

SANTANDER GROUP
CRITERIA FOR GRANTING DONATIONS

This document summarizes the application criteria for Santander Group granting of donations, as set out in its internal regulation.

1. Definition, scope and exclusions:

Companies must undertake a commitment to society beyond the results they generate and thus reinforce the links with their employees, customers, investors and society itself.

Santander Group promotes initiatives and projects that aim to contribute to the economic, social and sustainable development and growth of the communities where Santander Group is present. This contribution is made voluntarily, free and transparent through various instruments, counting Santander Group with criteria that regulate the donations for social purposes and the process for granting them.

Additionally, the definition of the following terms/concepts is necessary:

- *Donation*: Contribution, made voluntarily, for free and transparently through various instruments, whether monetary or in kind, which may include, among others, products, and services and that is made on behalf of an entity of Santander Group, without compensation, i.e. without receiving any tangible or measurable value in return.
- *Simple donation*: Donation in cash or in kind to the beneficiary entity to complete a specific project/purpose or with the objective of allowing it to continue carrying out the activities set out in its object and purpose.
- *Collaboration agreement*: Agreement between the beneficiary entity and the Santander Group entity that makes the contribution, outlining the objective and terms of the collaboration.

The criteria described below apply to all donations in cash or in kind, being the following being excluded and regulated by its own regulations:

- Gifts, acts of courtesy and invitations of little value, which will be governed by the General code of conduct and the Anti bribery and corruption policy.
- Contributions that involve advertising, commercial or institutional consideration (such as sponsorships, institutional contributions, etc.), regardless of the beneficiary, which will also be governed by their specific regulations.
- Contributions made from Santander Universities, which will be governed exclusively by the collaboration agreements expressly agreed with the universities and approved according to the internal processes defined and reviewed by Santander Universities.
- Contributions made from foundations, or similar entities, linked to Santander Group and governed by their statutes and governing bodies.
- Volunteering activities carried out by Santander Group employees: The activities carried out by employees of the Group other than those framed within collaboration agreements are not considered a donation.

- Charity collections held by non-profit entities of up to 2,000 euros and one-off donations for social purposes of less than 1,000 euros. In both cases excluding any activity involving advertising for the Santander entity.

2. General criteria of donations:

- Santander Group donations may materialize in simple donations or through collaboration agreements between the Santander Group entity that grants it and the beneficiary entity.
- Under no circumstances will donations be made in cash or by means of payment other than bank payments.
- Donations made must serve one of the following purposes, aligned with the implementation of the principles of the main conventions on which the responsible banking and sustainability policy is based:
 - The defence of human rights proclaimed in the UN's Universal Declaration of Human Rights.
 - Education, science, employment, innovation, and entrepreneurship.
 - Research in its different fields and manifestations.
 - Human welfare and social development.
 - Strengthening institutions and developing democratic principles.
 - Preservation and protection of the environment.
 - Art and culture.
 - Other social purposes accepted by Santander Group (e.g. healthcare).
- Humanitarian crises (pandemics, wars, natural disasters, etc). Donations made in this context, and depending on the severity of the crisis, must be coordinated between the involved local units and the corporate functions, and will comply with related regulations.
- Donations' beneficiaries:
 - Donations may be made to the following recipients:
 - Non-profit entities with social aims, such as foundations, NGO, and other similar entities both linked to and outside Santander Group.
 - The State, the autonomous regions, and local entities, as well as their dependent bodies.
 - International governmental bodies (e.g., the UN), as well as their agencies (e.g., the WHO).
 - Profit-seeking entities when the nature of the donation is exclusively for a social purpose.
 - Donations to individuals will be prohibited, except those made under the scope of a specific programme that has been previously approved in accordance with this regulation.
 - These recipients must have the competence, capacity and authorizations required to carry out their activities and services. Neither these entities nor their directors may be disqualified or involved in legal proceedings or another situation or conflict that could prevent or hinder the allocation of the donation delivered or potentially damage the reputation of Santander Group.

3. Donation process

Donation granting by Santander Group will follow a regulated process that will include at least the following critical elements that will be led by the sponsor function, the country and the corresponding control functions as appropriate, such as: the application file, approval process by the corresponding governing bodies (local and corporate as appropriate), formalization and execution of the donation, registration, monitoring and periodic reporting.