

***Annual information on the trading venues and intermediaries
that execute the orders of customers of Banco Santander, S.A.***

2019



Simple Personal Fair

Content

1. Introduction	7
2. Annual information on the trading venues and intermediaries that carry out customers' orders.	8
2.1 Information on retail customers	8
a) Equities: Shares and deposit certificates - Liquidity bands with a minimum variation of 5 and 6 (over 2,000 transactions per day)	8
b) Equities: Shares and deposit certificates - Liquidity bands with a minimum variation of 3 and 4 (from 80 to 1,999 transactions per day)	9
c) Equities: Shares and deposit certificates - Liquidity bands with a minimum variation of 1 and 2 (from 0 to 79 transactions per day)	10
d) Debt instruments – Obligations	11
e) Debt instruments – Money market instruments.....	12
f) Interest rate derivatives – Swaps, fixed term contracts and other interest rate derivatives	13
g) Currency derivatives – Swaps, fixed term derivatives and other currency derivatives	14
h) Equity derivatives – Swaps and other equity derivatives	15
i) Securitized derivatives - Purchase option certificates (including warrants) and certificates in derivatives	16
j) Products traded on the market (listed investment funds, listed debt instruments and listed commodities).....	17
k) Other instruments	18
2.2 Information on professional customers	19
a) Equities: Shares and deposit certificates - Liquidity bands with a minimum variation of 5 and 6 (over 2,000 transactions per day)	19

b) Equities: Shares and deposit certificates - Liquidity bands with a minimum variation of 3 and 4 (from 80 to 1,999 transactions per day)	20
c) Equities: Shares and deposit certificates - Liquidity bands with a minimum variation of 1 and 2 (from 0 to 79 transactions per day)	21
d) Debt instruments – Obligations	22
e) Debt instruments – Money market instruments.....	23
f) Interest rate derivatives – Futures and options admitted for trading in a trading venue	24
g) Interest rate derivatives – Swaps, fixed term contracts and other interest rate derivatives	25
h) Credit derivatives - Other credit derivatives	26
i) Currency derivatives – Swaps, fixed term derivatives and other currency derivatives	27
j) Equity derivatives – Futures and options admitted for trading in a trading venue ..	28
k) Equity derivatives – Swaps and other equity derivatives	29
l) Securitized derivatives - Purchase option certificates (including warrants) and certificates in derivatives	30
m) Commodity derivatives and issuance rights - Futures and options admitted for trading in a trading venue.....	31
n) Products traded on the market (listed investment funds, listed debt instruments and listed commodities).....	32
o) Other instruments	33
3. Annual information on the intermediaries that carry out customers' orders.	34
3.1 Information on retail customers.....	34
a) Equities: Shares and deposit certificates – Liquidity bands with a minimum variation of 5 and 6 (over 2,000 transactions per day)	34

b)	Equities: Shares and deposit certificates – Liquidity bands with a minimum variation of 3 and 4 (from 80 to 1,999 transactions per day)	35
c)	Equities: Shares and deposit certificates – Liquidity bands with a minimum variation of 1 and 2 (from 0 to 79 transactions per day)	36
d)	Debt instruments – Obligations	37
e)	Securitized derivatives – Purchase option certificates (including warrants) and certificates in derivatives	38
f)	Securitized derivatives – Other Securitized derivatives	39
g)	Products traded on the market (listed investment funds, listed debt instruments and listed commodities).....	40
h)	Other instruments	41
3.2	Information on professional customers	42
a)	Equities: Shares and deposit certificates – Liquidity bands with a minimum variation of 5 and 6 (over 2,000 transactions per day)	42
b)	Equities: Shares and deposit certificates – Liquidity bands with a minimum variation of 3 and 4 (from 80 to 1,999 transactions per day)	43
c)	Equities: Shares and deposit certificates – Liquidity bands with a minimum variation of 1 and 2 (from 0 to 79 transactions per day)	44
d)	Debt instruments – Obligations	45
e)	Securitized derivatives – Purchase option certificates (including warrants) and certificates in derivatives	46
f)	Securitized derivatives – Other Securitized derivatives	47
g)	Products traded on the market (listed investment funds, listed debt instruments and listed commodities).....	48
h)	Other instruments	49
4.	Annual information on securities financing transactions	50

4.1	Annual information on the trading venues that carry out customers' orders in regard to securities financing transactions	50
a)	Debt instruments – Obligations	50
b)	Debt instruments – Money market instruments.....	51
4.2	Annual information on the intermediaries that carry out customers' orders in regard to securities financing transactions	52
a)	Debt instruments – Obligations	52
b)	Debt instruments – Money market instruments.....	53
5.	Summary of the analysis of the quality of the execution obtained in the trading venues and intermediaries that carry out customers' orders	54
a)	Equities: Shares and deposit certificates – Liquidity bands with a minimum variation of 5 and 6 (over 2,000 transactions per day)	54
b)	Equities: Shares and deposit certificates – Liquidity bands with a minimum variation of 3 and 4 (from 80 to 1,999 transactions per day)	57
c)	Equities: Shares and deposit certificates – Liquidity bands with a minimum variation of 1 and 2 (from 0 to 79 transactions per day)	60
d)	Debt instruments – Obligations	63
e)	Debt instruments – Money market instruments.....	67
f)	Interest rate derivatives – Futures and options admitted for trading in a trading venue 70	
g)	Interest rate derivatives – Swaps, fixed term contracts and other interest rate derivatives	72
h)	Credit rate derivatives - Other credit derivatives	75
i)	Currency derivatives – Swaps, fixed term derivatives and other currency derivatives 77	
j)	Equity derivatives – Futures and options admitted for trading in a trading venue ..	80
k)	Equity derivatives – Swaps, fixed-term contracts and other equity derivatives.	82

l) Securitized derivatives – Purchase option certificates (including warrants) and certificates in derivatives	84
m) Securitized derivatives – Other Securitized derivatives	87
n) Commodity derivatives and issuance rights - Futures and options admitted for trading in a trading venue	90
o) Products traded on the market (listed investment funds, listed debt instruments and listed commodities).....	92
p) Other instruments	95
6. Summary of the analysis of the quality of the performance of the trading venues and intermediaries that execute customers' orders in regard to securities financing transactions.	
98	

1. Introduction

Banco Santander, S.A. (hereinafter "Santander" or "the Bank") is a private-law Spanish bank subject to the rules and regulations of the Bank of Spain and the National Securities Market Commission and registered with the Bank of Spain under number 0049.

Santander is authorised to provide investment services for the receipt or transfer of customers' orders and the execution of customers' orders for certain categories of financial instruments. To do so, and in compliance with the applicable legislation (primarily, Directive 65/2014/EU, Commission Delegated Regulation 2017/565 and Commission Delegated Regulation 2017/576), for each class of financial instrument the Bank must publish a report containing the five main trading venues and the five main intermediaries used, in terms of volume traded and customers' orders executed.

The report includes a summary of the analysis and conclusions obtained by Santander describing the quality of the execution achieved by the trading venues and intermediaries it used to execute all its customers' orders in 2019.

2. Annual information on the trading venues and intermediaries that carry out customers' orders.

2.1 Information on retail customers

- a) Equities: Shares and deposit certificates - Liquidity bands with a minimum variation of 5 and 6 (over 2,000 transactions per day)

Instrument category	Equities: Shares and deposit certificates - Liquidity bands with a minimum variation of 5 and 6 (over 2,000 transactions per day)				
Indicate whether in the previous year an average of <1 order was executed per day	<u>N</u>				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
MADRID STOCK EXCHANGE - XMAD	100	100	17.88	71.44	100
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-

- b) Equities: Shares and deposit certificates - Liquidity bands with a minimum variation of 3 and 4 (from 80 to 1,999 transactions per day)

Instrument category	Equities: Shares and deposit certificates - Liquidity bands with a minimum variation of 3 and 4 (from 80 to 1,999 transactions per day)				
Indicate whether in the previous year an average of <1 order was executed per day	<u>N</u>				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
MADRID STOCK EXCHANGE - XMAD	99.92	99.79	27.91	60.07	100
SOCIEDAD DE BOLSAS - ALTERNATIVE STOCK EXCHANGE - MABX	0.08	0.21	19.62	49.43	100
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-

- c) Equities: Shares and deposit certificates - Liquidity bands with a minimum variation of 1 and 2 (from 0 to 79 transactions per day)

Instrument category	Equities: Shares and deposit certificates - Liquidity bands with a minimum variation of 1 and 2 (from 0 to 79 transactions per day)				
Indicate whether in the previous year an average of <1 order was executed per day	N				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
MADRID STOCK EXCHANGE - XMAD	85.02	82.27	32.87	57.45	100
SOCIEDAD DE BOLSAS - ALTERNATIVE STOCK EXCHANGE - MABX	14.45	17.22	29.92	52.33	100
BARCELONA STOCK EXCHANGE - XBAR	0.37	0.05	-	-	100
SOCIEDAD DE BOLSAS LATIBEX - XLAT	0.15	0.22	22.95	19.67	100
BILBAO STOCK EXCHANGE - XBIL	0.01	0.03	-	-	100

d) Debt instruments – Obligations

Instrument category	Debt instruments – Obligations				
Indicate whether in the previous year an average of <1 order was executed per day	N				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BANCO SANTANDER S.A - 5493006QMFDDMYWIAM13	62.56	12.38	-	100	0.67
BANCO SANTANDER S.A. - SYSTEMATIC INTERNALISER - SANT	37.2	51.79	-	100	0.93
SEND - SISTEMA ELECTRONICO DE NEGOCIACION DE DEUDA - SEND	0.24	35.83	30.41	69.59	100
-	-	-	-	-	-
-	-	-	-	-	-

e) Debt instruments – Money market instruments

Instrument category	Debt instruments – Money market instruments				
Indicate whether in the previous year an average of <1 order was executed per day	S				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BANCO SANTANDER S.A - 5493006QMFDDMYWIAM13	100	100	-	100	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-

f) Interest rate derivatives – Swaps, fixed term contracts and other interest rate derivatives

Instrument category	Interest rate derivatives – Swaps, fixed term contracts and other interest rate derivatives				
Indicate whether in the previous year an average of <1 order was executed per day	N				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BANCO SANTANDER S.A - 5493006QMFDDMYWIAM13	60.28	98.63	-	100	0.34
BANCO SANTANDER S.A. - SYSTEMATIC INTERNALISER - SANT	39.72	1.37	-	100	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-

g) Currency derivatives – Swaps, fixed term derivatives and other currency derivatives

