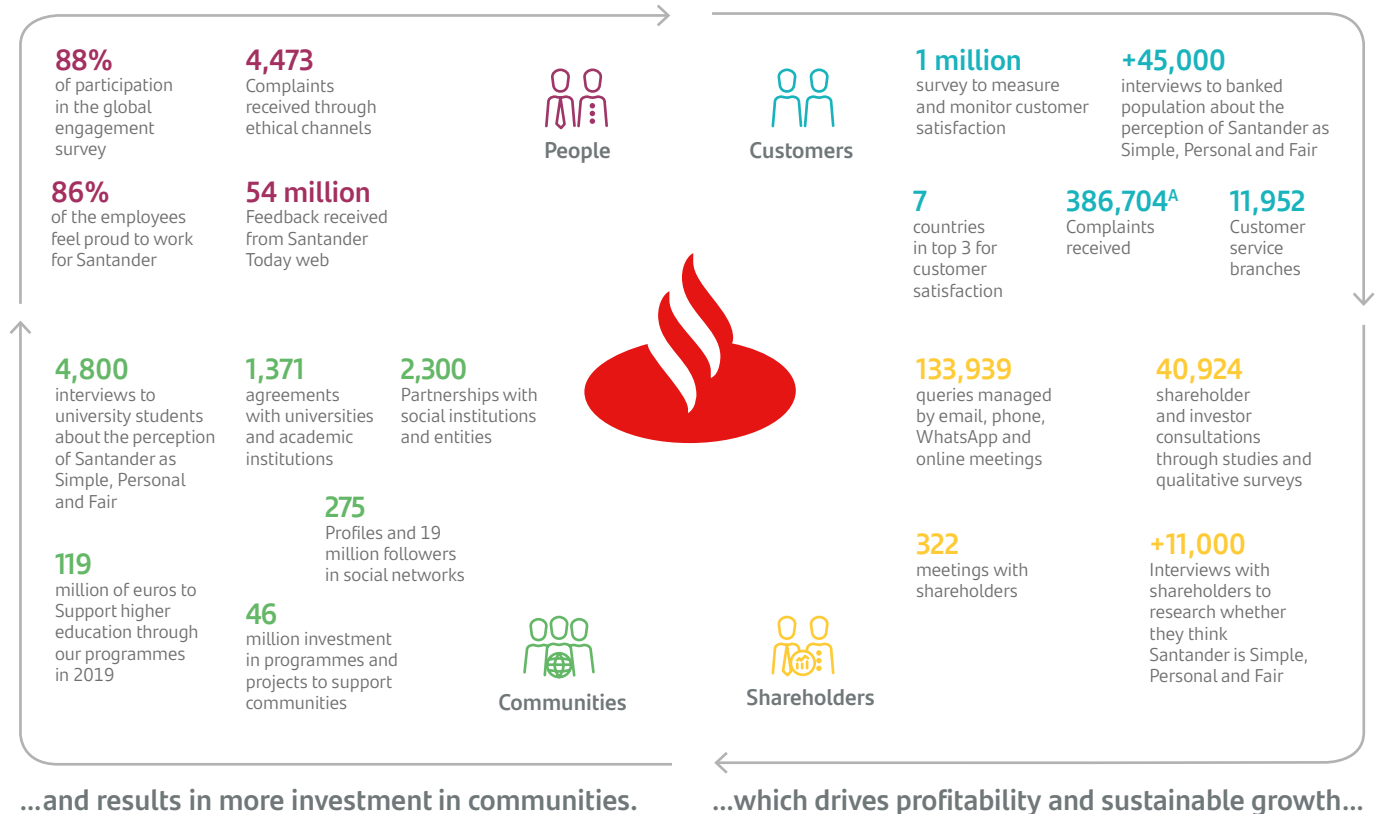
We are on a journey to embed our culture. Making all we do Simple, Personal and Fair is critical to our effort to build a more responsible bank. We know we have more to do - but we are proud of the progress we have made.

Our purpose

To help people and business to prosper

Employees who are more motivated and committed...

...make our customers more satisfied and loyal...



Our How:

Simple | Personal | Fair
In everything we do

A. Personal Protection Insurance (PPI) complaints and first instance customer incidents are excluded.

3. Our Governance

Robust internal governance

Santander has an internal governance structure that is regulated by key internal regulations such as Rules and Regulations of the Board of Directors of Banco Santander, S.A., Rules and Regulations of the General Shareholder's Meeting and a number of internal regulations (for example Corporate Frameworks, models, policies and procedures). The Group-Subsidiary Governance Model and Guidelines for Subsidiaries (Group Governance Model) establishes a set of guiding principles that regulates relations and interactions that should exist between the Group and its subsidiaries.



For more information about our internal governance please see our Annual Report p. 236

Culture governance

The **Responsible Banking, Sustainability & Culture Committee (RBSCC)** was established in 2018 with the main purpose of assisting the Board of Directors in reviewing initiatives in relation to the corporate culture and values of the Bank and to drive progress on sustainability and responsible banking issues. The RBSCC is supported by the Culture Steering Group and the Inclusive & Sustainable Banking Steering Group.

The Board of Directors is assisted by the RBSCC in fulfilling its oversight responsibilities with respect to the responsible banking strategy and sustainability issues of the Group, in particular, providing advice to the Board on the formulation of the corporate culture and values, assisting the Board in the promotion of, and in embedding the corporate culture and values across the Group and overseeing and monitoring the corporate reputation and engagement with stakeholders. In 2019, 11 culture-related agenda items have been taken to the RBSCC

▶ The **Culture Steering (CS)**, promotes, supports and holistically measures the implementation of The Santander Way Corporate Culture across the geographies, ensuring Corporate and local actions are consistent. It is composed by senior members from across the Group, heads of global areas and country heads. All of these Heads, or their delegated representatives, are required to present their culture plans to the CS on an annual basis. The Culture Steering held 11 meetings in 2019

▶ The **Inclusive & Sustainable Banking Steering (ISBS)** ensures that the Group progresses towards its core objectives on inclusive and sustainable growth. The ISBS promotes measures and initiatives to tackle social and financial inclusion, extend and improve access to education and training, support the investment in the transition to a low carbon economy and supports investment which has a beneficial impact on society as a whole.

▶ **Santander subsidiaries.** Guiding principles for subsidiaries (and global business units) was established in 2018 and developed since then to ensure that governance and implementation of both the responsible banking agenda and the Corporate Culture are embedded across the Group as a whole. Likewise, each subsidiary has appointed a senior responsible for the Responsible Banking function. All geographies have established committees covering their cultural transformation initiatives.

Policies that support our Corporate Culture

Corporate Culture Policy

The Corporate Culture Policy establishes the guidelines and required global minimum standards in order to embed our common culture. In December 2019, the Board approved the new Corporate Culture Policy, which has been made public for the first time in 2020.

This updated policy incorporates the Leadership Commitments within The Santander Way minimum standards, Global Volunteering Standards and, updated Diversity and Inclusion (D&I) principles. These new principles include references to disabilities and different sexual orientations and the importance of our products reflecting the diversity of our customers.



More information
about our Corporate
Culture Policy here

The Santander Culture is structured on three levels:

1. Common Minimum Standards:

These elements are at 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.

→ The Santander Way:

- Our Purpose
- Our Aim
- Our How: Simple Personal and Fair
- Corporate Behaviours
- Leadership commitments
- Risk Pro

→ Stakeholders and virtuous circle

- 4 key stakeholders: people, customers, shareholders and communities

→ Santander Brand

→ Governance and Measurement

→ Commitment of Senior Management and Effective Communication

2. Mandatory global initiatives to be implemented in the Group and can be adapted and managed at local level. Some examples are volunteering initiatives, My Contribution or StarMeUp recognition.

3. Local initiatives, developed with autonomy within the Corporate Culture Policy and consistent with the Corporate Frameworks. These are particular initiatives from countries that respect the global framework but do not necessarily exist in other geographies.

An example of a global initiative adapted and managed at local level: The Santander Week



Every year, we celebrate "We Are Santander Week", which our teams run.

During this period, the whole Group celebrates being part of a large, diverse and successful team which encourages collaboration and contribution to our communities.

This is our main global initiative for sharing culture and fostering a pride of belonging to Santander, which increases motivation and engagement.

Santander Week is an example of global initiative that can be adapted at a local level. The activities carried out during vary from country to country and they include volunteering, food collection, tree plantation or promoting a healthy lifestyle via sports events, among others.

Code of conduct

The General Code of Conduct is based on our corporate behaviours and ethical principles. It defines the standards to be applied by Santander's employees in their day-to-day activities.

Santander provides all its employees with bi-annual training on the Code of Conduct -available on the Santander knowledge site - and the

compliance function is available to address any queries with respect to its application.

Moreover, during 2019 we have produced a new, simplified edition of the Code of Conduct, supporting the formal Code, to aid understanding and awareness of the importance the Code plays in everyone's role in the organisation.

Equal opportunities, diversity and non-discrimination

People are selected, remunerated, and promoted in accordance with their skills, training, knowledge, experience, leadership, diversity of thought, personal aspirations and future potential.

Respect for people

We promote relations based on respect for the dignity of others, participation, equality and reciprocal cooperation, propitiating a respectful working environment in a bid to achieve a positive working atmosphere.

Compatibility of work with personal life

We promote a working environment, which is compatible with personal development, helping the people in their teams achieve the best possible balance between the requirements of their work and their personal and family requirement

Environmental protection and social and environmental responsibility policies

Employees are committing themselves actively and responsibly to comply with and observe legal social and environmental regulations in force, as well as the General Sustainability Policy and the Human Rights policy.

Collective rights

We respect the internationally recognised rights of unionisation, association and collective bargaining, as well as the activities undertaken by organisations representing employees

Prevention of occupational risks

This is fundamental to achieve a comfortable and safe working environment.



To find out about our corporate behaviours see page 17.

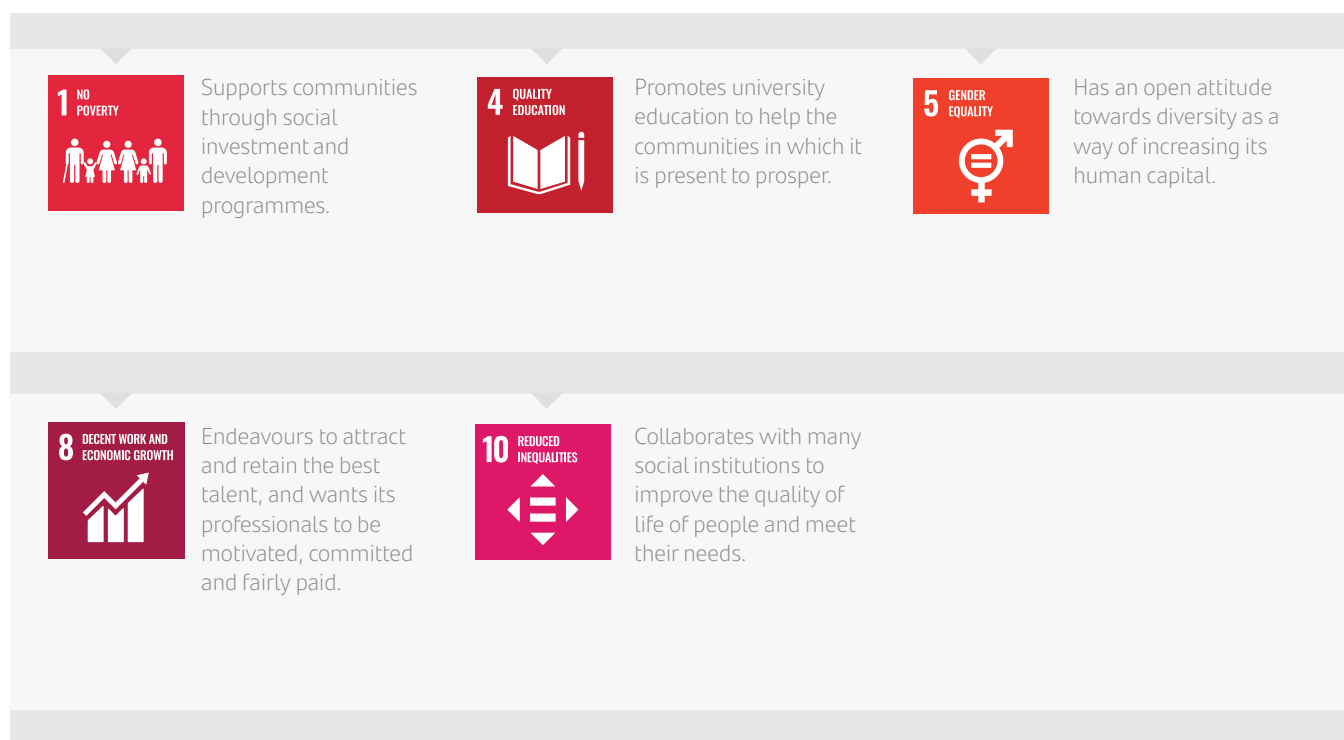


The code can be consulted on our corporate website.

