

Santander Financial Services plc Financial Crime Statement

Santander Financial Services plc (SFS) is committed to deterring, detecting and disrupting financial crime. Our policies and controls are designed to ensure that financial crime risks are identified, appropriately mitigated and managed. These policies and controls, together with our anti-financial crime strategy, seek to promote responsible and sustainable commercial growth, protect our communities and foster prosperity.

Company details

SFS is a public limited company registered in England with branches operating in the Isle of Man and Jersey. SFS is authorised and regulated by the UK Prudential Regulation Authority (PRA) and regulated by the Financial Conduct Authority (FCA) in the UK, the Isle of Man Financial Services Authority (IOMFSA) in the Isle of Man & the Jersey Financial Services Commission (JFSC) in Jersey. The FCA, IOMFSA and JFSC are the designated anti-money laundering and counter terrorist financing (AML/CTF) supervisors for the financial services industry and undertake periodic supervisory visits of the firms which it regulates, including SFS.

SFS plc is wholly owned by Santander UK Group Holdings Limited, which is in turn wholly owned by Banco Santander, S.A.. Banco Santander, S.A. is authorised by the PRA, the FCA and Banco De España. It is listed on the main regulated market of the London Stock Exchange and the Bolsa de Madrid.

Banco Santander S.A. is a founding member of the [Wolfsberg Group](#), an association of thirteen global banks that aims to develop financial services industry standards to counter financial crime.

Summary of the SFS approach to financial crime

SFS recognises the damaging impact financial crime has on our society, communities and customers. We understand our role in deterring, detecting and disrupting it. To this end, SFS is committed to complying with all applicable financial crime regulations and legislation, including sanctions laws and regulations, that prevent it from being used to facilitate terrorist financing, money laundering, bribery, corruption and tax evasion.

SFS is committed to conducting business in accordance with the highest ethical standards. We believe that having a comprehensive and effective financial crime framework through policies, as well as, appropriate systems and controls to prevent and detect illicit or sanctioned activity is a business imperative and a positive investment that protects SFS plc from legal, regulatory and reputational risks.

Our financial crime framework determines our approach to collecting and safely storing customer information and explains why we request certain documentation from our customers at the point of opening a bank account, or thereafter if additional information is needed.

The framework includes policies and standards that apply to all business areas within SFS and our employees, agents, consultants and contractors, as well as entities that may be owned or part-owned by SFS. These have been developed to comply with UK/EU/Isle of Man/Jersey legislation, FATF recommendations and the legal regime applicable to other jurisdictions in which SFS operates or conducts business. Our framework covers (but is not limited to):

- Risk-based requirements for identifying and verifying the customer, understanding the nature and purpose of the business relationship, and performing due diligence so as to explain and mitigate associated financial crime risks.
- Risk-based periodic or event driven reviews of business relationships.
- Business level risk assessments for sanctions, AML/CTF and other financial crime risks.
- Country risk ratings. SFS classifies certain jurisdictions as high risk in compliance with EU/UK law and having regard to national and international findings in relation to jurisdictions' corruption levels, crime, drug trafficking, modern slavery, illegal wildlife trafficking levels or indications of support for terrorism and nuclear arms proliferation.
- Processes (including transaction monitoring) for detecting, investigating and reporting suspicious activity.
- Customer and payment screening requirements to identify prospective sanctions matches in compliance with UK, European or US (OFAC) sanctions legislation and processes for escalating and reporting any true matches identified.
- Governance arrangements (including the appointment of a Money Laundering Reporting Officer and Money Laundering Compliance Officer) that clearly describe accountabilities, responsibilities and escalation routes.
- Training requirements for the business, including specialised training for certain business areas.
- Oversight monitoring, record-keeping, information sharing and management information requirements.
- Provisions for the regular (at least annual) review of our policies and standards.

Our controls are designed to effectively manage and monitor financial crime risk and ensure that financial crime risk is managed within the SFS' financial crime risk appetite, hence effectively reducing the risk of SFS being used in connection with financial crime.

SFS is committed to the most effective response to Anti-Money Laundering (AML) and Counter Terrorist Financing (CTF). Our financial crime risk appetite requires application of robust system and controls to manage the risks, taking all reasonable steps to manage any residual money laundering and terrorist financing risks. SFS will not conduct business with individuals or entities that are subject to sanctions regulations, that would violate SFS or Banco Santander Sanctions Policy or that it believes are engaged in illicit activity. SFS has no appetite for establishing or maintaining relationships with customers associated with Money Laundering or

Terrorist Financing offences.

SFS' Chief Executive Officer, Board of Directors and Senior Management Team are committed to their responsibilities under UK, Jersey and Isle of Man law and regulations to reduce the extent to which it is possible for SFS to be used for a purpose connected with financial crime, and to protect the interests of its customers and staff.

