

Socially Responsible Investment Policy

February 2026



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1. Introduction

Santander Asset Management Luxembourg, S.A. (hereinafter "SAMLux"), through its activities, can have a relevant impact on society and the environment.

In this regard, environmental, social and governance (hereinafter "ESG") factors may influence the risk and opportunity profile of investments. Taking these factors into account provides a more comprehensive view that supports sound investment decisions in the best financial interests of clients, while also potentially generating positive effects on society and the environment

As an asset manager, SAMLux has the fiduciary duty to always act in the long-term interest of its clients. In order to fulfil this duty, , alongside financial factors, ESG aspects that may influence risk and opportunity management are incorporated into investment analysis, with the aim of achieving a comprehensive view that facilitates better founded investment decisions

Consequently, SAMLux's purpose is to act in a responsible manner, assuming a series of commitments beyond legal obligations, through a better management of risks and opportunities (including those related to sustainability), seeking to meet the financial objectives of customers while contributing to a sustainable development of businesses and society.

SAMLux's purpose is to try to maximize its contribution to sustainable development, promoting the positive impact of its activities, while being aware that these can generate adverse impacts on sustainability factors, which must be managed properly, trying to minimize them whenever necessary, keeping in mind the objective of always acting in clients' best interest.

SAMLux's socially responsible investment approach is inspired by the United Nations Principles of Responsible Investment:

- Incorporate ESG issues into investment analysis and decision-making processes.
- Incorporate ESG issues into our ownership policies and practices.
- Seek appropriate disclosure on ESG issues from the entities in which SAMLux invests.
- Promote acceptance and implementation of the Principles within the investment industry.
- Work together to enhance SAMLux effectiveness in implementing the Principles.
- Report on SAMLux activities and progress towards implementing the Principles.

This policy defines SAMLux's approach to socially responsible investment (hereinafter SRI) and defines the criteria considered in the integration of ESG variables in the investment process. It also incorporates relevant aspects within the SRI and as part of its fiduciary duty, such as the exercise of voting rights and *engagement*, which are described in detail in the corresponding policies defined in this regard.

2. Scope of application

This policy is intended to apply to all assets, sectors and countries in which SAMLux invests through its active management products. Those funds that are passively managed (such as guaranteed, structured or index funds) fall outside the scope of this policy.

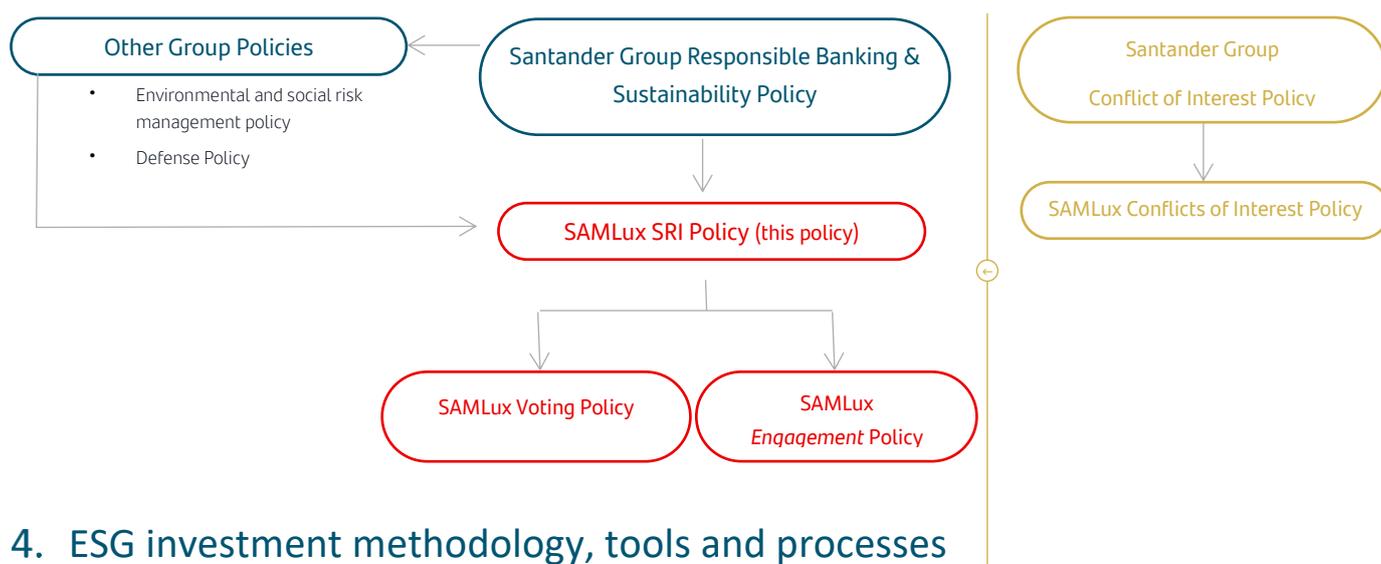
The investment process defined in point 4 of this policy includes direct investment in equities and fixed income, as well as indirect investment through funds managed by third parties. In the case of funds mandated to third-party managers, SAMLux performs an analysis of the manager's ESG capabilities, which is incorporated into the RFPs (*Request for Proposal*), being especially relevant for mandates with an SRI approach.