Instrument category	Currency derivatives – Swaps, fixed term derivatives and other currency derivatives				
Indicate whether in the previous year an average of <1 order was executed per day	N				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BANCO SANTANDER S.A. - SYSTEMATIC INTERNALISER - SANT	97.93	99.64	-	100	1.06
TULLETT PREBON EUROPE - FX DERIVATIVES - TEFD	1.42	0.1	-	100	-
GFI BROKERS - GFBO	0.39	0.05	-	100	-
FXALL - FXAL	0.26	0.21	-	100	-
-	-	-	-	-	-

h) Equity derivatives – Swaps and other equity derivatives

Instrument category	Equity derivatives – Swaps and other equity derivatives				
Indicate whether in the previous year an average of <1 order was executed per day	<u>NO</u>				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BANCO SANTANDER S.A - 5493006QMFDDMYWIAM13	100	100	-	100	18.16
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-

- i) Securitized derivatives - Purchase option certificates (including warrants) and certificates in derivatives

Instrument category	Purchase option certificates (including warrants) and certificates in derivatives				
Indicate whether in the previous year an average of <1 order was executed per day	N				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
MADRID STOCK EXCHANGE - XMAD	100	100	48.51	50.23	100
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-

- j) Products traded on the market (listed investment funds, listed debt instruments and listed commodities)

Instrument category	Products traded on the market (listed investment funds, listed debt instruments and listed commodities)				
Indicate whether in the previous year an average of <1 order was executed per day	<u>N</u>				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
MADRID STOCK EXCHANGE - XMAD	100	100	46.44	43.62	100
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-

k) Other instruments

Instrument category	Other instruments				
Indicate whether in the previous year an average of <1 order was executed per day	N				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
SOCIEDAD DE BOLSAS - ALTERNATIVE STOCK EXCHANGE - MABX	67.88	78.84	-	-	100
MADRID STOCK EXCHANGE - XMAD	32.12	21.15	18.94	67.30	100
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-

2.2 Information on professional customers

- a) Equities: Shares and deposit certificates - Liquidity bands with a minimum variation of 5 and 6 (over 2,000 transactions per day)

Instrument category	Equities: Shares and deposit certificates - Liquidity bands with a minimum variation of 5 and 6 (over 2,000 transactions per day)				
Indicate whether in the previous year an average of <1 order was executed per day	N				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
MADRID STOCK EXCHANGE - XMAD	97.53	92.8	35.83	14.78	97.86
CHI-X EUROPE - CHIX	1.29	2.53	61.15	38.85	7.54
BATS EUROPE - BATE	0.71	2.19	66.18	33.82	8.47
TURQUOISE MTF - TRQX	0.41	1.69	77.31	22.69	9.79
BATS EUROPE DARK POOL - BATD	0.03	0.34	47.45	52.55	12.16

b) Equities: Shares and deposit certificates - Liquidity bands with a minimum variation of 3 and 4 (from 80 to 1,999 transactions per day)

Instrument category	Equities: Shares and deposit certificates - Liquidity bands with a minimum variation of 3 and 4 (from 80 to 1,999 transactions per day)				
Indicate whether in the previous year an average of <1 order was executed per day	<u>N</u>				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
MADRID STOCK EXCHANGE - XMAD	98.1	94.16	20.99	10.92	96.2
CHI-X EUROPE - CHIX	0.83	2.12	59.4	40.6	3.36
BATS EUROPE - BATE	0.66	2.02	56.15	43.85	3.58
TURQUOISE MTF - TRQX	0.27	1.13	84.14	15.86	3.5
BATS EUROPE DARK POOL - BATD	0.08	0.22	67.17	32.83	3.54

c) Equities: Shares and deposit certificates - Liquidity bands with a minimum variation of 1 and 2 (from 0 to 79 transactions per day)

Instrument category	Equities: Shares and deposit certificates - Liquidity bands with a minimum variation of 1 and 2 (from 0 to 79 transactions per day)				
Indicate whether in the previous year an average of <1 order was executed per day	N				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
MADRID STOCK EXCHANGE - XMAD	69.28	50.97	14.72	8.15	97.86
SOCIEDAD DE BOLSAS - ALTERNATIVE STOCK EXCHANGE - MABX	20.11	41.90	39.99	37.32	98.32
SOCIEDAD DE BOLSAS LATIBEX - XLAT	10.48	6.72	6.16	7.31	100
CHI-X EUROPE - CHIX	0.05	0.15	87.50	12.50	-
BILBAO STOCK EXCHANGE - XBIL	0.03	0.02	-	-	100

d) Debt instruments – Obligations

Instrument category	Debt instruments – Obligations				
Indicate whether in the previous year an average of <1 order was executed per day	N				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BANCO SANTANDER S.A - 5493006QMFDDMYWIAM13	28.16	15.04	-	98.09	2.34
BANCO SANTANDER S.A. - SYSTEMATIC INTERNALISER - SANT	26.48	21.85	-	100	0.91
TRADEWEB EUROPE LIMITED - TREU	22.19	22.42	-	100	0.74
BLOOMBERG TRADING FACILITY LIMITED - BMTF	16.11	28.73	-	100	0.88
BONDVISION EUROPE - SSOB	1.71	0.54	-	100	0.8

e) Debt instruments – Money market instruments

Instrument category	Debt instruments – Money market instruments				
Indicate whether in the previous year an average of <1 order was executed per day	N				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
MTS ITALIA - MTSC	42.79	34.95	-	100	-
BANCO SANTANDER S.A - 5493006QMFDDMYWIAM13	33.36	51.79	-	100	1.11
BLOOMBERG TRADING FACILITY LIMITED - BMTF	8.32	3.64	-	100	1.75
BONDVISION EUROPE MTF - SSOB	6.21	2.81	-	100	-
TRADEWEB EUROPE LIMITED - TREU	5.14	2.88	-	100	-

f) Interest rate derivatives – Futures and options admitted for trading in a trading venue

Instrument category	Interest rate derivatives – Futures and options admitted for trading in a trading venue				
Indicate whether in the previous year an average of <1 order was executed per day	<u>N</u>				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
EUREX DEUTSCHLAND - XEUR	93.35	97.81	33.72	31.48	100
ICE FUTURES EUROPE - FINANCIAL PRODUCTS DIVISION - IFLL	6.65	2.19	6.7	42.68	100
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-

g) Interest rate derivatives – Swaps, fixed term contracts and other interest rate derivatives

Instrument category	Interest rate derivatives – Swaps, fixed term contracts and other interest rate derivatives				
Indicate whether in the previous year an average of <1 order was executed per day	N				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BANCO SANTANDER S.A - 5493006QMFDDMYWIAM13	43.25	28.11	-	100	1.03
BANCO SANTANDER S.A. - SYSTEMATIC INTERNALISER - SANT	37.28	49.71	-	100	0.58
TULLETT PREBON EUROPE - CORPORATE BONDS AND SECURITISED DEBT - TEMF	6.95	2.02	-	100	-
BLOOMBERG TRADING FACILITY LIMITED - BMTF	4.57	0.57	-	100	-
ICAP SECURITIES – OTF - IOTF	2.81	5.94	-	100	2.43

h) Credit derivatives - Other credit derivatives

Instrument category	Credit derivatives - Other credit derivatives				
Indicate whether in the previous year an average of <1 order was executed per day	<u>S</u>				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BLOOMBERG SEF LLC - BBSF	81.46	25.54	-	100	-
BANCO SANTANDER S.A - 5493006QMFDDMYWIAM13	18.54	74.46	-	100	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-

i) Currency derivatives – Swaps, fixed term derivatives and other currency derivatives

Instrument category	Currency derivatives – Swaps, fixed term derivatives and other currency derivatives				
Indicate whether in the previous year an average of <1 order was executed per day	<u>N</u>				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BANCO SANTANDER S.A. - SYSTEMATIC INTERNALISER - SANT	54.07	68.7	-	99.97	1.34
REFINITIV TRANSACTIONS SERVICES LIMITED - FXALL RFQ - TRAL	43.99	21.15	-	100	1.12
CURRENEX MTF - RFQ - MCXR	0.9	0.67	-	100	0.48
BLOOMBERG TRADING FACILITY LIMITED - BMTF	0.48	1.12	-	99.85	1.74
REFINITIV TRANSACTION SERVICES LIMITED - FORWARDS MATCHING - TRFW	0.15	0.24	-	100	1.36

j) Equity derivatives – Futures and options admitted for trading in a trading venue

Instrument category	Equity derivatives – Futures and options admitted for trading in a trading venue				
Indicate whether in the previous year an average of <1 order was executed per day	<u>N</u>				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
MEFF FINANCIAL DERIVATIVES - XMRV	72.25	45	-	-	100
EUREX DEUTSCHLAND - XEUR	21.6	38.88	24.58	24.14	100
EURONEXT PARIS MONEP - XMON	4.52	8.68	46.19	23.38	100
ICE FUTURES EUROPE - FINANCIAL PRODUCTS DIVISION - IFLL	1.52	6.69	5.85	36.92	100
ITALIAN DERIVATIVES MARKET - XDMI	0.07	0.67	-	-	100

k) Equity derivatives – Swaps and other equity derivatives

Instrument category	Equity derivatives – Swaps and other equity derivatives				
Indicate whether in the previous year an average of <1 order was executed per day	<u>N</u>				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BANCO SANTANDER S.A - 5493006QMFDDMYWIAM13	100	100	-	100	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-

I) Securitized derivatives - Purchase option certificates (including warrants) and certificates in derivatives

Instrument category	Securitized derivatives - Purchase option certificates (including warrants) and certificates in derivatives				
Indicate whether in the previous year an average of <1 order was executed per day	<u>S</u>				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
MADRID STOCK EXCHANGE - XMAD	100	100	23.13	66.42	100
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-

m) Commodity derivatives and issuance rights - Futures and options admitted for trading in a trading venue

Instrument category	Commodity derivatives and issuance rights - Futures and options admitted for trading in a trading venue				
Indicate whether in the previous year an average of <1 order was executed per day	<u>N</u>				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
ICE FUTURES EUROPE - IFEU	99.97	99.94	10.48	19.04	100
EUROPEAN ENERGY EXCHANGE - REGULATED MARKET - XEER	0.03	0.06	-	-	100
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-

n) Products traded on the market (listed investment funds, listed debt instruments and listed commodities)

Instrument category	Products traded on the market (listed investment funds, listed debt instruments and listed commodities)				
Indicate whether in the previous year an average of <1 order was executed per day	<u>N</u>				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
MADRID STOCK EXCHANGE - XMAD	99.68	99.68	12.42	13.82	100
CHI-X EUROPE - CHIX	0.21	0.16	-	100	-
BATS EUROPE - BATE	0.07	0.1	33.33	66.67	-
BATS EUROPE DARK POOL - BATD	0.02	0.03	-	100	-
BATS EXCHANGE - BATS	0.02	0.03	100	-	-

o) Other instruments

Instrument category	Other instruments				
Indicate whether in the previous year an average of <1 order was executed per day	N				
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
MADRID STOCK EXCHANGE - XMAD	66.37	37.04	28.12	13.79	96.60
SOCIEDAD DE BOLSAS - ALTERNATIVE STOCK EXCHANGE - MABX	31.96	60.64	-	-	97.34
CHI-X EUROPE - CHIX	0.65	0.74	32.73	67.27	1.21
BATS EUROPE - BATE	0.45	0.68	35.76	64.24	1.32
BATS EUROPE DARK POOL - BATD	0.38	0.22	97.92	2.08	-

