

GENERAL SUSTAINABILITY POLICY

General Policy

**Santander Bank Polska Group
(the “Group”)**

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1 INTRODUCTION

This document defines the sustainability approach of Santander Bank Polska S.A. (“Santander” or the “Bank”) and the Santander Bank Polska Group (the “Group” or the “Bank’s Group”). It is based on the best practices included in international conventions, initiatives and protocols, codes of conduct and internationally relevant guides on the subject (see Appendix 1). Among them, special attention will be given to the United Nations Sustainable Development Goals (SDG), the Paris Agreement and the Responsible Banking Principles of the United Nations Environment Programme Finance Initiative (UNEP FI).

Initiatives and principles of this Policy do not affect the strict compliance with the relevant national legislation.

This Policy develops the Responsible Banking Framework and is complemented by other policies: the Human Rights Policy, the Corporate Culture Policy and the Environmental, Social, and Climate Change Risk Management Policy (hereinafter “responsible banking policies”).

2 DEFINITION

This Policy, which defines the general guiding principles of Santander regarding sustainability, within the context of Responsible Banking, is oriented towards creating long-term value, developing environmental and social business opportunities and managing social and environmental risks, such as climate change, resource scarcity and breaches of social rights.

Consistently generating profitability is necessary to be sustainable in the long-run. Santander understands that sustainability is key to generating value for all stakeholders and, to that end, it is committed to developing opportunities and managing these risks.

Under this premise, Santander has voluntarily taken on certain ethical, social and environmental commitments that go beyond its legal obligations toward its stakeholders. The Group understands that these commitments will address both the direct impact of its operations, and the indirect impact of its banking activity.

Specific governance bodies at the board and the executive level have been defined in the Group for the supervision and coordination of the main aspects related to sustainability. Furthermore,

the approval of responsible banking policies is done at the Management Board of Santander Bank Polska S.A.

3 SCOPE OF APPLICATION

This Policy applies across the entire Santander Bank Polska Group and, in so far as it reflects best practices, is considered a reference document that may be used as a guide for other units in the development of the subject area in question.

The Bank's Group units:

- 1) **Santander Leasing S.A.,**
- 2) **Santander Factoring sp. z o.o.,**
- 3) **Santander Towarzystwo Funduszy Inwestycyjnych S.A.,**
- 4) **Santander Consumer Bank S.A.**

are expected to use it as a basis for developing their own regulations, without prejudice to any adaptation that may be required for compliance with regulations and recommendations or requirements of supervisory authorities, among other reasons.

The regulations which are valid on the date that this Policy comes into force must be adapted to it.

4 GENERAL SUSTAINABILITY PRINCIPLES

4.1 Relationships with stakeholders

Under this Policy, the Bank sets out a number of principles and commitments, designed to create long-term value for its stakeholders.

- **Employees:**

Above all else, the Bank's continued success depends on our employees. Therefore, the Bank works to attract, retain and develop our talent to have the best professionals, always making sure they provide customers with the best service. The General Code of Conduct will, in turn, catalogue the ethical principles and rules of conduct by which all activities of the Group employees must be governed.

With regard to its employees, the Group will observe the following principles:

- Respect for diversity, and non-discrimination because of gender, race, age or any other condition.
- Promotion of work-life balance, as well as a safe and healthy workplace for employees.
- Encourage equal opportunities among its employees, aspiring to have a balanced representation between men and women in all functions and responsibilities.
- Make sure employees behave in accordance with certain ethical and responsible conduct principles and rules by implementing the General Code of Conduct.
- Promote programmes to make employees aware of social and environmental issues, including measures for good environmental management practices, social and environmental risks and business opportunities.
- Encourage corporate volunteering to help the communities it serves prosper and increase our employees pride in belonging to this company.

- **Customers:**

Build long-term relationships of trust being established with customers, earning their loyalty, adapting to their needs and enhancing their satisfaction.

