



GRI Content Index and Responsible Banking Principles Index

GRI Content Index (102-55)

For the Materiality Disclosures services, GRI Services has revised that the GRI content index is clear, and that the references to the disclosures 102-40 through to 102-49 correspond to the indicated sections of the report.



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Disclosure	Content	Page / Direct Answer	Omission	Verification
GRI 101: FOUNDATION 2016				
GENERAL DISCLOSURES				
GRI 102: GENERAL DISCLOSURES 2016				
1. Organizational Profile				
102-1	Name of the organization	p. 42 - Banco Santander México, S.A., Institución de Banca Múltiple, Grupo Financiero Santander México.		✓
102-2	Activities, brands, products, and services	p. 46 y 47 - None of Santander's products or services are prohibited.		✓
102-3	Location of headquarters	Corporate Headquarters located at: Avenida Prolongación Paseo de la Reforma 500, Colonia Lomas de Santa Fe, Delegación Álvaro Obregón, C.P.01219, Mexico City. The Global Headquarters of Santander is located in Madrid, Spain.		✓
102-4	Location of operations	p. 46 - All the significant operations, investments, contracts and relevant data in this report refer to Mexico as a region, since the global context of Santander's operation in the world is referenced in the Report of Spain and in this report in page 23.		✓
102-5	Ownership and legal form	Banco Santander México, S.A., Multiple Banking Institution, Grupo Financiero Santander México. Private financial institution subsidiary of the Bank Santander Spain.		✓
102-6	Markets served	p. 46		✓
102-7	Scale of the organization	p. 44, 46 and 47		✓
102-8	Information on employees and other workers	p. 142-144 - Santander does not have employees part-time. Activities carried out by workers who are not employees, do not represent a significant part for the organization. The data was collected through of extraction of Human Resources systems.		✓
102-9	Supply chain	p. 220-222		✓

Disclosure	Content	Page / Direct Answer	Omission	Verification
102-10	Significant changes to the organization and its supply chain	There were no significant changes in our operations nor in our supply chain.		✓
102-11	Precautionary Principle or approach	p. 110 and 112		✓
102-12	External initiatives	p. 106-109		✓
102-13	Membership of associations	p. 106-109		✓
2. Strategy				
102-14	Statement from senior decision-maker	p. 48, 50, 52 and 54		✓
102-15	Key impacts, risks, and opportunities	p. 48, 50, 52, 54		✓
3. Ethics and Integrity				
102-16	Values, principles, standards, and norms of behavior	p. 63-65 and 120-121		✓
102-17	Mechanisms for advice and concerns about ethics	p. 120-126		✓
4. Governance				
102-18	Governance structure	p. 93-102		✓
102-22	Composition of the highest governance body and its committees	p. 94-95		✓
5. Stakeholder Engagement				
102-40	List of stakeholder groups	p. 68-69		✓
102-41	Collective bargaining agreements	p. 142		✓
102-42	Identifying and selecting stakeholders	p. 66		✓
102-43	Approach to stakeholder engagement	p. 68-69		✓
102-44	Key topics and concerns raised	p. 266-274		✓

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Disclosure	Content	Page / Direct Answer	Omission	Verification
6. Reporting Practice				
102-45	Entities included in the consolidated financial statements	p. 92		✓
102-46	Defining report content and topic Boundaries	p. 266-267		✓
102-47	List of material topics	p. 266-274		✓
102-48	Restatements of information	p. 262		✓
102-49	Changes in reporting	p. 262		✓
102-50	Reporting period	p. 262		✓
102-51	Date of most recent report	p. 262		✓
102-52	Reporting cycle	p. 260		✓
102-53	Contact point for questions regarding the report	p. 262		✓
102-54	Claims of reporting in accordance with the GRI Standards	p. 262		✓
102-55	GRI content index	p. 284-294		✓
102-56	External assurance	p. 262 and 298-301		✓

MATERIAL TOPICS

Corporate Governance

GRI 103: MANAGEMENT APPROACH 2016

103-1	Explanation of the material topic and its Boundary	p. 268		✓
103-2	The management approach and its components	p. 88-103		
103-3	Evaluation of the management approach	p. 88-103		

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Disclosure	Content	Page / Direct Answer	Omission	Verification
Comprehensive Risk Management				
GRI 103: MANAGEMENT APPROACH 2016				
103-1	Explanation of the material topic and its Boundary	p. 268		✓
103-2	The management approach and its components	p. 110-117		
103-3	Evaluation of the management approach	p. 110-117		

