

Social, Environmental and Climate Responsibility Policy - PRSAC

Effective as of 07/01/2022, reviewed on 06/19/2024

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1. Introduction

Banco Santander's purpose is to help people and businesses prosper. This aim inspires the development of the business over the short, medium, and long term, while remaining aligned with our culture, which values simple, personal and fair relationships. Driven by this purpose, we strive to achieve our global objective: to be the best open financial services platform by acting responsibly and earning the loyalty of our internal community, consumers, shareholders, and the communities where we operate.

Santander understands that generating profit, profitability, and positive results in a consistent and responsible manner is essential for long-term sustainability. To this end, it undertakes to manage its social, environmental, and climate risks and impacts.

2. Objective

The purpose of this Policy is to set forth the principles and guidelines for Santander's social, environmental, and climate practices in business and relations with Stakeholders within the sphere of influence of the Organization, with a view to preventing negative impacts and expanding the positive impacts arising from both its financial Operations and Activities.

3. Definitions

For the purposes of this Policy, the terms specified below, when used with the first letter capitalized, shall have the following meaning:

- **Activities:** internal processes and practices of the Organization that may cause social, environmental, and climate impact, not to be confused with Operations or financial services;
- **Internal Community:** directors, statutory officers, employees, interns, and apprentices;
- **Financing:** a type of financial Operation originated in the primary credit market in which the Organization grants, through short, medium and long-term financial loans, funds with a specific purpose as stipulated in the contract;
- **Common interest:** the interest shared by a group of individuals who are legally or factually bound by the same cause or circumstance, when not of an environmental or climatic nature;
- **Environmental nature:** preservation and restoration of the environment, including its recovery, when feasible;
- **Climatic nature:** positive contributions towards

- The transition to a low-carbon economy, in which the emission of greenhouse gases is diminished or offset, and the natural mechanisms for capturing these gases are preserved;
- The reduction of impacts caused by frequent and severe weather events or long-term environmental changes that may be associated with shifts in climate patterns;
- **Social nature:** the respect, protection, and promotion of fundamental rights and guarantees, as well as those of common interest;
- **Operations:** financial operations of all participating companies within the Prudential Conglomerate (see Appendix - PRSAC Companies List) identified as being subject to assessment of social, environmental, and climate issues by the Organization;
- **Organization or Santander:** Banco Santander (Brasil) S.A. and other Prudential Conglomerate companies to which this policy is applicable, as defined in Appendix - PRSAC Companies List;
- **Stakeholders:** Santander's main stakeholders are its internal community, shareholders, customers, suppliers, and the community in which it operates, as well as society as a whole;
- **Project:** investment undertaken by the financed party responsible for obtaining environmental permits to implement or expand facilities that cause significant social, environmental, and climate impact, and for which an Environmental Impact Assessment and associated reports are required under current legislation;
- **Proportionality:** the compatibility of this Policy with the business model, the nature of operations, and the complexity of products, services, activities, and processes of Santander;
- **PRSAC:** Social, Environmental, and Climate Responsibility Policy;
- **Relevance:** the suitability of this Policy to the dimension and significance of the exposure to social, environmental, and climate risks addressed in CMN Resolutions No. 4,557/2017, 4,926/2021, and 4,943/2021;
- **Environmental Risk:** the possibility of the institution incurring losses due to events associated with environmental degradation, including the excessive utilization of natural resources;
- **Climate Risk:** the possibility of the Organization incurring losses due to:
 - Events associated with the transition process towards a low-carbon economy, in which the emission of greenhouse gases is reduced or offset and the natural mechanisms for capturing these gases are preserved (transition climate risk); and
 - Events associated with frequent and severe weather events or long-term environmental changes that may be related to shifts in climate patterns (physical climate risk);

- **Social Risk:** the possibility of the Organization incurring losses due to events associated with the violation of fundamental rights and guarantees or detrimental actions against common interests.

4. Applicability

This policy applies to Banco Santander (Brasil) S.A. and the companies of the Prudential Conglomerate, included in the Appendix - PRSAC Companies List, hereinafter collectively referred to as "Santander" or as "Organization". The application of the PRSAC within these companies will always consider the principles of Relevance and Proportionality, as defined in item 3 of this document. These same principles are considered in the other documents mentioned herein, which may have different application scopes from those of the PRSAC, depending on their specific contexts.

5. Reference principles and relationship with other policies

Santander is always oriented towards compliance with Brazilian law. Accordingly, it seeks to remain constantly up to date on the social, environmental, and climate legislation applicable to the Organization, as well as other regulations of interest to its business in this domain.

