



Human Rights Policy

Approved 5 November 2020

 Santander Consumer Bank

This HUMAN RIGHTS Policy (the "Policy") applies to Santander Consumer Bank AS, its branches and subsidiary (collectively "SCB" or the "Bank").

1 Scope and purpose

This policy outlines the commitment of Santander Consumer Bank AS to human rights in accordance with the highest international standards, in particular the 2011 United Nations Guiding Principles on Business and Human Rights.

This policy applies across the corporation 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. SCB units 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 local regulations, the recommendations or requirements of their supervisory authorities, among other reasons.

The regulations transposing this policy must be validated at SCF HQ and corporate level before being approved by the entity involved. The regulations which are valid on the date that this policy comes into force must be adapted to it.

2 General Definitions

In line with its Corporate Culture, Santander undertakes to respect and promote human rights within the scope of its business, and to prevent and mitigate any infringement directly caused by its business.

This policy includes Santander stance on this matter and establishes principles in line with the main international declarations, such as:

- The International Bill of Human Rights, created by the Universal Declaration of Human Rights proclaimed in 1948 by the United Nations General Assembly through the International Covenant on Civil and Political Rights and its two protocols, and the International Covenant on Economic, Social and Cultural Rights.
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and its eight fundamental conventions
- The United Nations Guiding Principles on Business and Human Rights.
- OECD guidelines for multinational companies.
- The ten principles of the United Nations Global Compact.
- The Equator Principles.
- The Global Standard Conduct for Business to protect the Rights of LGBTI individuals
- Convention on the Rights of the Child and its two Protocols

This Human Rights Policy of Santander Consumer Finance is aligned with the Bank's General Code of Conduct, Consumer Protection Policy, Corporate Culture Policy and the Environmental and Social Policies.

3 Roles and responsibilities

The CEO and Board of Directors of SCB are ultimately responsible for compliance with relevant legal and internal requirements. The managing directors are responsible for compliance within their business units.

4 The Santander human rights principles and commitments

4.1 Relationships with Santander Bank employees

Preventing discrimination and practices that infringe upon people's dignity

Santander employees have the right to enjoy a respectable work environment. To this end, providing equal opportunities related to work access and promotions will be a basic principle in Santander, ensuring at all times that people will not be discriminated for their sex, race, age, religion, origin, disabilities, marital status, sexual orientation, or social condition. The Bank also undertakes to maintain a work environment free of harassment, abuse, intimidation or violence.

Rejecting forced labour and child exploitation

Santander will not knowingly resort to any form of forced or compulsory labour. Furthermore, the Bank rejects child labour and will respect the provisions of the ILO convention or the legal minimum working aged established in countries (provided it is more demanding than the ILO convention).

Respecting the freedom of association and collective bargaining

Santander recognises workers' fundamental rights to form and associate with unions or representative bodies. SCB also guarantees respect for the freedom of expression, union activity, collective bargaining and the recognised protection of workers' representatives in accordance with each country's labour legislation

Protecting employees' health

Santander considers its employees' safety and health fundamental and prioritises the permanent improvement of work conditions. Furthermore, SCB will comply with all requirements set out under each country's laws on this matter, and will take appropriate measures to ensure safety and health in the workplace.

Offering respectable employment

Santander remunerates employees respectably, based on their training, experience, responsibilities and functions, in accordance legislation and socio-economic setting. It also ensures its employees' right to rest in accordance with local legislation; and in the event no legal framework exists on this subject, Santander will set out the necessary conditions to guarantee that right.

SCB sees to it that its employees have the right to personal data and privacy protection.

Santander offers its employees flexible work practices that allow them to balance their professional careers with other interests and responsibilities. The Bank strives to create a work environment that adapts to each employee's personal and

family lives without compromising the demand or focus on the results.

4.2 Relationships with customers and suppliers

Fair treatment of customers

Santander employees should be especially attentive to offer customers only products and/or services that match their situation and needs, making it easy for them to understand the terms and conditions, benefits, risks and costs and avoiding any unjustified discrimination to whom the products are offered, all in accordance with SCB General Code of Conduct and the Consumer Protection Policy.

Fostering respect for human rights within the relation with customers and suppliers

In relation to its clients, Santander has acquired public commitments such as the Equator Principles, as well as the application of its own sectorial policies and General Code of Conduct, among others, that provide measures regarding the exercise of due diligence to prevent, mitigate and manage impacts on human rights.

Santander will foster respect for human rights throughout the supply chain. In particular, SCB will urge suppliers and their employees to adhere to the commitments described under this policy, always with respect for their management autonomy and following the best practices and procedures found under the Bank's purchasing regulations.

In line with this Policy, Santander has specific human rights requirements for its suppliers detail in the Certification Policy.

4.3 Relationships with communities where Santander operates

Santander undertakes to directly support and promote human rights in the communities it serves (in cooperation with government bodies, international organisations, civil organisations and other institutions), and to control the impact of the transactions on the communities it serves.

Santander assumes that the broad impact of its activity goes beyond the communities in which it directly operates. Therefore, the evaluation of this impact and the promotion of human rights will also occur in those affected communities, regardless of the physical presence of the Bank in them.

Healthy and Clean environment

Santander recognises the right of communities to have a healthy and clean environment, and undertakes to act to minimise the environmental impact of its transactions. This means:

- Assuming the obligation to analyse, identify and correct negative social and environmental impacts during the risk analysis process regarding lending activities and in a way that is consistent with the guidelines approved by the International Finance Corporation.
- Developing specific policies that, in keeping with the Equator Principles, regulate the necessary requirements to offer financing to sectors, activities, or potential customers that pose a special social, environmental or human rights risk.

Guarantee security with respect for human rights

Santander will ensure that physical, banking and computer-related security measures are implemented in order to guarantee respect for the human rights; employees carrying out these functions must demonstrate that they are suitable for this position and will receive training as necessary.

Help eradicate corruption

As a signatory of the ten principles of the United Nations Global Compact, Santander undertakes to work against corruption of all types, including extortion and bribery.

Santander is a founding member of the Wolfsberg Group. The principles and guidelines established by this group are an important reference in the fight against money laundering, corruption and terrorism among others.

Commitment to other business partners

SCB undertakes to disseminate the compliance of human rights policy among all its business partners

5. Assessment and control procedure

SCB will work to ensure that this policy is implemented effectively; analyse its implementation on a regular basis; and assess the risk of breach within the areas where it operates.

In due diligence processes prior to entering into lending agreements or any other type of agreement, and within the scope of the Equator Principles, the Social and Environmental Policies and the Corporate Defense and Crime Prevention Policy, Santander undertakes to assess the human rights policies and practices of its counterparties as part of its analysis process.

Additionally, it will guarantee the appropriate resources to anticipate and mitigate risks in all of its activities by implementing the identified corrective measures, and be responsible for monitoring these measures.

Any identified breach of the respect for human rights will be analysed based on internal procedures, legislation and agreements in force, possibly resulting in disciplinary measures being taken.

Furthermore, the Bank's employees are obliged to inform Santander Consumer Finance HQ of any identified breach of the commitments found in this policy. To do this, employees may contact Santander through the whistleblowing channel created under the General Code of Conduct, anonymously and without fear of reprisal.