



Banco Comercial  
Português, S.A.

# Sustainability Report

## 2023

Millennium  
bcp



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**Miguel Maya**  
Presidente da Comissão Executiva  
Vice-Presidente do Conselho  
de Administração



**Nuno Amado**  
Presidente do Conselho  
de Administração

# Joint Message from the Chairman of the Board of Directors and the Chairman of the Executive Board

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The year 2023 was marked by a favorable evolution in global economic activity, benefiting from the reduction in inflation levels, after the strong increase observed in 2022. While the context remained complex, with macroeconomic and geopolitical uncertainties having increased, Millennium bcp's activity was also influenced by favorable factors, particularly those resulting from the normalization of monetary policy, with the bank ending the year with a consolidated net profit of 856 million euros, corresponding to a return on equity (ROE) of 16%, and a robust capital position, reflected in a CET1 ratio of 15.4% and total capital of 19.9%.

The preparation and rigorous work in pursuit of the objectives outlined in the strategic plan, with the main targets reached more than a year in advance, allowed us to achieve results that mark 2023 as the end of the transition period and signal a progression to a new phase, with the return to normalization of the bank.

One of our hallmarks has been our commitment to Sustainability. In 2023, we once again stood at the side of people, society and communities in creating lasting and consequential social value, and in protecting the environment, climate and biodiversity, through a corporate culture that is based on, and manifests itself in ethical, inclusive and responsible business practices.

Having as a reference framework the Strategic Plan "Overcoming 24", with Sustainability as one of its fundamental axes, and using the Sustainability Master Plan, an aggregator of actions to be developed in the ESG (Environmental, Social and Governance) areas, as an instrument of innovation, evolution and change, Millennium bcp has strengthened its governance model, as well as its risk, credit and supply chain management policies and processes. It has renewed the solutions, products and services on offer, reflecting a transformative dynamic that allows the bank to respond to the growing requests, needs and ambitions of stakeholders and the expectations of regulators.

On the business level, the bank continued to support companies and families, providing sustainable credit, investment and savings solutions suited to their needs and financial capabilities. In terms of accessibility, Millennium bcp provides integrated platforms and innovative electronic banking functionalities, in particular mobile banking, which is a strong contribution to inclusive banking, and is today also a distinctive brand recognized by customers and users in the different geographies in which the bank is present.

Microcredit, a financing solution designed to encourage entrepreneurship and self-employment in Portugal which the bank has offered since 2005, enabled the creation, in 2023, of 42 new jobs, with more than 7,450 jobs attributable to projects financed since 2005 by Millennium bcp's Microcredit.

Millennium bcp also promotes a culture of environmental responsibility, mitigation and adaptation to climate change and protection of the surrounding environment and biodiversity. The preservation of natural resources and the rationalization of consumption remain essential objectives of the bank's environmental impact policy. As a tangible result of this commitment, the production of renewable energy from the two photovoltaic grids installed in Taguspark stands out. These represented, in 2023, 31.9% of local electricity consumption and meant of 811 tonnes of CO2 were not emitted.

Millennium bcp is equally committed to equal opportunities, diversity and inclusion. Initiatives to support pregnancy and parenthood, conciliation between work and family, professional development and leadership opportunities for women, as well as involvement in projects such as Nova SBE's "Commitment to Inclusion," dedicated to life of people with disabilities, are examples and testimony of these commitments.

As part of the bank's appreciation for and professional development of its employees, mention must be made of the investment in training, which allowed, in 2023, to deliver more than 6,000 actions in different formats.

Through the Millennium bcp Foundation, we maintained support for culture, promoting events aimed at different target audiences, holding thematic exhibitions to share the bank's art collection, promoting and recognizing creative merit and contributing to the recuperation of historical buildings and museum heritage, with special emphasis on the Rua dos Correiros Archaeological Center (NARC).

Education, science and research are also areas in which the Millennium bcp Foundation continues to be present through an active and consistent policy of supporting multidisciplinary projects and initiatives that stand out for their innovation, social and environmental impact and ability to provide value to society.

In social support, we reinforced, among the communities we serve, the bank's commitment to the most disadvantaged, needy and vulnerable. In Portugal, as part of our Social Responsibility Plan, we maintained the partnership with the Food Bank and Entrajuda, as well as promoting protocols, initiatives and support in favor of institutions such as EPIS, CASA, Brigada do Mar and BIPP/Semear, developing joint actions involving more than 200 Millennium Volunteers.

In Mozambique, the bank supported the "Banking Olympics", a financial literacy program aimed at young people that is now in its 12th edition, as well as the partnership with Friends in Global Health (FGH) for the rehabilitation of 41 health centers in the province of Zambézia destroyed by Cyclone Freddy.