4. The Santander Way, in line with the UN Sustainable Development Goals

As part of its contribution to promoting and reflecting society's needs and values, Santander joined the United Nations Environment Programme Finance Initiative (UNEP FI) to develop the principles for responsible banking to align the sector with the SDGs and the Paris Climate Agreement.

Main SDGs where Santander Culture has the most weight



All social agents, including companies, have a responsibility to contribute to the Sustainable Development Goals (SDG) of the United Nations. We contribute directly to achieving the SDGs through our business activities and also through our community investment programmes.



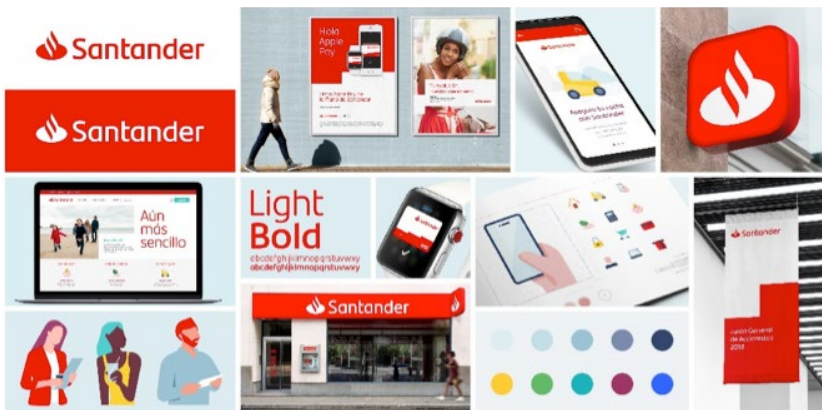
To know more about Santander's contribution to the achievement of the UN SDG, please see section 8 in this report

5. Reflecting our Culture through the Santander Brand

The Santander brand is a key strategic asset for the Group and conveys a consistent message of strength and trust that underscores the Bank's commitment to employees, customers, shareholders and the community.

The brand makes our culture tangible, which is why we define its positioning anchored in our mission and the way we do things. The challenge of the Santander brand is to bring prosper closer to people's daily lives by doing things in a simple, personal and fair way.

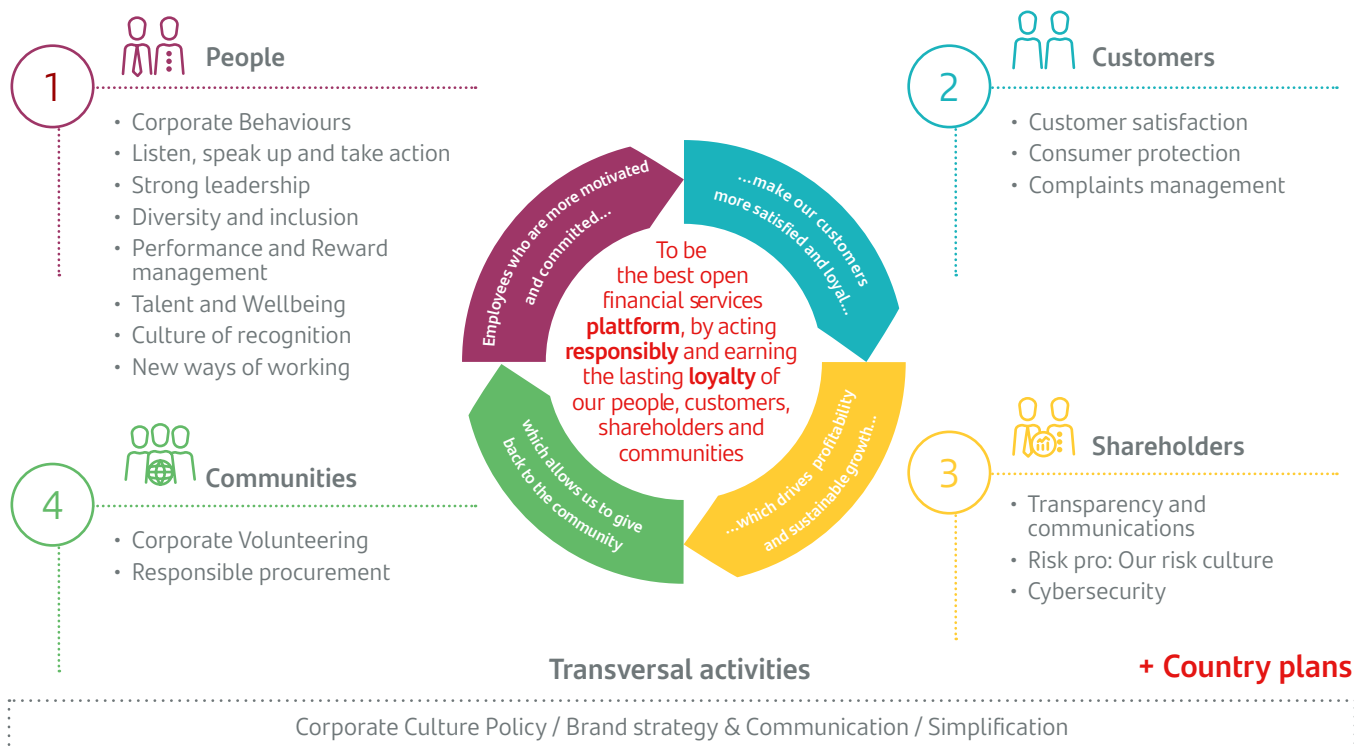
It defines the importance of our purpose, to help people and business prosper



“ The Santander brand is one of our Bank's major strengths and is recognised internationally for the trust and credibility it conveys ”

Ana Botín, Group Executive
Chairman

6. Strengthening our SPF culture



Santander A bank that is... Simple | Personal | Fair

How do we measure our cultural transformation?

In order to evidence that our SPF cultural transformation initiatives are delivering results. We gather data through specific measurement methods for each of our group of stakeholders.

→ **Global Engagement Survey:** We track our people's satisfaction through our Annual Global Engagement Survey (GES), which was completed by 160,639 employees in 2019 (88% participation rate).

→ **Brand Tracker SPF perception:** Through our Brand tracker we measure SPF perception around our customers, shareholders, investors and university students to understand their perception of Santander being Simple, Personal and Fair.

- For people, measured annually as part of the GES: 84% in 2019.
- For customers, measured twice a year as part of the brand tracker across 10 countries: 63% in 2019.

- SPF questions included in annual surveys to Shareholders: In 2019, 56% shareholders think that the Bank is Simple, Personal and Fair.

- SPF questions included in annual surveys to university students: 59% university students consider that the Bank is Simple, Personal and Fair in 2019.

→ **Customer satisfaction:** We are consistently tracking our customers' views and their experiences with Santander utilising Global Net Promoter Score (NPS), which measures customers' loyalty. NPS is one of our strategic KPIs.

→ **Customer complaints:** The Group's increasing digitalisation of the monitoring of complaints and their root causes also provides relevant information for identifying and measuring risk levels and for taking proactive action to address the issues being raised. In 2019, we received 386,704 complaints from customers.

People

- Engagement Surveys
- Ethical channels
- HR metrics
- External awards

Customers

- +4 M surveys^A
- 45k interviews
- Customer Complaints
- Net Promoter Score (NPS)

Shareholders

- +11k interviews
- Shareholder value
- External awards
- Environmental, Social and Governance (ESG) indexes

Communities

- 4,800 interviews to university students
- 1,371 agreements with universities and academic institutions

Our People

Our success depends on our people. To help every colleague do their best and serve our customers professionally each day, we have built a strong, common culture across all areas of the bank.



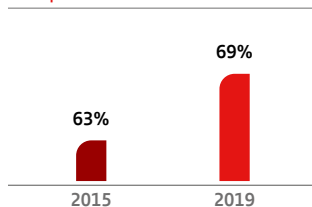
We listen to our people and our colleagues tell us that we are becoming more Simple, Personal and Fair.

- 85% are proud to work for Santander (+1 p.p. vs 2018)
- 81% would recommend Santander to family or friends as a place to work (+1 p.p. vs 2018)
- 86% agree "We act responsibly and make a positive contribution to society (+3 p.p. vs 2018)
- 86% agree "I can contribute to our purpose of helping people and businesses prosper (+2 p.p. vs 2018)
- 81% agree "I am encouraged to come up with new or better ways of doing things" (+3 p.p. vs 2018)
- 77% say "I have opportunities to have my ideas for making us more Simple, Personal and Fair adopted and put into use" (+4 p.p. vs 2018)
- 82% of employees feel motivated to contribute to building a bank that is Simple, Personal and Fair (+1 p.p. vs 2018).
- 4,473 issues received through ethical channels (3,879 in 2018) following increased promotion and importance of our channels.

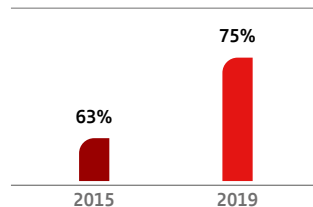
Strong S|P|F culture

% of employees that consider Santander is Simple, Personal and Fair.

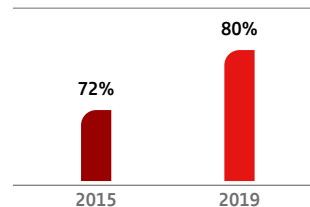
Simple



Personal



Fair



More information on page 23.

As well as our People telling us we are becoming more Simple, Personal and Fair we are being recognised externally.



Top Employers Europe 2019

Has acknowledged Santander's excellence in the working conditions and contribution to personal and professional development in eight European countries



Great Place to work list of the 25 best companies to work for in the world

The Bank has been included for the first time in this list, ranking 24th and is the world's 2nd best bank to work for thanks to our performance in Portugal, Argentina, Brazil, Chile, Mexico and Uruguay, among others.

Santander was also distinguished by Great Place to Work as one of the **Best Places to Work 2019** in Latin America in the Multinationals category, ranking n°. 15.

In 2019 we set a new commitment to be one of the Top 10 company to work for in 6 of the countries where we operate by 2021. This changed from "top bank to work for" to reflect the broader competitive environment that we operate in and to attract the best talent.









Corporate behaviours

In order to live The Santander Way, we have defined eight corporate behaviours.

Defined in 2016, these behaviours apply to all on a daily basis, even when we are having a

bad day or when we are not our normal selves.

These behaviours have been incorporated into the employee lifecycle from recruitment, development and performance management.

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

risk pro
...Everyone's business

I am responsible for the risks I encounter on my day-to-day work



For detailed information on risk pro, please see "Risk pro: Our risk culture" section of this Report

The behaviours and risk culture must be included at the heart of all processes for people (employee lifecycle): recruitment and hiring,

performance management, training, career development, remuneration, recognition, etc.

