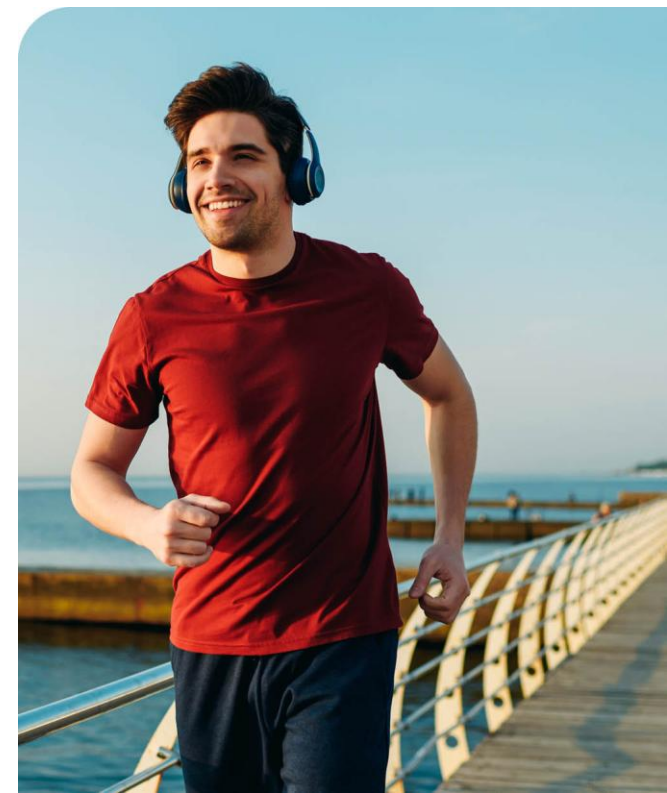




Code of Supplier **Responsibility**

Supplier Code of Conduct - Santander UK plc



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Foreword

To tackle the material challenges that we face as a society, businesses of all shapes and sizes will need to embrace more responsible practices to make meaningful differences to the communities we operate within and impact. To ensure this responsibility runs throughout our own business and is a positive influence on others, we actively seek to partner with suppliers who share these values most closely and reflect this throughout their entire value chain.

Our Santander UK Sustainable and Responsible Banking Strategy consists of three pillars: Environment, Social, and Governance. We guide our employees using this framework, underpinned by core principles and targets. In updating this 'Code', I want to ensure this is clearly communicated to you, as a supplier and as an intrinsic part of our business. For us, having a clear strategy supports our vision of helping people and businesses prosper and enables us to identify and respond to our most important sustainability issues.

This Code of Supplier Responsibility outlines our Strategy and ambition for being a responsible bank, to help you understand our priorities; as well as detailing the specific expectations of our supplier partners. Alongside this we want to share our commitment to continue to improve the outcomes for our customers and the communities we work within, and how we will help you so we achieve this together.



We know that every organisation is on a different path when it comes to implementing responsible business practices, that's why we have outlined both "what we expect" (the minimum standards) and "what we encourage" (practices we encourage our supplier partners to commit to or work towards). We encourage you to reflect on your own responsible business plan, and how you can align with our standards and ambition, to maximise the positive impact you can have on all your stakeholders.

We recognise that serving our customers is only possible through our supplier partnerships, and I thank you for the efforts you deliver daily to make our customers' 'better' happen. Working with our suppliers in the right, responsible way means providing our customers with the very best we can offer and driving benefit into the wider community and economy.

This Code reflects our latest commitments as a business and expectations of our suppliers. Thank you for your commitment to this, and I look forward to working with you to serve our customers and responsibly help people and businesses prosper.