3. Annual information on the intermediaries that carry out customers' orders.

3.1 Information on retail customers

- a) Equities: Shares and deposit certificates – Liquidity bands with a minimum variation of 5 and 6 (over 2,000 transactions per day)

Instrument category	Equities: Shares and deposit certificates – Liquidity bands with a minimum variation of 5 and 6 (over 2,000 transactions per day)				
Indicate whether in the previous year an average of <1 order was executed per day	<u>N</u>				
Five main intermediaries classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
POPULAR BOLSA - 9598008JTB0XRPA09978	33.67	68.3	31.75	60.29	-
INSTINET EUROPE LIMITED - 213800MXAKR2LA1VBM44	24.88	17.57	19.68	70.89	-
MORGAN STANLEY EUROPE SE - 54930056FHWP7GIWYY08	17.41	10.54	18.46	66.4	-
HSBC BANK PLC - MP6I5ZYZBEU3UXPYFY54	16.55	0.76	61.37	35.05	-
MORGAN STANLEY & CO. INTERNATIONAL PLC - 4PQUHN3JPFGFNF3BB653	5.82	2.65	28.68	60.08	-

- b) Equities: Shares and deposit certificates – Liquidity bands with a minimum variation of 3 and 4 (from 80 to 1,999 transactions per day)

Instrument category	Equities: Shares and deposit certificates – Liquidity bands with a minimum variation of 3 and 4 (from 80 to 1,999 transactions per day)				
Indicate whether in the previous year an average of <1 order was executed per day	<u>N</u>				
Five main intermediaries classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
POPULAR BOLSA - 9598008JTB0XRPA09978	48.72	84.4	36.24	55.1	-
MORGAN STANLEY EUROPE SE - 54930056FHWP7GIWYY08	23.24	4.96	38.57	52.09	-
INSTINET EUROPE LIMITED - 213800MXAKR2LA1VBM44	12.36	7.92	15.55	76.71	-
HSBC BANK PLC - MP6I5ZYZBEU3UXPYFY54	10.12	0.89	38.66	44.26	-
MORGAN STANLEY & CO. INTERNATIONAL PLC - 4PQUHN3JPF GFNF3BB653	4.61	1.04	42.79	49.76	-

- c) Equities: Shares and deposit certificates – Liquidity bands with a minimum variation of 1 and 2 (from 0 to 79 transactions per day).

Instrument category	Equities: Shares and deposit certificates – Liquidity bands with a minimum variation of 1 and 2 (from 0 to 79 transactions per day)				
Indicate whether in the previous year an average of <1 order was executed per day	N				
Five main intermediaries classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
MORGAN STANLEY EUROPE SE - 54930056FHWP7GIWYY08	38.58	16.61	21.96	57.68	-
POPULAR BOLSA - 9598008JTBOXRPA09978	28.26	59.47	29.43	35.14	-
INSTINET EUROPE LIMITED - 213800MXAKR2LA1VBM44	20.27	18.63	14.28	70.66	-
HSBC BANK PLC - MP6I5ZYZBEU3UXPYFY54	8.72	2.37	1.13	11.3	-
MORGAN STANLEY & CO. INTERNATIONAL PLC - 4PQUHN3JPF GFNF3BB653	4.15	2.86	19.63	55.61	-

d) Debt instruments – Obligations

Instrument category	Debt instruments – Obligations				
Indicate whether in the previous year an average of <1 order was executed per day	S				
Five main intermediaries classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
INVERDIS BANCO - 95980020140005184148	98.2	1.68	20.78	79.22	-
BANCA IMI S.P.A. IN FORMA ABBREVIATA ANCHE SOLO IMI S.P.A. - QV4Q8OGJ7OA6PA8SCM14	1.8	98.32	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-

e) Securitized derivatives – Purchase option certificates (including warrants) and certificates in derivatives

Instrument category	Securitized derivatives – Purchase option certificates (including warrants) and certificates in derivatives				
Indicate whether in the previous year an average of <1 order was executed per day	<u>S</u>				
Five main intermediaries classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
POPULAR BOLSA - 9598008JTB0XRPA09978	79.26	93.82	52.47	47.22	-
MORGAN STANLEY EUROPE SE - 54930056FHWP7GIWYY08	9.04	1.74	11.11	38.89	-
INSTINET EUROPE LIMITED - 213800MXAKR2LA1VBM44	5.67	3.96	68.29	51.22	-
MORGAN STANLEY & CO. INTERNATIONAL PLC - 4PQUHN3JPFQFNF3BB653	4.99	0.29	-	-	-
HSBC BANK PLC - MP6I5ZYZBEU3UXPYFY54	1.03	0.19	-	100	-

f) Securitized derivatives – Other Securitized derivatives

Instrument category	Securitized derivatives - Other Securitized derivatives				
Indicate whether in the previous year an average of <1 order was executed per day	<u>S</u>				
Five main intermediaries classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
INSTINET EUROPE LIMITED - 213800MXAKR2LA1VBM44	56.91	38.1	-	100	-
MORGAN STANLEY & CO. INTERNATIONAL PLC - 4PQUHN3JPF GFNF3BB653	21.90	14.29	33.33	66.67	-
MORGAN STANLEY EUROPE SE - 54930056FHWP7GIWYY08	16.26	42.86	-	-	-
HSBC BANK PLC - MP6I5ZYZBEU3UXPYFY54	4.93	4.76	-	-	-
-	-	-	-	-	-

g) Products traded on the market (listed investment funds, listed debt instruments and listed commodities)

Instrument category	Products traded on the market (listed investment funds, listed debt instruments and listed commodities)				
Indicate whether in the previous year an average of <1 order was executed per day	N				
Five main intermediaries classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
INSTINET EUROPE LIMITED - 213800MXAKR2LA1VBM44	63.35	53.11	26.95	57.31	-
MORGAN STANLEY EUROPE SE - 54930056FHWP7GIWYY08	24.62	35.	11.43	50.8	-
MORGAN STANLEY & CO. INTERNATIONAL PLC - 4PQUHN3JPFGFNF3BB653	6.81	8.65	9.93	56.51	-
POPULAR BOLSA - 9598008JTBOXRPA09978	2.87	2.1	18.31	78.87	-
HSBC BANK PLC - MP6I5ZYZBEU3UXPYFY54	2.35	1.13	10.53	73.68	-

h) Other instruments

Instrument category	Other instruments				
Indicate whether in the previous year an average of <1 order was executed per day	<u>S</u>				
Five main intermediaries classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
MORGAN STANLEY EUROPE SE - 54930056FHWP7GIWYY08	46.23	0.13	19.51	73.17	66.85
POPULAR BOLSA - 9598008JTB0XRPA09978	43.93	99.79	0.55	17.44	3.54
INSTINET EUROPE LIMITED - 213800MXAKR2LA1VBM44	7.90	0.05	-	71.43	-
MORGAN STANLEY & CO. INTERNATIONAL PLC - 4PQUHN3JPFGFNF3BB653	1.69	0.01	-	57.14	-
HSBC BANK PLC - MP6I5ZYZBEU3UXPYFY54	0.25	0.01	-	100	-

3.2 Information on professional customers

- a) Equities: Shares and deposit certificates – Liquidity bands with a minimum variation of 5 and 6 (over 2,000 transactions per day)

Instrument category	Equities: Shares and deposit certificates – Liquidity bands with a minimum variation of 5 and 6 (over 2,000 transactions per day)				
Indicate whether in the previous year an average of <1 order was executed per day	N				
Five main intermediaries classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
JEFFERIES INTERNATIONAL LIMITED - S5THZMDUJCTQZBTRVI98	23.7	31.62	44.17	50.91	-
HSBC BANK PLC - MP6I5ZYZBEU3UXPYFY54	22.58	15.07	75.71	22.91	-
INSTINET EUROPE LIMITED - 213800MXAKR2LA1VBM44	16.52	21.54	32.13	64.59	-
VIRTU ITG EUROPE LIMITED - 213800EEC95PRUCEUP63	16.45	3.7	77.64	19.38	-
RBC EUROPE LIMITED - TXDSU46SXBWIGJ8G8E98	8.78	1.66	50.23	48.53	-

- b) Equities: Shares and deposit certificates – Liquidity bands with a minimum variation of 3 and 4 (from 80 to 1,999 transactions per day)

Instrument category	Equities: Shares and deposit certificates – Liquidity bands with a minimum variation of 3 and 4 (from 80 to 1,999 transactions per day)				
Indicate whether in the previous year an average of <1 order was executed per day	N				
Five main intermediaries classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
HSBC BANK PLC - MP6I5ZYZBEU3UXPYFY54	41.08	41.37	69.3	28.64	-
VIRTU ITG EUROPE LIMITED - 213800EEC95PRUCEUP63	21.36	16.6	62.21	31.87	-
UBS EUROPE SE - 5299007QVIQ7IO64NX37	12.77	12.92	66.67	28.68	-
INSTINET EUROPE LIMITED - 213800MXAKR2LA1VBM44	10.84	13.53	17.56	79.86	-
JEFFERIES INTERNATIONAL LIMITED - S5THZMDUJCTQZBTRVI98	4.89	5.29	40.72	42.51	-

c) Equities: Shares and deposit certificates – Liquidity bands with a minimum variation of 1 and 2 (from 0 to 79 transactions per day)

Instrument category	Equities: Shares and deposit certificates – Liquidity bands with a minimum variation of 1 and 2 (from 0 to 79 transactions per day)				
Indicate whether in the previous year an average of <1 order was executed per day	N				
Five main intermediaries classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
HSBC BANK PLC - MP6I5ZYZBEU3UXPYFY54	26.43	21.77	66.95	30.08	-
INSTINET EUROPE LIMITED - 213800MXAKR2LA1VBM44	25.99	26.29	13.33	83.86	-
VIRTU ITG EUROPE LIMITED - 213800EEC95PRUCEUP63	19.42	6.55	64.79	32.39	-
POPULAR BOLSA - 9598008JTB0XRPA09978	9.33	10.15	0.91	49.09	-
RBC EUROPE LIMITED - TXDSU46SXBWIGJ8G8E98	8.77	4.06	59.09	38.64	-

d) Debt instruments – Obligations

Instrument category	Debt instruments – Obligations				
Indicate whether in the previous year an average of <1 order was executed per day	S				
Five main intermediaries classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
INVERISIS BANCO - 95980020140005184148	100	100	20	80	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-

e) Securitized derivatives – Purchase option certificates (including warrants) and certificates in derivatives