Employee lifecycle



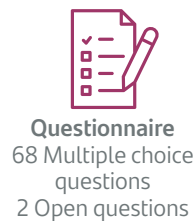
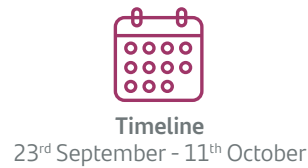
Listen, Speak Up and Take Action

If we are to build a responsible bank, everyone should feel able to speak up, not just to suggest how to improve doing things, but to alert management when things go wrong, or when there is suspected malpractice.

Listen

Global engagement survey

Tracking our employees' satisfaction via the engagement survey is fundamental for our Group, as it enables us to continue to progress towards being the best bank to work for.



88%
of participation
+0 p.p. vs 2018

82%
of employees committed
+0 p.p. vs 2018

85%
of employees are satisfied with Santander as a place to work
+1 p.p. vs 2018

88%
of employees believe Santander acts responsibly in the way it does business
+0 p.p. vs 2018

Speak up

Speaking up is essential for cultural change and responsible banking. We think that it is better for our people to tell us the issues and problems so we can fix them, rather than hear about them from customer complaints or other external sources.

For this reason, we have set several channels for our employees to speak up, such as our ethical channels, Global Engagement Survey, Validate ideas channel and pulse surveys, which allow us to capture their views and identify areas of improvement.

Promoting "Speaking Up" without fear

This means:	What we do:	How we do
PROTECT	Risks and ethical concerns Internal governance	Ethical channels and Whistleblowing lines Committees and forums
INNOVATE	Ideas, solutions, simplification Improved processes	Agile working Validate digital ideas channel
ENGAGE	Recognition, performance management, feedback	StarMeUp, MyContribution Global Engagement survey and pulse surveys

Ethical channels (Whistleblowing)

We provide our employees with Escalation Channels through which they can communicate confidentially and, if wished, anonymously, any allegedly unlawful acts or breaches of the General Code of Conduct.

In 2019, a new model for employees, **Canal Abierto**, was launched with the purpose to report breaches of the General Code of Conduct and behaviours which are not in line with the corporate behaviours.

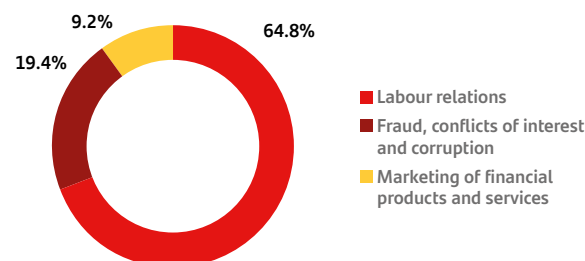
To develop this model, we carried out an analysis to identify geographies' best practices and established eight common standards agreed at the Culture steering. These include CEO sponsorship, awareness and easy access, feedback on actions taken, anonymity and methods to avoid conflicts of interest.

Canal Abierto has been internally promoted to all levels of the organisation and extended to the Group's main geographical areas. In 2020, it is being launched in Portugal, Poland, Openbank and Argentina. Additionally, various communication campaigns remind employees of the importance of reporting inappropriate conduct and we have increased our externally managed ethical channels from 5 to 7 countries, including Mexico, US, UK, Chile, Portugal, Spain and the Corporate Centre.

As a result, the 2019 Global Engagement Survey (GES) questions improved from the previous year in relation to speaking up (+5 p.p.) and leadership (+9 p.p.) questions comparing to the rest of the industry. 72% of our employees feel free to speak up without fear of negative consequences and 75% think that

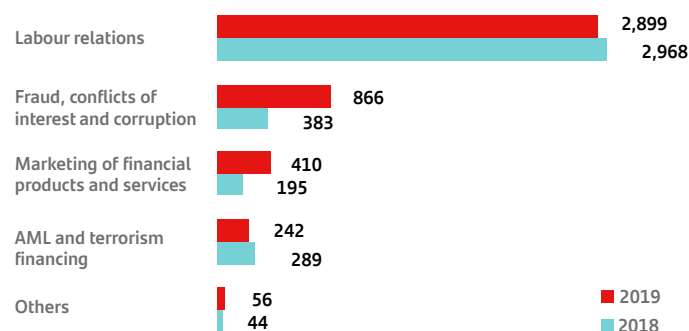
senior leadership encourages reporting important information up-the-line, even if it's bad news.

Types of complaints received in 2018



4,473 issues received through the Group's channels in 2019, 79% of which have been processed. 20.57% of the communications received have resulted in disciplinary proceedings, with 32% of these resulting in the dismissal of the employees involved.

The average processing time for managing issues raised through these channels is 30 days.



Take action

Strong Governance

We have developed a strong governance in order to ensure our employee's complaints are solved.

On an annual basis, Regulatory Compliance reports to the Audit Committee. Issues relate to questionable finance and accounting practices, and the process of generating financial information, auditing and internal controls in accordance with the Sarbanes-Oxley Act.

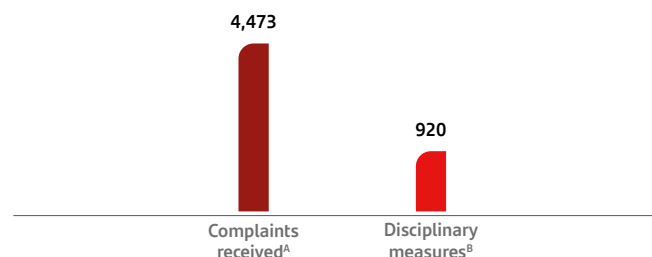
The Risk Board Committee supervises the whistleblowing channels and Regulatory Compliance is responsible for application and interpretation of the General Code of Conduct and other codes and rules and regulations that implement it, including management of the Corporate Defense Model and the Group's whistleblowing channels.

Disciplinary procedures

The Human Rights Committee, consisting of representatives from Human Resources, Compliance, Internal Audit, Operational Risks,

Labour relations and Technology functions, is responsible for imposing disciplinary measures for significant breaches of the General Code of Conduct and proposing corrective actions, which may lead to labour-offence sanctions, notwithstanding any administrative or criminal sanctions that may also result from such a breach.

Complaints that originated a disciplinary action



A. Consolidated data of the Top 10 local units and the corporate centre, which include the complaints received in all their whistleblowing channels, which are not comparable between each other

B. This figure does not include the disciplinary measures from UK, as is not available

Strong Leadership

We know that Leadership is fundamental to the pace of our culture change. Great leaders are essential to transmit Our Purpose, Our Aim and Our How. Having great leaders helps us to change faster and with more stable and lasting foundations. During 2018, more than 300 colleagues in 28 countries or units across Santander Group contributed to defining our new leadership's commitments. **In 2019, we launched these commitments and incorporated them into our Santander Way minimum standards in all units.**

To embed the Commitments in all our operations worldwide, we ran a major internal communications campaign and included them in the leaders' development programs and specific training modules. In addition, four questions which reflect the Leadership Commitments have been included in the global engagement survey and feed into the performance management system, MyContribution.

Our leadership commitments

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

Supporting the team to develop and make impact

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

- Recognises 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

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
- Mobilises and accelerates change in a responsible way
- Innovates with an entrepreneurial mindset, not being afraid to fail, learning from setbacks

...by always being SPF

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

- 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



Leading the bank, leading others, and, leading yourself

Diversity and Inclusion

Diversity and Inclusion (D&I) is a key feature of our culture. Being an inclusive bank and embracing every type of diversity is something that is valued by all our main stakeholders.

The importance of D&I is reflected in our ten Responsible Banking Commitments agreed in 2019, three of which relate directly to diversity and inclusion:

We aim to have between **40% - 60%** women members on our Group Board by 2021

▶ In 2019 we achieved
40%

We aim to have **30%** women in senior leadership positions by 2025

▶ In 2019 we currently have
22.7%,
up 2% from 2018.

We aim to eliminate the equal pay gap by 2025. We decreased our equal pay gap from **3%** in 2018 to

▶ **2%**,
in 2019.

During the year, progress has been made to enhance diversity and inclusion across the bank and increase external reporting:

We updated our general D&I principles to reflect our commitment to people with disabilities and different sexual orientations as well as to highlight the importance of having appropriate, accessible products for all:

→ We improved some of our internal diversity enablers, including:

- **Board approval for new minimum standards for maternity and paternity leave** which will be implemented from 2020 over a 3-year period: a primary maternity leave of at least 14 weeks and a secondary leave of at least 4 weeks
- Diversity & Inclusion training
- The updated International Mobility Policy
- New guidelines regarding flexible working
- Increased networking groups

→ We increased our external D&I reporting, publishing in 2019 our first Diversity & Inclusion Thematic report based on 2018 initiatives to provide greater detail of our initiatives and good practices.

→ We strengthened our commitment on Gender by **signing the UN Women's Empowerment Principles**, a set of principles –including equal pay for work of equal value, gender-responsive supply chain practices and zero tolerance against sexual harassment– that offer guidance to businesses on how to promote gender equality and women's empowerment in the workplace, marketplace and community.

→ We also **joined the Valuable 500**, a campaign that calls on global businesses to place disability on their board agendas, and being proactive to eradicate the exclusion of disabled people in business.

“ Diversity and inclusion are essential in Banco Santander's agenda. Joining the Valuable 500 is part of our commitment to embed a truly inclusive workplace and to promote quality education for people with disabilities ”

Ana Botín, Santander Executive Chairman

For 2020, D&I remains one of our Responsible Banking cultural priorities. Focus will be on improving robust data across all levels of the organisation, tracking progress against achievement of our internal and external goals and enhancing the various enablers to promote diversity.



Thanks to the work done during 2019, Santander Group has been named as a **Leader in Diversity 2020 by the Financial Times** in a new index, which lists the 700 leading companies across Europe with outstanding diversity and inclusion policies. The index was published in November 2019



In 2019 Santander obtained the highest score out of the 322 companies that form part of the Bloomberg Gender-Equality Index. This is the **third consecutive year in which Santander achieves the first position in the Index**, despite a 41% increase in companies being included in the index from the previous year

“ For Santander, publicly disclosing our data through the Bloomberg Gender-Equality Index is an important discipline not only in evaluating our internal practices, but also in helping us understand how we are performing relative to our peers. Our continued inclusion in the Index underscores Santander's ongoing commitment to providing an inclusive environment for all our employees and also to supporting gender equality in our communities ”

Ana Botín, Santander Executive Chairman



For detailed information on see our new Diversity and Inclusion thematic Report.

Performance and reward management

Remuneration system

Topics such as pay for performance, meritocracy and pay equality, are increasingly important and visible in today's workplace. Ensuring that remuneration is compelling, fair, and equitable is a key objective to create a strong working environment, drive employee engagement, and support the company's strategy.

We have a comprehensive remuneration system that combines a fixed salary, which reflects the individual's role and level of responsibility, with short and long-term variable remuneration.

The system is designed to reward employees for their performance on the basis of merit. It mirrors the performance management philosophy that reflects both what has been achieved and how results are obtained. In addition, we offer competitive benefits which may include pension, banking products and services, life and medical insurance.

Fixed remuneration is determined by reference to the local markets, and strictly follows the collective agreements applicable in each geography, whereas variable remuneration is a form of reward for achieving the Group's quantitative and qualitative strategic targets.

Also, to align with European regulations on remuneration, we have identified 1,359 staff who take decisions that may involve some risk for the Group. We apply to them a deferral policy for their variable remuneration which includes deferral of between three and seven years, payment in shares - 50% of variable remuneration - and potential reduction -malus- or recovery -clawback.

In 2019, we have supported the adoption of methodology to include responsible banking within executive remuneration framework.

We have continued to embed risk frameworks in the context of remuneration. We drive awareness of fair pay practices within remuneration (including gender pay, equal pay, and inclusion).

Our executive scorecard underpins the Group's remuneration scheme. When calculating our achievement against profitability metrics in 2020, we will also consider progress against our Responsible Banking targets.