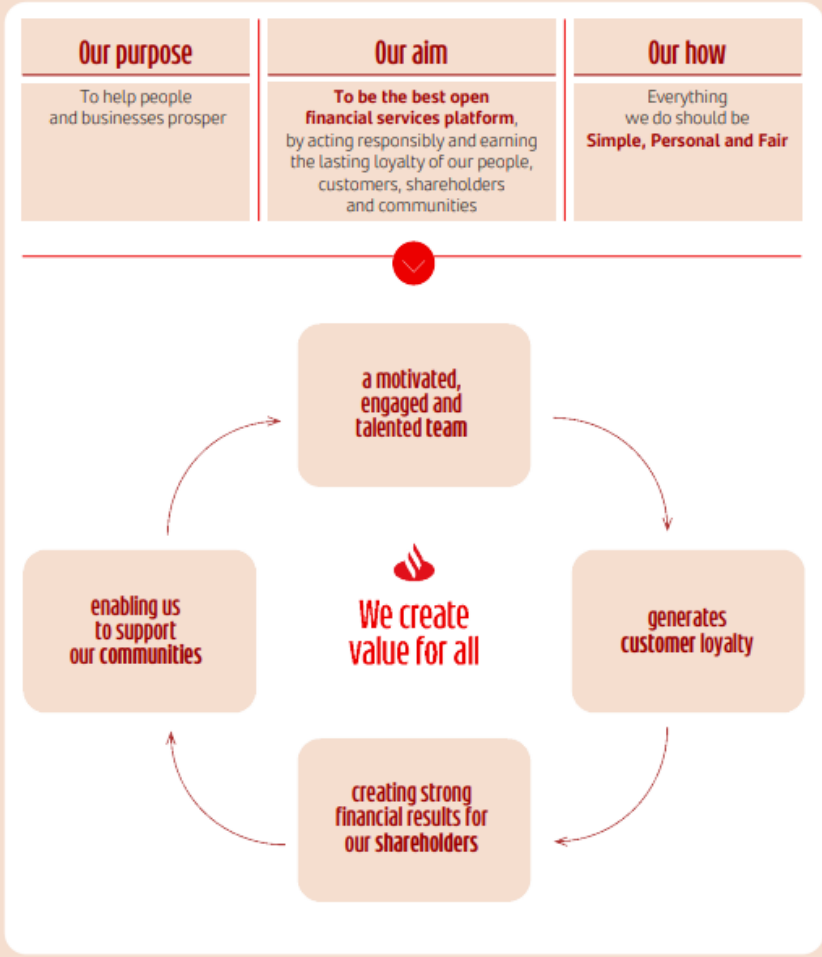
Jarrold Glover
Director of Cost and Procurement UK

Working
together to
responsibly
help
businesses and
people prosper



Our Values: Simple, Personal and Fair

We follow the Santander Way



Our commitment to our Customers, People, Shareholders and Communities

At Santander UK, we are here to help people and businesses prosper. Our core business is critical to this, but we also know that we need to go beyond banking.

For us, prosperity includes opportunity, fairness, and resilience for our customers, communities, and our people. It also means working with stakeholders to support a just and orderly transition to a more sustainable future.

We are committed to delivering outstanding experience by following **The Santander Way** and living our values of **Simple, Personal and Fair**.

Our aim is to be the best open financial services platform by acting responsibly and earning the lasting loyalty of our colleagues, customers and communities.

At Santander UK, we embed sustainability into our business strategy by linking climate action, financial health and inclusion, education, employability, and entrepreneurship, and strong governance to everyday decision making.



Our Sustainability Commitments

Our Sustainability strategy is guided by our double materiality assessment and reflects what matters most to our business and stakeholders.

Our environmental focus aims to support customers with their transition goals and provide financing for green solutions, renewable energy, and clean technologies.

Our social objectives promote financial inclusion and financial health and invest in the skills and opportunities that enable people and communities to thrive.

Our governance framework ensures clear accountability and transparent decision making on sustainability matters.

ENVIRONMENT



Supporting our customers in the green transition while tackling our key climate impacts, risks, and opportunities.

1. Supporting our customers in their transition goals
2. Embedding climate in risk management
3. Aiming to align our activity with the UN Paris Agreement

We're taking practical steps to support our customers with their environmental goals. We expand green finance, support renewable energy, and clean technology projects, and help customers make their homes be more energy efficient. By improving climate data, strengthening risk management, and working with partners, we aim to address barriers and build long-term progress.



SOCIAL



To support productive and inclusive growth for our customers, communities, and employees, enabling prosperity through financial health, skills, inclusion, and opportunity.

1. Our Customers: Making their better happen
2. Our Communities: Better communities
3. Our People: Unleash our people's potential

We help people build stronger financial capability and provide better access to skills and opportunity. This includes improving financial health, supporting education, employability, and entrepreneurship, and investing in young people and communities. We also develop our colleagues through learning, inclusion, and social mobility, creating the conditions for our people to grow and thrive.