3. General principles and relationship with other policies

This policy, which defines the general guiding principles of SAMLux regarding socially responsible investment, is aligned with the general principles of Santander Group's Responsible Banking and Sustainability Policy and is based on the best practices included in international conventions and protocols, codes of conduct and internationally relevant guides on this particular subject.

This policy is based on the applicable regulations in each case and is inspired by recognised international conventions, protocols and codes of conduct, which serve as guidance to strengthen the quality and consistency of our approach¹.

This policy is complemented by other policies of SAMLux, SAM and Santander Group, according to the following chart:



4. ESG investment methodology, tools and processes

SAM LUX delegates the portfolio management function to SAM (asset manager business of the Santander Group), or third-party portfolio managers where the external portfolio manager is responsible for the investment decision process.

Investment managers carry out an ESG assessment of the different assets in which they invest, which allows a broader view of the sustainability risks and opportunities they present. This analysis seeks to identify those issuers that are best prepared to manage risks and seize opportunities linked to ESG aspects, thereby strengthening their long-term resilience and competitiveness.

The ESG assessment is a robust process that takes into account different components:

¹ More information in the Annex

- A valuation analysis where the behaviour of issuers is assessed in relation to different environmental, social and governance factors. For this assessment, investment managers use the information provided by external data providers, incorporating it into their own valuation methodology.
- Exclusions applied mainly to companies whose activities or practices may generate material risks —financial, regulatory, environmental, social or reputational—, or in cases where significant controversies are identified in their behaviour. These exclusions are based on Santander Group policies and are applied with the aim of strengthening risk management. Likewise, exclusions may also be established in connection with regulatory breaches or specific SRI product mandates.
 - List of excluded companies in the defence sector linked to the manufacture of controversial weapons defined by Santander Group. See Annex II.
 - Concerning exclusions defined in the Santander Group's Environmental and Social risk management policy, the following ones can be stated:
 - Issuers deriving more than 30% of revenues from the exploration and production of non-conventional oil and gas (fracking² and oil sands) and/or Arctic oil and gas.
 - Issuers deriving more than 25% of revenues from thermal coal mining (0% by 2030) and coal-fired power generation (10% by 2030)³.
 - Issuers proven or reasonably suspected to be involved in serious or severe human rights⁴ violations or breaches of international standards in this regard and not subject to ongoing engagement.
 - For other prohibited activities, defined in the Santander Group's Environmental and Social Risk Management Policy, that may potentially be applicable to SAMLux's business, the Manager carries out a continuous review of the available data by external suppliers to determine its possible application.

The implementation of the exclusions included in the Santander Group's Environmental and Social Risk Management Policy to third party managed non-ESG funds will be assessed on a case-by-case basis.

In addition, other exclusions may be applied for non-compliance with regulations or are related to specific SRI products conditions.

The ESG evaluation of companies is based on the concept of double materiality, understood as both the impact of ESG factors on the risk and opportunity profile of investments and the potential effects of investments on those factors. This assessment is composed of general analysis criteria - common to all sectors - and specific criteria - depending on the sector and activity - covering all relevant ESG aspects related to the essential thematic areas for an environmental, social and good governance analysis. In the case of third-party funds, and when possible due to information availability, SAMLux conducts an ESG analysis in order to assess their alignment with SAMLux's SRI approach.