- The Bank aims to offer products and services that are simple, personalised and adapted to the needs and risk profile of its customers and provide them with accurate, sufficient and appropriate information.
- It will give customers access to the various products and services the Bank offers through a multi-channel offering so customers may use them however, whenever, and wherever they wish based on their needs.
- The Bank will also design social and environmental products and services in order to promote financial inclusion and help protect the environment and mitigate climate change.
- It will monitor exceptional situations or settings that may have an effect on certain customers in order to offer them alternative solutions, in particular, among those groups in a situation of vulnerability or risk of social exclusion.
- It will make decisions taking into account ethical, social and environmental matters and financial and risk criteria pursuant to this Sustainability Policy and the Environmental, Social, and Climate Change Risk Management Policy.
- The Bank will be particularly diligent to prevent and avoid funding of illegal activity in compliance with the financial crime prevention rules and by taking any additional measures deemed necessary.

- Santander will promote specialized financial education with the objective of providing information to current and potential clients about products and financial services, as well as the expertise needed for decision-making. In addition, and as one of the main principles of consumer protection, the Bank will analyse gaps found in customers' knowledge in order to update the financial education programs.

- **Shareholders:**

Long-term value creation and maximum information transparency are fundamental in the Bank's relationship with its shareholders.

To this end Santander:

- will ensure equal treatment between shareholders;
- will offer thorough, clear and accurate information to all shareholders through various communication channels made available to them by the Bank.

- **Communities:**

The Bank also helps the communities it serves to prosper socially and economically through its social investments, with education being a main point of interest. The Bank understands as well the support to education as an empowering lever that contributes to alleviating many of the major problems faced by humanity, such as poverty and hunger.

- The Bank holds higher education to be the driver of growth, progress and future well-being. It is the main social investment the Bank makes and the hallmark of its commitment towards the community. Through agreements with universities, the Bank will promote the improvement and excellence of universities, international mobility of university groups (teachers, students and researchers), research, innovation and entrepreneurship.
- The Bank will promote general financial education with the aim of improving citizens' financial culture and providing them with tools and knowledge to help them in making financial decisions, in line with the Bank's Consumer Protection principles.
- The Bank will also pay close attention to childhood education, entrepreneurship and job creation, as well as social welfare, and promote initiatives to raise awareness about these issues and the fight against climate change.

- The Bank will consider, within its social investment decisions, contributing towards the eradication of poverty and support the most disadvantaged groups aiming at further social inclusion.
- It will also promote employee participation in this area through volunteer initiatives.

- **Suppliers:**

The Bank has ethical and transparent relationships with suppliers, as detailed in the Suppliers Certification Policy, which states that responsible banking principles will be considered when selecting suppliers, mentioning in particular:

- Ethics and conduct: as referring to compliance with principles of fair and honest treatment, transparency and honesty. It is also expected that suppliers have ethical policies and at least comply with applicable laws, anti-corruption measures and initiatives to ensure business integrity.
- Social aspects: such as the protection of human rights in accordance with the UN Universal Declaration of Human Rights, and in terms of health, safety requirements and diversity and inclusion in the working environment of suppliers, encouraging the observance of the UN Global Compact¹ principles.
- Environmental aspects: inviting suppliers to join the Group commitment on environmental protection and transition to a low carbon economy.

4.2 Environmental commitments

- **Environment:**

The Bank is committed to protecting the environment, especially in relation to developing solutions for the climate change challenge. To this end, the Bank undertakes to consider both the environmental impact of its facilities and internal operations, and of its banking and financial activity.

- a) Internal environmental management:**

The Bank promotes management systems based on internationally accepted regulatory standards and driven by a continuous improvement and management model (ISO Rules).

¹ Global Compact: voluntary initiative based on CEO commitments to implement universal sustainability principles and to take steps to support UN goals.

The Bank calculates, measures and controls consumption, emissions and waste of most of its facilities – captured and processed through an internally developed processing system subject to annual audits by an independent external entity. This allows it to identify critical points that generate bigger environmental impacts. It makes the adoption of more effective prevention measures possible and establishes targets in order to improve environmental management in a systematic manner.

Regarding internal environmental management, the Bank makes the following commitments:

- Meet regulatory requirements and others that are related to the Bank’s activities, products and services.
- Promote continuous improvement of its management systems in order to improve environmental performance.
- Establish work guidelines and control mechanisms to ensure environmental protection and pollution prevention.
- Communicate the Policy to employees and society and establish with its stakeholders communication channels related to environmental topics.

b) Banking and financial activity:

The Bank is responding to the challenge posed by climate change and related regulatory demands by establishing, through its Environmental, Social, and Climate Change Risk Management Policy clear prohibitions and restrictions to the financing of activities that may have a direct environmental and social impact, including long term effects of climate change.