GOVERNANCE



To maintain clear and robust governance systems, with well-defined accountability, that support the success of Santander UK, its customers, and wider stakeholders.

1. Stakeholder engagement
2. Effective Board of Directors
3. Responsible practices and stakeholders' interests

Strong governance underpins everything we do. Clear Board oversight, defined accountability, and responsible decision-making guide how we manage risks, meet regulatory expectations, and maintain trust. By embedding culture, conduct transparent reporting across the company, we help decisions stay fair, consistent, and aligned with long-term value for customers, colleagues, and society.



What you need to do

Your agreement to this Code of Supplier Responsibility is a key condition of doing business together.

Our preferred supplier partners are those who embrace these commitments and continually strive to help us be the easiest way to make our customers' better happen.

Supplier Definition

We define a supplier as any third-party organisation, and their affiliates (including agencies, intermediaries, and our customers) that provides goods or services to Santander UK. This includes potential suppliers seeking to work with Santander UK.

The core commitments of the Code of Supplier Responsibility are outlined in pages 6 to 11 of this document.

The Code of Supplier Responsibility applies to all suppliers.

What we expect:

- Read and reflect on our Code of Supplier Responsibility (in particular consider how you meet these expected standards and behaviours).
- Communicate this Code of Supplier Responsibility to your employees, parent company, subsidiaries, and subcontractors.
- Understand that this document is intended to complement our contracts with suppliers and the rules we set out when we procure our goods and services, which will always take precedence.
- Recognise that non-compliance with this Code may adversely affect your commercial relationships with Santander UK and may also constitute a contractual breach where directly related to established contractual provisions.
- Confirm agreement with this Code of Supplier Responsibility when you submit a proposal to perform a service for Santander UK or if you are asked to complete our supplier qualification process.

What we encourage:

- If in doubt regarding any of the content of this Code, please speak with your Service Manager, your primary Santander UK contact.

Speaking up

Suppliers should feel able to raise concerns about actions or decisions that breach the standards set out in this Code without fear of victimisation. In the first instance, concerns can be raised via your Santander UK Service Manager.

Alternatively, please contact Navex Global, an independent organisation who operate a telephone and secure web-based service reporting tool called EthicsPoint.

Call: 0800 0698792

Online: www.santanderuk.ethicspoint.com.

You can also report concerns over wrongdoing or misconduct involving Santander UK employees or contractors by contacting the Santander UK Whistleblowing Team:

whistleblowingteam@santander.co.uk

Santander UK will take all whistleblowing concerns received seriously and, where appropriate and proportionate, investigate further. A whistleblower's confidentiality will be respected, and a whistleblower will not be treated any differently for raising a concern.

If you prefer, you can raise concerns with our regulators, the Financial Conduct Authority or the Prudential Regulation Authority.



Environmental Sustainability

Our Climate strategy is designed to support our customers in a just and orderly transition, as we work to align our activity with the UN Paris Agreement.

We encourage and rely upon our suppliers to join us in that commitment by developing internal programs designed to foster a culture of sustainability across their own operations and supply chain.

What we expect:

- Be aware of, and support us in, complying with all relevant environmental legislation and work with us to achieve the aims of our Environmental Operations Policy.
- Have a documented environmental policy, statement, or program to mitigate environmental risks, the implementation of which should be evident throughout all levels of the company.
- Have processes in place to ensure that your operations conform to all applicable environmental legislation. All required environmental permits, approvals and registrations are to be obtained, maintained, and complied with in accordance with the conditions and requirements defined therein.
- Understand the environments you operate in and actively seek to measure and reduce any potentially harmful impacts from your operations.

What we encourage:

- Have a commitment and plan to reach net zero emissions by 2050 (or sooner), supported by well-defined interim targets that drive measurable progress.
- Work towards disclosing scope 1, 2 and 3 greenhouse gas emissions and broader improved ESG performance.
- Consider the environmental credentials and performance of suppliers within your own supply chain and require them to operate to a minimum set of standards.