Specifically, this Policy is consistent with Resolution No. 4,945/2021 from the National Monetary Council ("CMN"), which sets forth the guidelines that must be followed in the establishment and implementation of the Social, Environmental, and Climate Responsibility Policy ("PRSAC") by financial institutions and other institutions authorized to operate in the country by the Brazilian Central Bank.

Furthermore, the PRSAC is aligned with the Corporate guidelines set forth in the General Sustainability Policy, the Human Rights Policy, the Corporate Culture Policy, the Environmental, Social, and Climate Change Risk Management Policy, and the Principles of Action in Tax Matters. Other policies of Banco Santander Brasil complement this Policy and are referenced throughout this document.

In this context, the principles and guidelines stated in this Policy aim to both fulfill the obligations of managing social, environmental, climate, and governance practices established in the applicable legislation, as well as the commitments voluntarily undertaken by Santander. Among these commitments, we emphasize the aspiration to reach Net Zero by 2050, setting decarbonization

targets for activities and sectors; the United Nations Guiding Principles on Business and Human Rights; and the UNEP-FI Principles for Responsible Banking.

Thus, the reference principles considered for the development of this Policy are:

- Professional ethics;
- Respect for human rights;
- Respect for diversity and the fight against any form of discrimination;
- Management of social, environmental, and climate risks and impacts linked to the Organization's products, services, activities and processes;
- Climate change mitigation and adaptation; and
- Promotion of the Sustainable Development Goals of the United Nations Global Compact (SDGs).

6. Stakeholder engagement

Santander strives to continuously consider Stakeholders in the conduct of its business, aiming to generate long-term value and build, maintain, and strengthen trustworthy, inclusive, ethical, and mutually beneficial relationships. In this context, it provides communication channels such as Customer Service ("SAC"), Ombudsman, Contact Us, Open Channel, and the sustainability department e-mail address sustentabilidade@santander.com.br, to provide digital access to customers and other users. Additionally, it has established guidelines and initiatives related to its main Stakeholders:

- a. **Shareholders and Investors:** best governance and information transparency practices, including the practices stated in items 13 and 14;
- b. **Customers:** best practices in social, environmental, and climate risk assessment, products and services, anti-corruption, sustainable businesses, and financial education, as stated in items 11 and 12 of this Policy;
- c. **Community and society:** best practices in information transparency, social investment, and financial guidance, as stated in items 12 and 14 of this Policy;
- d. **Erro! Fonte de referência não encontrada. Internal community:** best labor practices, as stated in item 7 of this Policy; and
- e. **Suppliers:** best practices in supplier management, as stated in item 8 of this Policy.

7. Internal Community

Professional ethics and respect for Human Rights govern the behavior of Santander's internal community and are reflected in its commitments and internal codes of conduct, such as the following Compliance regulations: Code of Ethical Conduct and Compliance: Anti-corruption.

In addition, the Organization provides conditions for the development of its professionals and bases its relationships with the internal community on best labor practices. To this end, the Vice Presidency of People and Ombudsman seeks to:

- a. Act with a focus on preventing accidents, incidents, occupational diseases, and promoting health, which includes the practices provided for in the following Human Resources regulations: PCMSO - Medical Control Program for Occupational Health and Human Resources: Work Safety Prevention Programs and Occupational Accident Reporting, in addition to promoting full health through the Be Healthy global program, encouraging the internal community to adopt lifestyle habits that balance physical and mental wellness;
- b. Provide a healthy and safe work environment for the entire internal community, interns, young apprentices, and third parties, free from any form of abuse/harassment, intimidation and violence, such as moral and sexual harassment, as well as any form of work involving slave-like conditions, child labor, and sexual exploitation. Part of this commitment is to fight against all forms of discrimination based on color, race, ethnicity, origin, social class, gender, religion, sexual orientation, marital status, age, or physical appearance;
- c. Respect and value the diversity of gender, race, ethnicity, age, sexual orientation, or any other condition, in addition to promoting an inclusive work environment, with equal opportunities and encouraging a balance between personal and professional life;
- d. Encourage the internal community to incorporate social, environmental, and climate practices into their daily lives, through appropriate training on the issues addressed in this Policy and the sharing of Santander's sustainability strategy, areas of focus, and initiatives;
- e. Train and engage the internal community regarding Information Security, raising awareness about the existing risks in the business operation, and providing guidance on the adopted security standards, governance of the subject, and the employee's role; and
- f. Ensure that the remuneration structure adopted by Santander does not encourage behaviors incompatible with the PRSAC.

