Santander Holdings USA, Inc.

Santander

COMPLIANCE POLICY

ENTERPRISE POLICY

Santander Holdings USA, Inc. (“SHUSA”) believes that our success is grounded in our Values, which are also shared by Banco Santander, S.A. and its subsidiaries (collectively with SHUSA, “Santander”). Santander’s commitment to treat customers, colleagues and stakeholders in a manner that is *Simple, Personal and Fair* means that every action undertaken by a SHUSA Team Member is founded on *INTEGRITY, CUSTOMER COMMITMENT, PEOPLE, TEAMWORK, OWNERSHIP,* and *INNOVATION*. It is because of this commitment throughout the Santander organization that Santander’s customers, clients, and shareholders trust us to deliver world class products and services and select Santander. Safeguarding this trust – by always conducting business responsibly, with integrity and a disciplined approach to risk management – is a responsibility shared by each SHUSA Team Member.

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1. Introduction

1.1 Purpose of the Document

Santander Holdings USA, Inc. ("SHUSA") is committed to achieving and maintaining full compliance with the laws and regulations governing the conduct of each of its Operating Entities ("Operating Entities" or "OEs"). This Enterprise Compliance Policy (the "Policy") establishes a common framework for compliance risk management, as described in Federal Reserve Letter SR 08-8[1], to be maintained in each OE. This includes fair lending where there are lending operations. SHUSA Operating Entities are expected to have an operating compliance policy that follows the framework, principles and programmatic elements set forth in this Policy.

1.2 Scope

The Policy applies to SHUSA. It also provides the foundation and principles for the Operating Entities to develop corresponding operating policies and procedures commensurate with their strategies and business activities.[2]

The fair lending section of the Policy applies to all SHUSA Operating Entities and corporate functions that engage in credit activities, both consumer and non-consumer, and includes all phases of the lending lifecycle from the initial marketing efforts, taking applications, making credit decisions, servicing and support, and collections processes.

The principles herein apply to all strategies and activities that subject the Operating Entities to compliance risk and any of its risk factors.

1.3 Document Approval and Maintenance

The Policy is authored and owned by the SHUSA Chief Compliance Officer ("CCO"), and recommended by the SHUSA Compliance Committee ("SHUSA CC"), to the SHUSA Enterprise Risk Management Committee ("SHUSA ERMC"), to the SHUSA Risk Committee ("Risk Committee") for final presentation to and approval by the SHUSA Board of Directors ("Board").

The Policy is reviewed by the ERMC and approved by the SHUSA Board at least annually, or when changes occur, to ensure that it remains applicable to SHUSA's strategy and current and planned activities. Ad-hoc Policy reviews can be performed at the discretion of the CCO. The ERMC, Risk

[1] Federal Reserve Letter SR 08-8: Compliance Risk Management Programs and Oversight at Large Banking Organizations with Complex Compliance Profiles

[2] This policy is expected to be adopted by all U.S. operating entities of Santander S.A. ("Santander") that are not part of SHUSA.

Committee, or SHUSA Board may also initiate updates to the Policy in response to changing conditions. Changes or updates to the Policy must be developed in consultation with the CCO and approved by the SHUSA Board.

1.4 Definitions

SHUSA employs the following definition of compliance risk:

Compliance	Compliance risk, that includes Conduct risk, is the risk arising from violations of laws, rules, or regulations, or from non-conformance with prescribed practices, internal policies and procedures, or ethical standards. Compliance risk exposes the company to potential fines, civil money penalties, payment of damages, and voiding of contracts. Compliance risk can result in diminished reputation, reduced franchise or enterprise value, limited business opportunities, and lessened expansion potential. When the violations or nonconformance previously mentioned are related to the prevention and/or detection of money laundering, tax evasion, or other criminal activities, there is a Bank Secrecy Act/Anti-Money Laundering (“BSA/AML”) compliance risk.