Santander UK's Climate Strategy				
Helping our customers in the transition and managing climate-related risks and impacts				
Supporting our customers in their transition goals 	Embedding climate in risk management 	Aiming to align our activity with the UN Paris Agreement 		
Help our customers transition to a low-carbon economy	Integrate climate-related risks and adhere to regulatory and supervisory expectations	Align key lending portfolios and reduce our own environmental footprint		
Green finance products and propositions	Embedding climate as a transversal risk	Interim goals and addressing our dependencies		
Key Enablers				
Strategic partnerships	Data and disclosures	Stakeholder research and engagement	Policy advocacy	Green skills

- Make practical efforts to eliminate or reduce levels of generated waste, reusing and recycling waste materials wherever possible. The handling, storage, movement, treatment, and disposal of all waste to be carried out in accordance with applicable regulations and in an environmentally responsible manner
- Provide a credible ESG scorecard from a reputable third party, for example EcoVadis.

Human Rights

We expect all suppliers to respect the human rights of your **own workforce**, your **supply chain**, and your **customers**. This includes complying with the provisions of the **Modern Slavery Act 2015**.

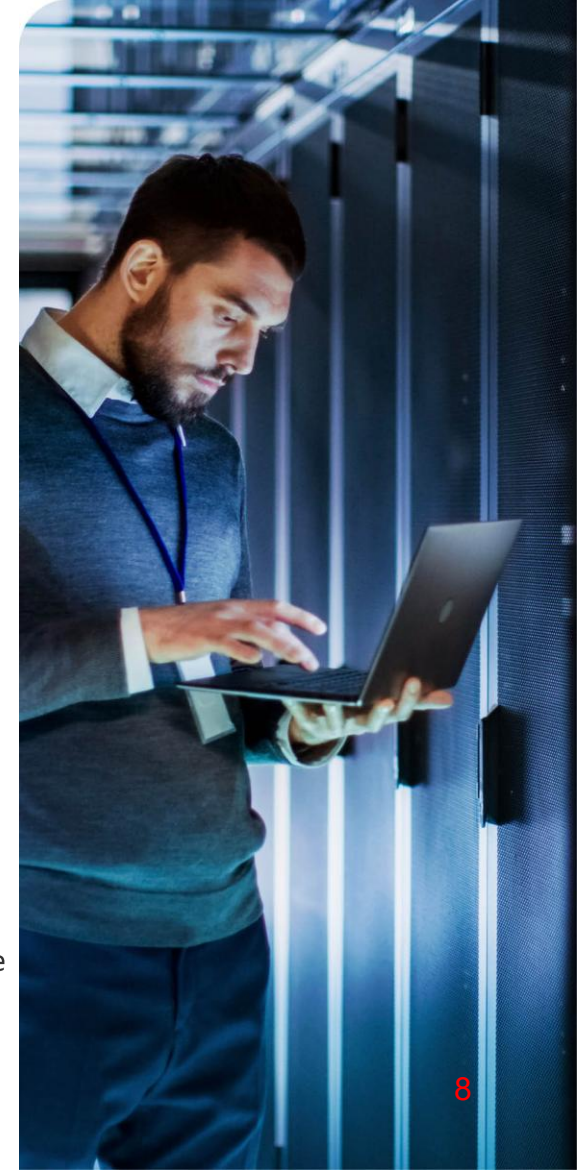
What we expect:

- Respect the human rights of your employees and to comply with all relevant legislation, regulations, and directives, including awareness and mitigation of the risk of modern slavery in the countries and communities in which you operate and, where relevant, compliance with the UK Modern Slavery Act.
- Have robust means of ensuring that the subcontractors in your supply chain also comply with the Modern Slavery Act 2015.
- Prohibit forced labour (slavery) and human trafficking in your supply chain and give all employees the right and ability to leave employment if they choose.
- Prohibit child labour. Child labour is defined as work that 'deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development'. This includes (i) any child below the minimum working age engaged in non-light work, and (ii) juvenile workers engaged in hazardous work.
- Ensure that wages meet the legally mandated minimum without unauthorised deductions.
- Allow your employees to legally organise and join associations (such as labour unions).
- Ensure working hours are in accordance with local regulation and industry practice and voluntary overtime is at a manageable level.
- Treat all employees fairly and do not harass or discriminate against any group in your

- employment practices, based on gender, race, age, sexual orientation, gender identity, disability, faith, or family circumstances.
- Ensure there are no negative consequences for anyone who raises a concern.
- Champion your workforce and customers' health, safety, and wellbeing.
- Map your value chain to understand players in your ecosystem.