For additional information regarding our remuneration system see page 39 in our annual report



For additional information regarding remuneration data see Key metrics section in our Annual Report's Responsible Banking Chapter



For additional information regarding board remuneration see section 6 of the Corporate governance chapter in our annual report

My contribution

MyContribution, launched in 2016, is a performance management model applying directly to senior leaders, employees nominated as being in key positions and material risk takers -according to Regulatory & Compensation policy-.

In addition to them, other employees may participate or fall within the scope, subject to agreement with local HR teams. This tool has been designed from scratch and has the following objectives in mind:

- Give a strong importance to how colleagues deliver, not only what they deliver
- Ensure meritocracy in performance
- Drive continuous feedback
- Identify high performance
- Set clear expectations
- Support risk management

How does it work?

The MyContribution model assesses employees with a 60% weighting on what they have produced, and 40% weighting on how they have produced it.

Feedback on how colleagues deliver is taken from a range of sources including manager observations, team feedback, peers' feedback (in 360° tools) or the insights gained from the annual global engagement survey.

During 2019 we have been working on harmonising a Global Performance Management

Framework continuing with MyContribution, which will be launched in 2020.

The new model from 2020 onwards proposes a performance management scheme based 50% on what employees do, 40% on how they do it and also includes a risk component accounting for 10% of the total performance ranking. The 10% for risk culture, focusses on everyone managing the risks they face in their jobs, (including non-financial risks such as conduct, operational and cyber risks).

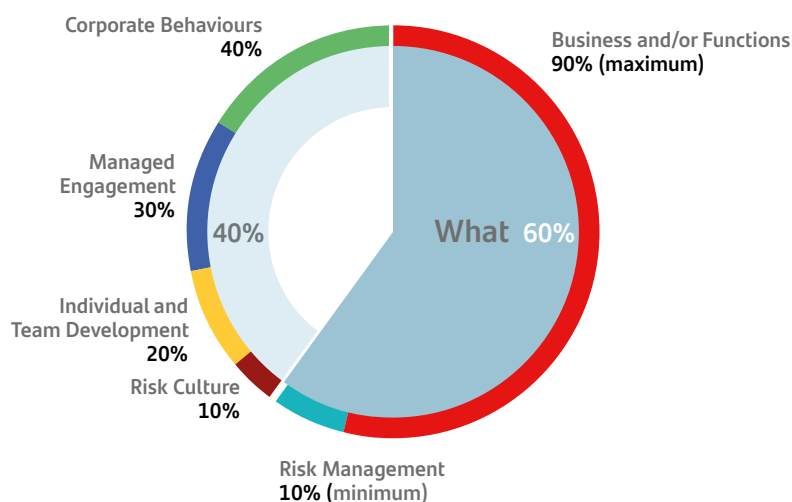
Based on this, MyContribution framework will permeate to all levels and all geographies and will be common for all the employees with some variations depending on the segment and level.

How we do it

Demonstrated behaviours on reaching your objectives

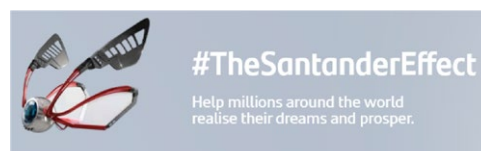
What we do

Objectives that help achieve sustainable business results



Our Employee Value Proposition (EVP)

Our employee value proposition conveys what we are and how we want to be seen as employer both internally and externally. It reflects our values, aligned with people's perceptions. We have updated our employee value proposition and launched The Santander Effect, highlighting Santander as an employer of choice for current and future talent



The EVP is composed of 5 attributes:



Talent and wellbeing

Talent

To win in the new business environment, and to earn and retain customers' loyalty, we need a workforce that is both talented and motivated. Talent management and retention is therefore one of our key human resources strategies.

Main Group data	2019	2018
Total employees (thousand)	196	203
% employees with a permanent contract	97.9	96.0
% employees working full time	94.9	94.6
Employees joining/leaving (turnover)	17.6	15.4
% of workforce promoted	8.3	8.6
Average length of service (years)	10.2	10.3
% Coverage of collective agreements	74.5	70.6

Identify our needs and manage talent

The market is constantly evolving and demands new capacities and skills. We have a number of core projects in place to help us identify our needs and manage talent in an optimum way in order to cover them:

- **Strategic Workforce Planning (SWP)** aims to identify and quantify the resources and skills needed to deliver the future business strategy. It allows a detailed analysis to help

create action plans and address the need of new and changing profiles.

- **Skill Model** helps focus our current workforce upskilling efforts by helping them assess the gap between what they know now and the demands of the future.

- **Dojo** is the programme that tackles Santander's learning and development transformational challenge interconnecting all Santander

countries in one global learning and development ecosystem.

Finally, we have launched **Workday**, a new human resources information system global platform that will provide us with a seamless view of individuals' skills and competences, while making it easier to communicate internally and work together. The platform is already in place in Corporate Centre and Santander Consumer Finance (SCF) and will be rolled out to the rest of countries over the next 2 years.

Programmes to develop the best talent

Talent review

A structured process to identify our future potential talent.

Global Succession Planning

Ensures the appropriate coverage of vacancies in key positions in the Group and the management and monitoring of potential replacements.

One of our priorities is to increase the percentage of women in the pipeline for succession planning to meet 2025 commitments. In 2019, we focused on building rigorous standards for promotion, recruitment, succession planning, training and the building of talent pipelines to ensure strong diversity representation.

The Appointments Committee performed an overall review of the succession planning process for directors and key managerial roles to identify areas of improvement. This resulted in an enhanced

process with a clear methodology and responsibilities' allocation, as well as overall effectiveness monitoring and Controls^A.

Action Learning Programme Santander

ALPS³ A 9-month learning programme aimed at senior management talent. ALPS develops leadership and business problem resolution skills within a collaborative environment. It involves participants in strategic business challenges, discovering and learning about the latest business trends and applying the agile framework to promote the bank transformation. Since its launch, 95 people have participated.

The second series of this programme concluded in June 2019 and we launched a third edition in November, which counts with 35 participants and will finish in September 2020.

Young Leaders Programme



The Young Leaders Programme's goal is to create channels for

our younger generation of talents to contribute to the strategy and transformation of Santander.

Launched in 2018, this 18-month professional development programme, involves 280 young employees - 47% of them female - from 22 countries who have distinguished themselves with their digital understanding, innovative approach, adherence to our SPF culture and corporate behaviours. Participants were chosen by their peers, and are engaged directly with our top executives, having the opportunity to take part in strategic forums both at local and corporate level. 32% of Young Leaders have been promoted during the program and a second series is planned for September 2020.

A. Improvements were included in the updating of the succession policy for managerial positions approved by the board on 27 February 2020, and will also be included in the updating of the policy for the selection, suitability assessment and succession of directors approved by the Board the 2nd April 2020

Wellbeing - BeHealthy

With our global well-being programme, BeHealthy, we aim to inspire our employees and their families to achieve a healthy and well-balanced life. Thus, our ambition is to become one of the healthiest companies in the world. The program is built upon four key pillars:



Know your numbers: Take action based upon data, and prevent.



BeBalanced: Preserve your balance and well-being, reconcile your personal and professional life.



Eat well: Take care of your diet, you are what you eat.



Move: Practice the exercise that is most appropriate to your physical and health status.

BeHealthy gives employees access to health and wellbeing benefits, including training on the four pillars -such as the Sustaining Executive Performance Training, which provides keys to improve performance by encouraging healthy habits- and access to different health and wellness centers across the globe. In 2019, we also launched a new nutrition programme about optimum nutrition which includes videos, recipes and backup material such as infographics or downloadable action plans.

Our priority to protect the health of our employees has become particularly important during the Covid-19 crisis. We have put in place contingency plans and strengthened remote working to contribute to our employees well-being.

The actions we are implementing to support our employees, customers and key stakeholders during this unprecedented time will be explained in detail in our 2020 report.



For more details about the initiatives we are implementing to face Covid, please see our website All Together. Now

Culture of recognition: StarMeUp

StarMeUp

We have launched a global recognition platform called StarMeUp which allows our people to recognise employees who lead by example with regards to our culture.

Since 2016, colleagues have awarded more than two million StarMeUp stars to their peers who stand out for being Simple, Personal and Fair.



StarMeUP

Launched

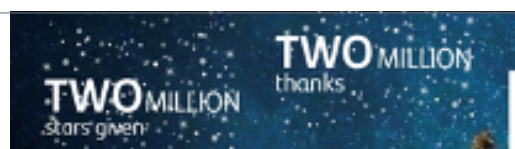
December 2016

187,207^A

global active users

2, 202,683

stars sent globally



The platform has eight different kind of stars, one per each of the 8 corporate behaviours. In 2019 we promoted the platform launching new temporary stars:



Cyber hero star, to award employees for their focus on cybersecurity



Champion star, to recognise the team mates who have stood out the most during the 2019 season.



Santander effect star, to acknowledge employees who have made a big positive impact both within and outside the Bank.



Risk Pro Star: to recognise those employees who identify or escalate risks enabling action to be taken.

A. Most updated data from 2019

New ways of working

FlexiWorking

We promote the transition towards a more flexible way of working that enhances the work life balance of our employees. Our corporate flexiworking policy, applicable to the entire Group, includes a set of measures referring to:

- How we organise the working day (flexibility in time): schedules of entry / exit, alternative configurations to the day, regulation of vacations, guides and recommendations for the rational use of mail and meetings.
- Where we work from (flexibility in space): working remotely, teleworking.

People whose FlexiWorking needs are met are more likely to stay with a company and feel happy and engaged (thus producing better business outcomes). For that reason, Santander has committed to promoting a rational management of working time, as well as the use of technologies that allow a better organisation of the work of our

professionals, specifically addressing the employees' right to digital disconnection.

In 2019 we undertook a survey of 6,000 employees to understand their needs related to flexiworking. After reviewing the results and undertaking a gap analysis, we reviewed the policy and refreshed the value proposition while developing local action plans. **We created guides with a clearer, common definition and vision of flexiworking, setting a common framework for all group.**

In addition, **the Bank has measures aimed at facilitating the work-life balance of its employees** through the different agreements signed with the relevant unions' representatives and we have also developed specific guidance both for managers and employees. As a result of these efforts, 85% of employees indicated that their direct manager helped them reach a reasonable balance between personal and professional life in the 2019 Global Engagement Survey.

The ten Santander FlexiWorking basic principles

- **1. Available to all** – there are options for everyone, and ways of working that can suit many situations. Some roles may seem more suited to FlexiWorking, however we encourage and are committed to exploring what is possible at all levels and in all roles from Branches through to Head Office sites.
- **2. Digital detoxes are encouraged** – FlexiWorking does not mean you are expected to be available or contactable 24/7. Disconnection from work is encouraged and employees should disconnect outside of work hours, during holiday periods, special leave etc.
- **3. Fairness is essential** – both in the FlexiWorking requests, and, the treatment of all colleagues in all working patterns. Why you request FlexiWorking doesn't matter, it is reason neutral.
- **4. Flexiworking comes in many forms** – we embrace and encourage all forms of flexibility in when, where and how much people work: utilising the right tools, technology and innovative workspaces to increase efficiency and effectiveness.
- **5. FlexiWorking evolves** – all arrangements should be regularly reviewed as business and colleague needs change. As new ways of working become available, adoption should be encouraged.
- **6. Job design is key** – FlexiWorking is most successful when a role is designed to be flexible, not just trying to fit FlexiWorking into existing roles. This will look different across roles and individuals, but all roles have scope for FlexiWorking within their design.
- **7. Shared responsibility and respect** – all parties have a shared responsibility to benefit from FlexiWorking, respecting each other's working patterns, and making it work. Managers and team members alike should all Lead by Example.
- **8. Customer service remains our priority** – so when considering FlexiWorking options, we always ask that you consider the business impact of your arrangements.
- **9. Managing performance requires consideration** – performance management will focus on what you deliver and how you deliver it, with reviews in place to reflect and respect FlexiWorking arrangements.
- **10. Trust, transparency and constant communication** – are key. All colleagues should have equal access to progression, promotion and development opportunities, regardless of FlexiWorking arrangements – never should there be discrimination or favoritism. Human Resources will be on hand to support if any doubts or issues arise about FlexiWorking.

