

2024

Sustainability Disclosures

Helping people and businesses prosper



Disclaimer

This document has been prepared in conjunction with high-level global public objectives developed by our parent company, Banco Santander, S.A. ("BSSA"). The targets and objectives referred to in this document are aspirational; as such, no guaranty or promise is made that they will be met or implemented successfully. The statistics, metrics and other data and information included in this document are not necessarily audited and not necessarily prepared in accordance with generally accepted accounting principles ("GAAP"). The information and any underlying assumptions contained in this document are expected to evolve over time. This document relates to the consolidated business of Santander Holdings USA, Inc., and its subsidiaries ("SHUSA") as well as certain activities of BSSA's New York branch and does not address the performance or operations of vendors, suppliers, customers or other third parties. This document is not comprehensive and should be read in conjunction with SHUSA's Annual Report on Form 10-K and Quarterly Reports on Form 10-Q and Banco Santander's Annual Report on Form 20-F.

This document contains certain terms used in the Global Reporting Initiative's ("GRI's") framework and standards, such as "material" and "materiality." This terminology may be used differently than in other disclosures SHUSA makes from time to time and is different from similar terminology used in the context of filings SHUSA makes with the Securities and Exchange Commission ("SEC") from time to time.

This document contains certain "forward-looking statements" within the meaning of the Private Securities Litigation Reform Act of 1995, including statements regarding our corporate social responsibility and sustainability targets, goals, objectives, programs and other business plans and initiatives. These statements are typically accompanied by the words "anticipates," "believes," "estimates," "expects," "forecasts," "goals," "intends," "plans," "projects," "may," "will," "should," "would," "could" and similar terms. Although we believe that the expectations reflected in these forward-looking statements are reasonable as of the date on which the statements are made, factors such as risks and uncertainties

described in SHUSA's and BSSA's filings with the SEC from time to time may cause SHUSA's and BSSA's performance to differ materially from that suggested by the forward-looking statements. If one or more of the factors affecting SHUSA's or BSSA's forward-looking statements renders those statements incorrect, SHUSA's or BSSA's actual results, performance or achievements could differ materially from those expressed in or implied by the forward-looking statements. Readers should not consider these factors to be a complete set of all potential risks or uncertainties as new factors emerge from time to time.

The information in this document is for general information purposes only and does not constitute legal, tax, accounting, financial or investment advice or an offer to invest. In making this document available, SHUSA and BSSA give no advice and make no recommendation to buy, sell or otherwise deal in shares or other securities of BSSA, SHUSA, Santander Bank, N.A. (the "Bank"), Santander Consumer USA Inc. or any other securities or investments. Prior to making any investment, a prospective investor should consult with its own investment, accounting, legal and financial advisors to evaluate independently the risks, consequences and suitability of that investment.



Global Reporting Initiative (GRI) content index

This report has been prepared in accordance with the GRI Standards 2021, including GRI 1: Foundation 2021, GRI 2: General Disclosures 2021 and GRI 3: Material Topics. We continue to monitor the development of financial services sector standards. The following tables provide corresponding references across our reporting. The full text of disclosures and other information can be found on the GRI website.¹

→ View website

As our sustainability disclosure evolves, we will continue to enhance our reporting and align to developments across standards, regulations and common practice.

Topic-specific disclosures determined to be "non-material" based on our Double Materiality Assessment and for which we do not provide significant content in the Sustainability Report have been omitted from this table. Certain information may not be disclosed if it is not considered material, is privileged or confidential, could cause a competitive disadvantage or is not reportable in a manner that aligns to the related GRI indicator.





GRI Standard: General Disclosures

Disclosure	Indicator	Comment	Reference
Organizatio	n and reporting practices		
GRI 2: Gene	eral Disclosures		
2-1	Organizational details		2024 Sustainability Report: Our business
2-2	Entities included in the organization's sustainability reporting		2024 Sustainability Report: Our business; Annual Report and 10-K: Item 1. Business
2-3	Reporting period, frequency and contact point		2024 Sustainability Report: Our business; Report Back Cover
2-4	Restatements of information		2024 Sustainability Report: Our business
2-5	External assurance	External assurance is not provided on this standalone US report. However, PricewaterhouseCoopers Auditores S.L. performs limited assurance for Banco Santander and its subsidiaries as part of the publication of the Banco Santander Annual Report. Independent verification of a variety of metrics, including US results, is available at the Group level.	For information on Banco Santander's external assurance, including the scope of information and processes covered, see <u>Banco Santander Annual Report</u> .
2-6	Activities, value chain and other business relationships		2024 Sustainability Report: Our business; Double materiality assessment



Disclosure	Indicator	Commen
2-7	Employees	

Reference

Workforce distribution by race, ethnicity, gender and employment category¹

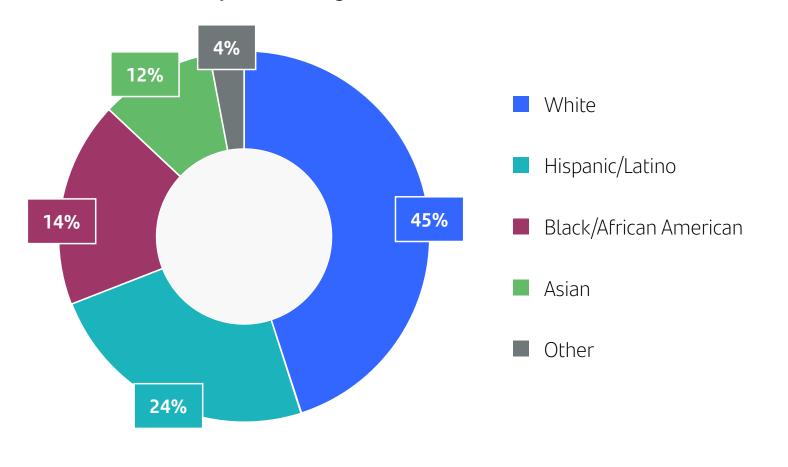
Job category Gender White Hispanic/ Latino Black/ African American Asian Other % of employee population Executive/ Senior level Women 19% 8% 1% 1% 1% 1% Men 44% 21% 1% 3% 3% 3% First/ Mid-level managers Women 22% 8% 4% 5% 2% 36% Non- management Women 23% 16% 12% 7% 3% 63% Total Women 23% 11% 5% 6% 2% 54% Men 23% 13% 9% 6% 2% 46%								
Senior level Men 44% 21% 1% 3% 3% First/ Mid-level managers Women 22% 8% 4% 5% 2% 36% Non- management Women 23% 16% 12% 7% 3% 63% Total Women 23% 11% 5% 6% 2% 54%	Job category	Gender	White	1 /	African	Asian	Other	
Men 44% 21% 1% 3% 3% First/ Mid-level managers Women 22% 8% 4% 5% 2% 36% Non- management Men 32% 12% 3% 9% 3% Non- management Women 23% 16% 12% 7% 3% 63% Total Women 23% 11% 5% 6% 2% 54%	,	Women	19%	8%	1%	1%	1%	1%
Mid-level managers Men 32% 12% 3% 9% 3% Non-management Women 23% 16% 12% 7% 3% 63% Men 17% 10% 6% 4% 2% Total Women 23% 11% 5% 6% 2% 54%	Jernor tevet	Men	44%	21%	1%	3%	3%	
managers Men 32% 12% 3% 9% 3% Non-management Women 23% 16% 12% 7% 3% 63% Men 17% 10% 6% 4% 2% Total Women 23% 11% 5% 6% 2% 54%	, , , , , , , , , , , , , , , , , , ,	Women	22%	8%	4%	5%	2%	36%
management Men 17% 10% 6% 4% 2% Total Women 23% 11% 5% 6% 2% 54%		Men	32%	12%	3%	9%	3%	
Men 17% 10% 6% 4% 2% Total Women 23% 11% 5% 6% 2% 54%		Women	23%	16%	12%	7%	3%	63%
	management	Men	17%	10%	6%	4%	2%	
Men 23% 13% 9% 6% 2% 46%	Total	Women	23%	11%	5%	6%	2%	54%
		Men	23%	13%	9%	6%	2%	46%