Instrument category	Securitized derivatives – Purchase option certificates (including warrants) and certificates in derivatives				
Indicate whether in the previous year an average of <1 order was executed per day	<u>S</u>				
Five main intermediaries classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
HSBC BANK PLC - MP6I5ZYZBEU3UXPYFY54	81.65	40	100	-	-
CITIGROUP GLOBAL MARKETS LIMITED - XKZZ2JZF41MRHTR1V493	14.31	20	-	-	-
UBS EUROPE SE - 5299007QVIQ7IO64NX37	4.03	40	-	100	-
-	-	-	-	-	-
-	-	-	-	-	-

f) Securitized derivatives – Other Securitized derivatives

Instrument category	Securitized derivatives - Other Securitized derivatives				
Indicate whether in the previous year an average of <1 order was executed per day	<u>S</u>				
Five main intermediaries classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
UBS EUROPE SE - 5299007QVIQ7IO64NX37	37.57	34.78	-	87.5	-
VIRTU ITG EUROPE LIMITED - 213800EEC95PRUCEUP63	27.52	17.39	75	25	-
CITIGROUP GLOBAL MARKETS LIMITED - XKZZ2JZF41MRHTR1V493	25.93	26.09	100	-	-
HSBC BANK PLC - MP6I5ZYZBEU3UXPYFY54	4.87	8.7	50	50	-
JEFFERIES INTERNATIONAL LIMITED - S5THZMDUJCTQZBTRVI98	4.11	13.04	33.33	66.67	-

g) Products traded on the market (listed investment funds, listed debt instruments and listed commodities)

Instrument category	Products traded on the market (listed investment funds, listed debt instruments and listed commodities)				
Indicate whether in the previous year an average of <1 order was executed per day	N				
Five main intermediaries classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
FLOW TRADERS B.V. - 549300CLJI9XDH12XV51	48.39	19.82	-	-	-
CITIGROUP GLOBAL MARKETS LIMITED - XKZZ2JZF41MRHTR1V493	15.34	34.53	37.43	59.36	-
COMMERZBANK AKTIENGESELLSCHAFT - 851WYGNLUQLFZBSYGB56	14.92	16.2	-	-	-
SUSQUEHANNA INTERNATIONAL SECURITIES LIMITED - 635400IAV22ZOU1NFS89	5.32	1.87	-	-	-
OPTIVER V.O.F. - 7245009KRY SAYB2QCC29	5.01	2.31	-	-	-

h) Other instruments

Instrument category	Other instruments				
Indicate whether in the previous year an average of <1 order was executed per day	<u>S</u>				
Five main intermediaries classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
INSTINET EUROPE LIMITED - 213800MXAKR2LA1VBM44	52.36	21.88	-	71.43	
CITIGROUP GLOBAL MARKETS LIMITED - XKZZ2JZF41MRHTR1V493	11.97	18.75	50	50	-
UBS EUROPE SE - 5299007QVIQ7IO64NX37	10.14	3.13	-	100	-
JEFFERIES INTERNATIONAL LIMITED - S5THZMDUJCTQZBTRVI98	9.34	9.38	-	66.67	-
RBC EUROPE LIMITED - TXDSU46SXBWIGJ8G8E98	4.62	9.38	33.33	66.67	-

4. Annual information on securities financing transactions

4.1 Annual information on the trading venues that carry out customers' orders in regard to securities financing transactions

a) Debt instruments – Obligations

Instrument category	Debt instruments – Obligations	
Indicate whether in the previous year an average of <1 order was executed per day	N	
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)
BANCO SANTANDER S.A - 5493006QMFDDMYWIAM13	94.64	97.23
BROKERTEC EUROPE LIMITED - ALL MARKETS - BTEE	0.32	2.5
EUROMTS LTD - XMTS	0.04	0.27
-	-	-
-	-	-

b) Debt instruments – Money market instruments

Instrument category	Debt instruments – Money market instruments	
Indicate whether in the previous year an average of <1 order was executed per day	N	
Five main trading venues classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)
BANCO SANTANDER S.A - 5493006QMFDDMYWIAM13	97.17	97.12
BROKERTEC EUROPE LIMITED - ALL MARKETS - BTEE	2.52	2.5
EUROMTS LTD - XMTS	0.31	0.38
-	-	-
-	-	-

4.2 Annual information on the intermediaries that carry out customers' orders in regard to securities financing transactions

a) Debt instruments – Obligations

Instrument category	Debt instruments – Obligations	
Indicate whether in the previous year an average of <1 order was executed per day	S	
Five main intermediaries classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)
TRADITION SECUR AND FUTURES OTC - 969500V058ZSY03FNX80	31.3	20.25
BGC FINANCIAL, L.P - 549300NP4MIDUNET0550	31.25	29.11
Corporate Models CAPITAL MARKETS BROKERAGE S.A., AGENCIA DE VALORES - 213800MDEXILA5OUWS43	18.26	20.25
ALL TRADING EUROPE ASSETS & MARKETS SOCIEDAD DE VALORES SA - 549300UZRRVYI5I5P867	13.85	12.65
TULLETT PREBON (SECURITIES) LIMITED - 549300BMVW85YF9FGN67	5.24	5.06

b) Debt instruments – Money market instruments

Instrument category	Debt instruments – Money market instruments	
Indicate whether in the previous year an average of <1 order was executed per day	S	
Five main intermediaries classified by trading volume (decreasing order)	Proportion of trading volume of the total for this category (%)	Proportion of orders executed in the total for this category (%)
Corporate Models CAPITAL MARKETS BROKERAGE S.A., AGENCIA DE VALORES - 213800MDEXILA5OUWS43	100	100
-	-	-
-	-	-
-	-	-
-	-	-

5. Summary of the analysis of the quality of the execution obtained in the trading venues and intermediaries that carry out customers' orders

- a) Equities: Shares and deposit certificates – Liquidity bands with a minimum variation of 5 and 6 (over 2,000 transactions per day)
- **Relative importance assigned by the Bank to the prices, costs, speed, plurality of the execution or any other factor when assessing the quality of the execution**

When Santander provides the service for receiving and transmitting the orders from its customers to an intermediary, it takes into account the following factors:

- Existence of an own order execution policy: consideration will only be given to intermediaries that have a formally established order execution policy which meets the requirements specified by the MiFID II regulations
- Access to trading venues: access by intermediaries to trading venues considered relevant at all times.
- Clearing and settlement arrangements: the clearing house with which the intermediary has an arrangement for clearing of transactions must be a member of the central counterparties or clearing and settlement systems of the selected trading venues. The clearing house must also have the solvency and the technical and human means required for the performance of its functions.
- Practical execution of orders: The selected intermediary must be able to systematically and consistently obtain the best possible result for the Bank's customer orders at the relevant trading venues included in the order execution policy.

For retail customers Santander determines the best possible result in terms of the total service (that is, considering the price and cost variables).

The various trading venues Banco Santander uses to operate directly in the market as a market member are the main centres in terms of liquidity for securities from issuers of Spanish nationality.

- **Possible close links, conflicts of interest and common interests with respect to any trading venue or intermediary used to execute orders**

In 2019, as a transitory measure owing to technical issues, as indicated in the order execution policy, Santander used Popular Bolsa, S.V., S.A. (entity belonging to Santander Group) as an intermediary.

- **Specific arrangements with the trading venues or intermediaries for payments made or received, discounts, rebates or non-monetary benefits received**

In 2019, Santander had no specific arrangement with any of the intermediaries or trading venues it uses to execute and transmit its customers' orders in terms of payments made or received, discounts, rebates or non-monetary benefits received.

- **Factors that led to a modification of the list of trading venues or intermediaries included in the Bank's execution policy**

Based on the factors described in the Bank's best execution policy, the list of trading venues and intermediaries through which the Bank executes its orders has been updated.

- **Differentiation of the order execution according to the customers' categorisation when the Bank treats customer categories differently and when this may affect the method of executing the order**

Santander applies the criteria it has defined in its best execution policy with the aim of guaranteeing the best execution of its customers' transactions. The entity follows the factors established in its execution policy. For retail customers the key factors are price and cost (which determine the total consideration for the customer).

- **Criteria that have been prioritised over immediate price and cost criteria when executing retail customer orders and the way these other criteria have been decisive in achieving the best possible result in terms of the total amount to the customer**

Santander does not give priority to any criteria other than price and cost when executing orders for retail customers.

- **Way in which the Bank has used any data or instruments relating to the quality of the execution, including all data published under the Delegated Regulation (EU) 2017/575**

Santander analyses the trading venues to which it belongs using a tool under contract from an external provider, and assesses the execution service in order to offer the best result. It also carries out an analysis of the intermediaries to ensure compliance with the best execution policy.

- **Way in which the Bank has used the information from a consolidated information provider established in accordance with article 65 of Directive 2014/65/EU.**

In 2019, Santander did not directly use any information from a consolidated information provider.

b) Equities: Shares and deposit certificates – Liquidity bands with a minimum variation of 3 and 4 (from 80 to 1,999 transactions per day)

- **Relative importance assigned by the Bank to the prices, costs, speed, plurality of the execution or any other factor when assessing the quality of the execution**

When Santander provides the service for receiving and transmitting the orders from its customers to an intermediary, it takes into account the following factors:

- Existence of an own order execution policy: consideration will only be given to intermediaries that have a formally established order execution policy which meets the requirements specified by the MiFID II regulations
- Access to trading venues: access by intermediaries to trading venues considered relevant at all times.
- Clearing and settlement arrangements: the clearing house with which the intermediary has an arrangement for clearing of transactions must be a member of the central counterparties or clearing and settlement systems of the selected trading venues. The clearing house must also have the solvency and the technical and human means required for the performance of its functions.
- Practical execution of orders: The selected intermediary must be able to systematically and consistently obtain the best possible result for the Bank's customer orders at the relevant trading venues included in the order execution policy.

For retail customers Santander determines the best possible result in terms of the total service (that is, considering the price and cost variables).

The various trading venues Banco Santander uses to operate directly in the market as a market member are the main centres in terms of liquidity for securities from issuers of Spanish nationality.

- **Possible close links, conflicts of interest and common interests with respect to any trading venue or intermediary used to execute orders**

In 2019, as a transitory measure owing to technical issues, as indicated in the order execution policy, Santander used Popular Bolsa, S.V., S.A. (entity belonging to Santander Group) as an intermediary.

- **Specific arrangements with the trading venues or intermediaries for payments made or received, discounts, rebates or non-monetary benefits received**

In 2019, Santander had no specific arrangement with any of the intermediaries or trading venues it uses to execute and transmit its customers' orders in terms of payments made or received, discounts, rebates or non-monetary benefits received.

- **Factors that led to a modification of the list of trading venues or intermediaries included in the Bank's execution policy**

Based on the factors described in the Bank's best execution policy, the list of trading venues and intermediaries through which the Bank executes its orders has been updated.

- **Differentiation of the order execution according to the customers' categorisation when the Bank treats customer categories differently and when this may affect the method of executing the order**

Santander applies the criteria it has defined in its best execution policy with the aim of guaranteeing the best execution of its customers' transactions. The entity follows the factors established in its execution policy. For retail customers the key factors are price and cost (which determine the total consideration for the customer).