In addition, the following term is employed in this Policy:

“Appropriate Oversight Committee”

This Policy requires that each Operating Entity of SHUSA establishes or designates a committee to perform certain compliance risk management responsibilities. The Policy recognizes that not all OEs may have the need for a dedicated compliance risk management committee that focuses exclusively on the responsibilities of this Policy. In those circumstances, Operating Entity management may propose to the Operating Entity Chief Compliance Officer that an existing OE committee assume the additional responsibilities contemplated by this Policy.

The “Appropriate Oversight Committee” is the committee within an Operating Entity whose charter reflects the responsibilities specified in this Policy.

This Policy requires that all Operating Entities of SHUSA, to the extent of applicability to their OEs, comply with all applicable laws and regulations that pertain to Fair Lending which include, but are not limited to, the following:

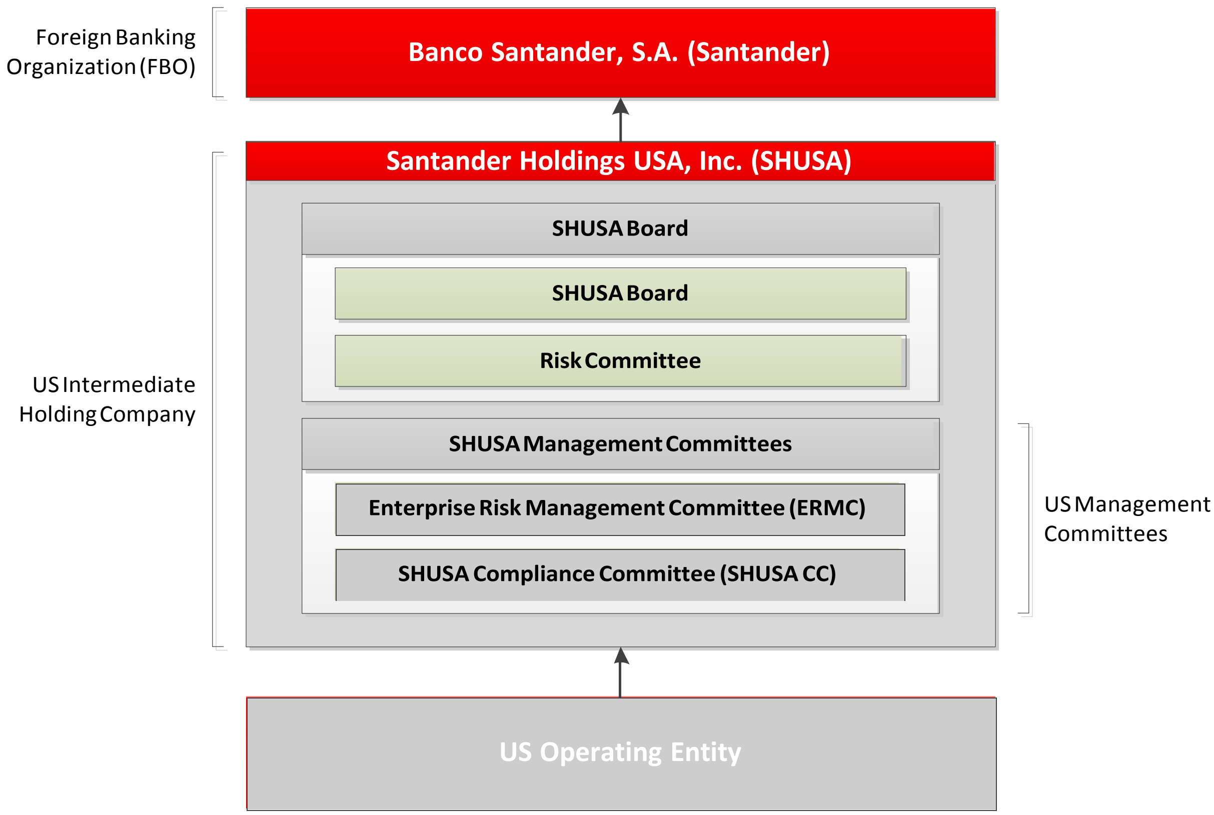
1. Regulation B and the Equal Credit Opportunity Act (“ECOA”).
   ECOA prohibits discrimination based on sex, marital status, race, color, religion, national origin, age (if above the age of majority), income derived from public assistance and whether the applicant has exercised rights under the Federal Consumer Credit Protection Act.
2. Fair Housing Act (“FHA”)
   FHA prohibits discrimination based on race, color, religion, sex, handicap, familial status and national origin.