^{*} Based on disclosures provided by employees.

Workforce distribution by age¹

Age	Count	Percent
>50	3,372	30%
30-50	6,428	57%
<30	1,541	14%
Total	11,341	100%

Racial and ethnic composition at a glance¹



¹ Charts and tables contain rounded values, which may not add up to 100 percent.



Disclosure	Indicator	Comment	Reference
2-8	Workers who are not employees		Information unavailable
2-9	Governance structure and composition		<u>2024 Sustainability Report</u> : Facilitating responsible growth; Effective governance; Experienced leadership and management; Sustainability governance framework; <u>SHUSA Board and US Leadership Team</u>
2-10	Nomination and selection of the highest governance body		2024 Sustainability Report: Facilitating responsible growth; Effective governance; Experienced leadership and management; Sustainability governance framework
2-11	Chair of the highest governance body		<u>2024 Sustainability Report</u> : Facilitating responsible growth; Effective governance; Experienced leadership and management; Sustainability governance framework
2-12	Role of the highest governance body in overseeing the management of impacts		<u>2024 Sustainability Report</u> : Facilitating responsible growth; Effective governance; Experienced leadership and management; Sustainability governance framework
2-14	Role of the highest governance body in sustainability reporting		<u>2024 Sustainability Report</u> : Facilitating responsible growth; Effective governance; Experienced leadership and management; Sustainability governance framework
2-15	Conflicts of interest		2024 Sustainability Report: Facilitating responsible growth; General Code of Conduct
2-22	Statement on sustainable development strategy		2024 Sustainability Report: A letter from our CEO; Our business; Advancing our strategy; Toward a climate-resilient world; Annual Report and 10-K: Item 1. Business



Disclosure	Indicator	Comment	Reference
2-23	Policy commitments		2024 Sustainability Report: Toward a climate-resilient world; Santander US community plan; Facilitating responsible growth; Compliance; GRI 406-1; Annual Report and 10-K: Item 1. Business For additional information on our global policy see Banco Santander Annual Report.
2-24	Embedding policy commitments		2024 Sustainability Report: Responsible business; Toward a climate-resilient world; Supporting our customers in their transition goals; Responsible wealth management and investment services; Electric vehicle lending; Climate management; Santander US community plan; Empowering our customers; People highlights For additional information on our global policy see Banco Santander Annual Report.
2-25	Processes to remediate negative impacts		2024 Sustainability Report: Empowering our customers; Risk management; Compliance; Toward a climate-resilient world
2-26	Mechanisms for seeking advice and raising concerns		2024 Sustainability Report: Empowering our customers; Compliance; Risk management
2-27	Compliance with laws and regulations		Instances of noncompliance with laws or regulations are disclosed in the 2024 Annual Report and 10-K if they met the SEC's threshold for financial filing inclusion. For more information see Annual Report and 10-K: Note 20. Commitment, Contingencies and Guarantees.
2-28	Membership associations	Santander is a member of several trade associations at both the national and regional levels. We participate in these organizations to engage in the consideration of policy issues that are emerging within our industry. Our national memberships include the American Bankers Association, Institute of International Bankers, Bank Policy Institute and Consumer Bankers Association, among others.	
2-29	Approach to stakeholder engagement		2024 Sustainability Report: Stakeholder engagement; Double materiality assessment



GRI Standards: Topic-Specific Disclosures

Disclosure	Indicator	Comment	Reference				
Material top	Material topics						
GRI 3: Mate	rial topics						
3-1	Process to determine material topics		2024 Sustainability Report: Double materiality assessment				
3-2	List of material topics		2024 Sustainability Report: Double materiality assessment				
E1 - Climate	Change Change						
GRI 3: Mate	rial topics						
3-3	Management of material topics		<u>2024 Sustainability Report</u> : Double materiality assessment; Climate management; Climate materiality assessment; Supporting our customers in their transition goals; Reducing our environmental footprint; <u>Annual Report and 10-K: Item 1. Business</u> ; <u>Banco Santander Annual Report: Our objectives</u>				
GRI 201: Ecc	onomic performance						
201-2	Financial implications and other risks and opportunities due to climate change		2024 Sustainability Report: Climate management; Climate materiality assessment; Annual Report and 10-K: Item 1A. Risk Factors				
GRI 305: Em	GRI 305: Emissions						
305-1	Direct (Scope 1) GHG Emissions		2024 Sustainability Report: Santander US environmental metrics				



Indicator	Comment	Reference
Energy indirection (Scope 2) GHG Emissions		2024 Sustainability Report: Santander US environmental metrics
Other indirect (Scope 3) GHG emissions	Santander US does not currently calculate all financed emissions, which constitute a significant portion of Scope 3 emissions. As part of our ambition to work to achieve net zero carbon emissions, we are working toward calculation and reporting of Scope 3 emissions. Select sectoral emissions are reported at the Group level.	2024 Sustainability Report: Santander US environmental metrics; Banco Santander Annual Report: Our objectives
Climate targets and performance		2024 Sustainability Report: Santander US environmental metrics
Э		
Energy Consumption and efficiency		2024 Sustainability Report: Santander US environmental metrics
Energy Consumption outside the organization		2024 Sustainability Report: Santander US environmental metrics
Reduction of energy consumption		2024 Sustainability Report: Santander US environmental metrics
	Energy indirection (Scope 2) GHG Emissions Other indirect (Scope 3) GHG emissions Climate targets and performance gy Energy Consumption and efficiency Energy Consumption outside the organization	Energy indirection (Scope 2) GHG Emissions Other indirect (Scope 3) GHG emissions Santander US does not currently calculate all financed emissions, which constitute a significant portion of Scope 3 emissions. As part of our ambition to work to achieve net zero carbon emissions, we are working toward calculation and reporting of Scope 3 emissions. Select sectoral emissions are reported at the Group level. Climate targets and performance gy Energy Consumption and efficiency Energy Consumption outside the organization