8. Suppliers

Santander always strives to work with suppliers with good social, environmental, climate, and ethical conduct, and who encourage the adoption of best practices, rejecting any practices that are not compliant with the law, that disrespect human rights or that are associated with acts of personal bias or that characterize situations of corruption or bribery. To this end, it seeks to:

- a. Include social, environmental, and climate criteria in the supplier selection, monitoring, and follow-up process, according to the guidelines of the following Administrative Services regulations: Supplier Approval Policies and Administrative Services: Corporate Outsourcing and Third-Party Agreement Framework;
- b. Include in all its contracts with suppliers a contractual clause that stipulates social, environmental, and climate obligations, namely obligations related to the prevention of slave labor, child labor and sexual exploitation, respect for the environment, and the fight against all forms of corruption; and
- c. Encourage its suppliers to adopt social, environmental, and climate policies and/or practices, such as codes of ethics, environmental management, climate change mitigation, health and safety management, and promotion of diversity and inclusion, in accordance with the United Nations Global Compact Principles.

9. Competition

The organization values the practice of fair competition and possesses the Antitrust Policy - Compliance with Brazilian Competition Defense Legislation, which serves as a reference guide in complying with legislation related to competition defense, while also being one of the pillars of Corporate Defense¹ to ensure compliance with Brazilian legislation, within the scope of interactions promoted by Banco Santander Brasil, its controlled companies, and employees. Additionally, Santander always seeks to cooperate with other financial institutions, whenever possible, on social, environmental, and climate-related issues, aiming to expand the positive impacts of the financial sector on the market and society.

¹ Policy that establishes and consolidates organizational measures for the prevention and detection of criminal risks, with the aim of minimizing the risk of illicit behaviors by employees and ensuring that Banco Santander undertakes the necessary efforts to maintain its business activities in compliance with legal and regulatory requirements, and in accordance with the guidelines of the Santander Group.

10. Environmental Management

Santander seeks to apply best practices in Environmental Management and in combating climate change, favoring an approach centered on anticipating and preventing environmental impacts, while pursuing continuous improvement and observing the precautionary principle, in accordance with the following guidelines:

- a. Apply to the Organization's facilities the provisions of the Sustainability: Environmental Management System regulation;
- b. Measure and manage the consumption of natural resources, promoting measures aimed at energy and water efficiency; and the use of renewable energies to make the best use of these resources while preserving them;
- c. Measure and manage waste generation, promoting its proper management, including electronic waste;
- d. Measure, reduce and report greenhouse gas emissions. This includes the use of nationally and internationally recognized standards for conducting its emissions inventory; and
- e. Provide customers, when applicable, with information regarding the disposal of electronic waste associated with the products and services offered by the Organization.

11. Social, Environmental, and Climate Risk Management

Santander acknowledges the existence of social, environmental, and climate risks, and regards them as a component of the other types of risk managed by the Organization.

In this context, the Organization relies on systems, routines, and procedures in place to identify, assess, manage, and mitigate the social, environmental, and climate risks of its products, services, activities, and processes prioritized based on the principles of Relevance and Proportionality, and which, therefore, must be included within the scope of Santander's integrated risk management system. This management is provided for in the Integrated Social, Environmental, and Climate Risk Management Policy and must adhere to the following guidelines:

- a. Application of restrictions on relationships with customers, potential customers, and suppliers, whether individuals or legal entities, included in the "Official Register of Employers found to have submitted workers to slave-like conditions" (Interministerial Ordinance MTPS/MMIRDH No. 4);
- b. Assessment of financial transaction counterparties, whenever deemed proportional and relevant based on specific criteria for each institution within the prudential conglomerate, including the potential adoption of restriction and exclusion criteria for sectors and activities that may have negative social, environmental, and climate impacts, either in the short or

- long term. As part of this assessment, particular attention will be given to relationships and businesses involving agricultural activities in the Amazon biome;
- c. Adoption of a specific procedure for managing social, environmental, and climate risks in Project Financing operations, which may include the use of contractual clauses and analysis requirements as defined by the Equator Principles;
 - d. Adoption of social, environmental, and climate diligence in the acceptance, renewal, and enforcement of real estate guarantees;
 - e. Data recording pertaining to losses associated with social, environmental, and climate risks, in accordance with the provisions of SARB No. 14, issued by FEBRABAN;
 - f. Use of criteria in the product creation/review process, including considerations related to transparency, customer suitability, and reputation risk;
 - g. Adoption of risk mitigation measures associated with money laundering, terrorism financing, corruption, and bribery;
 - h. Assessment of social, environmental, and climate risks as part of the decision-making process concerning new investments made through equity participation in companies.