3. Fair Credit Reporting Act ("FCRA")

FCRA prohibits obtaining or using medical information in connection with the consumer's eligibility for credit.

2. Governance and Accountability

SHUSA has established the following governance structure to oversee the management of its operations, including effective compliance risk management.



2.1 Policy Governance

The full responsibilities of the SHUSA Board, Risk Committee, ERMC, and SHUSA CC are detailed in the SHUSA ERM Framework ("ERM Framework") and in their respective mandates and committee charters. With respect to compliance risk management:

- The SHUSA Board will review and approve the Policy, oversee implementation of the Policy, and monitor compliance with the Policy;
- The Risk Committee will review and recommend the policy to the SHUSA Board;
- The SHUSA ERMC will present the Policy to the SHUSA Risk Committee and Board and escalate and report on key compliance risks and performance indicators to the SHUSA Risk Committee, Board, and Santander; and
- The SHUSA CC is responsible for:
    - The development, recommendation, and oversight and administration of the Policy;

- Reviewing regular reporting on business line, Operating Entity and SHUSA level compliance risks and exposures; and
- Providing direction to risk organization, as necessary.

In addition to these committees, the SHUSA CC may designate forums or subcommittees to support oversight and management of specific risks or risk areas within compliance risk management.

2.2 Operating Entity Governance

Each Operating Entity is responsible for developing operating policies and procedures that embrace and execute upon this Policy, the SHUSA ERM Framework, and allocated compliance risk limits and metrics that flow from the enterprise level, in addition to all similar concepts in place at the OE level.

Operating Entities are expected to submit their operating policy to their respective boards or designated committees for formal review and adoption in accordance with the ERM Framework and the processes defined in the SHUSA Enterprise Policy Administration Policy. Operating Entity structures for the management and governance of compliance risk should align with the ERM Framework, report to their respective boards or designated committees at the OE level, and be directly accountable to the SHUSA risk management function.

3. Policy

3.1 Policy Statement

It is the policy of SHUSA that its Operating Entities shall comply with all applicable U.S. law and regulation pertaining to the conduct of their operations.

This Policy requires that each SHUSA Operating Entity establish a compliance risk management program that includes the following programmatic elements:

- A Chief Compliance Officer;
- Risk identification and assessment;
- Controls;
- Monitoring and testing;
- Issue management and escalation; and
- Training.

This Policy delegates to the SHUSA CCO the authority to provide guidance and interpretation on these programmatic compliance risk management elements and to prescribe compliance risk management elements, programs, processes and practices deemed appropriate for effective compliance risk management at any individual Operating Entity or across SHUSA OEs, as outlined in the US Compliance risk framework.

3.2 Risk Identification and Assessment

Operating Entity policies and procedures shall ensure that the Operating Entity Chief Compliance Officer in the second line of defense identifies the compliance laws and regulations applicable to the OE and that the first line of defense line of business management identifies the specific compliance obligations of their business activities. The Operating Entity Chief Compliance Officer uses the results of risk identification to develop and update, at least annually, a "regulatory map," showing compliance obligations applicable to each Operating Entity and incorporating any changes in laws and regulations.

Risk assessment is fundamental to effective internal control and compliance risk management. Operating Entity policies and procedures shall ensure that the Operating Entity Chief Compliance Officer assists in the risk assessment process by establishing consistent standards and protocols for assessing compliance risks across the OE. The Chief Compliance Officer establishes a common methodology by which to rate the relative risk associated with each compliance obligation in accordance with the US compliance risk management framework and standards. The Chief Compliance Officer publishes guidance for rating compliance risks and oversees the rating process, ensuring that it is executed consistently throughout the Operating Entity.