Ethical Behaviour

GRI 103: MANAGEMENT APPROACH 2016

103-1	Explanation of the material topic and its Boundary	p. 268		✓
103-2	The management approach and its components	p. 118-126		
103-3	Evaluation of the management approach	p. 118-126		

GRI 205: ANTI-CORRUPTION 2016

205-2	Communication and training about anti-corruption policies and procedures	p. 121-123		✓
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Financial Inclusion

GRI 103: MANAGEMENT APPROACH 2016

103-1	Explanation of the material topic and its Boundary	p. 269		✓
103-2	The management approach and its components	p. 204-211		
103-3	Evaluation of the management approach	p. 204-211		

FINANCIAL SERVICES SECTOR DISCLOSURE 2013 G4 ASPECT: LOCAL COMMUNITIES

FS13	Access points in low-populated or economically disadvantaged areas by type	p. 207 There was a 186.2% increase of acces points between 2018 and 2019		✓
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Disclosure	Content	Page / Direct Answer	Omission	Verification
Accesibility of Products and Services				
GRI 103: MANAGEMENT APPROACH 2016				
103-1	Explanation of the material topic and its Boundary	p. 269		✓
103-2	The management approach and its components	p. 152, 176-177 and 204-211		
103-3	Evaluation of the management approach	p. 152, 176-177 and 204-211		
FINANCIAL SERVICES SECTOR DISCLOSURE 2013 G4 ASPECT: LOCAL COMMUNITIES				
FS13	Access points in low-populated or economically disadvantaged areas by type	p. 207 There was a 186.2% increase of acces points between 2018 and 2019		✓
Training of Employees				
GRI 103: MANAGEMENT APPROACH 2016				
103-1	Explanation of the material topic and its Boundary	p. 269		✓
103-2	The management approach and its components	p. 142-151		
103-3	Evaluation of the management approach	p. 142-151		
GRI 404: TRAINING AND EDUCATION 2016				
404-1	Average hours of training per year per employee	p. 142-145		✓
Diversity and Labor Inclusion				
GRI 103: MANAGEMENT APPROACH 2016				
103-1	Explanation of the material topic and its Boundary	p. 270		✓
103-2	The management approach and its components	p. 152-170		
103-3	Evaluation of the management approach	p. 152-170		
GRI 405: DIVERSITY AND EQUAL OPPORTUNITY 2016				
405-1	Diversidad en órganos de gobierno y empleados	p. 90, 95, 142-144		✓

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Disclosure	Content	Page / Direct Answer	Omission	Verification
Gender Equality				
GRI 103: MANAGEMENT APPROACH 2016				
103-1	Explanation of the material topic and its Boundary	p. 270		✓
103-2	The management approach and its components	p. 152-160		
103-3	Evaluation of the management approach	p. 52-160		
GRI 405: DIVERSITY AND EQUAL OPPORTUNITY 2016				
405-1	Diversidad en órganos de gobierno y empleados	p. 90, 95, 142-144		✓
Capture and Retention of Talent				
GRI 103: MANAGEMENT APPROACH 2016				
103-1	Explanation of the material topic and its Boundary	p. 270		✓
103-2	The management approach and its components	p. 148-161		
103-3	Evaluation of the management approach	p. 148-161		
GRI 401: EMPLOYMENT 2016				
401-1	New employee hires and employee turnover	p. 142-145 - The methodology used to calculate turnover rate is as follows: Annual turnover = $\frac{\sum \text{Total accumulated casualties for the active iHC month 2nd fortnight of month } i}{12i} = 1 \times 100$.		✓
Occupational Health and Safety				
GRI 103: MANAGEMENT APPROACH 2016				
103-1	Explanation of the material topic and its Boundary	p. 270		✓
103-2	The management approach and its components	p. 161-165		
103-3	Evaluation of the management approach	p. 161-165		
GRI 403: OCCUPATIONAL HEALTH AND SAFETY 2018				
403-1	Occupational health and safety management system	p. 161-165		
403-2	Hazard identification, risk assessment, and incident investigation	p. 164-165		
403-3	Occupational health services	p. 160-161		

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Disclosure	Content	Page / Direct Answer	Omission	Verification
403-4	Worker participation, consultation, and communication on occupational health and safety	p. 162-163		
403-5	Worker training on occupational health and safety	p. 145 y 164		
403-6	Promotion of worker health	p. 161-164		
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	p. 161-165		✓
403-8	Workers covered by an occupational health and safety management system		Information not available. The response to this disclosure is being strengthened for next year.	