Nonetheless, the fact that an initiative is not included among the prioritized Activities and Operations does not prevent Santander from adopting complementary measures, outside the scope of this Policy, that contribute to the strategy and fulfillment of the commitments undertaken by the Organization regarding Sustainable Development.

12. Promoting positive impacts

In addition to fostering a risk management approach aimed at mitigating negative social, environmental, and climate impacts, Santander endeavors, through its actions, to contribute to a more egalitarian, fair, and sustainable society.

12.1. Fostering sustainable business

Santander understands that individual needs and societal challenges, such as those expressed in the UN Sustainable Development Goals, including climate change and other social, environmental, and climate issues, present several business opportunities.

Accordingly, the Organization promotes the offering of financial products and services that foster, for instance, solutions related to: energy efficiency, greenhouse gas emissions reduction, cleaner

production, more sustainable buildings, accessibility renovations, sustainable agribusiness, environmental asset trading, mobility, health, education, microfinance, in addition to supporting entrepreneurship and other initiatives that address the needs of customers deemed vulnerable or historically discriminated against, and which contribute to sustainable development.

These solutions may or may not involve specific products for social, environmental, and climate purposes; Santander establishes specific eligibility criteria for these operations in its Sustainable Finance and Investment Classification System (SFCIS). According to this system, sustainable products and services can be classified into two main categories:

- Dedicated financing, wherein the funds obtained by the customers are exclusively allocated towards specific activities and projects with social, environmental, or climate benefits; and
- Sustainability-linked financing, in which the use of resources is unrestricted, but the financing terms are contingent upon the fulfillment of objectives related to social, environmental, or climate aspects by the customer.

12.2. Financial education

Santander recognizes the importance of financial education for customers, the internal community, and society. For this reason, it encourages knowledge of financial planning concepts and provides content for the proper utilization of financial products and services, based on the needs of its customers and potential customers. In this manner, the Organization aims to provide financial guidance across its interaction channels, which permeate the customer contact journey.

12.3. Social investment

Santander works to generate a positive impact on society through the voluntary and systematic transfer of funds, in a planned and monitored manner, to social projects of public interest. Among the priority areas for investment are education, the promotion of human rights, and productive inclusion, encompassing support for entrepreneurship and employability programs with a focus on the future professions and social and emotional skills. The strategy and practices for making these investments, as well as for donations and volunteering activities involving the internal community, are established in the Sustainability: Social Investment regulation.

12.4. Support for Higher Education

Santander regards Higher Education as one of the main factors that drive the generation of growth, progress, and well-being in society. Accordingly, it establishes partnerships with universities to

promote academic excellence, research, university-level innovation, and entrepreneurship, in addition to fostering international mobility for students, professors, and researchers.

13. Governance

13.1. Structure

The Organization maintains a corporate governance structure aimed at promoting the appropriate handling of social, environmental, and climate issues, monitoring the results achieved and proposing advancements. To this end, it has designated an officer, appointed by the Executive Committee and accountable to the Brazilian Central Bank of Brazil, to ensure compliance with this Policy, whose responsibilities are outlined in the Organization's internal regulations. Furthermore, it follows a process that stimulates continuous improvement and fosters adherence verification, including the alignment and integration of the Organization's regulations with the guidelines set forth in this Policy. This process includes:

- a. The Sustainability Committee, an advisory body responsible for providing guidance to the Board of Directors on the progress of the social, environmental, and climate agenda, challenges the Organization to promote actions in support of this theme, considering the best practices. The Committee also monitors risk management, business opportunities, and adherence to actions aimed at ensuring the effectiveness of the PRSAC. Its meetings are held at least four times a year and may be convened extraordinarily;
- b. The Social, Environmental, and Climate Risk Working Group (GT RSAC), coordinated by the Executive Vice Presidency of Risks, is tasked with monitoring the Organization's activities on issues related to the social, environmental, and climate agenda, establishing a connection between the Executive Committee and other governance bodies. The GT RSAC is also responsible for overseeing multidisciplinary working groups aimed at implementing priority projects concerning the regulatory and institutional framework associated with this agenda;
- c. The Reputational Working Group, coordinated by the Risk area, which assesses situations with potential reputational risk associated with social, environmental, and climate risks, including opinions on customers involved in slave-like work practices, as well as other customers or credit operations deemed sensitive;
- d. The Sustainable Finance Forum, coordinated by the Institutional ESG area, is responsible for analyzing new sustainable finance products and transactions from a technical perspective, ensuring their alignment with Santander's Sustainable Finance Classification System (SCFS). The purpose of the Forum is to safeguard the integrity of the sustainable finance products

offered by Santander, mitigate potential transactional risks, and enable the origination of sustainable business with customers.