Digital workplace

A digital workplace is a unified online platform where tech-based solutions and tools allow employees to be productive, creative and engaged anytime, anywhere. In 2019 we worked on a pilot of a digital workplace to be launched in 2020 and rolled out over the next 2 years across the Group.

The new digital workplace will help us change the way we work in terms of how we communicate and collaborate across the entire Group as well as locally and will simplify our employees' work integration into one single platform tools and processes. This platform will provide increased opportunities to share best practices and initiatives across the Group.

SPF Workspace

We have collaborative and flexible ecosystems with modern and innovative technical resources. We have created a workspace atmosphere that directly maps our company's culture with the purpose of inspiring employees to be more efficient.

What do we get? Employees challenged and inspired who feel appreciated and enjoy their work environment

- Collaboration enhancement
- Creativity boost driven from inspirational spaces
- Efficiency gains
- Talent attraction and retention



Simplification

Making our processes simpler is a priority for us, not only because Simple is one of our core values, but also because it is closely related to the ability to adapt to a changing environment, which remains a challenge for the Group.

Simplification enhances employee engagement, drives efficiencies through improved processes and decision making, delivers faster services and supports cost reduction through smarter working practices. According to Harvard Business Review, it is also a key driver for customers' loyalty.

For these reasons, in 2019 we have launched a **Global Simplification Initiative**, to ensure we meet our customers' and employees' expectations of making Santander a Simple bank. As part of the initiative, we nominated a local responsible person for Simplification, enabling us to capture simplification initiatives in all geographies. We identified over 116 and undertook a global mapping with the aim of identifying synergies, sharing best practices and agreeing common ways to measure simplification.

We also used the Global Engagement Survey (GES), Net Promoter Score (NPS), and Simple, Personal and Fair Perception surveys (SPF) to ask our employees and customers about their priorities in terms of simplification. They told us they wanted a clear and simple language, processes and products that are easy to understand, and quick service. In light of these findings, we launched a series of initiatives:

- Simplification is now **included in the objectives for management roles**.

- We have simplified the Group's structure into **three regions**: Europe, South America and North America.
- We have launched the new **Santander.com website** to provide a simplified and streamlined platform for our stakeholders.
- We have developed a **new digital workplace platform** to enhance and promote communications, collaboration and best practice sharing across the Group. It will be launched during 2020.
- We **simplified our HR platform** for our employees to make it easier to access relevant information.
- A **products and services global review** is being conducted, focusing in particular on speed of service.
- A systems review is being conducted, and improvements made to foster digitalisation, making it easier for customers to deal with us and for teams to work together.
- Using **agile methodologies**, we are changing processes to reduce the time to market, time to make decisions and boost collaboration.

In addition, we have achieved a reduction of 48% of our fora in the Corporate Centre, saving 533 senior management hours per month. A focus on policy simplification remains on target to achieve a total reduction of policy pages by 30%. There has also been a small positive increase in our GES results, improving by +1 p.p. from 2018.

Agile transformation in line with SPF culture

The Agile project has three main objectives:

1. **Reducing** time-to-market, and therefore, stronger market leader position.
2. **Increasing** employee engagement and empowerment.
3. **Collaboration:** Agile as a mind-set, i.e. Keep It Simple, better communication, feedback, knowledge sharing and one team spirit.

How do we achieve this? By challenging traditional hierarchy and building squad teams with agile practices to nurture autonomy and collaboration. Whilst also finding new ways of working more agilely, reducing bureaucracy bankwide and increasing efficiency at work.

During 2019 we continued working on these three objectives. We celebrated "Agile days", where representatives from the Agile Transformation and Engineering Excellence teams from different countries had the opportunity to share progress and experiences.

An overview of our global simplification project



Sharing good practices across the Group

Fostering collaboration and sharing best practices helps us leverage our global scale and improve our performance faster. In 2019, more than fifteen global best practices workshops were held by the different functions. Some of these are:

- **Good Conduct with Customers Workshop:** focused on conduct with customers, digitalisation and process simplification.
- Planning and monitoring **Compliance & Conduct (C&C) programmes:** these aimed at reinforcing the process of C&C planning and monitoring annual programmes.
- **First Data Forum:** focused on the relevance of data and how Santander must extract maximum value from it in a responsible way.
- **First workshop on best reputational risk practices:** the purpose of this workshop was to strengthen the network of people working on reputational risk and share experiences and best practices.
- **Internal communications workshop:** shared best practices and discussed on how to move forward towards a single digital workplace across the Group.

- **Responsible Banking Workshop:** helped outline the future of Santander Responsible Banking strategy.

- Held a workshop in Madrid with 59 attendees from Culture Teams across the Group to continue **"Building Our Common Culture"**. The event comprised of 3 days of co-creation, knowledge sharing, and external guests to help build upon key culture related topics.

In addition, through country visits and presentations to monthly Culture Steering meetings, good practices are shared. Some local initiatives that have been shared wider and adopted in other countries include:

- **Risk Pro Heroes**, developed and launched in Poland to recognise employees who have highlighted potential fraud has also been adopted in Germany.
- The UK **Keep it Simple Santander (KISS)**, which has been adopted and launched in the US during 2019.
- The successful **Work Cafe**, launched in Chile a couple of years ago, which has been extended in a number of countries including Spain and UK in 2019.

Our customers



We listen to our customers^A

- + 4 million surveys^B to measure and monitor customer satisfaction
- +45,000 interviews to banked population about the perception of Santander as Simple, Personal and Fair
- 386,704 formal complaints received, resolved and analysed reporting issues concerning each complaint
- 6 countries in the Top 3 for Customer Satisfaction

How banks behave towards customers has an impact on loyalty and is directly linked with customers' perception of Responsible Banking.

Not behaving responsible has a double impact in our Profit & Loss account: a direct conduct cost (including reimbursements to clients) and an indirect cost derived from the long term impact of dissatisfied customers (churn rate and lack of recommendation) which is much higher than direct impact.

Santander has good practices and different levers to ensure responsible business practices, resulting from the joint effort of different functions in the Bank. These include actively and systematically **listening**

to our customers to understand their needs in the best way and to drive customer empathy through our Customer Centers; **simplifying our product catalogue** to our clients; implementing **vulnerable customers Guidelines** (based on our Consumer Protection Principles); proactively tackling practices related to transparency, communications, prices, fees... and **improving customer experience**.

In 2019, Santander continued to focus on enhancing customer satisfaction, covering their needs and boosting loyalty. At the end of December 2019, the bank had 145 million customers, of which **more than 21.5 million were loyal (+9 p.p. in the year)** with an increase in both individuals and corporates. Digital customers rose 15% in the year to close at 37 million.

Customer Voice (CuVo):

As part of placing customers at the heart of what we do, we have introduced a Global Working Group called CuVo (Customer Voice) that meets monthly and is participated by all global areas that have an impact on customers. The matters discussed in this forum come from many different channels, such as customer centres or customer care on social media, and we constantly work to enhance our customers' insights:

- In 2019, we have opened **two new customer centres** in Chile and Portugal, complementing the ones we had in Mexico and Spain.

- We have also analysed the countries' social media customer care models and best practices and have designed a **global to-be model to provide the best customer care on social media**.
- We developed **action plans to enhance local models** and increase the use of reports generated in this channel for business insights purposes.
- Additionally, we held a **global workshop on Customer Voice best practices** where we shared good practices and addressed regulatory trends.

^A Data from 2019

^B Most updated data from 2019

Customer Satisfaction

Customer satisfaction is one of the most relevant aspects according to our Group matrix and to achieve it, we need to listen and understand our customers. For that reason, we are consistently tracking our customers' views and their experiences to identify where we can improve our services further and gauge customers' loyalty. For example, this year, in addition to the Global NPS, we have launched a new digital benchmark to understand digital customers in nine of our markets.

2019 Target

to rank among the top 3 for customer satisfaction in main markets^A

TOP
competitors

A. Except in US.



2019 Achievement

This year, the Group is in the top 3 for customer satisfaction in six out of nine geographies

6

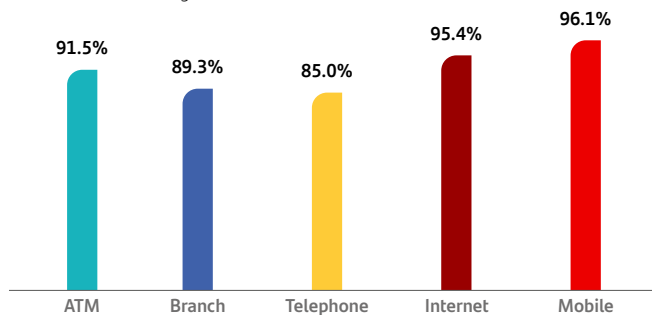
countries in the top 3



And the number of loyal customers increased by 1.7 million, to a total of 21.5 million loyal customers

Customer satisfaction

% satisfaction among active retail customers



NPS survey

South America



4°



2°



2°



2°

Europe



3°



4°



3°



2°

North America



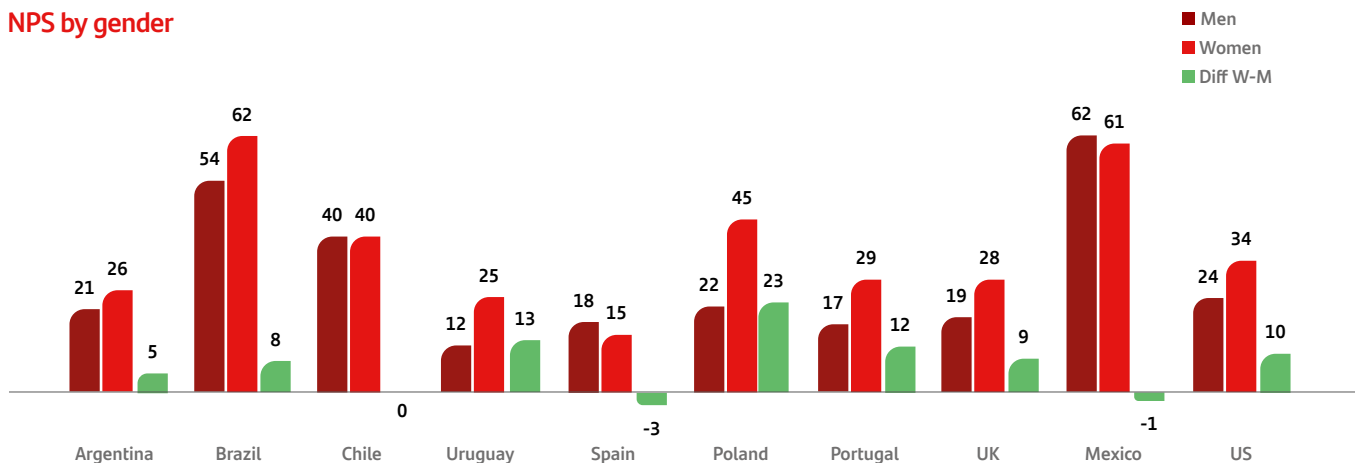
4°



9°

Internal benchmark to measure customer satisfaction, audited by Stiga / Deloitte

NPS by gender



Sources: CX Benchmark Global (2019), internal NPS

Transforming the customer experience

Improving our customers' experience is key to achieve customers' satisfaction and eventually, their loyalty. We have several initiatives to improve our customers' experience:

- **Simplifying the product catalogue.**
- **Improving the service for our clients with initiatives such as Toque Santander in Mexico**, a protocol that reminds employees how to welcome customers, listen and solve their problems, and how to encourage the engagement with the Bank. Likewise, there is our **Service attitude program in Portugal**, a mandatory training focusing on the best ways employees should behave to deliver excellent customer service.
- **Enhancing our customers experience with new models of branches**, such as Work Café, Smart

Red, Digital (highly automated branch, focused on self-service and multichannel strategy with extended opening hours), Fast point (service hub for monetary and operational transactions with the quickest service), and Multichannel point (small format retail kiosk to provide banking services to customers located within retail locations such as shopping malls).