Additional related topics covered under GRI 2-12 to 2-14 (Governance and Sustainability roles); GRI 2-22 to 2-24 (Strategy and Policies)

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GRI 3: Material topics

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3-3	Management of material topics	2024 Sustainability Report: Double materiality assessment; Culture,
		Engagement and Inclusion; People highlights; Engaging our employees; Supporting and rewarding employees; Annual Report and 10-K: Item 1.
		Business; Banco Santander Annual Report: Achievements of our 2024 priorities



Disclosure	Indicator	Comment	Reference					
GRI 401: Em	ployment							
401-1	New employee hires and employee turnover		ne du			tal number of employee turnover during reporting eriod Total number of employee turnover during reporting period		
			Under 30 Wome	n 196		339		
			Men	232		239		
			30 - 50 Wome			729		
			Men	300		494		
			Over 50 Wome			425		
		-	Men	83		259		
			TOTAL	1,127		2,485		
		В	ased on identification provided by	y employees.				
401-3	Parental leave		Total number of employees t entitled to parental leave		nale 88	Male 5,245	Totals 11,333	
			Total number of employees v parental leave	who took 154	1	128	282	
			Total number of employees vectors are to work in the reporting perior leave ended)	128	278	
			Total number of employees work after parental leave endemployed 12 months after the	ded that were still	3	126	274	
				Fer	nale	Male	е	
			Return to work and retention employees who took parenta		/ o	100	%	
		F E	Return to work and retention employees who took parenta were employed 12 months a return to work ¹	rates of 969 al leave and	6	98%		
		1	ased on identification provided by Based on internal methodol employed 12 months after r	ogy that assesses empl				



Disclosure	Indicator	Comment	Reference
GRI 403: Oc	cupational health and safety		
403-1	Occupational health and safety management system	Santander US has occupational health and safety management systems in place which operate and comply with all legal requirements with regard to risk prevention.	2024 Sustainability Report: Supporting and rewarding employees; Risk management
403-3	Occupational health services	Santander Corporate Security provides a safe environment for Santander Team Members and customers by identifying and managing security threats. Several reporting channels are available to team members, including a response hotline.	2024 Sustainability Report: Supporting and rewarding employees
403-4	Worker participation, consultation and communication on occupational health and safety		2024 Sustainability Report: Supporting and rewarding employees; Engaging our employees
403-6	Promotion of worker health		2024 Sustainability Report: Supporting and rewarding employees
GRI 404: Tra	nining and education		
404-1	Average hours of training per year per employee		2024 Sustainability Report: People highlights
404-2	Programs for upgrading employee skills and transition assistance programs		2024 Sustainability Report: People highlights
404-3	Percentage of employees receiving regular performance and career development reviews		2024 Sustainability Report: Supporting and rewarding employees



Disclosure	Indicator	Comment	Reference
GRI 405: Div	ersity and equal opportunity		
405-1	Diversity of governance bodies and employees		2024 Sustainability Report: Culture, Engagement and Inclusion; GRI 401; GRI 2-7
405-2	Ratio of basic salary and remuneration of women to men		2024 Sustainability Report: Culture, Engagement and Inclusion; Banco Santander Annual Report: Employees
GRI 406: No	n-discrimination		
406-1	Incidents of discrimination and corrective actions taken	Santander is committed to providing equal employment opportunity for all colleagues and applicants regardless of age, race, color, sex, gender, national origin, citizenship status, sexual orientation, religion, pregnancy, maternity, marital status, gender identity or expression, genetic information, disability, veteran status or any other status protected under federal, state or local law. All employees receive training on our Code of Conduct, which provides the framework for nondiscrimination across our operations. Colleagues may report complaints, including violation of the Code of Conduct, via multiple channels, including our 24/7, third-party Ethics Line or Portal. All complaints are confidential and may be anonymous. Complainants can track complaint status via the Portal. Upon receipt of any allegation of a violation, Santander conducts a prompt, thorough and impartial investigation. Violations of the Code are subject to appropriate discipline, up to and including termination of employment. Santander strictly prohibits retaliation against colleagues for reporting or assisting in an investigation. We maintain strong tracking and reporting capabilities to monitor compliance with key risk-mitigating controls in this area.	2024 Sustainability Report: Culture, Engagement and Inclusion



Disclosure	Indicator	Comment	Reference	
S3 – Affecte	ed Communities			
GRI 3: Mate	rial topics			
3-3	Management of material topics		2024 Sustainability Report: Double materiality assessment; Supporting customers and communities; Annual Report and 10-K: Item 1. Business	
GRI 413: Loc	cal communities			
413-1	Operations with local community engagement, impact assessments and development programs		2024 Sustainability Report: Supporting customers and communities	
413-2	Operations with significant actual and potential negative impacts on local communities	Santander US operations have no significant negative impact on the communities we serve and where we are located. Across our footprint we make a positive impact in communities by providing access to banking products and services, as well as through community partnerships, philanthropy and volunteerism. Potential for environmental impact of applicable products and services is assessed as required under our Environmental , Social and Climate Change Policy requirements.	2024 Sustainability Report: Climate management	
S4 – Consun	4 – Consumers and End-users			
GRI 416: Cus	GRI 416: Customer health and safety			
416-1	Assessment of the health and safety impacts of product and service categories	A designated committee assesses the potential impact of all new or significantly modified products and services prior to launch. Products and services are reviewed throughout their lifecycle to ensure they perform as planned.	2024 Sustainability Report: Empowering our customers	



Disclosure	Indicator	Comment	Reference		
GRI 417: Mai	GRI 417: Marketing and labeling				
417-1	Requirements for product and service information and labeling	A designated committee assesses the potential impact of all new or significantly modified products and services prior to launch. Products and services are reviewed throughout their lifecycle to ensure they perform as planned.	2024 Sustainability Report: Empowering our customers		
417-2	Incidents of non-compliance concerning product and service information and labeling	We report material non-compliance incidents in accordance with applicable regulatory requirements.			
417-3	Incidents of non-compliance concerning marketing communications	We report material non-compliance incidents in accordance with applicable regulatory requirements.			
GRI 18 Custo	omer Privacy				
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Santander has a robust program in place to respond to customer data complaints related to potential privacy breaches. The response program complies with applicable laws and regulations, including providing notices to affect individuals, regulators and other entities.			
G1- Business	G1- Business Conduct				
GRI 3: Mater	GRI 3: Material Topics				
3-3	Management of material topics		2024 Sustainability Report: Double materiality assessment; Stakeholder engagement; Responsible business; Banco Santander Annual Report: Looking Ahead		



Disclosure	Indicator	Comment	Reference
GRI 205: An	nti-corruption		
205-1	Operations assessed for risks related to corruption		2024 Sustainability Report: Risk management; Compliance; General Code of Conduct
205-2	Communication and training about anti-corruption policies and procedures		2024 Sustainability Report: Risk management; Compliance; General Code of Conduct
205-3	Confirmed incidents of corruption and actions taken		2024 Sustainability Report: Risk management; Compliance; General Code of Conduct

Additional GRI standards aligned to G1 – Business Conduct are previously reported under 2-23 (Policy commitment); 2-24 (Embedding policy commitments); 2-26 (mechanisms to seek advice and raise concern); 2-15 (Conflicts of interest); 2-6 (Activities, value chain and other relationships)



International Sustainability Standards Board (ISSB)

As part of our commitment to transparent, decision-useful non-financial reporting, Santander US has transitioned from Sustainability Accounting Standards Board (SASB) standards to the International Sustainability Standards Board (ISSB)'s IFRS S1 and S2 standards for this disclosure period.