In Poland, highlights include the program of Bank Millennium and its Foundation "Our People'23: Save the Planet", which stimulated and enabled a set of proximity actions with social and environmental impact on the population, involving more than 200 Millennium Volunteers. Additional mention should be made of "Financial ABC", a program that, in its 10th edition, remains a local benchmark in financial literacy initiatives for young people.

Millennium bcp also reaffirmed its commitment to the 10 Principles of the United Nations Global Compact - in a link that dates back to 2005 and was renewed in 2018 - recognizing in the Sustainable Development Goals (SDGs) of the United Nations 2030 Agenda a unifying and aspirational vision, capable of stimulating processes of change and evolution that the economic, social and environmental reality imposes and requires. The Bank chose as priority SDGs: 4 - Quality Education; 7 - Renewable and Accessible Energy; 8 - Decent Work and Economic Growth; 10 - Reduce inequalities; and 13 - Climate Action.

In 2024, we will continue to promote decarbonized and resilient economic development models, based on ethical, responsible business practices that foster the prosperity of families and companies in the countries where we operate, creating wealth and ensuring its fair distribution, protecting the planet, the climate and biodiversity, while ensuring respect for human dignity, improving living conditions and maintaining democratic, plural and inclusive systems of social and political organization.

We conclude by reiterating Millennium bcp's commitment to society and its different Stakeholders, highlighting that the normalization path undertaken, embodied in the results presented for 2023, allow us to confidently assert that Millennium bcp is a bank prepared for the future.