Fair Compensation to Employees

GRI 103: MANAGEMENT APPROACH 2016

103-1	Explanation of the material topic and its Boundary	p. 271		✓
103-2	The management approach and its components	p. 96, 160-161		
103-3	Evaluation of the management approach	p. 96, 160-161		

GRI 201: ECONOMIC PERFORMANCE 2016

201-1	Direct economic value generated and distributed	p. 275		✓
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Fair Treatment of Suppliers

GRI 103: MANAGEMENT APPROACH 2016

103-1	Explanation of the material topic and its Boundary	p. 271		✓
103-2	The management approach and its components	p. 220-223		
103-3	Evaluation of the management approach	p. 220-223		

Selection of Suppliers Under Criteria of Social and Environmental Responsibility

GRI 103: MANAGEMENT APPROACH 2016

103-1	Explanation of the material topic and its Boundary	p. 272		✓
103-2	The management approach and its components	p. 220-223		
103-3	Evaluation of the management approach	p. 220-223		

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Disclosure	Content	Page / Direct Answer	Omission	Verification
GRI 412: HUMAN RIGHTS ASSESSMENT 2016				
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	p. 220-221 226 contracts evaluated in 2019 which equivalent to 63% of total suppliers homologated. The remaining 37% is excepted of this evaluation by corporate policy. The significant investment agreements within our supply chain come from strategic suppliers of the Bank (standardized through Aquanima).		✓

Promotion of Environmental and Social Principles and Respect for Human Rights in the Company's Value Chain

GRI 103: MANAGEMENT APPROACH 2016

103-1	Explanation of the material topic and its Boundary	p. 272		✓
103-2	The management approach and its components	p. 220-223		
103-3	Evaluation of the management approach	p. 220-223		

GRI 412: HUMAN RIGHTS ASSESSMENT 2016

412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	p. 220-221		✓
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Investment in Social Development (Health Programs, Nutrition, Children, Support for Natural Disasters)

GRI 103: MANAGEMENT APPROACH 2016

103-1	Explanation of the material topic and its Boundary	p. 272		✓
103-2	The management approach and its components	p. 242-257		
103-3	Evaluation of the management approach	p. 242-257		

Support for Education

GRI 103: MANAGEMENT APPROACH 2016

103-1	Explanation of the material topic and its Boundary	p. 272		✓
103-2	The management approach and its components	p. 210-211 and 230-241		
103-3	Evaluation of the management approach	p. 210-211 and 230-241		

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Disclosure	Content	Page / Direct Answer	Omission	Verification
FINANCIAL SERVICES SECTOR DISCLOSURE 2013 G4 ASPECT: PRODUCT AND SERVICE LABELING				
FS16	Initiatives to enhance financial literacy by type of beneficiary	p. 210-211		✓
Support for Research and Innovation in Education				
GRI 103: MANAGEMENT APPROACH 2016				
103-1	Explanation of the material topic and its Boundary	p. 273		✓
103-2	The management approach and its components	p. 230-241		
103-3	Evaluation of the management approach	p. 230-241		
Support for the First Employment and Entrepreneurship in University Students				
GRI 103: MANAGEMENT APPROACH 2016				
103-1	Explanation of the material topic and its Boundary	p. 273		✓
103-2	The management approach and its components	p. 156-158 and 230-241		
103-3	Evaluation of the management approach	p. 156-158 and 230-241		
Consumption and Energy Saving (Eco-Efficiency)				
GRI 103: MANAGEMENT APPROACH 2016				
103-1	Explanation of the material topic and its Boundary	p. 273		✓
103-2	The management approach and its components	p. 216-217		
103-3	Evaluation of the management approach	p. 216-217		
GRI 302: ENERGY 2016				
302-1	Energy consumption within the organization	p. 216		✓

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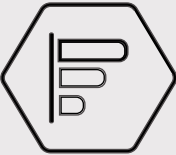