- **Criteria that have been prioritised over immediate price and cost criteria when executing retail customer orders and the way these other criteria have been decisive in achieving the best possible result in terms of the total amount to the customer**

Santander does not give priority to any criteria other than price and cost when executing orders for retail customers.

- **Way in which the Bank has used any data or instruments relating to the quality of the execution, including all data published under the Delegated Regulation (EU) 2017/575**

Santander analyses the trading venues to which it belongs using a tool under contract from an external provider, and assesses the execution service in order to offer the best result. It also carries out an analysis of the intermediaries to ensure compliance with the best execution policy.

- **Way in which the Bank has used the information from a consolidated information provider established in accordance with article 65 of Directive 2014/65/EU.**

In 2019, Santander did not directly use any information from a consolidated information provider.

- c) Equities: Shares and deposit certificates – Liquidity bands with a minimum variation of 1 and 2 (from 0 to 79 transactions per day)
- **Relative importance assigned by the Bank to the prices, costs, speed, plurality of the execution or any other factor when assessing the quality of the execution**

When Santander provides the service for receiving and transmitting the orders from its customers to an intermediary, it takes into account the following factors:

- Existence of an own order execution policy: consideration will only be given to intermediaries that have a formally established order execution policy which meets the requirements specified by the MiFID II regulations
- Access to trading venues: access by intermediaries to trading venues considered relevant at all times.
- Clearing and settlement arrangements: the clearing house with which the intermediary has an arrangement for clearing of transactions must be a member of the central counterparties or clearing and settlement systems of the selected trading venues. The clearing house must also have the solvency and the technical and human means required for the performance of its functions.
- Practical execution of orders: The selected intermediary must be able to systematically and consistently obtain the best possible result for the Bank's customer orders at the relevant trading venues included in the order execution policy.

For retail customers Santander determines the best possible result in terms of the total service (that is, considering the price and cost variables).

The various trading venues Banco Santander uses to operate directly in the market as a market member are the main centres in terms of liquidity for securities from issuers of Spanish nationality.

- **Possible close links, conflicts of interest and common interests with respect to any trading venue or intermediary used to execute orders**

In 2019, as a transitory measure owing to technical issues, as indicated in the order execution policy, Santander used Popular Bolsa, S.V., S.A. (entity belonging to Santander Group) as an intermediary.

- **Specific arrangements with the trading venues or intermediaries for payments made or received, discounts, rebates or non-monetary benefits received**

In 2019, Santander had no specific arrangement with any of the intermediaries or trading venues it uses to execute and transmit its customers' orders in terms of payments made or received, discounts, rebates or non-monetary benefits received.

- **Factors that led to a modification of the list of trading venues or intermediaries included in the Bank's execution policy**

Based on the factors described in the Bank's best execution policy, the list of trading venues and intermediaries through which the Bank executes its orders has been updated.

- **Differentiation of the order execution according to the customers' categorisation when the Bank treats customer categories differently and when this may affect the method of executing the order**

Santander applies the criteria it has defined in its best execution policy with the aim of guaranteeing the best execution of its customers' transactions. The entity follows the factors established in its execution policy. For retail customers the key factors are price and cost (which determine the total consideration for the customer).

- **Criteria that have been prioritised over immediate price and cost criteria when executing retail customer orders and the way these other criteria have been decisive in achieving the best possible result in terms of the total amount to the customer**

Santander does not give priority to any criteria other than price and cost when executing orders for retail customers.

- **Way in which the Bank has used any data or instruments relating to the quality of the execution, including all data published under the Delegated Regulation (EU) 2017/575**

Santander analyses the trading venues to which it belongs using a tool under contract from an external provider, and assesses the execution service in order to offer the best result. It also carries out an analysis of the intermediaries to ensure compliance with the best execution policy.

- **Way in which the Bank has used the information from a consolidated information provider established in accordance with article 65 of Directive 2014/65/EU.**

In 2019, Santander did not directly use any information from a consolidated information provider.

d) Debt instruments – Obligations

- **Relative importance assigned by the Bank to the prices, costs, speed, plurality of the execution or any other factor when assessing the quality of the execution**

In 2018 Santander (Code MIC SANT) declared itself a “Systematic Internaliser” according to article 4(1)(20) of MiFID II (Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014) for the products described on the Bank's website: www.bancosantander.es.

For all activities involving the provision of liquidity and intermediation on equity products, Santander receives its customers' requests or orders through different channels and, after considering the following factors, carries out a "best execution" of the transaction:

- Specifications in the order: Specific instructions from the customer.
- Price: Best price at the time of executing the order.
- Volume: Size of the order in relation to the supply and demand for a specific financial instrument in the trading venues available.
- Probability and efficiency in the execution and liquidation: Capacity to provide an execution and liquidation that ensure the correct completion of the customer's order.
- Costs: Lower costs associated with the execution, clearing and liquidation of the order (as applicable).
- Speed: Speed in conveying the orders to the trading venues.
- Any other relevant consideration for executing the order such as the available liquidity or the trading policy.

When operating with retail customers, the factors that are given greater importance when assessing the quality of the execution are the price of the financial instrument and the associated costs, as required by the applicable regulations, and these factors are also given greater relevance in transactions with professional customers.

In general, in all its activities as an executor of orders, Santander applies the aforementioned criteria as a reference. However, in exceptional market situations, the relative importance of these factors may vary notably, and certain additional conditioning factors not considered here may also be taken into account. To determine the relative importance of each of the reference factors mentioned,

Santander applies its experience as a liquidity provider and, depending on the market conditions at the time of the transaction, takes into account:

- The commercial policy applicable to the customer.
- The characteristics of the order.
- The instrument and liquidity of the order on the market.
- Factors specific to the trading venue that executes the transaction.

Additionally, Santander provides the service for receiving and transmitting orders in relation to some fixed income instruments.

When Santander provides the service for receiving and transmitting the orders from its customers to an intermediary, it takes into account the following factors:

- Efficiency: capacity to obtain the best possible result, access and/or knowledge of the market or specific sections, resolution of incidents, efficient management of orders and execution of orders without waiting times, inter alia.
 - Service quality: value-added service and personalised attention, among others.
 - Access to trading venues: access by intermediaries to markets or trading venues considered relevant for each instrument.
- **Possible close links, conflicts of interest and common interests with respect to any trading venue or intermediary used to execute orders**

In 2019, Santander continued acting as a Systematic Internaliser, and also published prices in different trading venues available to the customers, who can use them to execute transactions against Santander.

Moreover, Santander has no agreement of preference or participation in force in any of the other trading venues or intermediaries used to execute transactions deriving from customers' requests or orders.

- **Specific arrangements with the trading venues or intermediaries for payments made or received, discounts, rebates or non-monetary benefits received**

In 2019, Santander did not have in force any agreement for commissions, discounts, rebates or any other non-monetary benefit with any trading venue used to execute the customers' requests or orders.

Santander had no specific arrangement with any of the intermediaries it uses to execute its customers' orders in terms of payments made or received, discounts, rebates or non-monetary benefits perceived.

- **Factors that led to a modification of the list of trading venues or intermediaries included in the Bank's execution policy**

Based on the factors described in the Bank's best execution policy, the list of trading venues and intermediaries through which the Bank executes its orders has been updated.

Santander declared itself to be a "Systematic Internaliser" for this product as described on the Bank's website, www.bancosantander.es, and it also publishes prices in different trading venues that are available to the customers, who can use them to execute transactions against Santander.

- **Differentiation of the order execution according to the customers' categorisation when the Bank treats customer categories differently and when this may affect the method of executing the order**

Santander applies the best execution criteria for all its customers regardless of their categorisation.

In general, Santander applies the aforementioned criteria as a reference, although the factors that are given greater relevance when assessing the quality of the execution are the price of the financial instrument and the associated costs, as required by the applicable regulations.

- **Criteria that have been prioritised over immediate price and cost criteria when executing retail customer orders and the way these other criteria have been decisive in achieving the best possible result in terms of the total amount to the customer**

Santander does not give priority to any criteria other than price and cost when executing orders on behalf of retail customers.

- **Way in which the Bank has used any data or instruments relating to the quality of the execution, including all data published under the Delegated Regulation (EU) 2017/575**

The various trading venues Banco Santander uses to operate directly in the market as a market member are the main venues in terms of liquidity for securities from country issuers.

- **Way in which the Bank has used the information from a consolidated information provider established in accordance with article 65 of Directive 2014/65/EU.**

In 2019, Santander did not directly use any information from a consolidated information provider.

e) Debt instruments – Money market instruments

- **Relative importance assigned by the Bank to the prices, costs, speed, plurality of the execution or any other factor when assessing the quality of the execution**

In 2018 Santander (Code MIC SANT) declared itself a “Systematic Internaliser” according to article 4(1)(20) of MiFID II (Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014) for the products described on the Bank's website: www.bancosantander.es.

For all activities involving the provision of liquidity and intermediation on equity products, Santander receives its customers' requests or orders through different channels and, after considering the following factors, carries out a "best execution" of the transaction:

- Specifications in the order: Specific instructions from the customer.
- Price: Best price at the time of executing the order.
- Volume: Size of the order in relation to the supply and demand for a specific financial instrument in the trading venues available.
- Probability and efficiency in the execution and liquidation: Capacity to provide an execution and liquidation that ensure the correct completion of the customer's order.
- Costs: Lower costs associated with the execution, clearing and liquidation of the order (as applicable).
- Speed: Speed in conveying the orders to the trading venues.
- Any other relevant consideration for executing the order such as the available liquidity or the trading policy.

When operating with retail customers, the factors that are given greater importance when assessing the quality of the execution are the price of the financial instrument and the associated costs, as required by the applicable regulations, and these factors are also given greater relevance in transactions with professional customers.

In general, in all its activities as an executor of orders, Santander applies the aforementioned criteria as a reference. However, in exceptional market situations, the relative importance of these factors may vary notably, and certain additional conditioning factors not considered here may also be taken into account. To determine the relative importance of each of the reference factors mentioned,

Santander applies its experience as a liquidity provider and, depending on the market conditions at the time of the transaction, takes into account:

- The commercial policy applicable to the customer.
- The characteristics of the order.
- The instrument and liquidity of the order on the market.
- Factors specific to the trading venue that executes the transaction.

Additionally, Santander provides the service for receiving and transmitting orders in relation to some fixed income instruments.

○ **Possible close links, conflicts of interest and common interests with respect to any trading venue or intermediary used to execute orders**

In 2019, Santander continued acting as a Systematic Internaliser, and also published prices in different trading venues available to the customers, who can use them to execute transactions against Santander.

Additionally, Santander has no agreement of preference or participation in force in any of the other trading venues used to execute transactions deriving from customers' requests or orders.