The ISSB Standards, namely IFRS S1 (General Requirements for Disclosure of Sustainability -related Financial Information) and IFRS S2 (Climate-related Disclosures) represent a global baseline for sustainability disclosure and consolidate key elements from SASB, the Taskforce on Climate-Related Financial Disclosure and other leading frameworks. In addition to promoting important global alignment across Banco Santander and enhanced transparency, ISSB draws from SASB's metrics and structure, ensuring continuity with our previous disclosures.

This report is our first year of reporting informed by IFRS S1 and S2 and we acknowledge we are still working to align to specific recommendations of the ISSB framework, resulting in partial alignment to some recommendations. Where applicable we have mapped disclosures to SASB sector-specific metrics, including Industry Standards Version 2018-10 issued by SASB. The disclosures below have been selected based on their relevance to Santander US' mix of businesses and include Asset Management & Custody Activities (FN-AC), Commercial Banks (FN-CB), Consumer Finance (FN-CF) and Investment Banking & Brokerage (FN-IB). Unless otherwise noted, data and descriptions apply to our US-wide enterprise and businesses, not just to the business referenced in the sector standard. We remain committed to refining and enhancing reporting in line with leading practices and regulatory and investor expectations.

We do not disclose all metrics included in the referenced industry standards, but we will continue to evaluate additional metrics for future inclusion based on their relevance to key stakeholders. All data is as of and for the year ended December 31, 2024, unless otherwise noted.

Reference	Disclosure description	Sections and/or explanation
Governance		
IFRS S1-27(a)	The governance body(s) (which can include a board, committee or equivalent body charged with governance) or individual(s) responsible for oversight of sustainability- related risks and opportunities, including information about:	<u>2024 Sustainability Report</u> : Facilitating responsible growth; Effective governance; Experienced leadership and management; Sustainability governance framework; <u>SHUSA Board and US Leadership Team</u>
	(i) How responsibilities for sustainability-related risks and opportunities are reflected in the terms of reference, mandates, role descriptions and other related policies applicable to that body(s) or individual(s).	



Reference	Disclosure description	Sections and/or explanation
IFRS S1-27(a)	(ii) How the body(s) or individual(s) determines whether appropriate skills and competencies are available or will be developed to oversee strategies designed to respond to sustainability-related risks and opportunities.	<u>2024 Sustainability Report</u> : Facilitating responsible growth; Effective governance; Experienced leadership and management; <u>SHUSA Board and US Leadership Team</u>
	(iii) How and how often the body(s) or individual(s) is informed about sustainability- related risks and opportunities.	<u>2024 Sustainability Report</u> : Facilitating responsible growth; Effective governance; Experienced leadership and management; Sustainability governance framework; <u>SHUSA Board and US Leadership Team</u>
	(iv) How the body(s) or individual(s) takes into account sustainability-related risks and opportunities when overseeing the entity's strategy, its decisions on major transactions and its risk management processes and related policies, including whether the body(s) or individual(s) has considered trade-offs associated with those risks and opportunities.	<u>2024 Sustainability Report</u> : Facilitating responsible growth; Effective governance; Experienced leadership and management; Climate materiality assessment; Risk management
	(v) How the body(s) or individual(s) oversees the setting of targets related to sustainability-related risks and opportunities, and monitors progress towards those targets, including whether and how related performance metrics are included in remuneration policies.	Banco Santander Annual Report: Remuneration; Our climate transition plan
IFRS S1-27(b)	Management's role in the governance processes, controls and procedures used to monitor, manage and oversee sustainability-related risks and opportunities, including information about:	<u>2024 Sustainability Report</u> : Effective governance; Experienced leadership and management; Sustainability governance framework
	(i) Whether the role is delegated to a specific management-level position or management-level committee and how oversight is exercised over that position or committee.	
	(ii) Whether management uses controls and procedures to support the oversight of sustainability-related risks and opportunities and, if so, how these controls and procedures are integrated with other internal functions.	



Reference	Disclosure description	Sections and/or explanation
Strategy		
Sustainability-relate	ed Risks and Opportunities	
IFRS S1-30(a)	Sustainability-related risks and opportunities that could reasonably be expected to affect the entity's prospects.	<u>2024 Sustainability Report</u> : Advancing ourstrategy; Double materiality assessment; Materiality assessment – Detailed methodology; Climate management; Risk management; <u>Annual Report and 10-K: Item 1A. Risk Factors</u> ; <u>Banco Santander Annual Report: Our objectives</u>
IFRS S1-30(b)	The time horizons—short, medium or long term—over which the effects of each of those sustainability-related risks and opportunities could reasonably be expected to occur.	
IFRS S1-30(c)	How the entity defines "short term", "medium term" and "long term" and how these definitions are linked to the planning horizons used by the entity for strategic decision-making.	
Business Model and	Value Chain	
IFRS S1-32(a)	A description of the current and anticipated effects of sustainability-related risks and opportunities on the entity's business model and value chain.	<u>2024 Sustainability Report</u> : Double materiality assessment; Climate management; Risk management; Supporting our customers in their transition goals; <u>Annual Report and 10-K: Item 1A. Risk Factors</u> ; <u>Banco Santander Annual Report:</u> <u>Our objectives</u> ; <u>Achievement of our 2024 priorities</u>
IFRS S1-32(b)	A description of where in the entity's business model and value chain sustainability- related risks and opportunities are concentrated.	
Strategy and Decision	on-making	
IFRS S1-33(a)	How the entity has responded to, and plans to respond to, sustainability-related risks and opportunities in its strategy and decision-making.	2024 Sustainability Report: Supporting our customers in their transition goals; Reducing our environmental footprint; Banco Santander Annual Report: Our objectives
IFRS S1-33(b)	The progress against plans the entity has disclosed in previous reporting periods, including quantitative and qualitative information.	
IFRS S1-33(c)	Trade-offs between sustainability-related risks and opportunities that the entity considered.	