Disclosure	Content	Page / Direct Answer	Omission	Verification
Consumption and Water Saving				
GRI 103: MANAGEMENT APPROACH 2016				
103-1	Explanation of the material topic and its Boundary	p. 273		✓
103-2	The management approach and its components	p. 218		
103-3	Evaluation of the management approach	p. 218		
GRI 303: WATER AND EFFLUENTS 2016				
303-1	Water withdrawal by source	p. 218		✓
Waste Management				
GRI 103: MANAGEMENT APPROACH 2016				
103-1	Explanation of the material topic and its Boundary	p. 274		✓
103-2	The management approach and its components	p. 219		
103-3	Evaluation of the management approach	p. 219		
Generation of Emissions				
GRI 103: MANAGEMENT APPROACH 2016				
103-1	Explanation of the material topic and its Boundary	p. 274		✓
103-2	The management approach and its components	p. 215		
103-3	Evaluation of the management approach	p. 215		
GRI 305: EMISSIONS 2016				
305-1	Direct (Scope 1) GHG emissions	p. 215		✓
305-2	Energy indirect (Scope 2) GHG emissions	p. 215		✓

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Disclosure	Content	Page / Direct Answer	Omission	Verification
Consumption and Saving of Paper and Other Materials				
GRI 103: MANAGEMENT APPROACH 2016				
103-1	Explanation of the material topic and its Boundary	p. 274		✓
103-2	The management approach and its components	p. 218		
103-3	Evaluation of the management approach	p. 218		
GRI 301: MATERIALS 2016				
301-1	Materials used by weight or volume	p. 218		✓
Materiality and Sustainability Strategy				
GRI 103: MANAGEMENT APPROACH 2016				
103-1	Explanation of the material topic and its Boundary	p. 274		✓
103-2	The management approach and its components	p. 62 and 266-267		
103-3	Evaluation of the management approach	p. 62 and 266-267		
Citizenship and Corporate Philanthropy				
GRI 103: MANAGEMENT APPROACH 2016				
103-1	Explanation of the material topic and its Boundary	p. 274		✓
103-2	The management approach and its components	p. 104-109		
103-3	Evaluation of the management approach	p. 104-109		
Dialogue with Stakeholders				
GRI 103: MANAGEMENT APPROACH 2016				
103-1	Explanation of the material topic and its Boundary	p. 274		✓
103-2	The management approach and its components	p. 66-69		
103-3	Evaluation of the management approach	p. 66-69		

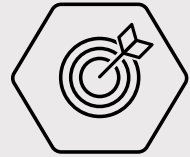
Responsible Banking Principles Index

Progress in the implementation of the principles for responsible banking

	PRINCIPLE	PAGE
	<p>"Principle 1: Alignment We will align our business strategy to be consistent with and contribute to individuals' needs and society's goals, as expressed in the Sustainable Development Goals, the Paris Climate Agreement and relevant national and regional frameworks."</p>	
	<p>1.1. Describe (high-level) your bank's business model, including the main customer segments served, types of products and services provided, the main sectors and types of activities, and where relevant the technologies financed across the main geographies in which your bank has operations or provides products and services..</p>	p. 44-47
	<p>1.2. Describe how your bank has aligned and/or is planning to align its strategy to be consistent with and contribute to society's goals, as expressed in the Sustainable Development Goals (SDGs), the Paris Climate Agreement, and relevant national and regional frameworks..</p>	p. 50, 54, 78, 80-81, 84-85 and 106-109
	<p>"Principle 2: impact and Target Setting We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products and services. To this end, we will set and publish targets where we can have the most significant impacts."</p>	
	<p>2.1. Impact Analysis: Show that your bank has identified the areas in which it has its most significant (potential) positive and negative impact through an impact analysis that fulfills the following elements: a) Scope: The bank's core business areas, products/services across the main geographies that the bank operates in have been as described under 1.1. have been considered in the scope of the analysis. b) Scale of Exposure: In identifying its areas of most significant impact the bank has considered where its core business/its major activities lie in terms of industries, technologies and geographies. c) Context & Relevance: Your bank has taken into account the most relevant challenges and priorities related to sustainable development in the countries/regions in which it operates. d) Scale and intensity/salience of impact: In identifying its areas of most significant impact, the bank has considered the scale and intensity/salience of the (potential) social, economic and environmental impacts resulting from the bank's activities and provision of products and services. Your bank should have engaged with relevant stakeholders to help inform your analysis under elements c) and d)) Show that building on this analysis, the bank has</p> <ul style="list-style-type: none"> • Identified and disclosed its areas of most significant (potential) positive and negative impact • Identified strategic business opportunities in relation to the increase of positive impacts / reduction of negative impacts. 	p. 128-263

PRINCIPLE

PAGE

**2.2. Target Setting**

Show that the bank has set and published a minimum of two Specific, Measurable (can be qualitative or quantitative), Achievable, Relevant and Time-bound (SMART) targets, which address at least two of the identified "areas of most significant impact", resulting from the bank's activities and provision of products and services.

