

CORPORATE RESPONSIBILITY POLICY

1. INTRODUCTION.

Santander Free Zone (ZFS) understands Corporate Responsibility (CR) as the set of actions developed to establish relationships of trust, stable, solid and of mutual benefit with its stakeholders.

Its stakeholders are the people who make up ZFS, customers, suppliers and external collaborators, investors and funders, regulators and other market agents and social groups.

The main objective of this Policy is to establish the principles of action and commitments with its stakeholders, in coherence with the corporate strategy of the ZFS, as well as to determine the responsibilities and specific monitoring instruments to ensure compliance.

2. COMMITMENTS AND PRINCIPLES OF ACTION.

Within the framework of the general strategy, specific lines of action and commitments have been defined towards interest groups focused on the generation of value by establishing and developing solid principles of action that facilitate sustainable growth in the long term.

2.1. Excellence in service.

The customer is the basic center of ZFS operations, and through an active dialogue it is intended that the Entity be able to give a quick and efficient response, providing an excellent service and customer experience that, in addition to meeting the requirements legal, is in accordance with your needs and fulfills the commitments voluntarily assumed:

- 2.1.1. Safety, reliability and competitiveness.
- 2.1.2. Active and bidirectional communication.
- 2.1.3. Simple and efficient operation.
- 2.1.4. Innovative products and services.
- 2.1.5. Products and services with high added value.
- 2.1.6. Technological innovation.

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2.2. Commitment to results.

The ZFS Consortium, as a State Public Entity of those provided for in article 80 of Law 50/1998, of December 30, on Fiscal, Administrative and Social Measures, must comply with current legislation, especially in relation to Law 47/2003, of November 26, General Budgetary.

Key aspects are to properly manage risks, and develop a solid model with growth potential, which guarantees long-term sustainability.

The following commitments are established:

- 2.2.1. Sustained profitability appropriate to the resources invested.
- 2.2.2. Efficient allocation and management of resources.
- 2.2.3. Approved risk levels and thresholds.
- 2.2.4. Continuous incorporation of sustainability aspects.

2.3. Responsible management of the environment.

ZFS is committed to acting beyond compliance with legal requirements, and will act with other environmental requirements that it will voluntarily adopt, involving suppliers, working with different stakeholders and promoting the responsible use of natural resources.

2.4. Interest in people.

For ZFS it is essential to promote a quality work environment, based on respect, diversity and personal and professional development. With this philosophy, the ethical behavior guidelines of all its employees should be established in their daily performance and, specifically, with regard to the relationships and interactions it maintains with all its stakeholders.

Fundamental aspects will be:

- 2.4.1. Professional development.
- 2.4.2. Motivating work environment.
- 2.4.3. Balance between professional and personal life.
- 2.4.4. Promotion of diversity and equality.

2.5. Security and health.

The performance of the ZFS in health and safety goes beyond compliance with legal obligations, promoting the continuous improvement of working conditions and in the management of safety, health and well-being, involving not only the people who They form ZFS, but also suppliers, collaborating companies, clients and other interest groups, with the aim of avoiding and preventing accidents and damage to health, providing a safe and healthy environment as well as promoting their health and well-being.

Commitments:

- 2.5.1. Health and safety as an individual responsibility that cannot be delegated, assumed by the entire organization, as well as by suppliers and collaborating companies.
- 2.5.2. Appropriate evaluation and management of any potential risk situation.
- 2.5.3. Learning as a driver of the culture of safety.
- 2.5.4. Health education and health promotion.
- 2.5.5. Provide the necessary resources and means.

2.6. Responsible supply chain.

For ZFS, suppliers and collaborating companies are fundamental actors in the optimal functioning of the value chain. Based on this, ZFS promotes the maintenance of long-term, stable, solid and mutually beneficial relationships of trust, under the principles of effectiveness and risk management.

2.7. Social commitment.

In art. 1 of Order HAP / 1412/2016, of August 29, which authorizes the constitution of the ZFS Consortium and approves its Statutes, the following is established:

"The constitution of the ZFS Consortium is authorized, which will have as its main objective the establishment and exploitation of the ZFS in order to promote the development of industrial, commercial and mercantile activities in it, satisfying general interests"

Based on this clear and concise corporate purpose, ZFS is committed to the economic and social development of its area of influence, providing knowledge, management skills and creativity, as well as dedicating part of the benefits to social investment.

2.8. Integrity and transparency.

ZFS considers that the trust of its clients, its professionals, suppliers and external collaborators, investors and funders, regulators and other market agents and social groups, is based on integrity, understood as ethical, honest, responsible and good faith behavior. of each of the people who work in and for ZFS.

Commitments:

- 2.8.1. Reject corruption, fraud and bribery.
- 2.8.2. Comply with the national and international standards in force.
- 2.8.3. Act responsibly in business management and comply with tax obligations.
- 2.8.4. Compete in the market legally.
- 2.8.5. Promote information transparency.
- 2.8.6. Maintain dialogue with stakeholders through appropriate and accessible channels.

This Corporate Responsibility Policy, approved by the Plenary of the Santander Free Zone Consortium, at the request of the Executive Committee, makes it the Entity's base strategy in its daily management.

The Plenary itself is responsible for ensuring the proper implementation and monitoring of the commitments assumed in this Policy, as well as promoting dissemination, knowledge and compliance, and all with the aim of achieving and consolidating a solid Corporate Responsibility culture.