The Chief Compliance Officer will ensure that the Operating Entity has processes to identify new compliance risks, laws, regulations and regulatory guidance in between risk assessment cycles and ensures timely Operating Entity compliance, reporting to the Appropriate Oversight Committees.

3.3 Controls

Operating Entity policies and procedures shall ensure that first and second lines of business management design, document and implement preventative and detective controls by which each compliance obligation is satisfied. The extent and rigor of controls should be proportionate to the risk rating assigned in the risk assessment process. The Chief Compliance Officer reviews the controls for sufficiency and requires remedial action where controls are insufficient or not properly documented.

Operating Entity policies and procedures shall ensure prior to launch a new product or service will be approved by an Appropriate Oversight Committee. Operating Entity lines of business identify the new product or service's key risks and compliance-related requirements. The Operating Entity Chief Compliance Officers assist lines of business in identifying compliance obligations that would apply to the new product or service. Operating Entity line of business management then develop a proposed set of controls to ensure compliance with the identified regulatory requirements.

Operating Entity policies shall ensure that the Operating Entity Chief Compliance Officer is a full voting member of the Appropriate Oversight Committee whose charter includes technology and information system oversight and investment decision making.

3.4 Monitoring and Testing

Operating Entity policies and procedures shall ensure ongoing compliance monitoring and periodic testing activities to ensure adherence to the Operating Entity compliance policies and procedures and all applicable laws and regulations.

Compliance monitoring includes activities carried out on an ongoing basis by the first lines of defense lines of business, usually daily, weekly, or monthly. Operating Entity first line of business management is responsible for the effective functioning of compliance controls in their respective businesses, and for performing control monitoring and quality assurance activities. In addition, the Operating Entity Chief Compliance Officer may conduct independent monitoring as needed.

Broadly defined, compliance testing includes assurance activities performed on a selected basis according to a schedule set annually or periodically under a testing program. The frequency of testing activities usually ranges from 12 to 24 months, depending on the level of risk involved. The Operating Entity Chief Compliance Officer is responsible for establishing common Operating Entity testing standards according to the US Compliance risk management framework standards. Operating Entity policies and procedures shall ensure that an annual compliance testing plan based on the assessed risk of each compliance obligation is developed and implemented. The testing schedule shall be approved by the Chief Compliance Officer and Appropriate Oversight Committees.

The testing plan is risk-based: higher-risk regulations and policies receive more frequent testing than those with lower risk ratings. The testing plan also includes provisions for additional testing in response to unscheduled developments, such as the approval of new rules and regulations, audit recommendations, examination findings, or internal investigations.

Any significant compliance breach or systemic weakness discovered in testing and monitoring activities is promptly escalated to the Operating Entity Chief Compliance Officer, and when necessary Appropriate Oversight Committees. OE Chief Compliance Officers are expected to report any material testing and monitoring issues through agreed reporting standards as defined in the US Compliance risk management framework.

3.5 Issue Management/Escalation

Operating Entity policies and procedures shall ensure management is expected to correct promptly compliance violations and control weaknesses whether self-identified or identified by the Chief Compliance Officer, Internal Audit, external auditors or regulators. Line of business management prepare corrective action plans to address compliance weaknesses or failures. The Chief Compliance Officer reviews and approves corrective action plans. When appropriate, the Chief Compliance Officer notifies senior management and Appropriate Oversight Committees of compliance issues and corrective actions, and tracks and monitors compliance issues and the status of corrective actions.

3.6 Training

Operating Entity policies and procedures shall ensure the development of an annual compliance training plan reviewed and approved by the Chief Compliance Officer and Appropriate Oversight Committees. The training plan defines the compliance curriculum and identifies the frequency and appropriate audience for each training topic. The training plan is risk-based, and targets any weaknesses detected through testing and monitoring activities. In addition to the training anticipated in the annual training plan, Operating Entity lines of business conduct remedial training to strengthen identified weaknesses (e.g. compliance violations, and examination and audit findings).