Reference	Disclosure description	Sections and/or explanation
Financial Position, Fi	nancial Performance and Cash Flows	
IFRS S1-34(a)	The effects of sustainability-related risks and opportunities on the entity's financial position, financial performance and cash flows for the reporting period (current financial effects).	<u>2024 Sustainability Report</u> : Supporting our customers in their transition goals; Climate management; Risk management; We continue to assess this requirement in light of US and other regulatory requirements. Information on financial condition is contained in the <u>Annual Report and 10-K</u> .
IFRS S1-34(b)	The anticipated effects of sustainability-related risks and opportunities on the entity's financial position, financial performance and cash flows over the short, medium and long term, taking into consideration how sustainability-related risks and opportunities are included in the entity's financial planning (anticipated financial effects).	<u>2024 Sustainability Report</u> : Supporting our customers in their transition goals; Climate management; Risk management; We continue to assess this requirement in light of US and other regulatory requirements. Information on financial condition is contained in the <u>Annual Report and 10-K</u> .
IFRS S1-35(a)	Quantitative and qualitative information about how sustainability-related risks and opportunities have affected its financial position, financial performance and cash flows for the reporting period.	
IFRS S1-35(b)	Quantitative and qualitative information about the sustainability-related risks and opportunities identified for which there is a significant risk of a material adjustment within the next annual reporting period to the carrying amounts of assets and liabilities reported in the related financial statements.	
IFRS S1-35(c)	Quantitative and qualitative information about how the entity expects its financial position to change over the short, medium and long term, given its strategy to manage sustainability related risks and opportunities, taking into consideration:	
	(i) Its investment and disposal plans, including plans the entity is not contractually committed to.	
	(ii) Its planned sources of funding to implement its strategy.	
IFRS S1-35(d)	Quantitative and qualitative information about how the entity expects its financial performance and cash flows to change over the short, medium and long term, given its strategy to manage sustainability-related risks and opportunities.	
Resilience		



Reference	Disclosure description	Sections and/or explanation
IFRS S1-41	A qualitative and, if applicable, quantitative assessment of the resilience of its strategy and business model in relation to its sustainability-related risks, including information about how the assessment was carried out and its time horizon.	2024 Sustainability Report: Disclaimer; Climate management; Risk management; Supporting our customers in their transition goals; Banco Santander Annual Report: Resilience of our strategy and business model to climate change
Risk Management		
IFRS S1-44(a)	The processes and related policies the entity uses to identify, assess, prioritise and monitor sustainability-related risks, including information about:	
	(i) The inputs and parameters the entity uses (for example, information about data sources and the scope of operations covered in the processes).	2024 Sustainability Report: Risk management; Climate management; Annual Report and 10-K: Item 1A. Risk Factors; Banco Santander policies, including Environmental, Social and Climate Change Risk Policy, Responsible Banking and Sustainability Policy; Banco Santander Annual Report: Embedding ESG in risk management
	(ii) Whether and how the entity uses scenario analysis to inform its identification of sustainability-related risks.	
	(iii) How the entity assesses the nature, likelihood and magnitude of the effects of those risks.	
	(iv) Whether and how the entity prioritises sustainability-related risks relative to other types of risk.	
	(v) How the entity monitors sustainability-related risks.	
	(vi) Whether and how the entity has changed the processes it uses compared with the previous reporting period.	
IFRS S1-44(b)	The processes the entity uses to identify, assess, prioritise and monitor sustainability- related opportunities.	
IFRS S1-44(c)	The extent to which, and how, the processes for identifying, assessing, prioritising and monitoring sustainability-related risks and opportunities are integrated into and inform the entity's overall risk management process.	



Reference	Disclosure description	Sections and/or explanation
Metrics and Targets		
IFRS S1-46(a)	Metrics required by an applicable IFRS Sustainability Disclosure Standard for each sustainability-related risk and opportunity that could reasonably be expected to affect the entity's prospects.	2024 Sustainability Report: Santander US environmental metrics; Banco Santander Annual Report: Our objectives
IFRS S1-46(b)	Metrics the entity uses to measure and monitor that sustainability-related risk or opportunity and its performance in relation to that sustainability-related risk or opportunity, including progress towards any targets the entity has set, and any targets it is required to meet by law or regulation.	
IFRS S1-51(a)	The metric used to set the target and to monitor progress towards reaching the target.	
IFRS S1-51(b)	The specific quantitative or qualitative target the entity has set or is required to meet.	
IFRS S1-51(c)	The period over which the target applies.	
IFRS S1-51(d)	The base period from which progress is measured.	
IFRS S1-51(e)	Any milestones and interim targets.	
IFRS S1-51(f)	Performance against each target and an analysis of trends or changes in the entity's performance.	
IFRS S1-51(g)	Any revisions to the target and an explanation for those revisions.	



Reference	Disclosure description	Sections and/or explanation
ISSB's IFRS S2 Clim	ate-related Disclosures	
Governance		
IFRS S2-6(a)	The governance body(s) (which can include a board, committee or equivalent body charged with governance) or individual(s) responsible for oversight of climate-related risks and opportunities. Specifically, the entity shall identify that body(s) or individual(s) and disclose information about:	2024 Sustainability Report: Facilitating responsible growth; Effective governance; Experienced leadership and management; Sustainability governance framework; SHUSA Board and US Leadership Team; Banco Santander Annual Report: Sustainability governance
	(i) How responsibilities for climate-related risks and opportunities are reflected in the terms of reference, mandates, role descriptions and other related policies applicable to that body(s) or individual(s).	
IFRS S2-6(a)	(ii) How the body(s) or individual(s) determines whether appropriate skills and competencies are available or will be developed to oversee strategies designed to respond to climate-related risks and opportunities.	<u>2024 Sustainability Report</u> : Facilitating responsible growth; Effective governance; Experienced leadership and management; Sustainability governance framework; <u>SHUSA Board and US Leadership Team</u> ; <u>Banco Santander Annual Report: Sustainability governance</u>
	(iii) How and how often the body(s) or individual(s) is informed about climate-related risks and opportunities.	
	(iv) How the body(s) or individual(s) takes into account climate-related risks and opportunities when overseeing the entity's strategy, its decisions on major transactions and its risk management processes and related policies, including whether the body(s) or individual(s) has considered trade-offs associated with those risks and opportunities.	
	(v) How the body(s) or individual(s) oversees the setting of targets related to climate-related risks and opportunities, and monitors progress towards those targets, including whether and how related performance metrics are included in remuneration policies.	