○ **Specific arrangements with the trading venues or intermediaries for payments made or received, discounts, rebates or non-monetary benefits received**

In 2019, Santander did not have any agreement in force for commissions, discounts, rebates or any other non-monetary benefit with any trading venue used to execute the customers' requests or orders.

○ **Factors that led to a modification of the list of trading venues or intermediaries included in the Bank's execution policy**

Based on the factors described in the Bank's best execution policy, the list of trading venues and intermediaries through which the Bank executes its orders has been updated.

Santander declared itself to be a “Systematic Internaliser” for this product as described on the Bank’s website, www.bancosantander.es, and it also publishes prices in different trading venues that are available to the customers, who can use them to execute transactions against Santander.

- **Differentiation of the order execution according to the customers' categorisation when the Bank treats customer categories differently and when this may affect the method of executing the order**

Santander applies the best execution criteria for all its customers regardless of their categorisation.

In general, Santander applies the aforementioned criteria as a reference, although the factors that are given greater relevance when assessing the quality of the execution are the price of the financial instrument and the associated costs, as required by the applicable regulations.

- **Criteria that have been prioritised over immediate price and cost criteria when executing retail customer orders and the way these other criteria have been decisive in achieving the best possible result in terms of the total amount to the customer**

Santander does not give priority to any criteria other than price and cost when executing orders on behalf of retail customers.

- **Way in which the Bank has used any data or instruments relating to the quality of the execution, including all data published under the Delegated Regulation (EU) 2017/575**

The various trading venues Banco Santander uses to operate directly in the market as a market member are the main venues in terms of liquidity for securities from country issuers.

- **Way in which the Bank has used the information from a consolidated information provider established in accordance with article 65 of Directive 2014/65/EU.**

In 2019, Santander did not directly use any information from a consolidated information provider.

f) Interest rate derivatives – Futures and options admitted for trading in a trading venue

- **Relative importance assigned by the Bank to the prices, costs, speed, plurality of the execution or any other factor when assessing the quality of the execution**

For customers' futures and options transactions, Santander receives orders from customers, which contain, among other information, the contract to be processed among those listed by the market. There is therefore no discretionality when choosing the contract/market when executing the orders, as it is determined by the customers when the orders are being conveyed. It should be noted that each futures and options contract is only listed in a single market.

- **Possible close links, conflicts of interest and common interests with respect to any trading venue or intermediary used to execute orders**

In 2019, Santander had no agreement of preference or participation in force in any of the different trading venues used to execute transactions deriving from customers' requests or orders.

- **Specific arrangements with the trading venues or intermediaries for payments made or received, discounts, rebates or non-monetary benefits received**

In 2019, Santander did not have in force any agreement for commissions, discounts, rebates or any other non-monetary benefit with any trading venue used to execute the customers' requests or orders.

- **Factors that led to a modification of the list of trading venues or intermediaries included in the Bank's execution policy**

Based on the factors described in the Bank's best execution policy, the list of trading venues and intermediaries through which the Bank executes its orders has been updated.

- **Differentiation of the order execution according to the customers' categorisation when the Bank treats customer categories differently and when this may affect the method of executing the order**

There is no discretionality when choosing the contract/market when executing the orders, as it is determined by the customers when the orders are being conveyed.

For this type of product the Bank does not provide the order execution service for retail customers.

- **Criteria that have been prioritised over immediate price and cost criteria when executing retail customer orders and the way these other criteria have been decisive in achieving the best possible result in terms of the total amount to the customer**

There is no discretionality when choosing the contract/market when executing the orders, as it is determined by the customers when the orders are being conveyed.

Most of the orders received are intended for transmission in markets where Santander is a direct member and they are therefore executed directly without the need for an intermediary.

For this type of product the Bank does not provide the order execution service for retail customers.

- **Way in which the Bank has used any data or instruments relating to the quality of the execution, including all data published under the Delegated Regulation (EU) 2017/575**

As there is no discretionality when choosing the market in which to execute the orders as this is determined by the customers, the Bank has not carried out any quality analysis of the execution of the centres.

- **Way in which the Bank has used the information from a consolidated information provider established in accordance with article 65 of Directive 2014/65/EU.**

In 2019, Santander did not directly use any information from a consolidated information provider.

g) Interest rate derivatives – Swaps, fixed term contracts and other interest rate derivatives

- **Relative importance assigned by the Bank to the prices, costs, speed, plurality of the execution or any other factor when assessing the quality of the execution**

In 2018 Santander (Code MIC SANT) declared itself a “Systematic Internaliser” according to article 4(1)(20) of MiFID II (Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014) for the products described on the Bank's website: www.bancosantander.es.

Additionally, in 2019 Banco Santander expanded the products in which it has voluntarily declared itself to be a “Systematic Internaliser”.

For operations with interest rate derivatives, the Bank provides prices to our customers who choose the channel (platform or spoken communication) with which to operate with Santander. There is therefore no discretionality by the Bank when choosing the trading venue for the operations, as this is determined by the customers.

- **Possible close links, conflicts of interest and common interests with respect to any trading venue or intermediary used to execute orders**

In 2019, Santander acted as a Systematic Internaliser in this type of instruments.

Moreover, Santander has no agreement of preference or participation in force in any of the trading venues used to execute transactions deriving from customers' requests or orders.

Additionally, Santander publishes prices in different trading venues that are available to the customers, who can use then to execute transactions against Santander.

- **Specific arrangements with the trading venues or intermediaries for payments made or received, discounts, rebates or non-monetary benefits received**

In 2019, Santander did not have any agreement in force for commissions, discounts, rebates or any other non-monetary benefit with any trading venue to execute the customers' requests or orders.

- **Factors that led to a modification of the list of trading venues or intermediaries included in the Bank's execution policy**

There was no change in the list of trading venues or intermediaries identified by Santander in its best execution policy.

Santander declared itself to be a “Systematic Internaliser” for this product as described on the Bank's website, www.bancosantander.es, and it also publishes prices in different trading venues that are available to the customers, who can use them to execute transactions against Santander.

- **Differentiation of the order execution according to the customers' categorisation when the Bank treats customer categories differently and when this may affect the method of executing the order**

There is no discretionality when executing transactions as this is determined by the customers at the time of the transaction.

- **Criteria that have been prioritised over immediate price and cost criteria when executing retail customer orders and the way these other criteria have been decisive in achieving the best possible result in terms of the total amount to the customer**

To quote a price for these instruments the Bank will calculate an initial fair and reasonable price, based on market information, to which it will add the costs and margins established for this purpose when they are implicit in the final price of the transaction, as indicated in Santander's order execution policy.

- **Way in which the Bank has used any data or instruments relating to the quality of the execution, including all data published under the Delegated Regulation (EU) 2017/575**

The customer determines the trading venue in which to execute their orders against Santander, and the Bank therefore does not make any quality analysis of the execution in the venues.

- **Way in which the Bank has used the information from a consolidated information provider established in accordance with article 65 of Directive 2014/65/EU.**

In 2019, Santander did not directly use any information from a consolidated information provider.

h) Credit rate derivatives - Other credit derivatives

- **Relative importance assigned by the Bank to the prices, costs, speed, plurality of the execution or any other factor when assessing the quality of the execution**

For operations with credit derivatives, the Bank provides prices to our customers who choose the channel (platform or spoken communication) with which to operate with Santander. There is therefore no discretionality by the Bank when choosing the trading venue for the operations, as this is determined by the customers.

- **Possible close links, conflicts of interest and common interests with respect to any trading venue or intermediary used to execute orders**

Santander has no agreement of preference or participation in force in any of the trading venues used to execute transactions deriving from customers' requests or orders.

- **Specific arrangements with the trading venues or intermediaries for payments made or received, discounts, rebates or non-monetary benefits received**

In 2019, Santander did not have any agreement in force for commissions, discounts, rebates or any other non-monetary benefit with any trading venue to execute the customers' requests or orders.

- **Factors that led to a modification of the list of trading venues or intermediaries included in the Bank's execution policy**

There was no change in the list of trading venues or intermediaries identified by Santander in its best execution policy.

- **Differentiation of the order execution according to the customers' categorisation when the Bank treats customer categories differently and when this may affect the method of executing the order**

There is no discretionality when executing transactions as this is determined by the customers at the time of the transaction.

For this type of product the Bank does not provide the order execution service for retail customers.

- **Criteria that have been prioritised over immediate price and cost criteria when executing retail customer orders and the way these other criteria have been decisive in achieving the best possible result in terms of the total amount to the customer**

To quote a price for these instruments the Bank will calculate an initial fair and reasonable price, based on market information, to which it will add the costs and margins established for this purpose when they are implicit in the final price of the transaction, as indicated in Santander's order execution policy.

- **Way in which the Bank has used any data or instruments relating to the quality of the execution, including all data published under the Delegated Regulation (EU) 2017/575**

The customer determines the trading venue in which to execute their orders against Santander, and the Bank therefore does not make any quality analysis of the execution in the venues.

- **Way in which the Bank has used the information from a consolidated information provider established in accordance with article 65 of Directive 2014/65/EU.**

In 2019, Santander did not directly use any information from a consolidated information provider.

i) Currency derivatives – Swaps, fixed term derivatives and other currency derivatives

- **Relative importance assigned by the Bank to the prices, costs, speed, plurality of the execution or any other factor when assessing the quality of the execution**

In 2018 Santander (Code MIC SANT) declared itself a “Systematic Internaliser” according to article 4(1)(20) of MiFID II (Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014) for the products described on the Bank's website: www.bancosantander.es.

For operations on currency derivatives the customers choose the channel (platform or spoken communication) with which to operate with Santander. There is therefore no discretionality by the Bank when choosing the trading venue for the operations, as this is determined by the customers.

- **Possible close links, conflicts of interest and common interests with respect to any trading venue or intermediary used to execute orders**

Santander has no agreement of preference or participation in force in any of the trading venues used to execute transactions deriving from customers' requests or orders.

Santander acts as a “Systematic Internaliser” for this type of product as indicated on the Bank's website, www.bancosantander.es.

Santander publishes prices in different trading venues that are available to the customers, who can use then to execute transactions against Santander.

- **Specific arrangements with the trading venues or intermediaries for payments made or received, discounts, rebates or non-monetary benefits received**

In 2019, Santander did not have any agreement in force for commissions, discounts, rebates or any other non-monetary benefit with any trading venue to execute the customers' requests or orders.

- **Factors that led to a modification of the list of trading venues or intermediaries included in the Bank's execution policy**

There was no change in the list of trading venues or intermediaries identified by Santander in its best execution policy.

Santander declared itself to be a “Systematic Internaliser” for this product as described on the Bank's website, www.bancosantander.es, and it also publishes prices in different trading venues that are available to the customers, who can use them to execute transactions against Santander.

- **Differentiation of the order execution according to the customers' categorisation when the Bank treats customer categories differently and when this may affect the method of executing the order.**

There is no discretionality when executing transactions as this is determined by the customers at the time of the transaction.