Operating Entities shall maintain records of all classes and attendance. The Operating Entity Chief Compliance Officer provides regular updates to senior management and Appropriate Oversight Committees on plan progress and additional remedial training, as appropriate.

The Board of Directors of an Operating Entity shall receive fair lending training, if applicable to the Operating Entity's activities, on an annual basis. Every SHUSA employee with direct consumer lending-related job responsibilities is required to take annual fair lending training. Training will cover fair and responsible lending laws and this policy.

3.7 Fair Lending Policy

The following section applies only to the SHUSA Operating Entities with consumer lending activities.

3.7.1 Purpose and Statement of Policy

The purpose of the Fair Lending section of the Compliance Policy is to ensure that all SHUSA Operating Entities with lending activities promote the availability of credit and provide fair and equitable treatment to all creditworthy customers and potential applicants throughout the lifecycle of their credit experience. This includes, but is not limited to SHUSA's marketing practices, underwriting standards, pricing policies, lending procedures, servicing routines, and collections practices. This Policy also prohibits any deceptive, misleading, or abusive lending practices.

All Operating Entities must execute their individual and joint responsibilities in complying with applicable fair lending laws, regulations and ethical standards.

Specifically, it is SHUSA's policy to:

- Provide customers with the information necessary to understand product terms and conditions in order to make informed decisions;
- Never discourage an applicant to complete or submit an application for credit;
- Assure all credit and lending products are available to qualified applicants, without bias or discrimination based on any prohibited basis;
- Treat and assist customers in a fair manner throughout the lending lifecycle;
- Assess and document, appropriate to the type of credit request and prior to making a credit determination, a potential customer's ability to repay a loan;
- Price credit products and services reasonably and consistently with prudent factors including the risk and cost of making loans, competition and marketplace strategy, and safe and sound banking practices; and
- Strictly prohibit any deceptive, misleading, or abusive lending or marketing practices.

3.7.2 Fair Lending Compliance Policy Requirements

Fair Lending Program

The Operating Entity Compliance Function will establish its Fair Lending Program ("FLP") to manage, measure, and mitigate fair lending risks throughout the Operating Entity. The CCO will approve the FLP, including any adjustments or enhancements, with the advice and guidance of the ERMC.

General Procedures and Controls

Each Operating Entity with lending authority must maintain written procedures and controls sufficient to assure compliance with this Policy and fair and responsible lending laws. The SHUSA Compliance Function will periodically review the Operating Entity's policies and processes to ensure compliance with this Policy and with applicable fair lending rules and regulations as part of its quality assurance function.

New Product Development

SHUSA Operating Entities must assure that the design, implementation, and maintenance of new products, and related materials, are consistent with applicable fair and responsible lending laws, this Policy, and safety and soundness principles. Prior to introduction, any new products must be reviewed in accordance with SHUSA's New Products and Business Activities requirements.

Advertising and Marketing

Operating Entities shall avoid advertisements and promotional materials that may imply or express any preference for, or exclusion of, any customers on a prohibited basis. Each Operating Entity is responsible for ensuring compliance with applicable fair and responsible lending laws in their advertising and marketing materials, and any marketing response models, or other methods, used to identify or select the recipients of advertising or promotional materials.

Redlining

SHUSA prohibits excluding customers based on geographic location. The design of all marketing materials shall encourage creditworthy applicants within SHUSA's market area to apply, without regard to location. This Policy does not require SHUSA personnel to approve or offer credit products outside the market area of the respective Operating Entity. However, the market area shall not exclude neighborhoods or communities because the demographics of the area favor a particular protected class.

Applications

Relevant Operating Entities shall actively promote fair and responsible lending and provide all customers with the same level of assistance and information. SHUSA prohibits discouraging customers from applying for credit. Each Operating Entity shall encourage, solicit, evaluate, and process credit applications, without bias toward or against a protected class, and in a manner that is consistent with applicable fair and responsible lending laws, as well as safe and sound banking practices.