² Due to the necessity to support the energy transition, energy security and affordability, and in situations where there can be exceptional social and economic implications, that could ultimately enable the transition and may play a crucial role in the economic and social local development (developing countries/emerging economies), exceptions in relation to fracking may be considered in jurisdictions where these activities are permissible under local regulation, subject to enhanced due diligence and appropriate approval.

³ These exclusions apply progressively until 2030. For exceptional cases such as the energy sector in Poland, it can be considered a roadmap with a more relaxed timetable, in order to achieve the same objectives by 2030 taking into account the characteristics of the local market.

⁴ Considering child labour, forced labour, discrimination at work, freedom of association, working conditions, grievance mechanisms for workers, occupational health and safety issues, impacts on communities and land grabbing.

This assessment is applied systematically across all issuers in equities and fixed income, in both direct and indirect investmentes, integrated into internal investment platforms alongside financial data. In addition to corporate issuers, ESG evaluation of sovereign issuers is carried out using adapted criteria. SAM Group's Democracy Index and Freedom in the World classifications may be applied to exclude certain sovereigns.

SAMLux benefits from access to ESG data and methodologies developed by the SAM global SRI team. These methodologies are updated periodically to reflect regulatory and market developments and support internal consistency across local entities.

The nature of illiquid/alternative vehicles requires a specific ESG methodology adapted to the characteristics of such products. In this sense, SAM has developed a methodology aligned with international standards. This includes:

- **Valuation analysis:** ESG criteria aligned with SDGs, sector indicators, and specific impacts defined by Santander Group's Environmental and Social, Risk Management Policy.
- **Exclusion analysis:** Sectoral exclusions based on internal policies apply. Norms-based screening or other exclusions may also apply. Application of these criteria is subject to analysis and adjustment per product to ensure relevance and regulatory alignment.

5. Voting and engagement

SAMLUX monitors the companies in which it invests in order to protect the interests of his clients, promote long-term value creation, manage risks and promote good governance in companies. Therefore, it carries out voting activities that are based on the SAMLUX voting policy.

Voting

SAMLux's voting policy establish the guidelines to be considered in the voting process at the annual general meetings (and extraordinary general meetings, if applicable) of the companies in which SAMLUX invests in. The policy is aligned with the applicable legislation and voluntary codes promoting best practices, and it is consistent with the respective objectives of each portfolio. SAMLUX aspires to exercise its right to vote whenever possible and when the costs associated with exercising the right to vote do not exceed the potential benefits. The information necessary to decide the vote comes from different sources that include internal analysis and can take as an input the recommendations of an external proxy advisor.

SAMLUX is responsible for controlling any potential conflicts of interest that may arise from exercising their right to vote. In the event of a conflict of interest, the provisions of the Voting Policy, the SAMLUX Conflict of Interest Policy and the Santander Group Conflict of Interest Policy will apply.

Engagement

SAMLUX seeks a double objective through dialogue and engagement activities with the companies in which it invests. On one hand, to understand in depth the issuers' business model, risks and opportunities. On the other hand, to promote continuous improvement of the strategy, management and reporting of environmental, social or governance aspects that are material for each issuer, with the aim of protecting the value of SAMLux's investments.

As SAM LUX delegates the portfolio management function, it is the engagement policy of each Investment Manager which defines the implementation of SAMLux's fundamentals regarding these engagement activities, which focus on those issues that are most relevant and have a greater impact on the value of the assets.

Likewise, SAMLux, due to its condition of wholly owned subsidiary of SAM, collaborates with other agents (other asset managers, investors networks, etc.) with the aim of sharing good risk management practices and promoting transparency in the industry. Through its participation in initiatives such as the Principles of Responsible Investment of the United Nations and forums such as Spainsif in Spain and Sustainability Technical Group at ANBIMA (Brazilian Financial and Capital Markets Association) in Brazil. SAM promotes the exchange of knowledge on responsible investment and maintains a constructive dialogue with stakeholders to foster transparency and improve risk and opportunity management in the sector

The engagement policy defines SAM's fundamentals regarding these engagement activities, which focus on those issues that are most relevant and have a greater impact on the value of the assets.