What we encourage:

- Achieve higher standards than the minimum set out in the Equality Act 2010.
- Ensure a zero tolerance of harassment and bullying, driving inclusion and increasing diversity overall; monitor incidents of bullying and harassment.
- Present diverse colleagues and teams to work alongside Santander UK.
- Be able to evidence that recruitment practices are accessible to widest possible groups and do not disproportionately affect anyone due to gender, race, ethnic or national origin, age, disability, sexual orientation, gender expression, gender identity and socio-economic background.
- Have diversity training available to the workforce and that uptake is being monitored.
- Collect data to understand the profile of the workforce and have measures to improve diversity.



Social

Our Social strategy reflects our ambition to building productive and inclusive growth with our customers, communities, and colleagues.

We aim to help our customers strengthen their financial health and access financial opportunities, support our communities through skills development and greater access to opportunity, and foster an inclusive culture in our workplace. Together, these priorities guide how we respond to our most material social topics in the UK.

Diversity and Inclusion

What we expect:

- Actively demonstrate commitment to equality, diversity, and inclusion through all aspects of workplace operations and management considering equality of opportunity in employment, skill development and career advancement, particularly with under-represented segments of society in local operations.
- Suppliers must undertake to treat all their employees fairly and equally and not to discriminate on the basis of birth, race, sex, religion, opinion or any other personal or social condition or circumstance.

What we encourage:

- Have a documented Diversity and Inclusion statement or set of statements within your Policy framework.
- Suppliers to support our diversity and inclusion efforts by recruiting, utilising, and developing diverse businesses on Santander UK's work. Diverse businesses are broadly defined as 'size diverse' i.e., small, and medium-sized enterprises where revenue and/or employment eligibility limits are defined locally; or 'ownership diverse' i.e., where socio-economic under-represented segments of society, as defined by local/regional standards, meet ownership, control, and operating standards for minority owned businesses designation. It is our commitment that diverse business enterprises shall have equal opportunity to compete for all goods and services to become preferred suppliers and/or subcontractor(s) for the organisation. Santander UK is committed to the development and growth of diverse business enterprises to build a better working world and expand networks.

Santander UK's Social Strategy

Support productive inclusive growth across our main stakeholders: Our Customers, Our Communities and Our People

Our Customers	Our Communities	Our People	
Making their better happen	Better communities	Unleash potential	
Financial health Financial inclusion Social finance (Social housing)	Education, employability, and entrepreneurship Financial education Vulnerable people	Social mobility in the workplace Talent and skills development Inclusive culture	
Key Enablers			
Partnerships and collaborations	Communication	Strategic workforce planning	Data and disclosures

Social continued

Our Social strategy reflects our ambition to building productive and inclusive growth with our customers, communities, and colleagues.

We aim to help our customers strengthen their financial health and access financial opportunities, support our communities through skills development and greater access to opportunity, and foster an inclusive culture in our workplace. Together, these priorities guide how we respond to our most material social topics in the UK.

Accessibility

What we expect:

- Suppliers are to abide by all standards, best practice guidance and regulations related to accessibility including, where applicable, Web Content Accessibility Guidelines (WCAG) v2.2 to minimum AA standard.
- Align with Hassel Inclusion's 5 key principles for digital inclusion and accessibility (or similar): Expand Awareness, Embed Strategy, Enable Process, Measure Effects, Continually Evolve.

What we encourage:

- All our suppliers to be committed to utilising, and making available, accessible technologies and products that contribute to the productivity of all employees, including those with disabilities. For the purpose of this Code of Supplier Responsibility, disability is defined as a colleague with a long-term health condition (including mental health and neurodiversity) which has a substantial impact on their day-to-day life.
- To have a documented accessibility statement or reference to accessibility within other policies.
- Accessibility roadmaps, ensuring consistent learning and improvement to create inclusive and accessible products, services and environments.

Mental Health

What we encourage:

- Active promotion of positive mental health at work.
- Suppliers to have a documented mental health and wellbeing strategy.

Health & Safety

What we expect:

- Suppliers must comply with health and safety requirements to provide their employees with a safe and appropriate working environment.