Reference	Disclosure description	Sections and/or explanation
IFRS S2-6(b)	Management's role in the governance processes, controls and procedures used to monitor, manage and oversee climate-related risks and opportunities, including information about:	<u>2024 Sustainability Report</u> : Effective governance; Experienced leadership and management; Sustainability governance framework; <u>Banco Santander Annual Report: Sustainability governance</u>
	(i) Whether the role is delegated to a specific management-level position or management-level committee and how oversight is exercised over that position or committee.	
	(ii) Whether management uses controls and procedures to support the oversight of climate-related risks and opportunities and, if so, how these controls and procedures are integrated with other internal functions.	
Strategy		
IFRS S2-9 (a)	The climate-related risks and opportunities that could reasonably be expected to affect the entity's prospects.	<u>2024 Sustainability Report</u> : Risk management; Climate management; Double materiality assessment; Supporting our customers in their transition goals; <u>Annual Report and 10-K: Item 1A. Risk Factors</u> ; <u>Banco Santander Annual Report: Our objectives</u> ; <u>Embedding ESG in risk management</u>
IFRS S2-9 (b)	The current and anticipated effects of those climate-related risks and opportunities on the entity's business model and value chain.	
IFRS S2-9 (c)	The effects of those climate-related risks and opportunities on the entity's strategy and decision-making, including information about its climate-related transition plan.	
IFRS S2-9 (d)	The effects of those climate-related risks and opportunities on the entity's financial position, financial performance and cash flows for the reporting period, and their anticipated effects on the entity's financial position, financial performance and cash flows over the short, medium and long term, taking into consideration how those climate-related risks and opportunities have been factored into the entity's financial planning.	
IFRS S2-9 (e)	The climate resilience of the entity's strategy and its business model to climate-related changes, developments and uncertainties, taking into consideration the entity's identified climate-related risks and opportunities.	



Reference	Disclosure description	Sections and/or explanation
Climate-related Risi	ks and Opportunities	
IFRS S2-10(a)	Climate-related risks and opportunities that could reasonably be expected to affect the entity's prospects.	<u>2024 Sustainability Report</u> : Supporting our customers in their transition goals; Climate management; Risk management; Double materiality assessment; <u>Annual Report and 10-K: Item 1A. Risk Factors</u> ; <u>Banco Santander Annual Report:</u> <u>Embedding ESG in risk management</u>
IFRS S2-10(b)	For each climate-related risk the entity has identified, whether the entity considers the risk to be a climate-related physical risk or climate-related transition risk.	
IFRS S2-10(c)	For each climate-related risk and opportunity the entity has identified, over which time horizons—short, medium or long term—the effects of each climate-related risk and opportunity could reasonably be expected to occur.	
IFRS S2-10(d)	How the entity defines 'short term', 'medium term' and 'long term' and how these definitions are linked to the planning horizons used by the entity for strategic decision-making.	
IFRS S2-13(a)	A description of the current and anticipated effects of climate-related risks and opportunities on the entity's business model and value chain.	
IFRS S2-13(b)	A description of where in the entity's business model and value chain climate-related risks and opportunities are concentrated.	
Strategy and Decision	on-making	
IFRS S2-14(a)	How the entity has responded to, and plans to respond to, climate-related risks and opportunities in its strategy and decision-making, including how the entity plans to achieve any climate-related targets it has set and any targets it is required to meet by law or regulation, including the information about:	2024 Sustainability Report: Santander US environmental metrics; Banco Santander Annual Report: Our objectives
	(i) current and anticipated changes to the entity's business model, including its resource allocation, to address climate-related risks and opportunities.	



Reference	Disclosure description	Sections and/or explanation
IFRS S2-14(a)	(ii) current and anticipated direct mitigation and adaptation efforts.	2024 Sustainability Report: Santander US environmental metrics; Banco Santander Annual Report: Our climate transition plan
	(iii) current and anticipated indirect mitigation and adaptation efforts.	
	(iv) any climate-related transition plan the entity has, including information about key assumptions used in developing its transition plan, and dependencies on which the entity's transition plan relies.	
	(v) How the entity plans to achieve any climate-related targets, including any greenhouse gas emissions targets, described.	
IFRS S2-14(b)	Information about how the entity is resourcing, and plans to resource, the activities disclosed in accordance with 14(a).	
IFRS S2-14(c)	Quantitative and qualitative information about the progress of plans disclosed in previous reporting periods in accordance with 14(a).	
Financial Position, Fina	ancial Performance and Cash Flows	
IFRS S2-15(a)	The effects of climate-related risks and opportunities on the entity's financial position, financial performance and cash flows for the reporting period.	2024 Sustainability Report: Supporting our customers in their transition goals; Climate management; Risk management; Annual Report and 10-K
IFRS S2-15(b)	The anticipated effects of climate-related risks and opportunities on the entity's financial position, financial performance and cash flows over the short, medium and long term, taking into consideration how climate-related risks and opportunities are included in the entity's financial planning.	We continue to assess this requirement in light of US and other regulatory requirements. Information on financial condition is contained in the Annual Report and 10-K.
IFRS S2-16(a)	How climate-related risks and opportunities have affected its financial position, financial performance and cash flows for the reporting period.	2024 Sustainability Report: Supporting our customers in their transition goals; Climate management; Risk management; Annual Report and 10-K



Reference	Disclosure description	Sections and/or explanation
IFRS S2-16(b)	The climate-related risks and opportunities identified in for which there is a significant risk of a material adjustment within the next annual reporting period to the carrying amounts of assets and liabilities reported in the related financial statements.	We continue to assess this requirement in light of US and other regulatory requirements. Information on financial condition is contained in the <u>Annual Report and 10-K</u> .
IFRS S2-16(c)	How the entity expects its financial position to change over the short, medium and long term, given its strategy to manage climate-related risks and opportunities, taking into consideration:	We continue to assess this requirement in light of US and other regulatory requirements. Information on financial condition is contained in the Annual Report and 10-K.
	(i) Its investment and disposal plans, including plans the entity is not contractually committed to.	
	(ii) Its planned sources of funding to implement its strategy.	
IFRS S2-16(d)	How the entity expects its financial performance and cash flows to change over the short, medium and long term, given its strategy to manage climate-related risks and opportunities.	
Climate Resilience		
IFRS S2-22(a)	The entity's assessment of its climate resilience as at the reporting date, including:	<u>2024 Sustainability Report</u> : Disclaimer; Climate management; Risk management; Supporting our customers in their transition goals; <u>Banco Santander Annual Report: Embedding ESG in risk management</u>
	(i) The implications, if any, of the entity's assessment for its strategy and business model, including how the entity would need to respond to the effects identified in the climate-related scenario analysis.	



Reference	Disclosure description	Sections and/or explanation
IFRS S2-22(a)	(ii) The significant areas of uncertainty considered in the entity's assessment of its climate resilience.	<u>2024 Sustainability Report</u> : Disclaimer; Climate management; Risk management; Supporting our customers in their transition goals; <u>Annual Report and 10-K</u> ; <u>Banco Santander Annual Report: Resilience of our strategy and business model to climate change</u>
	(iii) The entity's capacity to adjust or adapt its strategy and business model to climate change over the short, medium and long term, including:	
	(1) The availability of, and flexibility in, the entity's existing financial resources to respond to the effects identified in the climate-related scenario analysis, including to address climate-related risks and to take advantage of climate-related opportunities.	
	(2) the entity's ability to redeploy, repurpose, upgrade or decommission existing assets.	
	(3) the effect of the entity's current and planned investments in climate-related mitigation, adaptation and opportunities for climate resilience.	
	(b) How and when the climate-related scenario analysis was carried out, including the information about:	Banco Santander performs climate scenario analysis at the Group level. For more detail see <u>Banco Santander Annual</u> <u>Report: Internal climate models</u> . Santander US began additional climate scenario analysis work in 2024.
	(i) The inputs the entity used, including:	
	(1) Which climate-related scenarios the entity used for the analysis and the sources of those scenarios.	
	(2) Whether the analysis included a diverse range of climate-related scenarios.	
	(3) Whether the climate-related scenarios used for the analysis are associated with climate-related transition risks or climate-related physical risks.	
	(4) Whether the entity used, among its scenarios, a climate-related scenario aligned with the latest international agreement on climate change.	