- **Criteria that have been prioritised over immediate price and cost criteria when executing retail customer orders and the way these other criteria have been decisive in achieving the best possible result in terms of the total amount to the customer.**

To quote a price for these instruments the Bank will calculate an initial fair and reasonable price, based on market information, to which it will add the costs and margins established for this purpose when they are implicit in the final price of the transaction, as indicated in Santander's order execution policy.

- **Way in which the Bank has used any data or instruments relating to the quality of the execution, including all data published under the Delegated Regulation (EU) 2017/575**

The customer determines the trading venue in which to execute their orders against Santander, and the bank therefore does not make any quality analysis of the execution in the venues.

- **Way in which the Bank has used the information from a consolidated information provider established in accordance with article 65 of Directive 2014/65/EU.**

In 2019, Santander did not directly use any information from a consolidated information provider.

j) Equity derivatives – Futures and options admitted for trading in a trading venue

- **Relative importance assigned by the Bank to the prices, costs, speed, plurality of the execution or any other factor when assessing the quality of the execution**

For customers' futures and options transactions, Santander receives orders from customers, which contain, among other information, the contract to be processed among those listed by the market. There is therefore no discretionality when choosing the contract/market when executing the orders, as it is determined by the customers when the orders are being conveyed. It should be noted that each futures and options contract is only listed in a single market.

- **Possible close links, conflicts of interest and common interests with respect to any trading venue or intermediary used to execute orders**

In 2019, Santander had no agreement of preference or participation in force in any of the different trading venues used to execute transactions deriving from customers' requests or orders.

- **Specific arrangements with the trading venues or intermediaries for payments made or received, discounts, rebates or non-monetary benefits received**

In 2019, Santander did not have in force any agreement for commissions, discounts, rebates or any other non-monetary benefit with any trading venue used to execute the customers' requests or orders.

- **Factors that led to a modification of the list of trading venues or intermediaries included in the Bank's execution policy**

Based on the factors described in the Bank's best execution policy, the list of trading venues and intermediaries through which the Bank executes its orders has been updated.

- **Differentiation of the order execution according to the customers' categorisation when the Bank treats customer categories differently and when this may affect the method of executing the order**

There is no discretionality when choosing the contract/market when executing the orders, as it is determined by the customers when the orders are being conveyed.

- **Criteria that have been prioritised over immediate price and cost criteria when executing retail customer orders and the way these other criteria have been decisive in achieving the best possible result in terms of the total amount to the customer**

There is no discretionality when choosing the contract/market when executing the orders, as it is determined by the customers when the orders are being conveyed.

Most of the orders received are transmitted in markets where Santander is a direct member and they are therefore directly executed without needing to use any intermediary.

For this type of product the Bank does not provide the order execution service for retail customers.

- **Way in which the Bank has used any data or instruments relating to the quality of the execution, including all data published under the Delegated Regulation (EU) 2017/575**

As there is no discretionality when choosing the market in which to execute the orders as this is determined by the customers when they convey the orders, the Bank has not carried out any quality analysis of the execution of the centres.

- **Way in which the Bank has used the information from a consolidated information provider established in accordance with article 65 of Directive 2014/65/EU.**

In 2019, Santander did not directly use any information from a consolidated information provider.

k) Equity derivatives – Swaps, fixed-term contracts and other equity derivatives.

- **Relative importance assigned by the Bank to the prices, costs, speed, plurality of the execution or any other factor when assessing the quality of the execution**

For operations with equity derivatives – swaps, fixed-term contracts and other equity derivatives – the customers choose the channel (platform or spoken communication) with which to operate with Santander. There is therefore no discretionality by the Bank when choosing the trading venue for the operations, as this is determined by the customers.

- **Possible close links, conflicts of interest and common interests with respect to any trading venue or intermediary used to execute orders**

Santander has no agreement of preference or participation in force in any of the trading venues used to execute transactions deriving from customers' requests or orders.

- **Specific arrangements with the trading venues or intermediaries for payments made or received, discounts, rebates or non-monetary benefits received**

In 2019, Santander did not have any agreement in force for commissions, discounts, rebates or any other non-monetary benefit with any trading venue to execute the customers' requests or orders.

- **Factors that led to a modification of the list of trading venues or intermediaries included in the Bank's execution policy**

There was no change in the list of trading venues or intermediaries identified by Santander in its best execution policy.

- **Differentiation of the order execution according to the customers' categorisation when the Bank treats customer categories differently and when this may affect the method of executing the order**

There is no discretionality when executing transactions as this is determined by the customers at the time of the transaction.

- **Criteria that have been prioritised over immediate price and cost criteria when executing retail customer orders and the way these other criteria have been decisive in achieving the best possible result in terms of the total amount to the customer**

To quote a price for these instruments the Bank will calculate an initial fair and reasonable price, based on market information, to which it will add the costs and margins established for this purpose when they are implicit in the final price of the transaction, as indicated in Santander's order execution policy.

- **Way in which the Bank has used any data or instruments relating to the quality of the execution, including all data published under the Delegated Regulation (EU) 2017/575**

The customer determines the trading venue in which to execute their orders against Santander, and the Bank therefore does not make any quality analysis of the execution in the venues.

- **Way in which the Bank has used the information from a consolidated information provider established in accordance with article 65 of Directive 2014/65/EU.**

In 2019, Santander did not directly use any information from a consolidated information provider.

I) Securitized derivatives – Purchase option certificates (including warrants) and certificates in derivatives

- **Relative importance assigned by the Bank to the prices, costs, speed, plurality of the execution or any other factor when assessing the quality of the execution**

When Santander provides the service for receiving and transmitting the orders from its customers to an intermediary, it takes into account the following factors:

- Existence of an own order execution policy: consideration will only be given to intermediaries that have a formally established order execution policy which meets the requirements specified by the MiFID II regulations
- Access to trading venues: access by intermediaries to trading venues considered relevant at all times.
- Clearing and settlement arrangements: the clearing house with which the intermediary has an arrangement for clearing of transactions must be a member of the central counterparties or clearing and settlement systems of the selected trading venues. The clearing house must also have the solvency and the technical and human means required for the performance of its functions.
- Practical execution of orders: The selected intermediary must be able to systematically and consistently obtain the best possible result for the Bank's customer orders at the relevant trading venues included in the order execution policy.

For retail customers Santander determines the best possible result in terms of the total service (that is, considering the price and cost variables).

The various trading venues Banco Santander uses to operate directly in the market as a market member are the main centres in terms of liquidity for securities from issuers of Spanish nationality.

- **Possible close links, conflicts of interest and common interests with respect to any trading venue or intermediary used to execute orders**

In 2019, as a transitory measure owing to technical issues, as indicated in the order execution policy, Santander used Popular Bolsa, S.V., S.A. (entity belonging to Santander Group) as an intermediary.

- **Specific arrangements with the trading venues or intermediaries for payments made or received, discounts, rebates or non-monetary benefits received**

In 2019, Santander had no specific arrangement with any of the intermediaries or trading venues it uses to execute and transmit its customers' orders in terms of payments made or received, discounts, rebates or non-monetary benefits received.

- **Factors that led to a modification of the list of trading venues or intermediaries included in the Bank's execution policy**

No change occurred in the list of trading venues identified by Santander in its best execution policy. Based on the factors described in the Bank's best execution policy, the list of intermediaries through which the Bank executes its orders has been updated.

- **Differentiation of the order execution according to the customers' categorisation when the Bank treats customer categories differently and when this may affect the method of executing the order**

Santander applies the criteria it has defined in its best execution policy with the aim of guaranteeing the best execution of its customers' transactions. The entity follows the factors established in its execution policy. For retail customers the key factors are price and cost (which determine the total consideration for the customer).

- **Criteria that have been prioritised over immediate price and cost criteria when executing retail customer orders and the way these other criteria have been decisive in achieving the best possible result in terms of the total amount to the customer**

Santander does not give priority to any criteria other than price and cost when executing orders for retail customers.

- **Way in which the Bank has used any data or instruments relating to the quality of the execution, including all data published under the Delegated Regulation (EU) 2017/575**

Santander analyses the trading venues to which it belongs using a tool under contract from an external provider, and assesses the execution service in order to offer the best result. It also carries out an analysis of the intermediaries to ensure compliance with the best execution policy.

- **Way in which the Bank has used the information from a consolidated information provider established in accordance with article 65 of Directive 2014/65/EU.**

In 2019, Santander did not directly use any information from a consolidated information provider.

m) Securitized derivatives – Other Securitized derivatives

- **Relative importance assigned by the Bank to the prices, costs, speed, plurality of the execution or any other factor when assessing the quality of the execution**

When Santander provides the service for receiving and transmitting the orders from its customers to an intermediary, it takes into account the following factors:

- Existence of an own order execution policy: consideration will only be given to intermediaries that have a formally established order execution policy which meets the requirements specified by the MiFID II regulations
- Access to trading venues: access by intermediaries to trading venues considered relevant at all times.
- Clearing and settlement arrangements: the clearing house with which the intermediary has an arrangement for clearing of transactions must be a member of the central counterparties or clearing and settlement systems of the selected trading venues. The clearing house must also have the solvency and the technical and human means required for the performance of its functions.
- Practical execution of orders: The selected intermediary must be able to systematically and consistently obtain the best possible result for the Bank's customer orders at the relevant trading venues included in the order execution policy.

For retail customers Santander determines the best possible result in terms of the total service (that is, considering the price and cost variables).

- **Possible close links, conflicts of interest and common interests with respect to any trading venue or intermediary used to execute orders**

In 2019, Santander did not detect any conflict of interest in regard to the intermediaries used to execute its customers' orders.

- **Specific arrangements with the trading venues or intermediaries for payments made or received, discounts, rebates or non-monetary benefits received**

In 2019, Santander had no specific arrangement with any of the intermediaries it uses to execute and convey its customers' orders in terms of payments made or received, discounts, rebates or non-monetary benefits perceived.

- **Factors that led to a modification of the list of trading venues or intermediaries included in the Bank's execution policy**

No change occurred in the list of trading venues identified by Santander in its best execution policy. Based on the factors described in the Bank's best execution policy, the list of intermediaries through which the Bank executes its orders has been updated.

- **Differentiation of the order execution according to the customers' categorisation when the Bank treats customer categories differently and when this may affect the method of executing the order**

Santander applies the criteria it has defined in its best execution policy with the aim of guaranteeing the best execution of its customers' transactions. The entity follows the factors established in its execution policy. For retail customers the key factors are price and cost (which determine the total consideration for the customer).

- **Criteria that have been prioritised over immediate price and cost criteria when executing retail customer orders and the way these other criteria have been decisive in achieving the best possible result in terms of the total amount to the customer**

Santander does not give priority to any criteria other than price and cost when executing orders for retail customers.

- **Way in which the Bank has used any data or instruments relating to the quality of the execution, including all data published under the Delegated Regulation (EU) 2017/575**

Santander conducts an analysis of the intermediaries and assesses the execution service in order to offer the best result.