The Bank is also committed to meeting best practices and regulatory requirements related to the disclosure of its financial risks arising from climate change, and actions it is taking for the identification, management and monitoring of those risks.

Supporting the Bank’s ambition to become net zero in carbon emissions by 2050 in their fight against climate change, it will set decarbonisation targets in those activities and sectors that pollute the most. To do so, the Group will also engage with the customers to help them in their transition to a green economy.

Climate change and environmental and social risks also offer the Group the possibility of identifying new business opportunities. Through development of products designed to promote sustainability, the Group supports economic growth while respecting the environment.

- **Dialogue with stakeholders regarding other matters:**

In order to receive all important feedback, the Bank will maintain dialogue and consultation channels with its main stakeholders, employees, customers, shareholders, investors, suppliers, authorities, regulators, supervisors and NGOs.

5 FINANCE-RELATED ENVIRONMENTAL, SOCIAL AND CLIMATE CHANGE RISKS

The Bank lends great importance to the environmental, social and climate change risks stemming from its customers' activities in sensitive sectors.

The Bank has approved the Environmental, Social and Climate Change Risk Management Policy that contains criteria for identification, evaluation, monitoring and management of environmental and social risks and other activities related to climate change of customers operating in the following sectors: energy, soft commodities and mining and metals.

6 GOVERNANCE

6.1 Ownership

The Sustainability and ESG Team is accountable for drawing up this Policy.

The owner of this policy is the Management Board of Santander Bank Polska. Prior to approval, the Policy was reviewed by the Responsible Banking and Organisational Culture Committee.

6.2 Interpretation

The Sustainability and ESG Team is accountable for interpreting this policy.

It will be the responsibility of the Sustainability and ESG Team to inform the corresponding units in the Bank's Group subsidiaries of any revision or modification of this Policy for its correct adoption. This function will also be responsible for making the proper follow-up of said adoption.

6.3 Date of validity and periodic review

This Policy will come into force on the date it is published. Its contents will be reviewed on a regular basis, and any changes or modifications considered appropriate will be made.

This Policy is published for general knowledge on the corporate intranet and on the website <https://esg.santander.pl/2020/en/environmental-e/>.

6.4 Sustainability Governance at the Bank's Group

In order to analyse the opportunities, risks and challenges arising from matters related to sustainability, including climate change, the Bank has the following forums:

- **The Responsible Banking and Organisational Culture Committee** of Santander Bank Polska that assists Bank's Management Board in fulfilling its oversight duties with respect to the responsible business strategy and sustainability issues of the Bank and the Santander Bank Polska Group.
- A specific **ESG Forum**, that supports the Committee's works and proposes and monitors the sustainability strategy. This Forum is composed by senior managers.

The subsidiary entities, in accordance with the principle of proportionality, will establish the governing bodies (units, committees, forums or individuals) necessary for the management and monitoring of sustainability issues. Appointed representatives of subsidiaries will participate in quarterly ESG status meetings convened by the Santander Bank Polska's Sustainability and ESG Team.

Skills in sustainability, including climate change, will be considered as a factor for the composition of the governance bodies, as appropriate.

7 APPENDIX I: MAIN CONVENTIONS ON WHICH THIS POLICY IS BASED

- Equator Principles (International Finance Corporation guidelines);
- United Nations: Universal Declaration of Human Rights;
- UN Global Compact: United National Global Compact;
- UNEP FI: United Nations Environmental Programme for Financial Institutions;
- Principles of Responsible Banking (UNEP FI);
- United Nation Sustainable Development Goals;
- Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES);

- List of Wetlands of International Importance (RAMSAR);
- The International Union for Conservation of Nature (IUCN) list of critical natural habitats;
- The 2014 United Nations list of protected areas;
- UNESCO World Heritage list;
- The European Commission Code of Conduct for European enterprises operating in developing countries;
- The United Nations Guiding Principles on Business and Human Rights;
- OECD guidelines for multinational companies;
- The International Labour Organization's (ILO) Fundamental Conventions;
- Agreements reached at the 2015 COP21 summit on climate change in Paris;
- The Spanish National Securities Market Commission's (CNMV) Code of Good Governance;
- International Wildlife Trade Financial Taskforce.