Non-Consumer Credit

Operating Entities that offer non-consumer credit products, or services, must assess all fair and responsible lending risks associated with their activities, and must implement and maintain procedures and controls sufficient to manage any identified risks.

Steering

"Steering" occurs when SHUSA personnel, or a Third Party, offer or direct applicants to a credit product that may be less favorable than other products available to the applicant, based on creditworthiness and risk criteria. Each Operating Entity must adopt a process for assuring that qualified customers receive adequate information regarding available lending options when applying for or seeking credit.

Pricing

The pricing charged on loans originated by an Operating Entity must be reasonably consistent with prudent factors including, but not limited to, the risk and cost of making such loans; competition and marketplace strategy and conditions; and safety and soundness principles. Operating Entities must maintain written policies and procedures governing the pricing charged to customers for credit products and services.

Credit Risk Underwriting

Operating Entities must maintain written credit underwriting policies and procedures, which include approval criteria and appraisal practices. The Operating Entities must assure that the terms and conditions of a loan, including rates and fees, are based on defined, risk-based criteria. The risk and type of the loan will determine the amount and type of collateral required for securing the loan, whether consumer or non-consumer. SHUSA personnel may require and must value collateral based on established written risk based criteria.

Any credit risk or scoring models, scorecards, or other predictive models, processes, or systems used to assess loan applications must be consistent with fair and responsible lending principles. The Operating Entity executive is responsible for ensuring the validation of each model, or scorecard, consistent with the SHUSA Model Risk Management Policy.

Credit Account Servicing Activities

Operating Entities shall perform all aspects of credit account servicing without regard to any prohibited basis. Operating Entities must ensure account servicing activities are carried out in a manner consistent with fair and responsible lending laws, this Policy, and safety and soundness principles. Credit account servicing includes activities related to all of the following:

- Account maintenance
- Collateral management
- Servicing
- Payment processing
- Collections
- Loss mitigation, including modification of terms and conditions
- Foreclosure
- Complaint resolution
- Customer retention

Risk Assessment

The Appropriate Oversight Committee at each Operating Entity shall determine if an annual fair lending risk assessment will be prepared to identify fair lending risks affecting the Operating Entity. If prepared, the risk assessment documents the inherent risks, the effectiveness of internal controls, and the residual fair lending risks for all areas of the Operating Entity. It shall document the Operating Entity's exposure arising from the current operating environment, regulatory landscape, emerging trends, volume of business, product complexity, credit offerings, testing and monitoring results, and existing and prior fair lending risk issues. The assessment will include a prioritization of risk issues or weaknesses throughout the Operating Entity to enable identification and mitigation of the highest risk issues in a timely and effective manner. Risk assessments will follow standards contained in the US Compliance risk management framework.

Complaints

Each Operating Entity must maintain policies and procedures for tracking, evaluating, and responding to customer complaints alleging lending discrimination. The Appropriate Oversight Committee at the Operating Entity is responsible for reviewing such complaints in consultation with the respective areas. This committee, in conjunction with the Legal department and the appropriate Operating Entity manager, will respond to all fair lending-related complaints. If appropriate, the CCO will make recommendations to the Operating Entity for modifying controls or improving fair and responsible lending performance. Operating Entities shall adhere to reporting requirements issued by the SHUSA CCO for complaints alleging lending discrimination.

Compensation

Compensation programs for all sales representatives related to the sale of loan or credit products or services must promote sound business practices consistent with applicable fair and responsible lending laws and this Policy. Operating Entity executives, along with Human Resources at the Operating Entity, will review compensation plans at least annually to assure that they do not inadvertently incentivize employees or third parties to favor one group of applicants or borrowers over another. The Appropriate Oversight Committee will incorporate an evaluation of compensation plans for lenders and lending related third parties (e.g., brokers) into the periodic fair lending analyses and the annual fair lending risk assessment process.