Responsible Business Practices

Santander UK requires the highest standards of integrity. We operate a zero-tolerance approach to bribery, corruption, fraud, extortion and embezzlement. Breaches may result in termination and legal action.

What we expect:

- **Anti-bribery and corruption:** Do not offer, give or accept anything of value to improperly influence decisions. Comply with the UK Bribery Act 2010. Gifts and hospitality must be proportionate, transparent and never inappropriate.
- **Economic crime prevention:** Maintain effective controls to prevent Anti-Money Laundering, Counter-Terrorist Financing, sanctions breaches, bribery, tax evasion and fraud. Report any relevant breaches promptly.
- **Trade compliance:** Comply with all applicable trade controls and sanctions.
- **Third-party management:** Ensure subcontractors meet equivalent standards and legal requirements. Suppliers remain fully accountable.
- **Data protection and security:** Comply with Data Protection Act 2018 and UK GDPR. Apply appropriate security controls and report breaches immediately.
- **Conflicts of interest:** Identify, disclose and manage conflicts, including relationships with Santander colleagues.
- **Assurance:** Maintain records and demonstrate compliance on request.

What we encourage:

- **Speak Up:** Report concerns via appropriate channels.
- **Governance:** Maintain clear ethical policies and controls.
- **Continuous improvement:** Adopt a Code of Responsible Business, or equivalent.



Cyber Responsibility

We expect the highest standards of **Cyber Security** at Santander UK from our Suppliers. Keeping our customers and business **safe from Cyber threats and incidents** is paramount to upholding our values as a reputable organisation.

What we expect:

- The ability to provide documentation on your security protocols for hosting, identity management, and data protection, including how you handle access controls, encryption, and incident response.
- That you can evidence how you ensure compliance with industry standards and regulations, and what measures are in place to regularly audit and update your security practices.
- That you can demonstrate compliance with any security standards i.e. Cyber Essentials (+), SOC2 or ISO2007.
- Have a schedule of patching for both software and hardware to ensure timely updates and compliance with security standards.
- Annual penetration testing, where vulnerabilities are remediated.
- A timely and effective response to any security concerns Santander identifies through its continuous monitoring activities.
- A policy of transparency and information sharing in the event of a cyber security incident or breach.

What we encourage:

- Use of the relevant channels to Speak Up regarding any suggestions that incidents or breaches have occurred and not been reported so that necessary damage control and protective actions can be taken.
- A strong internal cyber security culture where controls and practices are subject to continuous review.
- Cyber security onboarding standards and continuous monitoring of your own third-party suppliers.



What we will do

The provisions of this Code of Supplier Responsibility are in addition to and not in lieu of any legal agreement or contract. We reserve **the right to review** your policies, procedures, and supporting documentation related to compliance with this Code and, in some higher risk instances, we may undertake an **on-site assessment** of key suppliers to validate adherence.

To ensure responsible and sustainable supply chain practices, **we commit to:**

- Provide mechanisms for prospective suppliers to be considered for work;
- Treat suppliers fairly with an open tendering process and a clear relationship management process;
- Work closely with our suppliers to collaborate and develop high quality products and services, effectively managing risks;
- Provide clear guidance on our payment procedures and pay invoices in line with agreed terms and in accordance with the Prompt Payment Code;
- Ensuring support for inclusive, accessible, and ethical living supply chain;
- Supporting viable opportunities to reduce environmental and climate impacts and to preserve our planet and natural resources;
- Interact and engage with our suppliers on a regular basis. This ensures maximum benefit for our customers in terms of price, quality, and social impact;
- Reviewing this Code as needed and revising it over time as our approach to responsible sourcing evolves.
- Assign you a service manager who will act as your key day to day point of contact.
- Take any concerns you have with how we operate with you seriously and, where appropriate and proportionate, investigate further.
- Encourage candor and the spirit of the challenge between the organisations, keeping a focus on best customer outcome and holding each other accountable to delivery.

Useful Resources

You can access more information on how we work with our suppliers online:

[Suppliers | Santander UK](#)

[Santander UK Sustainability Supplement 2025](#)

[Standard Terms & Conditions](#)

Corporate Governance:
[About Santander | Corporate governance](#)

SAP Ariba / Helios:
certification.uk@aquanima.com

Please feel free to contact us.
We value your feedback.