

## **Information Policy of Santander Bank Polska S.A.**

### **Version 3**

Santander Bank Polska S.A. (the "Bank") operates an information policy, providing clear and reliable information to its shareholders, customers and other stakeholders. The Bank provides information in accordance with law, corporate governance principles, observing banking and professional secrecy and adhering to the rules of preventing the use and disclosure of confidential information.

As a public institution, by means of its information policy the Bank seeks to build trust and understanding among its stakeholders and ensure reliable valuation of its shares on Warsaw Stock Exchange.

The Press Office of Santander Bank Polska is responsible for supervision over the Bank's Information Policy. The Policy is updated once a year.

### **Chapter 1**

#### **KEY RULES**

1. The key rule followed by the Bank in its provision of information is to ensure that all stakeholders have equal access to clear, precise, true and up-to-date information on Santander Bank Polska.
2. The purpose of the Bank's Information Policy is to:
  - a) define the mechanisms for effective communication between the Bank and market participants, including participants of the capital market;
  - b) build trust and understanding for the actions undertaken by the Bank and the Group;
  - c) promote the Bank's image as a responsible and reliable institution;
  - d) ensure that all groups of stakeholders have equal access to information;
  - e) meet its information obligations in a manner ensuring reliable valuation of the Bank's shares by the capital market.
3. The information on the Bank and the Group is provided based on:
  - a) applicable laws;
  - b) corporate governance principles.
4. The formal and legal compliance of the information provided by the Bank is supervised by relevant units in the Legal and Compliance Division.
5. Compliance of publicly disclosed information with the regulatory requirements is supervised by the Corporate Governance Department.
6. Financial information is provided in the form of periodic (quarterly, semi-annual and annual) reports. Furthermore, all the information is published on the Bank's website [www.santander.pl](http://www.santander.pl).
7. The Bank's units responsible for operating the Information Policy are:
  - a) Corporate Communication and Marketing Area as well as relevant business units – for communication with the media and customers;
  - b) Head of Investor Relations – for communication with investors;
  - c) Corporate Governance Department – for information obligations binding on a listed company.
  - d) Public Relations Department – for public policy matters.

## Chapter 2

### Communication with capital market participants

The Bank provides effective, regular and timely communication on its performance to all stakeholders, including capital market participants. As a listed company with an established market position, the Bank actively communicates with its stakeholders in order to satisfy their information requirements in accordance with the highest market standards and prevailing laws.

1. The Bank ensures equal access for all stakeholders to information concerning its operations, in particular by:
  - a) proper performance of information obligations arising from the fact that the Bank's shares are admitted to trading on regulated market, within the scope and timeframes required by generally applicable laws;
  - b) application of corporate governance rules;
  - c) ensuring dialogue with the capital market participants as part of responsibilities of the Head of Investor Relations and the Corporate Governance Department, by taking adequate actions in response to the information needs of defined groups of capital market participants, based on the best market standards and practice.
2. The general scope of the Bank's Information Policy is determined by a number of applicable laws related to operations of a public company on the capital market, in particular:
  - a) Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (Market Abuse Regulation) and repealing Directive 2003/6/EC of the European Parliament and of the Council and Commission Directives 2003/124/EC, 2003/125/EC and 2004/72/EC;
  - b) Act of 29 July 2005 on Public Offering, Conditions Governing the Introduction of Financial Instruments to Organised Trading, and on Public Companies (Journal of Laws of 2021, item 1983, consolidated text of 2 November 2021, as amended);
  - c) Act on Trading in Financial Instruments of 29 July 2005 (Journal of Laws of 2021, item 328, consolidated text of 22 February 2021, as amended);
  - d) Commercial Companies Code of 15 September 2000 (Journal of Laws of 2020, item 1526, consolidated text of 4 September 2020, as amended).
3. Moreover, subject to the above laws, the Bank conducts communication with the capital market participants adjusted to the needs of specified groups, in particular:
  - a) conferences on the Bank's performance for analysts, institutional and individual investors with the option to participate on a remote basis, held each time after the publication of financial results and on ad hoc basis as needed; the Bank publicly announces and broadcasts these conferences live on the Internet; the recordings are posted on the Bank's website in the Investor Relations section;
  - b) meetings of the Management Board of the Bank and Investor Relations representatives with institutional investors at investor conferences organised by investment banks;
  - c) meetings of the Management Board and Investor Relations representatives with individual investors at conferences for such investors;
  - d) meetings of the Management Board and Investor Relations representatives with analysts of brokerages and investment banks – as needed;
  - e) "one-on-one" meetings with the Management Board and Investor Relations representatives – as needed;
  - f) teleconferences of the Management Board representatives with institutional investors, individual investors and analysts – as needed;