Third Party Relationships

Operating Entities that rely on third parties to perform activities related to the lending process (e.g., brokers, correspondents, auto dealers, appraisers, collections agencies, etc.) must assure that such third parties comply with the SHUSA Third Party Provider Risk Management Policy and are aware of the Operating Entity's commitment to fair and responsible lending laws and regulations. Any contract with a third party must contain a provision under which the third party acknowledges and agrees to abide by applicable fair and responsible lending laws and regulations, Operating Entity contract requirements including reporting on compliance and the expectation to allow independent testing of such compliance activities.

4. Roles and Responsibilities

4.1 Three Lines of Defense

As described in the ERM Framework, SHUSA has established a "three lines of defense" model to organize the roles and responsibilities for risk management in each of the Operating Entities.

SHUSA and each of the OEs manage risk in accordance with a "three lines of defense" model:

- The first line of defense consists of risk-taking functions (business activities) and corporate functions[3] (e.g., the corporate center, finance, technology).
- The second line of defense consists of all risk functions, including Compliance.
- The third line of defense consists of Internal Audit.

Refer to the ERM Framework for a complete definition of the model, and the roles and responsibilities for each of the three lines of defense.

4.2 Specific Roles and Responsibilities

The table below summarizes the roles and responsibilities for SHUSA and OE committees and personnel under this Policy.

Line of Defense	Party	Role/Responsibility
Second	SHUSA Chief Compliance Officer (Policy Owner) and SHUSA Compliance Office (Administrator)	• Maintains Policy • Recommends Policy modifications based on regulatory changes and guidance, feedback on Policy effectiveness, and supervisory and audit input • Seeks approval of Policy at least annually from ERMC, Risk Committee, and Board • Oversees Policy implementation by compliance directors
Second	OE Compliance Directors or Chief Compliance Officers	• Coordinate review, formal adoption, and implementation of Policy within the governance structures of their respective entities – tailoring to specific needs of their entities • Coordinate development and approval of

[3] Corporate functions, as defined, are not inclusive of risk management or internal audit functions.

Line of Defense	Party	Role/Responsibility
		relevant compliance procedures
Second	SHUSA Legal	• Reviews Policy for consistency with other SHUSA policies
Third	SHUSA Internal Audit	• Independently validates the Policy and Bank compliance with Policy

5. Reporting Structure

5.1 Compliance Reporting Structure

To ensure effective management of compliance risk in SHUSA Operating Entities and across SHUSA, routine compliance information reporting practices will be observed. Operating Entity policies and procedures shall establish expectations for the content and frequency of Operating Entity line of business compliance reporting to the OE's Chief Compliance Officer and Appropriate Oversight Committees, as well as to the US Corporate Compliance Office (following agreed standards).

Each Operating Entity Chief Compliance Officer shall report at least monthly to the SHUSA CCO on Operating Entity:

- Top compliance risks;
- Material compliance issues or escalated issues, and status of corrective actions;
- Progress against adopted annual compliance risk management plans;
- Testing and monitoring results;
- Examination findings or regulatory concerns related to regulatory compliance;
- Emerging compliance issues which the Operating Entity will need to address; and,
- Any other compliance information required by the SHUSA CCO, including key risk indicators.

The SHUSA CCO reports monthly to the SHUSA ERMC on enterprise:

- Top compliance risks;
- Material compliance issues or escalated issues, and status of corrective actions;
- Progress against adopted annual compliance risk management plans;
- Testing and monitoring results;
- Examination findings or regulatory concerns related to regulatory compliance;
- Emerging compliance issues which SHUSA Operating Entities will need to address; and,
- Any other compliance information required by the SHUSA Chief Risk Officer.

6. Exceptions

6.1 Exceptions Policy

The following procedure defines the process for the review and approval of exceptions to this Policy.

