

GRUPO SANTANDER ANTI-CORRUPTION POLICY

Grupo Santander maintains a firm commitment to complying with current legislation in the different jurisdictions where it operates world-wide.

In order to meet this commitment, and ever aware of the importance of the fight against corruption, Grupo Santander pursues a policy of complete and total rejection (*zero tolerance*) in the face of any form of corruption, either in the public or private sector.

For this purpose, it has established principles of action and rules of conduct that should be observed in this regard by all employees and directors of the Group.

Likewise, specific guidelines exist for agents, intermediaries, advisors, partners and suppliers connected with the Group.

For the appropriate communication of these corporate principles and regulations, anti-corruption training guidelines have been established which it is compulsory to adopt in all Grupo Santander units.

As part of the corporate anti-corruption policy, rules and controls have been implemented regarding the giving and receiving of gifts and invitations (hospitality).

Likewise, in accordance with the Group's internal regulations, so-called facilitation payments are also rejected, as they could be considered as acts of corruption in certain cases.

Communication channels are available to Grupo Santander employees through which they may confidentially report to their respective compliance management on the committing of possible acts of corruption which they become aware of in the course of their professional activity.

These channels guarantee, on the one hand, the prohibition of any reprisals against employees who have reported such cases in good faith, and on the other, the right to defence of the person being reported.

The Group's corporate compliance and reputational risk area is responsible for the control and follow-up of the effective implementation and execution of the anti-corruption controls carried out by local compliance management teams.