- Investing in **better, smarter and more accessible services** which empower our customers, especially in terms of easy to use, simple, safe and effective payment and accounts solutions via mobile devices. For example, the blockchain solution **One Pay FX** is present in six Santander banks: Spain, UK, Brazil, Poland, Portugal and Chile (this two joining in 2019), and Mexico will be offering it in 2020. This solution offers transparency, predictability, digital experience and better speed.

New redesigned branches

We are transforming our customer experience with initiatives such as Smart red in Spain, Portugal, Mexico and UK or **Santander Ágil** in Mexico. Our new branches have an innovative and functional design that makes them more comfortable and accessible to all, and they offer a more agile and personalised service to our customers.

Our new branches increase brand visibility and engagement with communities. We have smashed our targets with a great NPS (over +50 in all countries) and both high customer acquisition and customer digitalisation.

Transforming remuneration practices to protect customers and increase satisfaction

Having the right remuneration scheme for our salesforce is fundamental to achieve customers' satisfaction. For this reason, we have undertaken a **transformational 3-year plan to revise remuneration practices** and achieve the highest standards in the schemes applied.

The action plan covers topics such as governance, variable/fixed remuneration ratio and linear business objectives that do not promote specific products. Conduct metrics are diversified and the target of the plan is that **quality components reach 40% within the total remuneration**.

Santander Work Café

Work Café Santander is Banco Santander's innovative space for clients and non-customers, which brings a bank, co-working area and coffee house together in a single place. It's a collaborative space open to all, where one can work, surf the internet, hold meetings, attend events and, of course, make financial arrangements as it works also as a branch. All of this can be done while having a delicious coffee.

The Work Café concept was developed by Santander in Chile in 2016. Since then, Spain, Portugal, Brazil and Argentina have followed. In 2019, Work Cafés opened in Poland, UK and Mexico. We currently have 69 Work Cafés across eight countries.



“ Offering a better service to our customers should increase their engagement with us, thereby their loyalty, consequently growing our revenue ”

Ana Botín, Group Executive Chairman.

Corporate Compliance & Conduct, with the collaboration of HR and local teams, have monitored the implementation of local action plans to check the improvements made. Since 2017, quality components account for 40% in the remuneration schemes in 5 out of 10 of our main geographies,

Training has also been enhanced. The main initiatives include developing a **procedure for sales force training** and designing a specific **mandatory course on conduct risk with customers** for all employees. In 2019, Group average completeness of this training was 89%.

Consumer Protection

Consumer Protection Policy and Principles

The Consumer Protection Policy, which includes our Consumer Protection principles, sets out operating standards that must be considered in drafting of internal guidelines by the Group's subsidiaries, as well as in their interactions with customers. The respect for customers and society, as well as their inherent rights, is a basic line of action of the group.

To ensure that Consumer Protection principles are embedded into our day to day practices, in 2019 we launched thematic reviews involving different issues related to the protection of our customers, such as treating customers in fraud cases, in debt collecting activity, and customer care on social media, and created action plans to share best practices across the Group. We also launched awareness campaigns in several countries and held workshops on product governance and consumer protection.



Additionally, we implemented a reporting process from countries to assess whether we are applying our principles and adopting SPF behaviour with customers.

Corporate Product Governance forum

The Product Governance and Consumer Protection function is an area within the Compliance and Conduct function. Its main objective is to establish specific criteria for identifying, regulating, and exercising of the rights of consumers in their interactions with the Group, as well as to establish specific criteria for monitoring and supervising their fulfilment.

To do so, we have strong governance, both at local and Corporate level: all units have Local Marketing Committees to prevent the inadequate distribution of products and services. Once approved by these Committees, new products are taken to the Corporate Product Governance Forum (CPGF), which validates them before being offered. With this double escalation process, we share good practices and guarantee that the risk of products and services is in line with the Group's risk appetite.

The CPGF is held monthly. It is chaired by the Group's Chief Compliance Officer and participated by different areas i.e. Tax, Legal, Cybersecurity,

Compliance, Finance, Technology and Risk. For a product to be approved, all areas must issue a positive report about it. The decisions from the CPGF are recorded and establish the conditions for the product's approval.

In addition, we have a strong governance to ensure that the Board of Directors and its delegated commissions are informed regarding products' governance. This includes:

- Information about the new/big impact proposals validated at Group-level (monthly) and the activities related to admission proposals (quarterly) in compliance reports. These reports are included within the risks reports and are presented in General Compliance Committee, Risk Control Committee, Risk Supervision, Regulation and Compliance Committee and Board of Directors.
- Create an annual monographic about the activity and risks associated to commercialisation conduct, presented in the General Compliance Committee and the Board.



For more information about our customer protection activities please see our annual report pg. 451

Vulnerable customers

A vulnerable customer is someone who, due to their personal circumstances, is especially susceptible to suffer a financial and / or personal detriment or loss. Customers can be considered vulnerable for a large array of reasons like gender, age, incapacities, disabilities or impairments, limited access to education and illiteracy.

In 2019, we developed new vulnerable customer guidelines to establish a consistent approach

throughout the Group. The goal is to prevent their over-indebtedness, ensure they are always treated fairly, with empathy and sensitivity according to their particular circumstances. These guidelines have been approved and shared with local units. Additionally, since 2019, as part of the continuous enhancement of the new product validation process, it is required to specify whether the new product or service can be offered to a vulnerable customer, taking into account ESG categorisation.



To know more about our initiatives for vulnerable customers, please see our Financial Empowerment thematic report

Complaints management

We don't simply aim to address complaints, but to learn from them, tackling the issues that gave rise to complaints in the first place.

The Group's procedure for complaint management and root-cause analysis aims at adequate handling of complaints submitted, ensuring compliance with the local and sectoral regulations applicable, and to provide customers with the best possible service.

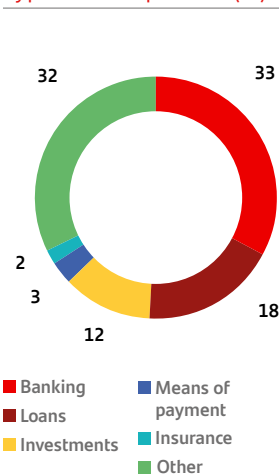
In 2019 the Group has focused on the first point of contact resolution with customers, to improve complaints handling and the customer experience while enhancing data analytics and ensuring that our processes and services take into account customers' feedback.

We have also sought to improve the root cause analyses of complaints in all the markets where we operate, while strengthening reporting of mitigation plans and governance.

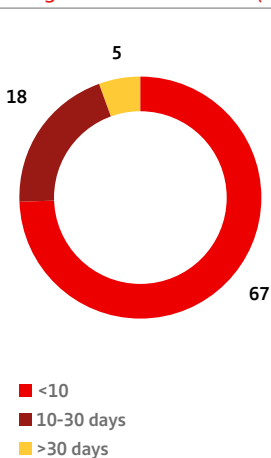


For more information about our complaints management process please see our Annual Report page 53.

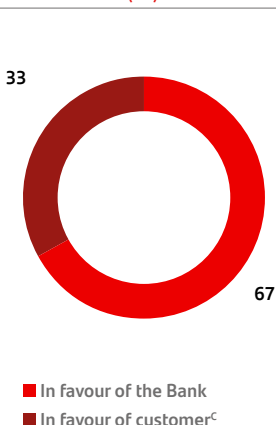
Types of complaints^A (%)



Average resolution time^A (%)



Resolution^{A,B} (%)



We listen to our customers and act to improve our service, as their loyalty is important to us and generates sustainable returns.

Listen We listen carefully to our customers' questions, complaints and claims.

Analyse We review and understand our customers' needs.

Act We provide innovations to address complaints.

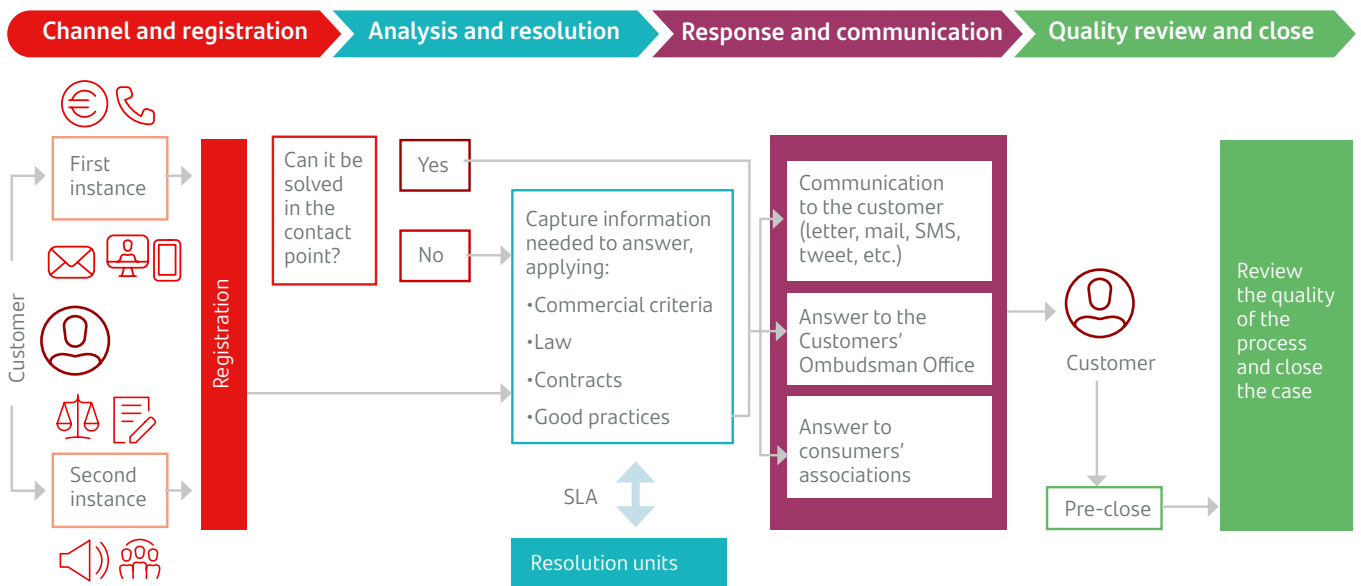
Improve We apply new processes globally.

A. Personal Protection Insurance (PPI) complaints in UK are excluded. This adjustment has been made to avoid a biased global outcome.
B. If the UK complaints were included, the uphold ratio would decrease up to 16%.
C. +2 p.p. vs 2018

Procedure for complaints management

Our complaints' management process considers two types of complaints:

1. **Customer incidents:** Complaints raised through usual communication channels such as contact centers, branches, social networks, internet banking and apps
2. **Formal complaints:** Complaints raised through formal channels such as regulators, consumers organisations, Customers' Ombudsman Offices or the Bank's top management



To solve customer incidents and complaints, we follow both commercial and technical criteria (laws, contracts, good practices, etc.). We aim to solve problems as soon as possible, always guaranteeing that the process is properly documented and follows local procedures.

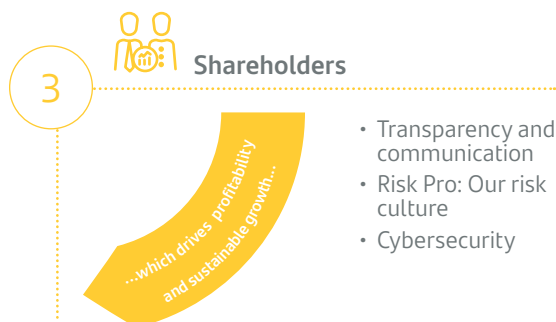
The volume of customer incidents is not inversely proportional to the quality of management processes. It is due to both an increase of the scope and to the development of more efficient processes to capture customer's voice. (E.g. We train call centers' agents on the importance of completing logging processes for an adequate complaint management). In addition, a large volume of formal complaints can point to an inadequate management of customer incidents.