Any OE seeking an exception must assess the risk that non-compliance causes Santander. If the OE believes the risk is reasonable, then the OE Compliance Director ("CD") will prepare a written request for an exception describing the risk analysis. The risk analysis will include: identification of the threats and vulnerabilities resulting from non-compliance with the Policy, the likeliness of an occurrence, and the potential impact, monetary or other, of an occurrence, versus the cost to comply; an evaluation of the potential risk to the OE and Santander as a whole, including a description of the compensating controls; and taking into account what value the exception will bring to the OE requesting the exception.

OE CD will submit the exception request to the SHUSA Compliance Office ("SHUSA CO") who will then gather any necessary background information in order to provide a recommendation to either approve or deny the request. SHUSA CO may include other areas in the decision making process such as Enterprise Risk or Internal Audit. The SHUSA CCO, or a designee, will approve or deny the request for an exception, and the requesting OE CD will be notified of the decision.

Exceptions are valid for a one-year period. As part of the required periodic review of the Policy, SHUSA CO will send a copy of approved exceptions back to the requesting OE CD who must confirm via email that there have been no changes that would preclude the exception from being continued. Exceptions will be documented in the appendix of the Policy[4] and identify the OE CD and their rationale for the request.

Policy specific exceptions will be granted by the SHUSA CCO throughout the calendar year and then formally reviewed by the designated oversight forums (e.g., Enterprise Risk Management, Risk Committee) as part of a required periodic review.

[4] There are no current exceptions to the Policy. Future exceptions would be listed in a new Appendix to this Policy.

7. Document History and Version Control

7.1 Ownership and Authorship

Version	Date	Author	Owner	Reason for Change
1.0	3.13.14	CRO	CRO	Initial Version
2.0	09.25.15	CCO	CCO	EPA format

7.2 Sign off

Approving Body	Governance Committee Approval	Final Approval Date
US Advisory Board	US Enterprise Risk Committee	3.13.14
SHUSA Board	SHUSA ERMC	09.25.15

8. Appendices

8.1 Appendix A – Key Contacts

Title	*Role*	*Name and Contact*
SHUSA Chief Compliance Officer	*Policy Owner*	*Carol Hunley, chunley@santander.us, 617-346-7213*
SHUSA Compliance Director	*Primary point of contact on policy related matters*	*Michael Wilcox, mwilcox@santander.us, 617-757-5533*

8.2 Appendix B – Regulatory Obligations Addressed by this Policy

Regulatory Agency	*Citation*	*Title*
FED	*SR 08-8*	*Compliance Risk Management Programs and Oversight at Large Banking Organizations with Complex Compliance Profiles*
FED	*12 CFR 202*	*Regulation B: Equal Credit Opportunity Act*
FED	*12 CFR 203*	*Regulation C: Home Mortgage Disclosure Act*
FED	*12 CFR 222*	*Regulation V: Fair Credit Reporting Act*
FED	*12 CFR 226*	*Regulation Z: Truth in Lending*
FED	*12 CFR 227*	*Regulation AA: Unfair or Deceptive Acts or Practices*
FED	*12 CFR 228*	*Regulation BB: Community Reinvestment Act*
CFPB	*12 CFR 1006*	*Regulation F: Fair Debt Collection Practices Act*
CFPB	*12 CFR 1022*	*Regulation V: Fair Credit Reporting Act*
CFPB	*12 CFR 1024*	*Regulation X: Real Estate Settlement Procedures Act*
CFPB	*12 CFR 1030*	*Regulation DD: Truth in Savings*

8.3 Appendix C – Related Policies and Process and Administrative Documents

Document Type	*Entity and Department*	*Owner*	*Document Title*
Enterprise Policy	*SHUSA Compliance*	*Chief Compliance Officer*	*SHUSA Code of Conduct and Ethics Policy*
Enterprise Policy	*SHUSA Legal*	*General Counsel*	*SHUSA Enterprise Policy Administration*
Enterprise Policy	*SHUSA Model Risk Management*	*Chief Model Risk Officer*	*SHUSA Model Risk Management Policy*
Enterprise Policy	*SHUSA Third Party Provider Risk Management Policy*	*Chief Risk Officer*	*SHUSA Third Party Provider Risk Management Policy*