Santander Financial Services plc Anti-Financial Crime (AFC) Strategy

Our AFC Strategy is based around our aspiration to be least attractive to criminals, to be seen as a safe bank by our customers and community, and to meet and exceed regulatory expectations by having a collective, forward looking and informed view to managing financial crime risks.

The Strategy instils this aspiration across our organisation, and our mission statement outlines our commitment to deter, detect and disrupt financial crime and our aim to protect our customers and communities from financial crime, fostering prosperity.

We implement the Strategy through innovation, collaboration and education in order to give colleagues the right tools to combat financial crime, and to share and learn from success stories.

We also leverage partnerships with industry, industry bodies, non-governmental organisations, charities, government and other stakeholders where appropriate to help protect the UK financial services sector.

We can and do, where legislation permits, share information about the latest financial crime threats - and are members of relevant Finance groups in the jurisdictions where we operate, through which we share best practice and hone our approach to policy and regulatory requirements in a manner compliant with applicable competition laws.

AML/CTF Statement

SFS has established anti money laundering and counter terrorist finance policies and standards. These follow a risk based approach and are subject to annual and ongoing review to combat money laundering and terrorist financing risks. These cover the following specifically:

- Comprehensive, risk-based Customer Due Diligence and Know Your Customer.
- Identification of financial crime risks pertaining to each business area and to our customers, and the adoption of higher risk ratings and consequently Enhanced Due Diligence processes when and where appropriate.
- Criteria and measures for Enhanced Due Diligence concerning customers who are judged to present higher financial crime risks.
- Establishing and maintaining standards and records for managing information related to financial

crime.

- Providing a financial crime training and education programme, covering trainings designed to ensure relevant employees are aware of their legal obligations relating to deterring, detecting, and disrupting financial crime.
- Complying with FATF Recommendation 16 and the Information on the Payer (Wire Transfer) Regulations in relation to wire transfers.

SFS' policies and standards are subject to independent and continuous review by the Financial Crime Compliance Team and Group Internal Audit departments to test business controls in situ and confirm their effectiveness. We are also subject to relevant testing by external auditors, regulators and oversight by the Unidad Corporativa Inteligencia Financiera (Central Anti-Money Laundering Department) of our Global Parent, Banco Santander, S.A. to confirm consistency and adherence to global operating standards.

We do not offer anonymous accounts and guard against establishing correspondent account relationships with shell banks or with correspondent banks that permit the use of their accounts by shell banks, among other types of restricted or prohibited activity.

SFS has appointed a Money Laundering Reporting Officers (MLROs) in the UK, Jersey and the Isle of Man. This is in accordance with its regulatory and criminal law obligations. The UK MLRO is also SFS' appointed Anti-Bribery and Corruption Officer and is responsible for oversight of the SFS control framework on preventing the facilitation of tax evasion. The Jersey and Isle of Man MLROs report to the Managing Directors of the respective branches and are required to deliver an annual report to the Executive Committee and Board.

Sanctions Statement

SFS is fully aligned with local regulatory frameworks and comply with applicable sanctions regimes, which are at a minimum those of the United Kingdom, Jersey, the Isle of Man, the European Union, the United Nations and the United States regimes. In addition, SFS complies with other applicable sanctions laws and regulations in the jurisdictions in which we operate.

We prohibit relationships with customers who are subject to sanctions or who act on behalf of or for the benefit of a government of a comprehensively sanctioned country or would violate SFS or Banco Santander Sanctions Policy. Transactions or undertaking business which is not in compliance with sanctions regulations or would violate SFS or Banco Santander Sanctions Policy are also prohibited. This includes any transaction initiated from a jurisdiction which SFS or Banco Santander classes as 'Prohibited' under our Sanctions Policy. Furthermore, relationships that have, or are proposing to develop business links or derive revenue (or assets) from countries that would breach SFS and Banco Santander Sanctions Policy are not accepted or maintained.

Our policies, standards and processes cover the following sanctions controls:

- Performing business level and customer sanctions risk assessments and implementing controls proportionate to the risks identified.
- Screening customers and payments during onboarding and in an ongoing manner to identify whether potential or current customers are sanctioned targets or whether transactions are prohibited under sanctions regimes or SFS and Banco Santander Sanctions Policy. This involves comparing sanctions and terrorist listings from open sources against customer databases and customer (incoming/outgoing) payment instructions.
- Investigating any potential matches identified within clear timeframes and delaying payments as required pending investigation.
- Escalating and reporting true matches to the appropriate sanctions authority.
- Preventing access to accounts (including online and mobile banking) or assets identified as connected to a sanctioned party or jurisdiction, as required.
- Providing training to all relevant staff on different types of sanctions regimes and potential breach channels and providing enhanced training to employees with connections to the US.
- Keeping full records of identified, eliminated or confirmed matches and providing regular information to bank management in relation to sanctions.
- Performing assurance testing to ensure that controls are proportionate and appropriate and function well.