For Santander, complaints management is not a business cost, but a key source of value creation.

Complaints serve so as to identify improvement opportunities and offer the chance of transforming them and improve customers' experience and brand perception.

The analysis of complaints received provides feedback for internal processes and is a useful input for the Clients, Technology, Operations and Strategy areas. It helps to identify the root causes of problems, to reduce complaints and to improve customer satisfaction. In addition, we develop thematic reviews on specific issues that cause numerous complaints. The conclusions of these reviews help to define corporate guidelines to be implemented at local level.

Our shareholders



We listen to our shareholders

- 11,000 interviews to shareholders about the perception of Santander as being Simple, Personal and Fair
- 40,924 Shareholder and investor consultations through studies and qualitative surveys
- 133,939 queries managed by email, phone, WhatsApp and online meetings
- 322 meetings with shareholders
- +800 communications sent using mainly digital channels
- 3,507 contact with institutional investors
- 126 meetings with ESG investors and analysts

Awards



Dow Jones Sustainability Index: Banco Santander was recognised as the Most Sustainable Bank in the World in 2019.

The bank gained prominent positions in the Extel survey, the main survey on institutional investors around the world.

The performance of our Shareholder and Investor Relations team was recognised by prestigious industry publications such as IR Magazine and Institutional Investor.

Euromoney magazine recognised Santander as the Best bank in Latin America, Brazil, Chile, Portugal and the Best SME Bank in Western Europe. We were also recognised as the Best investment bank in Spain and Poland and the best Private Banking in Latin America, Spain, Portugal, Mexico, Chile and Argentina.

Transparency and communication

Maintaining constant communication with shareholders and investors, informing them about the evolution of the Group and encouraging a fluid dialogue with them, is a priority for us. In 2019, we sent out 800 communications to shareholders and investors and organised 322 shareholders events.

We have adopted measures to facilitate shareholders' participation in the Annual General Meeting (AGM). The relevant information is available to them as required by law, and we answer all requests they send before the AGM in connection with the agenda in writing.

In 2019 Santander broke its record for participation, both at the general meeting of shareholders (quorum of 68.5% and nearly one million shareholders participating) and at the extraordinary general meeting (quorum of 59.2%). Additionally, the AGM and the Investors Day were certified by AENOR for third year in a row.

We also incorporated blockchain technology for shareholder voting in the AGM to target

We engage with investors in an active, fair and transparent way:

- Annual engagement through the AGM
- Quarterly results presentations
- Investor and strategy days
- Lead independent director engagement with key investors
- Investor roadshows
- Shareholder and Investor Relations team
- Proxy advisors, environment, social and governance (ESG) analysts and other influencers
- Respect fair disclosure principles

the delegation and voting cycle of minority shareholders. This offers greater transparency, helps simplify the process, increases the motivation to vote, and improves voting security. The best results in digital participation were also achieved at a general meeting (more than 300,000 shareholders).

Finally, we have created a new section in our corporate website on Shareholders and Investors that accounted for the 54% of traffic of the corporate website in 2019.



To know more about shareholder transparency, please see section 3 of the Corporate governance chapter in our Annual report

Risk pro^A: our risk culture

Managing risk prudently is a cornerstone of a responsible bank. This requires clear policies, processes and lines of accountability, all backed by a strong risk culture that reflects the fact that everyone has a role to play in managing risk.

risk pro

...Everyone's business

Risk management: key to being a responsible bank

Risk culture is the way we manage risk in Santander. It is everyone's personal responsibility to know and manage the risks in their day to day work.

Managing risk is the business of banking. Risk management helps us maintain a competitive advantage within a low margin market environment. Also, risk culture is now under regulatory scrutiny: European Central Bank and

other regulators are focusing on how risk is understood at all levels in financial services.

Our strong risk culture, (Risk pro) raises awareness and focusses on "personal responsibility for risk management, regardless of level or role".

Our risk management and compliance model is key in ensuring we operate and behave in a way that reflects our values and corporate culture, and delivers our responsible banking strategy. It is based on three lines of defence:

1st line of defence	2nd line of defence	3rd line of defence
<p>Business and Support Units</p> <p>Day to day management of risks</p>	<p>Control Areas: Risk management and compliance</p> <p>Assessing risk: measurement and monitoring</p>	<p>Internal Audit</p> <p>Providing assurance that Risk Management Framework is effective</p>

Santander's strong risk culture is one of the main reasons the Group has been able to deal with changes in the economic cycle, new customer requirements and the rise of competitiveness, and the reason why Santander has earned the trust of its employees, customers, shareholders and society as a whole.

The board of directors is responsible for the risk control and management, and, in particular, for setting the risk appetite for the Group. To do this, it counts with the expert support of the Risk, Supervision, Regulation and Compliance Board Committee. The Committee also assists the Board in monitoring the implementation of the Group's Risk strategy until 2025, which has been designed collaboratively by the Group's Chief Risk Officers.

91%

of employees claim that cyber security is considered a critical priority

75%

consider that senior leadership encourages reporting important information up-the-line even if it is bad news

79%

affirm they can report unethical behaviour or practices without fear of retaliation

93%

of employees can identify and feel personally responsible for the risks in their day-to-day work.



“ We are a bank and our job is to manage risks ”

Ana Botín, Group Executive Chairman.

A. Named "I AM Risk" (Identify, assess and manage risk) in the UK and US.

How do we embed Risk Pro?

- **Employee lifecycle:** From the selection and hiring phases and throughout their professional career, employees are made aware of their personal responsibility for risk management.
- **Performance management:** Risk is included in senior leader's performance assessment and across all levels in Corporate Centre and some countries. From 2020 this will be cascaded to all employees.

→ **Measurement:** we have a systematic and standardised way to detect any potential areas for improvement and implement action plans. We use specific measurement tools such as RPA exercise (Risk Profile Assessment) and we have set up a working group established to develop a simplified dashboard focusing on impacts for 2020. Risk culture is also monitored through Advance Risks Management (ARM) Guidelines.

- **Communications:** Best practices and initiatives that exemplify the risk culture are disseminated through various communication channels, leadership direction and individual actions. There is an annual communication plan prepared by the Risk Division.
- **Governance:** As a fundamental part of our culture, our strong internal culture governance promotes, supports and monitors implementation of risk culture across all geographies.

2019 progress: Embedding a strong risk culture

In 2019 we have continued to focus on embedding the importance of risk culture across all areas of the employee lifecycle including:

- Recruitment and onboarding
- Training and awareness – in 2019 this included an updated online mandatory training for all employees
- Strengthened risk within MyContribution performance management
- Recognition through a risk pro StarMeUp Risk Pro Star where employees could recognise their colleagues and risk pro heroes in some countries
- Day to day management including promoting speaking up and raising concerns
- Best practice sharing and promoting the importance of risk culture from our senior executives

As a result, risk pro remains the highest scoring question in our Global Engagement Survey with 93% of our employees saying, "I can identify and feel personally responsible for the risks I face day to day".

At the end of 2019 our risk culture approach was reviewed by the Joint Supervisory Team (JST) resulting in no formal findings. A series of good practices were observed, in particular relating to embedding risk into the employee lifecycle, the new minimum standards in our escalation channels and the new RBSCC governance structure. We continue to focus on speaking up and challenge and incorporating these in both the 2020 risk culture and Responsible Banking plans.

For 2020, the importance of risk has been reflected as a 10% single element in the MyContribution performance management approach for senior leaders and will be rolled out to all employees from 2020 to 2022. Everyone in the bank will have the same risk objective "Personally responsible for managing all the risks applicable to my role to embed a strong risk culture". Qualitative measures and targets will provide evidence of how employees manage risk (including operational, conduct and cyber) in their roles.

Cybersecurity

Santander's five cyber tips



Think before you click or replay



If you suspect it, report it



Be discreet online and in public



Keep your password safe



Protect your information and equipment

Cyberattacks and fraud pose systemic risks to financial services. Customers expect their data to be held securely and handled ethically. Therefore, embedding behaviour that promotes cybersecurity remains a key priority for us.

Our Cybersecurity and IT conduct Policy defines acceptable use of Santander equipment and Information Technology services, highlights areas of risk and gives guidance on how they can be avoided or mitigated so as to avoid legal, reputational or cyber-related incidents.

In 2019 a wide range of employee training and awareness campaigns have been launched across all entities in the Group and a new tool –available in the website and App tips- has been developed to help employees report any cyber incident. As well as this, a new Global Cyber Security Centre has been launched to protect our systems and customers by monitoring cyber threats 24 hours, 7 days a week, across all of Santander's core markets.

Information on cybersecurity is also shared with customers and general public through Santander digital channels, such as social media, banking apps, emails and the web and we work in partnership with public and private organisations to promote information sharing and collaboration on cyber security.

As a result, we have improved our score in different assessments such as Bitsight, which compares us to our peers and represents our level of cybersecurity. Also, 91% of employees answered positively to "Where I work, cyber security is considered a critical priority" in the GES survey (up 1 p.p. from 2018).

2019 highlights

Santander inaugurated a new Global Cyber Security Center

Santander inaugurated its new Global Cyber Security Centre in Madrid. The centre provides defense services to all entities of the group, bringing state of the art cyber defense technologies and hosting more than 350 cyber professionals.

Cyber awareness and training for employees and customers

Driving cyber secure behaviors remains a key priority for Santander. The goal is to help employees, customers and wider society prosper in the cyber space. A wide range of employee training and awareness campaigns have been launched across all entities in the Group, including online courses, articles, and practical exercises. The Santander 5 cyber tips and information are also being shared with customers and general public through Santander digital channels, such as social media, banking apps, emails and webpages.

Cyber heroes became mandatory for all units

Cyber Heroes global programme is an online training programme which aims to reinforce the idea that each of us play a direct role in the protection of Santander, our people and customers. The objective is to build a culture of cybersecurity awareness, and put into practice cybersecurity rules outlined in the Cybersecurity Policy. This training became mandatory for all countries and businesses in 2019

Cyber security in StarMeUp

We launched a new star, Cyber Hero, within StarMeUp to encourage colleagues to reward others for speaking up and reporting cyber incidents. Ana Botín, Chairman of Banco Santander awarded the star to all employees that did not click and always reported phishing exercises in 2019. Jose Antonio Álvarez, CEO of Banco Santander, also used StarMeUp to recognise employees who reported malicious emails that attempted to compromise the Bank's information and systems.

Our communities



We listen to our communities

Interviews

- 4,800 interviews to university students about the perception of Santander as Simple, Personal and Fair.
- 59% of interviewed students consider Santander is Simple, Personal and Fair.