Show that these targets are linked to and drive alignment with and greater contribution to appropriate Sustainable Development Goals, the goals of the Paris Agreement, and other relevant international, national or regional frameworks. The bank should have identified a baseline (assessed against a particular year) and have set targets against this baseline.

Show that the bank has analysed and acknowledged significant (potential) negative impacts of the set targets on other dimensions of the SDG/climate change/society's goals and that it has set out relevant actions to mitigate those as far as feasible to maximize the net positive impact of the set targets.

p. 84-85 and
130-133**2.3 Plans for Target Implementation and Monitoring.**

Show that your bank has defined actions and milestones to meet the set targets.

Show that your bank has put in place the means to measure and monitor progress against the set targets. Definitions of key performance indicators, any changes in these definitions, and any rebasing of baselines should be transparent.

p. 84-85 and
130-133**2.4. Progress on Implementing Targets**

For each target separately:

Show that your bank has implemented the actions it had previously defined to meet the set target.

Or explain why actions could not be implemented / needed to be changed and how your bank is adapting its plan to meet its set target.

Report on your bank's progress over the last 12 months (up to 18 months in your first reporting after becoming a signatory) towards achieving each of the set targets and the impact your progress resulted in. (where feasible and appropriate, banks should include quantitative disclosures)

p. 84-85 and
130-133**"Principle 3: Clients And Customers**

We will work responsibly with our clients and our customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations."



3.1. Provide an overview of the policies and practices your bank has in place and/or is planning to put in place to promote responsible relationships with its customers. This should include high-level information on any programmes and actions implemented (and/or planned), their scale and, where possible, the results thereof.

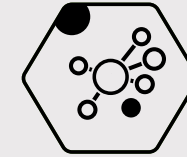
p. 166-185

3.2. Describe how your bank has worked with and/or is planning to work with its clients and customers to encourage sustainable practices and enable sustainable economic activities. This should include information on actions planned/implemented, products and services developed, and, where possible, the impacts achieved.

p. 166-185

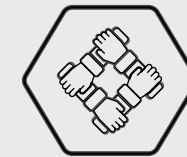
PRINCIPLE

PAGE

**"Principle 4: Stakeholders**

We will proactively and responsibly consult, engage and partner with relevant stakeholders to achieve society's goals."

4.1. Describe which stakeholders (or groups/types of stakeholders) your bank has consulted, engaged, collaborated or partnered with for the purpose of implementing these Principles and improving your bank's impacts. This should include a high-level overview of how your bank has identified relevant stakeholders and what issues were addressed/results achieved.

p. 68-69 and
268-274**"Principle 5: Governance and Culture**

We will implement our commitment to these Principles through effective governance and a culture of responsible banking"

5.1. Describe the relevant governance structures, policies and procedures your bank has in place/is planning to put in place to manage significant positive and negative (potential) impacts and support effective implementation of the Principles.

p. 48-133

5.2. Describe the initiatives and measures your bank has implemented or is planning to implement to foster a culture of responsible banking among its employees. This should include a high-level overview of capacity building, inclusion in remuneration structures and performance management and leadership communication, among others.

p. 48-133

5.3. Governance Structure for Implementation of the Principles

Show that your bank has a governance structure in place for the implementation of the PRB, including:

- a) target-setting and actions to achieve targets set
- b) remedial action in the event of targets or milestones not being achieved or unexpected negative impacts being detected.

p. 48-133

**"Principle 6: Transparency and Accountability**

We will periodically review our individual and collective implementation of these Principles and be transparent about and accountable for our positive and negative impacts and our contribution to society's goals."

6.1 Progress on Implementing the Principles for Responsible Banking

Show that your bank has progressed on implementing the six Principles over the last 12 months (up to 18 months in your first reporting after becoming a signatory) in addition to the setting and implementation of targets in minimum two areas (see 2.1-2.4).

Show that your bank has considered existing and emerging international/regional good practices relevant for the implementation of the six Principles for Responsible Banking. Based on this, it has defined priorities and ambitions to align with good practice.

Show that your bank has implemented/is working on implementing changes in existing practices to reflect and be in line with existing and emerging international/regional good practices and has made progress on its implementation of these Principles.

p. 84-85 and
130-133