We adopt a risk-based approach to charities operating in sanctioned jurisdictions and seek to fully understand sanctions risks associated with any operations or projects.

Anti-Bribery and Corruption (AB&C) Statement

We recognise the societal and reputational damage caused by bribery and corruption, and the individual and organisational consequences of failure to prevent bribery. We therefore have no appetite for maintaining relationships with employees and other persons who have engaged in bribery or corruption, or who have attempted to engage in such criminality, whilst acting on our behalf.

We expressly prohibit all forms of bribery and corruption involving our employees and other third-parties acting for and on behalf of the bank and require our employees and third-party suppliers and providers to behave ethically and without bribery or corruption at all times when performing any form of service on our behalf.

Our policies are designed to comply with the expectations of applicable anti-bribery legislation in the markets and jurisdictions in which we operate. They apply to all our employees, agency employees, consultants and contractors irrespective of their location, function, grade or standing.

Our policies:

- Explain the relevant legislation and our obligation to prevent bribery by anyone acting for or on behalf of SFS.
- Contain the requirements for identifying, assessing, monitoring and managing bribery and corruption risk. This includes conducting business unit and organisation-wide risk assessments that identify business areas that present higher risks.
- Provide helpful red flag indicators that alert colleagues to bribery or corruption risk.
- Clarify the roles and responsibilities of colleagues across the organisation in relation to anti-bribery and corruption, including senior -level authorisation for transactions, third-party relationships or outsourcing arrangements where appropriate.
- Describe clear channels for escalating and reporting concerns, including through our whistleblowing process.
- Lay down the requirements for mandatory and role-specific training across the organisation, the timely collection and analysis of management information, and for assurance testing.
- Set minimum standards of conduct in relation to anti-bribery and corruption, including clear communication of what is prohibited.
- Require robust controls for risk assessment, due diligence, and approval in relation to activities at more susceptible to bribery and other corruption risks, including charitable activity, corporate sponsorships, employment offers, gifts and hospitality, procurement, customer sourcing, political advocacy, and other interactions with public officials .
- Contain comprehensive requirements for managing the bribery and corruption risks in relationships with third-party providers of goods and services, including risk assessment, due diligence, contractual provisions, payment controls, and clear communication of SFS' expectations regarding bribery and corruption, ethical conduct, and channels for reporting concerns.

Finally, as part of our AFC Strategy, we engage with industry and other stakeholders to benchmark the strength of our AB&C framework against the views of expert external working groups, including Transparency International. We seek to strengthen our framework on an ongoing basis and review our AB&C policy and standards at least annually.

Statement on preventing the facilitation of tax evasion

Tax evasion is damaging to the government, businesses and societies in which it occurs. It diverts money and resources from those who need them most, hindering economic and social development.

Consequently, we have a zero-tolerance approach to our customers, employees and associated persons facilitating tax evasion whilst acting for or on behalf of SFS. We promote and maintain an ethical business culture, do not tolerate tax evasion in any aspect of our business.

Our policies are designed to comply with the expectations of applicable anti-tax evasion legislation in the markets and jurisdictions in which we operate. We have a dedicated policy and requirements in place to ensure that SFS and third-parties who are acting for or on behalf of it

can prevent the facilitation of tax evasion.

Our requirements mandate:

- Periodic (at least annual) business risk assessments.
- Risk assessment of customers and relevant third-party relationships.
- Ad hoc risk assessments at trigger events (such as changes to legislation) and periodic reviews.
- Due diligence procedures.
- Contractual clauses for third-parties acting as associated persons in relation to preventing the facilitation of tax evasion.
- Management information in relation to the risks faced by the business.
- Regular monitoring and review of the effectiveness of the systems and controls in place.

We provide a list of tax evasion red flags. We also have in place requirements for mandatory training on the facilitation of tax evasion and clearly assigned roles and responsibilities for ensuring compliance and accountability with the law and regulations.

Patriot Act Certification

In compliance with the United States Patriot Act, Santander Financial Services plc has prepared a Global Certificate for use by any institution that requires a Patriot Act Certification from Santander Financial Services plc. This certification should be used as a primary reference for any third-party who has a correspondent account relationship with Santander Financial Services plc or any of its subsidiaries or affiliates listed in the Global Certificate.

The certificates confirm the name and address of our USA process agent for the service of any notice or proceedings.