- g) the Investor Relations service on the Bank's corporate website – publication of information on the website immediately after its announcement;
  - h) answers to questions submitted via email and telephone – the Bank responds to any question as quickly as possible; in the case of questions sent by email within a maximum of 48 hours;
  - i) other communication tools as required, including open days for individual investors, presentations, newsletters, fact sheets, short video or written comments of the Management Board of the Bank representatives on the financial results (if required).
4. The Bank's General Meetings are convened in accordance with the applicable laws governing listed companies and the principles of corporate governance. Decisions taken by a General Meeting are communicated to the public and published on the Bank's website. The Bank broadcasts its General Meetings and makes online voting possible. Furthermore, the Bank allows media representatives to participate in its General Meetings.
  5. The Head of Investor Relations and the Corporate Governance Department are the functions responsible for defining the scope and implementation of the Information Policy towards capital market participants.

### **Chapter 3**

#### **Communication with customers**

The Bank is committed to ensuring reliable, comprehensive and timely communication with its existing and potential customers with respect to the Bank's products, services and financial performance. The key objective of the Bank's communication with customers is to ensure that they understand the Bank's principles and offering to be able to take informed and responsible decisions about using the specific products on offer.

1. The Bank communicates with customers by:
  - a) post;
  - b) emails – maximum response time is 24 hours;
  - c) remote video channels, chat (as part of the Online Advisor service) and the Polish Sign Language;
  - d) helpline;
  - e) advertising and merchandising materials available at branches and delivered by mail;
  - f) advertisements published in the media;
  - g) information published via electronic banking and in the mobile application;
  - h) information published at [www.santander.pl](http://www.santander.pl);
  - i) Bank's employees;
  - j) social media;
  - k) complaint-handling units and the Customer Care Office.
2. The Bank informs customers about changes in the products and services they hold within the timeframes provided by law or contract; the Bank provides information on the rules governing its products and services and responds to customer's questions and concerns.
3. When preparing its information and advertising materials, the Bank adheres to the principle of providing fair and complete information on the products offered by the Bank and its Group. The Bank's communication sent to customers is clear, simple and understandable, taking into account the target group and containing all the information required by law and standards defined by the financial regulator. Information and advertising materials relating to the products and services offered by the Bank are prepared and made available in accordance with the applicable law and the principles of fair competition.

4. The Bank's standards and procedures for the process of managing and handling complaints, including in respect of deadlines for responding to complaints, are in line with external regulations:
  - Act of 5 August 2015 on complaint handling by financial institutions and on Financial Ombudsman (Journal of Laws of 2019, item 2279 of 19 November 2019, as amended);
  - the Payment Services Act of 19 August 2011 (Journal of Laws of 2021, item 1907, consolidated text of 21 October 2021, as amended).
5. Customers may submit their complaints personally at any Bank outlet, electronically via Santander internet and Santander mobile, by phone, using a video connection (service for the hearing-impaired), and by post.
6. The Bank has appointed a Customer Care Officer to represent the customer's interests in the Bank and deal with complaint-related appeals. A customer who does not agree with the Bank's decision about their complaint may appeal to the Customer Care Officer.
7. As part of the complaint management process, the Bank monitors the number of complaints and analyses them to determine and recommend actions aimed to improve the Bank's processes, products and services and to eliminate root causes of complaints.
8. The Marketing Department and selected units in the Bank are responsible for defining the scope and implementation of the Information Policy towards customers. The Compliance Area is responsible for supervising the complaints management standard in the Bank.

#### **Chapter 4**

##### **Communication with the media**

The Bank operates a uniform, coordinated information policy towards the media. The policy is in line with the applicable laws and regulations, including those relating to banking secrecy, and complies with the best practice and regulatory requirements.

1. The key rule followed by the Bank in its provision of information to the media is to ensure that all journalists have equal access to clear, precise, true and up-to-date information on the Bank.
2. Media statements for the Bank are made by the Bank's Management Board, representatives of the Bank's Supervisory Board, the Press Spokesman, employees of the Press Office and other persons authorised by the Management Board or the Press Spokesperson.
3. Press releases, statements, declarations and responses to the media are made in Polish by the Bank's Press Office.
4. Information is released to the media as follows:
  - a) press releases;
  - b) statements;
  - c) replies to the questions;
  - d) interviews;
  - e) face-to-face meetings and conferences;
  - f) the Bank's social media channels;
  - g) [www.santander.pl](http://www.santander.pl).
5. Responses to questions from the media are given as soon as practicable. If a question requires more in-depth information to be obtained, the time of response will be agreed with the journalist concerned.
6. Contact details for the media are available on the Bank's website at [www.santander.pl](http://www.santander.pl)
7. Press Office is the unit responsible for defining the scope and implementation of the Information Policy towards the media.