For alternative funds, the applicability of voting and engagement policies will be assessed based on fund activity. Engagements may be conducted individually or through collaborative initiatives, with the SRI Team working alongside investment teams to prioritise actions based on material ESG impact.

6. Transparency

SAMLux expects issuers to report on the ESG aspects that are relevant to their activity and that can substantially influence the analysis and decisions of investors and other stakeholders.

In addition, being responsible for the investment implies being transparent about how SAMLux incorporates ESG aspects into its investment decisions. Therefore, SAMLux makes its socially responsible investment policies available to its stakeholders, being accessible on the website.

Similarly, SAMLux strictly monitors and complies with any legal reporting requirement.

The periodic information that customers receive about SAMLux's SRI products includes information related to the ESG analysis whenever it is considered appropriate and complying, in any case, with applicable regulation. The information may be communicated using different channels and formats (mails, reports, videos, etc.) As for its employees, SAMLux promotes information sharing on its activity in terms of socially responsible investment.

SAMLux is committed to maintaining high standards of transparency, ensuring that all its stakeholders receive high-quality, accurate and timely information about how relevant factors are integrated into the investment process, in line with regulatory obligations and best practices. To this end, it promotes the continuous improvement of the reporting systems to provide better information about the incorporation of ESG criteria in the investment processes, as well as information regarding the voting activities carried out by SAMLux.

Transparency reporting aligns with both regulatory requirements and voluntary standards to which SAMLux adheres. Internal and external reporting is supported by continuous improvement of systems that integrate ESG, SFDR, and Net Zero-related metrics.

7. Responsibilities and governing bodies

The SRI government in SAM Lux consists mainly of 3 bodies:

- **Executive Committee (COMEX)**

The committee is comprised of the SAM Lux's Conducting Officers. It is responsible, together with the SAMLux Board of Directors, for approving and overseeing the compliance with SRI strategy. Occasionally and depending on the topics to be discussed, representatives from other areas may participate.

- **Sustainability Strategies Monitoring forum**

The forum is made up, among others, of the Conducting Officers of portfolio management, risk management and compliance. It is responsible for overseeing the implementation of sustainability strategies applied to ESG products.

- **Voting committee**

The committee is made up of the Conducting Officers of different areas of SAMLux involved in voting activities (portfolio management, compliance, risk management, legal, etc.) It oversees compliance with SAMLux's voting policies and monitors and controls all activities related to this policy.

In addition, there are other more specific working groups and forums, as well as reporting lines on SRI to the governing bodies (senior management) of SAMLux which are responsible for supervising the implementation of the SRI strategy.

SAMLux will attend SAM Group's Sustainability Strategies Monitoring Forum on a monthly basis, and will be provided with the presentation as well as the recording of the meeting. Additional forums such as Voting and Engagement Forums and PASI (Principal Adverse Sustainability Impacts) Forums may be established to support governance of ESG integration, particularly for SRI and SFDR-aligned products.

8. Policy holder

The owner of this policy is The Board SAMLux, who is responsible for the approval and supervision of its implementation.

9. Policy updates

Version	Responsible area	Description	Committee Adoption	Date of adoption
1	Investment Management & Compliance SAMLUX	SRI Policy Approval	Board SAMLUX	June 2020
2	Investment Management & Compliance SAMLUX	Minor changes in "Relationship with other policies scheme"	Board SAMLUX	September 2024
3	Investment Management & Compliance SAMLUX	Updates related to governance and adaptation to last version of Santander Group's Policies	Board SAMLUX	June 2025
4	Investment Management & Compliance SAMLUX	Adaptation to the latest versions of Santander Group Policies and slight wording modification.	Board SAMLUX	February 2026

Annex I: Glossary of terms

- **Socially Responsible Investment (SRI):** Type of investment that applies financial and extra-financial criteria in the analysis and investment processes.
- **Fiduciary duty:** legal obligation of one of the parties to act in the best interest of the other. The most important fiduciary duties are to act in the best interest of the client, avoid any conflict of interest (duty of loyalty) and act with due care, skill and diligence (duty of prudence).
- **ESG criteria:** Environmental, social and governance criteria.
- **Voting rights:** Shareholders' right to vote at general shareholders meetings on corporate policy matters, including decisions on the composition of the board of directors, the initiation of corporate actions, the making of substantial changes in the operations of the corporation, etc.