Reference	Disclosure description	Sections and/or explanation
IFRS S2-22(a)	(5) Why the entity decided that its chosen climate-related scenarios are relevant to assessing its resilience to climate-related changes, developments or uncertainties.	Banco Santander performs climate scenario analysis at the Group level. For more detail see <u>Banco Santander Annual</u> <u>Report: Internal climate models</u> . Santander US began additional climate scenario analysis work in 2024.
	(6) The time horizons the entity used in the analysis.	
	(7) What scope of operations the entity used in the analysis.	
	(ii) The key assumptions the entity made in the analysis, including assumptions about:	
	(1) Climate-related policies in the jurisdictions in which the entity operates.	
	(2) Macroeconomic trends.	
	(3) National- or regional-level variables.	
	(4) Energy usage and mix.	
	(5) Developments in technology.	
	(iii) The reporting period in which the climate-related scenario analysis was carried out.	
Risk Management		
IFRS S2-25(a)	The processes and related policies the entity uses to identify, assess, prioritise and monitor climate-related risks, including information about:	2024 Sustainability Report: Climate management; Risk management; Banco Santander Annual Report: Embedding ESG in risk management
	(i) the inputs and parameters the entity uses.	



Reference	Disclosure description	Sections and/or explanation
IFRS S2-25(a)	(ii) whether and how the entity uses climate-related scenario analysis to inform its identification of climate-related risks.	See <u>IFRS S2-22(a)</u>
	(iii) how the entity assesses the nature, likelihood and magnitude of the effects of those risks.	2024 Sustainability Report: Climate management; Risk management; Double materiality assessment; Banco Santander Annual Report: Embedding ESG in risk management; Achievement of our 2024 priorities
	(iv) whether and how the entity prioritises climate-related risks relative to other types of risk.	
	(v) how the entity monitors climate-related risks.	
	(vi) whether and how the entity has changed the processes it uses compared with the previous reporting period.	
IFRS S2-25(b)	(b) the processes the entity uses to identify, assess, prioritise and monitor climate- related opportunities, including information about whether and how the entity uses climate-related scenario analysis to inform its identification of climate-related opportunities.	
IFRS S2-25(c)	(c) the extent to which, and how, the processes for identifying, assessing, prioritising and monitoring climate-related risks and opportunities are integrated into and inform the entity's overall risk management process.	
Metrics and Targets		
Climate-related Metrics		
IFRS S2-29(a)	Information relevant to the cross-industry metric categories of greenhouse gases, including:	



Reference	Disclosure description	Sections and/or explanation
IFRS S2-29(a)	(i) disclose its absolute gross greenhouse gas emissions generated during the reporting period, expressed as metric tonnes of CO2 equivalent, classified as:	2024 Sustainability Report: Santander US environmental metrics; Banco Santander Annual Report: Our environmental footprint; Our objectives
	(1) Scope 1 greenhouse gas emissions.	
	(2) Scope 2 greenhouse gas emissions.	
	(3) Scope 3 greenhouse gas emissions.	
	(ii) Measure its greenhouse gas emissions in accordance with the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004) unless required by a jurisdictional authority or an exchange on which the entity is listed to use a different method for measuring its greenhouse gas emissions.	
	(iii) The approach used to measure its greenhouse gas emissions, including:	
	(1) The measurement approach, inputs and assumptions the entity uses to measure its greenhouse gas emissions.	
	(2) The reason why the entity has chosen the measurement approach, inputs and assumptions it uses to measure its greenhouse gas emissions.	
	(3) Any changes the entity made to the measurement approach, inputs and assumptions during the reporting period and the reasons for those changes.	
	(iv) For Scope 1 and Scope 2 greenhouse gas emissions disclosed in accordance with paragraph $29(a)(i)(1)-(2)$, disaggregate emissions between:	



ner investees excluded from paragraph 29(a)(iv)(1). sation-based Scope 2 greenhouse gas emissions, and information about any contractual ments that is necessary to inform users' understanding of the entity's Scope 2 greenhouse missions.	2024 Sustainability Report: Santander US environmental metrics; Banco Santander Annual Report: Our environmental footprint; Our objectives
ration-based Scope 2 greenhouse gas emissions, and information about any contractual ments that is necessary to inform users' understanding of the entity's Scope 2 greenhouse	
ments that is necessary to inform users' understanding of the entity's Scope 2 greenhouse	
Scope 3 greenhouse gas emissions, disclose:	
e categories included within the entity's measure of Scope 3 greenhouse gas emissions, ordance with the Scope 3 categories described in the Greenhouse Gas Protocol Corporate Chain (Scope 3) Accounting and Reporting Standard (2011).	
ditional information about the entity's Category 15 greenhouse gas emissions or those ated with its investments (financed emissions), if the entity's activities include asset gement, commercial banking or insurance.	
te-related transition risks—the amount and percentage of assets or business activities rable to climate-related transition risks.	2024 Sustainability Report: Climate management; Banco Santander Annual Report: Embedding ESG in risk management
te-related physical risks—the amount and percentage of assets or business activities rable to climate-related physical risks.	
te-related opportunities—the amount and percentage of assets or business activities d with climate-related opportunities.	2024 Sustainability Report: Supporting our customers in their transition goals; Sustainable finance classification and governance; Responsible wealth management and investment services; Electric vehicle lending; Banco Santander Annual Report: Supporting our customers in their transition goal
l deployment—the amount of capital expenditure, financing or investment deployed ds climate-related risks and opportunities.	
dil di	rategories included within the entity's measure of Scope 3 greenhouse gas emissions, dance with the Scope 3 categories described in the Greenhouse Gas Protocol Corporate hain (Scope 3) Accounting and Reporting Standard (2011). Itional information about the entity's Category 15 greenhouse gas emissions or those led with its investments (financed emissions), if the entity's activities include asset lement, commercial banking or insurance. Interest transition risks—the amount and percentage of assets or business activities also be to climate-related transition risks. Interest transition risks—the amount and percentage of assets or business activities also be to climate-related physical risks. Interest transition risks—the amount and percentage of assets or business activities also be to climate-related physical risks. Interest transition risks—the amount and percentage of assets or business activities also be to climate-related physical risks. Interest transition risks—the amount and percentage of assets or business activities with climate-related opportunities.