Corporate Volunteering

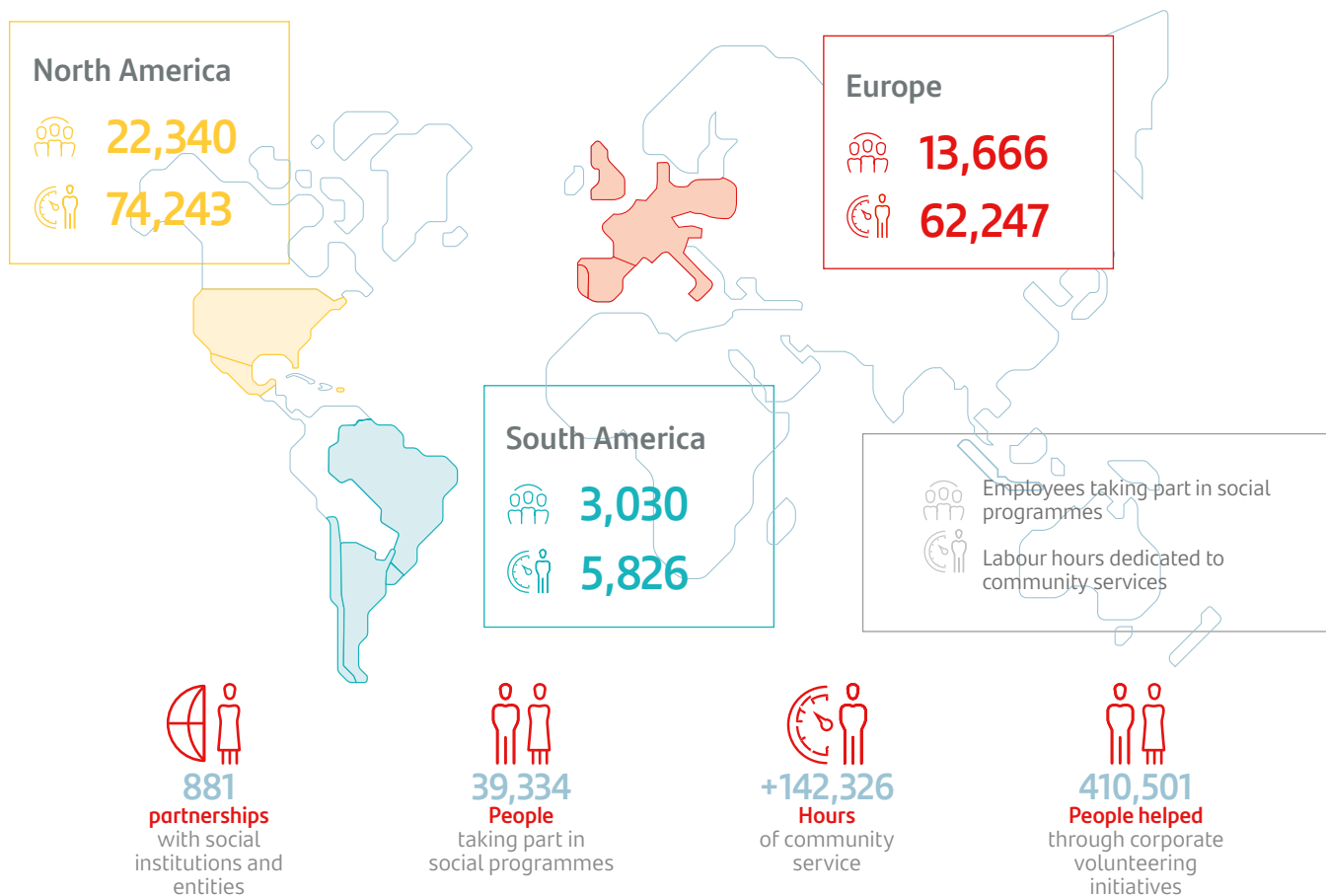
Banco Santander arranges different volunteering initiatives at both Group and local level to help the communities in which it operates to prosper. Doing this also helps us to engage with our people, supporting their professional development and promoting a deep connection with our SPF culture.

Higher education is the main focus of our initiatives to help communities. Additionally, we participate in projects to promote sustainable economic growth and we support numerous initiatives on social wellness, culture promotion and childhood education among others.

The group celebrates global volunteering days, common for the whole group whilst locally adapted. During The Santander Week and the International Volunteering day, countries, Global Divisions and the Corporate Centre develop their activities with great success. For example, in 2019 in Spain, more than 450 volunteers, including employees, pre-retirees, and retirees, along with their families and clients of the bank, have joined forces to collect more than a ton of waste, garbage, and plastic from different beaches through the Santander Natura Programme, which aims to preserve the environment and fight climate change.



Other interesting initiatives took place in the different geographies. For further details regarding our 2019 volunteering activities, please see 2019 Corporate Community investment Report



Responsible procurement

Our suppliers throughout the world also have an impact on communities and the environment. As we want to operate in a responsible way regarding all our stakeholders, we expect our suppliers to operate in an ethical way, upholding the same standards as we do.

We have a Model and a Certification Policy for managing our suppliers, setting out a common methodology for all countries to follow when selecting, approving and evaluating suppliers. In addition to traditional criteria -such as price and quality of service, diversity and sustainability issues are included in this methodology.

Within the Supplier Certification Policy, **we have included Principles of Responsible Behaviour for Suppliers** and apply to all suppliers providing services on or on behalf of Banco Santander. Aligned with the 10 principles of the Global Compact, they establish minimum principles that we expect from our suppliers including ethics and conduct, human rights, health and safety and diversity and inclusion. It notes that suppliers

must undertake to treat all their employees fairly and equally and not to discriminate on the basis of birth, race, sex, religion, opinion or any other personal or social condition or circumstance.

During 2019 we have enhanced the existing supplier questionnaire to vendors in some of our biggest markets, strengthening the new Principles of Responsible Behaviour and to understand the D&I position within our vendor base. The questionnaire helps us clarify whether a company meets our responsible behaviour principles, thereby putting pressure on businesses to become more diverse and inclusive and to comply with legislation regarding the inclusion of people with disabilities.

We have been enhancing our approach further by reviewing the questionnaire and including ESG (Environmental, Social and Governance) for our key suppliers. This extends D&I questions further to include wider elements including gender, people with disabilities, flexible working etc. **This will be implemented as a pilot in 2020.**



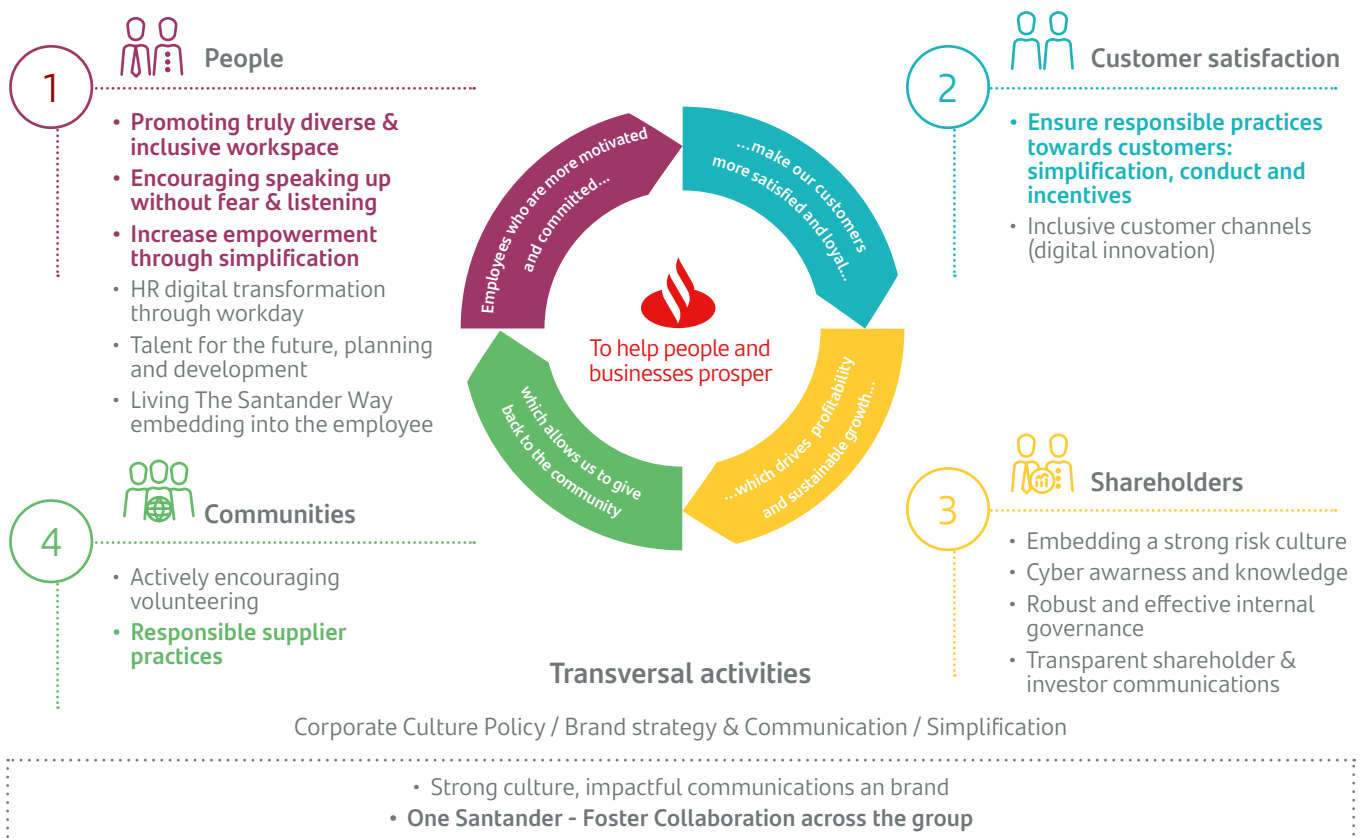
To know more about our Responsible procurement initiatives, see our Annual Report, p.54.

7. Our 2020 cultural agenda

Cultural transformation takes time and our initiatives continue to strengthen our SPF culture, both in our day to day activities and across all our stakeholders. We are making good progress and we must continue driving momentum within the consistent cultural framework understood and valued across the Group.

There is more to do to truly embed SPF into everything we do. We have developed a holistic 2020 cultural agenda that sets out our priorities regarding people, customers, shareholders and communities. The agenda is built around our virtuous cycle in which a committed team helps gain customer loyalty and trust, leading to

strong and more sustainable financial results that allows us to support our communities. For 2020, cultural priorities have been approved by RBSCC and Culture Steering and six of these have been identified as 2020-2022 key Responsible Banking cultural priorities.



The six Responsible Banking cultural priorities are:



These six priorities are intrinsically related to fulfilling our purpose of helping people and business prosper and to our values of being Simple Personal and Fair.

8. Our contribution to the United Nations Sustainable Development Goals

We contribute to achieving the SDGs through our business activities and our community investment programmes. Our corporate culture supports this ambition and is particularly relevant in some of the set targets:

GOAL	TARGET	SCOPE	DATA
	1.5	By 2030, build the resilience of the poor and those in vulnerable situations and reduce their exposure and vulnerability to climate-related extreme events and other economic, social and environmental shocks and disasters.	Support to the community: \$6 million in social investment and 1.6 million people helped through our social programmes
	4.3	By 2030, ensure equal access for all women and men to affordable and quality technical, vocational and tertiary education, including university	We have 1,333 agreements with different universities
	4.B	By 2020, substantially expand globally the number of scholarships available to developing countries, in particular least developed countries, small island developing States and African countries, for enrolment in higher education, including vocational training and information and communications technology, technical, engineering and scientific programmes, in developed countries and other developing countries	Banco Santander is the largest company investing in education and the largest private scholarship programme in the world
	5.1	End all forms of discrimination against all women and girls everywhere	New general principles on diversity and inclusion that provide global guidelines and minimum standards
	5.5	Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision making in political, economic and public life	55% of women in the workforce and 40% women in the Group Board Commitments: Women in the Board 40-60% by 2021. 30% women in senior leadership positions by 2025 and eliminate our gender pay gap by 2025
	8.3	Promote development-oriented policies that support productive activities, decent job creation, entrepreneurship, creativity and innovation, and encourage the formalization and growth of micro-, small- and medium-sized enterprises, including through access to financial services	196,000 employees. 98% with a fixed contract. 8.3% of the staff promoted
	8.5	By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value	In 2019 we received the Top Employers Europe 2019 certification and we have also been included for the first time in the Great Place to Work list of the 25 best companies to work for in the World as well as being distinguished as one of the best Places to Work 2019 in Latin America Commitment "top 10 companies to work for" in 6 of our main geographies by 2022
	8.8	Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment	We promote flexiworking and have several initiatives in place to support our employees' health, as BeHealthy or our Gympass
	10.2	By 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status	More than 1 million people helped through community investment to improve the lives of people at risk of exclusion, poverty or vulnerability. We have developed our Corporate Guidelines for the protection of vulnerable Customers, which take into account diversity criteria