Engagement: This refers to the process through which the investor conducts a constructive dialogue with investee companies, with the aim of gaining a deeper understanding of their performance, practices and policies – including those related to environmental, social and governance (ESG) factors – and encouraging transparency and the appropriate management of material risks. Engagement may also refer to the dialogue with other relevant stakeholders.

Annex II – Prohibited activities of the Santander Group's Defense Policy

SAMLUX and the Santander Group supports the right of nations to self-defence as enshrined in the United Nations Charter (Article 51), and this policy is intended to support global security and stability.

In addition to countries' need to protect their borders, the defence sector is also key to boosting economies as it helps create jobs and facilitates innovation and cross-cutting technological advancements that can be used in other industries such as logistics and telecommunications.

It is increasingly clear that public spending alone will not be sufficient to fulfil the defence industry's investment needs, and that the financial sector has a key role to play. Santander recognises the evolving needs of the defence sector and is committed to invest and provide financial solutions that contribute positively to sustainable growth and global security, and to be a proactive and responsible financier in the defence sector.

All investment decisions must be taken in line with compliance obligations and commitments to uphold human rights and international law, including but not limited to the United Nations Charter (Article 51), the Universal Declaration of Human Rights, the UN Global Compact and the UN Guiding Principles on Business and Human Rights.

All investments must be evaluated for compliance with all applicable local, regional, and international laws, including but not limited to EU, UK and US regulations, and export controls, embargoes, and sanctions⁵

⁵ Including those imposed by the European Union, the Organization for Security and Cooperation in Europe (OSCE), the United States, the Office of Foreign Assets Control (OFAC), and/or the United Nations.

When evaluating investments involving defence items⁶, dual-use items⁷ and/or key and dedicated components⁸, thorough due diligence⁹ must be conducted, including assessment against the following factors:

- Human rights and ethical considerations: Santander works to support and respect the human rights of its employees, customers, suppliers, shareholders, investors, and/or communities. All transactions are evaluated in order to assess the possible impact on the protection of internationally proclaimed human rights, and to ensure alignment with relevant international human rights conventions¹⁰.
- End-use and end-user assurance and diversion risk: One of the most important factors in our assessment is any potential end-use and/or end-user of the relevant item or service:
 - When evaluating transactions, know-your-client requirements are applied and they are ensured compliance with anti-money laundering and terrorism financing regulations.
 - It is also considered the political, economic, and financial stability, and the democratic principles of the country or countries involved.
 - It is evaluated the risk of diversion for unlawful purposes and/or to unauthorized actors, as well as other risks associated with the country, parties or envisaged end-use.
- It is considered whether the entity and transaction are supported (or otherwise) by government export credit agencies or multilateral entities.
- It assesses the compliance with relevant international conventions and treaties on the non-proliferation of controversial weapons¹¹ and other regulations and guidance issued by international forums¹².

For additional information, please refer to the Santander Group Defense Sector Policy, which is available at: <https://www.santander.com/content/dam/santander-com/en/contenido-paginas/nuestro-compromiso/pol%C3%ADticas/do-Defence%20sector%20policy-en.pdf>

⁶ Commodities (such as systems, equipment, components, materials, software or technology) that are in most part specially designed or modified for military use.

⁷ Goods, software and technology that can be used for both civilian and military applications.

⁸ Those components considered key, tailor-made and/or essential to the intended purpose of defense items and/or dual-use items.

⁹ To the extent required by applicable law, customers and transactions involving these items will also be subject to an enhanced due diligence process to determine the unique risks presented prior to decisioning.

¹⁰ Such as the UN Global Compact, the UN Guiding Principles on Business and Human Rights, The Universal Declaration of Human Rights and The ILO Declaration of Fundamental Principles of Rights at Work.

¹¹ Such as the; Biological Weapons Convention; Chemical Weapons Convention; The Treaty on the Non- Proliferation of Nuclear Weapons, the Convention on Cluster Munitions and the Ottawa Convention

¹² Such as the UN Protocol against the illicit manufacturing of and trafficking in firearms, their parts, components and ammunition, supplementing the UN Convention against transnational crime, the EU Code of Conduct regarding the export of weapons, etc.