Reference	Disclosure description	Sections and/or explanation
IFRS S2-29(f)	Internal carbon prices—the entity shall disclose:	Banco Santander Annual Report: Internal carbon pricing
	(i) an explanation of whether and how the entity is applying a carbon price in decision-making.	
	(ii) the price for each metric tonne of greenhouse gas emissions the entity uses to assess the costs of its greenhouse gas emissions.	
IFRS S2-29(g)	Remuneration, including the information about:	Banco Santander Annual Report: Integration of sustainability-related performance in incentive schemes
	(i) a description of whether and how climate-related considerations are factored into executive remuneration.	
	(ii) the percentage of executive management remuneration recognised in the current period that is linked to climate-related considerations.	
Climate-related Targets		
IFRS S2-33(a)	The metric used to set the quantitative and qualitative climate-related targets.	Banco Santander Annual Report: Our objectives
IFRS S2-33(b)	The objective of the target.	
IFRS S2-33(c)	The part of the entity to which the target applies.	
IFRS S2-33(d)	The period over which the target applies.	
IFRS S2-33(e)	The base period from which progress is measured.	



Reference	Disclosure description
IFRS S2-33(f)	Any milestones and interim targets.
IFRS S2-33(g)	If the target is quantitative, whether it is an absolute target or an intensity target.
IFRS S2-33(h)	How the latest international agreement on climate change, including jurisdictional commitments that arise from that agreement, has informed the target.
IFRS S2-34(a)	Whether the target and the methodology for setting the target has been validated by a third party.
IFRS S2-34(b)	The entity's processes for reviewing the target.
IFRS S2-34(c)	The metrics used to monitor progress towards reaching the target.
IFRS S2-34(d)	Any revisions to the target and an explanation for those revisions.
IFRS S2-35	An entity shall disclose information about its performance against each climate- related target and an analysis of trends or changes in the entity's performance.
IFRS S2-36(a)	Which greenhouse gases are covered by the target.
IFRS S2-36(b)	Whether Scope 1, Scope 2 or Scope 3 greenhouse gas emissions are covered by the target.

Sections and/or explanation

Banco Santander Annual Report: Our transition plan; Our objectives



Reference	Disclosure description	Sections and/or explanation
IFRS S2-36(c)	Whether the target is a gross greenhouse gas emissions target or net greenhouse gas emissions target. If the entity discloses a net greenhouse gas emissions target, the entity has been also required to separately disclose its associated gross greenhouse gas emissions target.	2024 Sustainability Report: Santander US environmental metrics; Banco Santander Annual Report: Our transition plan; Internal carbon pricing; GHG mitigation projects financed through carbon credits; Our objectives
IFRS S2-36(d)	Whether the target was derived using a sectoral decarbonisation approach.	
IFRS S2-36(e)	The entity's planned use of carbon credits to offset greenhouse gas emissions to achieve any net greenhouse gas emissions target. In explaining its planned use of carbon credits the entity shall disclose information:	
	(i) the extent to which, and how, achieving any net greenhouse gas emissions target relies on the use of carbon credits.	
	(ii) which third-party scheme(s) will verify or certify the carbon credits.	
	(iii) the type of carbon credit, including whether the underlying offset will be nature- based or based on technological carbon removals, and whether the underlying offset is achieved through carbon reduction or removal.	
	(iv) any other factors necessary for users of general purpose financial reports to understand the credibility and integrity of the carbon credits the entity plans to use.	



SASB Sector-Specific Standards Content Index

Reference	Disclosure description	Sections and/or explanation
Data security		
FN-CB-230a.1 FN-CF-230a.1	Number of data breaches Percentage involving personally identifiable information (PII) Number of account holders affected	Santander US did not experience a material data breach in 2024. However, it was impacted by a breach that occurred at Banco Santander. Customer data was not subject to the breach.
IFRS S2-36(b)	Description of approach to identifying and addressing data security risks	2024 Sustainability Report: Information security and privacy; Risk management; Annual Report and 10-K: Item 1C. Cybersecurity; Banco Santander Annual Report: Privacy, data protection and cybersecurity
Financial Inclusion &	Capacity Building	
FN-CB-240a.1	Amount of loans outstanding that qualified for programs designed to promote small business and community development	2024 Sustainability Report: Santander US community plan; Community development finance; Small business; Banco Santander Annual Report: Financial inclusion and financial health
FN-CB-240a.3	Number of no-cost retail checking accounts provided to previously unbanked or underbanked customers	2024 Sustainability Report: Empowering our customers (As of the end of February 2025, there were 23,041 Santander Essential checking accounts.); Banco Santander Annual Report: Financial inclusion and financial health
FN-CB-240a.4	Number of participants in financial literacy initiatives for unbanked, underbanked or underserved customers	2024 Sustainability Report: Customer and community highlights; Banco Santander Annual Report: Financial inclusion and financial health
Incorporation of ESC	Factors in Credit Analysis	
FN-CB-410a.2 FN-IB-410a.3 FN-AC-410a.2	Description of approach to incorporation of environmental, social and governance (ESG) factors in credit analysis	2024 Sustainability Report: Toward a climate-resilient world; Climate management; Risk management; Responsible wealth management and investment services; Banco Santander Annual Report: Embedding ESG in risk management



Reference	Disclosure description	Sections and/or explanation
FN-IB-410a.2	(1) Number and (2) total value of investments and loans incorporating integration of ESG factors by industry	2024 Sustainability Report: Supporting our customers in their transition goals
Business Ethics		
SASB.FN-AC-270a.1 SASB.FN-AC-510a.2 SASB.FN-CB-510a.2 SASB.FN-CF-270a.1 SASB.FN-IB-510a.2 SASB.FN-IB-510b.4	Description of approach to ensuring professional integrity, including duty of care	2024 Sustainability Report: Responsible business; Santander Group Policies (especially General Code of Conduct); Banco Santander Annual Report: Business conduct
Systemic Risk Management		
FN-CB-550a.1 FN-IB-550a.1	Global Systemically Important Bank (G-SIB) score by category	Banco Santander is a global systemically important bank. <u>G-SIB Scores</u> , <u>Annual Report and 10-K</u>
FN-CB-550a.2 FN-IB-550a.2	Description of approach to integrate results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy and other business activities	Santander Holdings USA participates in the annual FRB stress tests. SHUSA utilizes scenarios provided by the Federal Reserve as well as an internally generated stress scenario. SHUSA also completes multiple additional internal and regulatory stress tests including: stress of strategic plan, BSSA's Internal Capital Adequacy Assessment Process (ICAAP) and the European Central Bank's stress tests as required. Stress test results are incorporated into strategic planning, ongoing capital adequacy assessments and performance monitoring. For more information, see Federal Reserve Board of Governors .
Employee Diversity & Inclusion		
FN-AC-330a.1 FN-IB-330a.1	Percentage of gender and diversity group representation for (1) executive management, (2) non-executive management, (3) professionals and (4) all other employees	GRI 2-7; Banco Santander Annual Report: Inclusive culture
FN-CB-000.B	 Number of loans by segment Value of loans by segment: (a) personal, (b) small business and (c) corporate 	Annual Report and 10-K



For more information

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Santander Bank









Santander Consumer USA