13.2. Policy Approval and Review

Changes to this Policy must be approved by the Executive Committee and the Board of Directors with the assistance of the Responsible Officer tasked with ensuring compliance with this Policy, upon recommendation of the Sustainability Committee. A review process will be conducted at least every three years, pursuant to current regulatory requirements. Changes may be made in shorter periods of time according to the needs of the Organization.

13.3. Policy Oversight

It is the responsibility of the Internal Audit area to oversee adherence to the commitments undertaken and established controls by the various areas of the Organization in compliance with the PRSAC through the Audit internal planning.

13.4. Interpretation, omissions, and exceptions

The interpretation of this Policy, in the event of a divergence of understanding between the areas involved in its implementation, shall be entrusted to the Responsible Officer in charge of the PRSAC. In cases of exception to compliance with the rules set forth in the PRSAC, the applicant shall submit an exception request to the Executive Committee, which shall deliberate on the request and formalize its final decision in the minutes. Any omissions in this Policy shall be reported to the Responsible Officer for evaluation and, if necessary, for the execution of revisions and enhancements.

14. Disclosure

The Organization uses nationally and internationally recognized standards to report its social, environmental, and climate strategy and actions in a transparent manner, considering its several Stakeholders, including the disclosure of risks and management practices related to climate change. By doing so, we seek to encourage the dissemination of knowledge and the adoption of best social, environmental, and climate practices.

With regard to the disclosure of this Social, Environmental, and Climate Responsibility Policy and the practices described herein, Santander shall:

- a. Promote communication through its internal communication vehicles whose content is related to the commitments and practices contained in this Policy;
- b. Publish this Policy in its regulatory system, available on the corporate intranet;
- c. Make this Policy available in an easily identifiable location on its institutional sustainability website and on the Investor Relations website;
- d. Disclose the composition of the Sustainability Committee on the Investor Relations website;
- e. Report the following information in an easily identifiable location on its institutional sustainability website:
 - i. The measures implemented to ensure the effectiveness of this Policy, its evaluation criteria, results, and progress achieved;
 - ii. The list of economic sectors subject to business constraints due to aspects of a social, environmental, and climate nature;
 - iii. The list of products and services provided by the institution that positively contribute to aspects of a social, environmental, and climate nature; and
 - iv. The list of pacts, agreements, or commitments of a social, environmental, and climatic nature undertaken by Santander.

15. Related legislation and self-regulation

- CMN Resolution No. 4,557/2017;
- CMN Resolution No. 4,926/2021;
- CMN Resolution No. 4,943/2021;
- CMN Resolution No. 4,945/2021;
- CMN Resolution No. 4,950/2021;
- BCB Resolution No. 151/2021;
- Febraban SARB Regulation No. 14/2014;
- Interministerial Ordinance MTPS/MMIRDH No. 4 of 2016.

Responsible Department: Institutional VPE

Responsible Area: Relações Governamentais

Appendix - PRSAC Companies List

The table below contains the list of companies covered by this Policy (perimeter), which has been determined based on the criteria established in CMN Resolutions No. 4,945/2021 and No. 4,950/2021.

Banco Santander (Brasil) S.A.
Banco Santander (Brasil) S.A.
Aymoré Crédito, Financiamento e Investimento S.A.
Banco Bandepe S.A.
Banco Hyundai Capital
Banco RCI Brasil S.A.
Getnet Adquirência e Serviços para Meios de Pagamento S.A. - Instituição de pagamento
Getnet Sociedade de Crédito Direto S.A. (SCD)
Santander Brasil Administradora de Consórcio Ltda.
Santander Corretora de Câmbio e Valores Mobiliários S.A.
Santander Distribuidora de Títulos e Valores Mobiliários S.A.
Santander Leasing S.A. Arrendamento Mercantil
Superdigital Instituição de Pagamento S.A.
Toro Corretora de Títulos e Valores Mobiliários S.A.
Return Capital Gestão de Ativos e Participações S.A.