

Policy Statement

Foreword

Santander Consumer Bank AG (hereinafter: "Santander") is part of the global Santander Group. Our Spanish parent company, Banco Santander S.A., has declared its participation in the United Nations Global Compact. In this way, the Santander Group commits to all the principles for minimum social and environmental standards set out in the Global Compact. These principles represent Santander's values and direction around the world.

1. Corporate responsibility and human rights

1.1. Decisiveness of the statutory provisions

Santander conducts its business in accordance with all legal requirements. They are the central basic principle for economically responsible action. Santander therefore consistently complies with the applicable legal imperatives and obligations.

1.2. Prohibition of child labour and forced labour

Santander respects the ban on child labour. This applies in particular to the prohibition of employing a child below the age at which compulsory schooling ends according to the law of the respective place of employment. However, the employment age must never be less than 15 years. In addition, Santander strictly adheres to the ban on the worst forms of child labour for children under 18. This includes a consistent stance against all forms of slavery or forced labour, the sale of children, child trafficking and the use of children in illegal activities such as drug trafficking and cultivation. Santander is also clearly opposed to any form of child labour that, by its nature or the circumstances in which it is carried out, could be harmful to the health, safety or morals of children.

In general, whether for children or adults, Santander strictly observes the prohibition against employing people in forced labour. Santander outlaws all forms of slavery, slave-like practices, servitude or oppression, especially around the workplace.

1.3. Standing up for a safe and social working environment

The applicable laws, regulations and standards on occupational safety and health protection are complied with. Santander is committed to providing a safe and healthy working environment for its employees and to respecting occupational health and safety.

1.4. Freedom of association

Santander supports freedom of association - and respects the prohibition on restricting it in any way. All workers are free to organise or join trade unions.

1.5. Equal treatment and anti-discrimination

Santander respects the differences between people, the personal dignity, privacy and personal rights of each and every individual. Any form of discrimination in the workplace - for example, on the basis of a person's national and ethnic origin, social background, health status, disability, sexual orientation, age and gender, or political opinion, religion or belief - will not be tolerated in any way unless it is justified by the requirements of the job. This applies both to cooperation within the company and in dealing with customers and business partners. Santander actively promotes equal opportunities and prohibits all forms of discrimination in recruitment, promotion, pay or the provision of training and development for employees.

1.6. Respect for the prohibition of withholding a fair wage

Santander respects the prohibition against depriving its employees of a decent wage. The appropriate wage shall be at least the minimum wage determined by the applicable law and shall otherwise be determined by the law of the respective place of employment.

1.7. Respect for the natural basis of life

Santander is committed to maintaining the ecological balance, avoiding environmental impact and preserving natural resources as part of its sustainability strategy. Santander recognises and complies with all applicable local and internationally recognised environmental standards and laws. Santander takes its environmental responsibility throughout the supply chain and implements it both in terms of its own products and services and the packaging it uses.

Santander avoids any form of harmful alteration of the soil, refrains from polluting water or the air and respects the ban on harmful noise emissions. Santander also acts decisively against excessive water consumption that significantly affects the natural basis for food preservation and production, denies a person access to safe drinking water, impedes or completely destroys a person's access to sanitation, or damages a person's health.

1.8. Prohibition of unlawful eviction

Santander respects the prohibition of unlawful eviction and the prohibition of unlawful deprivation of land, forests and waters when acquiring, developing or otherwise using land, forests and waters whose use secures a person's livelihood.

1.9. Prohibition of the commissioning or use of private or public security forces

Santander respects the prohibition on hiring private or public security guards if, due to lack of instruction or control, the use of the security company violates the prohibition of torture, injures life or limb, or interferes with the freedom of association and union.

2. Environmental protection

2.1. Environmental laws and permits

Santander complies with applicable environmental laws and regulations, while ensuring that all necessary environmental permits are obtained, kept up to date and followed within the company.

2.2. Climate protection

Santander will make every effort to further reduce its carbon footprint and contribute to achieving the climate goals of the Paris Climate Conference.

2.3. Environmental due diligence: Hazardous substances and product safety

Santander will label hazardous substances and chemicals and organise their safe handling, storage, transport and disposal. Santander undertakes to comply with all product safety regulations.

In particular, Santander respects the prohibition on the production of mercury-added products and the use of mercury and mercury compounds, as well as the prohibition on the treatment of mercury waste under the Minamata Convention. Santander also complies with the ban on the production and use of toxic persistent organic chemicals and the ban on the non-environmentally sound handling, collection, storage and disposal of waste under the POPs Convention. In particular, Santander respects the prohibition on the export, transfer and disposal of hazardous waste under the Basel Convention.

2.4. Resources and environmental impact

Santander ensures that harmful environmental impacts are avoided or at least reduced wherever possible. Santander takes its environmental responsibility throughout the supply chain and implements it in terms of both products and packaging.

3. Business integrity

3.1. Avoidance of conflicts of interest

Santander ensures that all business decisions are made in the best interests of the company. This means that their business decisions are made free from any conflict of interest with private interests or other economic or other activities.

3.2. Combating corruption and bribery

Santander conducts its business without bribery, corruption or any kind of fraudulent business practice. Santander will at least comply with national laws and regulations.

3.3. Fair competition and antitrust law

Santander does not tolerate antitrust violations or the prevention of fair competition.

3.4. Subsidy fraud and incitement to subsidy fraud

If a contract is awarded on the basis of a formal tender, Santander will neither consult nor coordinate the bids with other bidders.

3.5. Money laundering prevention

Santander complies with legal requirements to prevent money laundering and does not engage in money laundering activities. Money laundering means that assets from criminal transactions are brought into circulation through further business activities.

4. Addressing the policy statement within the supply chain

Santander will publish this policy statement and ensure that the human rights strategy is implemented in its own relevant business areas.

Santander will train all employees on the human rights strategy and actively encourage them to report any violations they become aware of through a dedicated complaints procedure.

Similarly, Santander ensures that human rights and environmental due diligence is also taken into account in the selection of its suppliers and service providers. Santander will address these due diligence obligations with appropriate contractual regulations to all suppliers and ensure that they are implemented with appropriate control mechanisms.

5. Procedures for the fulfilment of due diligence obligations

To fulfil all due diligence obligations, Santander applies appropriate criteria to identify relevant suppliers and large borrowers, assesses them as part of the certification process and checks the accuracy of the information on a random basis. If deficiencies or violations are identified, corrective measures are continuously developed and implemented. The process is ensured by an overarching risk management system as well as corresponding risk analyses and appropriate complaint management.