- **Way in which the Bank has used the information from a consolidated information provider established in accordance with article 65 of Directive 2014/65/EU.**

In 2019, Santander did not directly use any information from a consolidated information provider.

n) Commodity derivatives and issuance rights - Futures and options admitted for trading in a trading venue

- **Relative importance assigned by the Bank to the prices, costs, speed, plurality of the execution or any other factor when assessing the quality of the execution**

For customers' operations in futures and options, Santander receives orders from the customers containing, among other information, the contract to be processed from the ones listed by the market. There is therefore no discretionality when choosing the contract/market when executing the orders, as it is determined by the customers when the orders are being conveyed. It should be noted that each futures and options contract is only listed in a single market.

- **Possible close links, conflicts of interest and common interests with respect to any trading venue or intermediary used to execute orders**

In 2019, Santander had no agreement of preference or participation in force in any of the different trading venues used to execute transactions deriving from customers' requests or orders.

- **Specific arrangements with the trading venues or intermediaries for payments made or received, discounts, rebates or non-monetary benefits received**

In 2019, Santander did not have in force any agreement for commissions, discounts, rebates or any other non-monetary benefit with any trading venue used to execute the customers' requests or orders.

- **Factors that led to a modification of the list of trading venues or intermediaries included in the Bank's execution policy**

Based on the factors described in the Bank's best execution policy, the list of trading venues and intermediaries through which the Bank executes its orders has been updated.

- **Differentiation of the order execution according to the customers' categorisation when the Bank treats customer categories differently and when this may affect the method of executing the order**

There is no discretionality when choosing the contract/market when executing the orders, as it is determined by the customers when the orders are being conveyed.

- **Criteria that have been prioritised over immediate price and cost criteria when executing retail customer orders and the way these other criteria have been decisive in achieving the best possible result in terms of the total amount to the customer**

There is no discretionality when choosing the contract/market when executing the orders, as it is determined by the customers when the orders are being conveyed.

Most of the orders received are transmitted to markets where Santander is a direct member and they are therefore executed directly without the need for an intermediary.

For this type of product the Bank does not provide the order execution service for retail customers.

- **Way in which the Bank has used any data or instruments relating to the quality of the execution, including all data published under the Delegated Regulation (EU) 2017/575**

As there is no discretionality when choosing the market in which to execute the orders as this is determined by the customers when they convey the orders, the Bank has not carried out any quality analysis of the execution of the centres.

- **Way in which the Bank has used the information from a consolidated information provider established in accordance with article 65 of Directive 2014/65/EU.**

In 2019, Santander did not directly use any information from a consolidated information provider.

- o) Products traded on the market (listed investment funds, listed debt instruments and listed commodities)
- o **Relative importance assigned by the Bank to the prices, costs, speed, plurality of the execution or any other factor when assessing the quality of the execution**

When Santander provides the service for receiving and transmitting the orders from its customers to an intermediary, it takes into account the following factors:

- Existence of an own order execution policy: consideration will only be given to intermediaries that have a formally established order execution policy which meets the requirements specified by the MiFID II regulations
- Access to trading venues: access by intermediaries to trading venues considered relevant at all times.
- Clearing and settlement arrangements: the clearing house with which the intermediary has an arrangement for clearing of transactions must be a member of the central counterparties or clearing and settlement systems of the selected trading venues. The clearing house must also have the solvency and the technical and human means required for the performance of its functions.
- Practical execution of orders: The selected intermediary must be able to systematically and consistently obtain the best possible result for the Bank's customer orders at the relevant trading venues included in the order execution policy.

For retail customers Santander determines the best possible result in terms of the total service (that is, considering the price and cost variables).

The various trading venues Banco Santander uses to operate directly in the market as a market member are the main centres in terms of liquidity for securities from issuers of Spanish nationality.

- o **Possible close links, conflicts of interest and common interests with respect to any trading venue or intermediary used to execute orders**

In 2019, as a transitory measure owing to technical issues, as indicated in the order execution policy, Santander used Popular Bolsa, S.V., S.A. (entity belonging to Santander Group) as an intermediary.

- **Specific arrangements with the trading venues or intermediaries for payments made or received, discounts, rebates or non-monetary benefits received**

In 2019, Santander had no specific arrangement with any of the intermediaries or trading venues it uses to execute and transmit its customers' orders in terms of payments made or received, discounts, rebates or non-monetary benefits received.

- **Factors that led to a modification of the list of trading venues or intermediaries included in the Bank's execution policy**

No change occurred in the list of trading venues identified by Santander in its best execution policy.

Based on the factors described in the Bank's best execution policy, the list of intermediaries through which the Bank executes its orders has been updated.

- **Differentiation of the order execution according to the customers' categorisation when the Bank treats customer categories differently and when this may affect the method of executing the order**

Santander applies the criteria it has defined in its best execution policy with the aim of guaranteeing the best execution of its customers' transactions. The entity follows the factors established in its execution policy. For retail customers the key factors are price and cost (which determine the total consideration for the customer).

- **Criteria that have been prioritised over immediate price and cost criteria when executing retail customer orders and the way these other criteria have been decisive in achieving the best possible result in terms of the total amount to the customer**

Santander does not give priority to any criteria other than price and cost when executing orders for retail customers.

- **Way in which the Bank has used any data or instruments relating to the quality of the execution, including all data published under the Delegated Regulation (EU) 2017/575**

Santander analyses the trading venues to which it belongs using a tool under contract from an external provider, and assesses the execution service in order to offer the best result. It also carries out an analysis of the intermediaries to ensure compliance with the best execution policy.

- **Way in which the Bank has used the information from a consolidated information provider established in accordance with article 65 of Directive 2014/65/EU.**

In 2019, Santander did not directly use any information from a consolidated information provider.

p) Other instruments

- **Relative importance assigned by the Bank to the prices, costs, speed, plurality of the execution or any other factor when assessing the quality of the execution**

When Santander provides the service for receiving and transmitting the orders from its customers to an intermediary, it takes into account the following factors:

- Existence of an own order execution policy: consideration will only be given to intermediaries that have a formally established order execution policy which meets the requirements specified by the MiFID II regulations
- Access to trading venues: access by intermediaries to trading venues considered relevant at all times.
- Clearing and settlement arrangements: the clearing house with which the intermediary has an arrangement for clearing of transactions must be a member of the central counterparties or clearing and settlement systems of the selected trading venues. The clearing house must also have the solvency and the technical and human means required for the performance of its functions.
- Practical execution of orders: The selected intermediary must be able to systematically and consistently obtain the best possible result for the Bank's customer orders at the relevant trading venues included in the order execution policy.

For retail customers Santander determines the best possible result in terms of the total service (that is, considering the price and cost variables).

The various trading venues Banco Santander uses to operate directly in the market as a market member are the main centres in terms of liquidity for securities from issuers of Spanish nationality.

- **Possible close links, conflicts of interest and common interests with respect to any trading venue or intermediary used to execute orders**

In 2019, as a transitory measure owing to technical issues, as indicated in the order execution policy, Santander used Popular Bolsa, S.V., S.A. (entity belonging to Santander Group) as an intermediary.

- **Specific arrangements with the trading venues or intermediaries for payments made or received, discounts, rebates or non-monetary benefits received**

In 2019, Santander had no specific arrangement with any of the intermediaries or trading venues it uses to execute and transmit its customers' orders in terms of payments made or received, discounts, rebates or non-monetary benefits received.

- **Factors that led to a modification of the list of trading venues or intermediaries included in the Bank's execution policy**

There was no change in the list of trading venues or intermediaries identified by Santander in its best execution policy.

- **Differentiation of the order execution according to the customers' categorisation when the Bank treats customer categories differently and when this may affect the method of executing the order**

Santander applies the criteria it has defined in its best execution policy with the aim of guaranteeing the best execution of its customers' transactions. The entity follows the factors established in its execution policy. For retail customers the key factors are price and cost (which determine the total consideration for the customer).

- **Criteria that have been prioritised over immediate price and cost criteria when executing retail customer orders and the way these other criteria have been decisive in achieving the best possible result in terms of the total amount to the customer**

Santander does not give priority to any criteria other than price and cost when executing orders for retail customers.

- **Way in which the Bank has used any data or instruments relating to the quality of the execution, including all data published under the Delegated Regulation (EU) 2017/575**

Santander analyses the trading venues to which it belongs using a tool under contract from an external provider, and assesses the execution service in order to offer the best result. It also always carries out an analysis of the intermediaries to ensure compliance with the best execution policy.

- **Way in which the Bank has used the information from a consolidated information provider established in accordance with article 65 of Directive 2014/65/EU.**

In 2019, Santander did not directly use any information from a consolidated information provider.

6. Summary of the analysis of the quality of the performance of the trading venues and intermediaries that execute customers' orders in regard to securities financing transactions.

- **Relative importance assigned by the Bank to the prices, costs, speed, plurality of the execution or any other factor when assessing the quality of the execution**

For operations on financing securities, the customers choose the channel (platform or spoken communication) with which to operate with Santander. The Bank has no discretion when choosing the trading venue for the operations, as this is determined by the customers.

- **Possible close links, conflicts of interest and common interests with respect to any trading venue or intermediary used to execute orders**

In 2019, Santander did not detect any conflict of interest in regard to the trading venues or intermediaries used to execute its customers' orders.

- **Specific arrangements with the trading venues or intermediaries for payments made or received, discounts, rebates or non-monetary benefits received**

In 2019, Santander did not have any agreement in force for commissions, discounts, rebates or any other non-monetary benefit with any trading venue to execute the customers' requests or orders.

Nor did Santander have any specific arrangement with any of the intermediaries it uses to execute its customers' orders in terms of payments made or received, discounts, rebates or non-monetary benefits perceived.

- **Factors that led to a modification of the list of trading venues or intermediaries included in the Bank's execution policy**

There was no change in the list of trading venues or intermediaries identified by Santander in its best execution policy.

- **Differentiation of the order execution according to the customers' categorisation when the Bank treats customer categories differently and when this may affect the method of executing the order**

There is no discretionality when executing transactions as this is determined by the customers at the time of the transaction.

- **Criteria that have been prioritised over immediate price and cost criteria when executing retail customer orders and the way these other criteria have been decisive in achieving the best possible result in terms of the total amount to the customer**

For the quotation of these instruments, the Bank will calculate an equitable and fair initial base price based on market data, with the addition of the expected costs and margins when they are implicit in the final transaction price.

- **Way in which the Bank has used any data or instruments relating to the quality of the execution, including all data published under the Delegated Regulation (EU) 2017/575**

The customer determines the trading venue in which to execute their orders against Santander, and the Bank therefore does not make any quality analysis of the execution in the venues.

- **Way in which the Bank has used the information from a consolidated information provider established in accordance with article 65 of Directive 2014/65/EU.**

In 2019, Santander did not directly use any information from a consolidated information provider.