**Miguel Maya**

Chairman of the Executive Committee  
Vice-Chairman of the Board of Directors



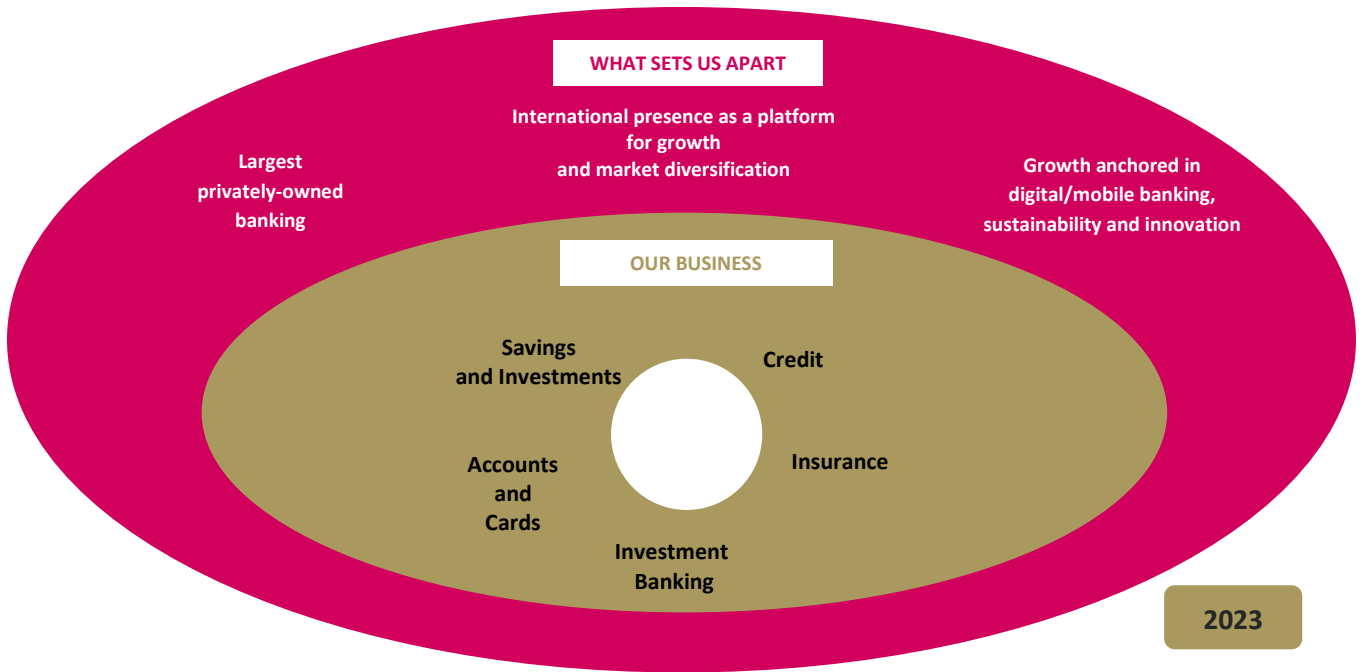
**Nuno Amado**

Chairman of the Board of Directors



# VALUE CREATION

## Value Creation Model



Axes	Inputs	Outputs
<b>Financial</b> BCP works to promote sustainable financial services and to deliver attractive returns to shareholders and other stakeholders.	Customers Total Resources: 95.3 thousand M€ Total credit: 55.2 thousand M€ Net profit: 856.0 M€	Interest paid on deposits and other resources: 882 M€ Taxes paid: 537.4 M€
<b>Service</b> BCP works to offer a quality service to customers, increasingly digital and with greater security.	No. of customers: 7.4 M No. of mobile customers: 5.3 M	Average resolution claims <sup>(1)</sup> : 8 days NPS ( <i>Net Promoter Score</i> ) <sup>(1)</sup> : 70.4% CSI Banca 2023 (Marktest) <sup>(1)</sup> : Millennium bcp is No.3 in the ranking
<b>Intellectual</b> BCP works to develop and improve its offer and services, adapting them to the latest trends and customer needs.	Investment in R&D <sup>(1)</sup> : 40.1 M€	Training hours: 728,681 (58% M, 42% H) 46 per employee
<b>Human</b> BCP works with and for the people who make up its workforce and who guarantee a quality service every day.	No. of employees: 15,688 Gender distribution: 55% M, 45% H Recruitment rate: 9.7%	Employee satisfaction: 75% <sup>(1)(2)</sup> Employees with permanent contracts: 93.4% Employees with a collective labour agreement: 99.7% <sup>(3)</sup>
<b>Social</b> BCP works to support the local communities, empowering them and providing them with the means to add social value.	Donations: 2.4 M€ Payments to local Suppliers: 90.3% Social Bonds <sup>(1)</sup> : 500 M€	Millennium bcp Foundation <sup>(1)</sup> supports 127 projects: 58% in Culture, 10% in Knowledge and 32% in Social Solidarity <sup>(1)</sup>
<b>Nature</b> BCP works to minimise negative impacts on the environment, climate, and biodiversity, both in its operations and in the support to its customers.	Electricity consumed <sup>(4)</sup> : 47,760 MWh In Portugal and Poland, 100% from renewable sources.	0.75 tCO <sub>2</sub> emitted / employee <sup>(5)</sup> 3.04 MWh consumed / employee <sup>(4)</sup>

### United Nations Sustainable Development Goals <sup>(6)</sup>



<sup>(1)</sup> Includes only operations in Portugal.

<sup>(2)</sup> average of global indicators.

<sup>(3)</sup> Value reflects the operations in which this regime is applicable (PT and MZ).

<sup>(4)</sup> Electricity - Public Grid.

<sup>(5)</sup> Includes scope 1, 2 (market-based) and 3 emissions.

<sup>(6)</sup> Review of priority SDGs carried out in the context of the 2022/2023 Stakeholder Consultation (PT).

# SUMMARY OF INDICATORS

## MAIN INDICATORS

### SUMMARY OF NON FINANCIAL INFORMATION

	Unid.	2023	2022	2021	2020	2019	2018	Var. %23/22
<b>CUSTOMERS</b>								
Total of Customers	Thousands	7 450	7 203	6 812	6 667	6 617	5 826	3.4%
Number of Active Customers (1)	Thousands	6 701	6 478	6 143	5 705	5 598		3.4%
Interest paid on deposits and interbank funding	Million euros	882	422	91	188	301	327	109.0%
Claims registered (2)	Number	223 172	201 828	172 753	172 674	136 562	108 244	10.6%
Claims resolved	Percentage	93.9%	92.2%	93.4%	92.8%	92.2%	99.3%	1.7 p.p.
<b>ACCESSIBILITIES</b>								
Branches	Number	1 206	1 239	1 288	1 38	1 536	1 101	-2.7%
Activity in Portugal		399	407	434	478	505	546	-2.0%
International activity		807	832	854	902	1 031	555	-3.0%
Branches opened on Saturday		153	160	162	167	143	122	-4.4%
Branches with access conditions to people with reduced mobility		793	826	875	937	875	866	-4.0%
Internet	Users number	2 435 902	2 762 685	2 653 754	2 453 555	2 214 885	1 980 905	-11.8%
Call Center	Users number	659 605	479 265	622 735	491 969	431 169	429 982	37.6%
Mobile banking	Users number	4 678 735	4 293 837	3 700 969	3 214 664	2 601 401	2 106 289	9.0%
ATM	Number	2 849	2 943	2 959	3 022	2 988	2 952	-3.2%
<b>EMPLOYEES</b>								
Portugal Employees	Number	6 242	6 252	6 289	7 013	7 204	7 095	-0.2%
International Employees	Number	9 446	9 495	9 731	10 322	11 377	8 972	-0.5%
TOTAL	Number	15 688	15 747	16 020	17 335	18 581	16 067	-0.4%
<b>LABOUR INDICATORS (3)</b>								
Breakdown by professional category	Number							
Executive Committee		24	23	28	28	28	28	4.3%
Senior Management		159	167	165	163	221	178	-4.8%
Management		1 648	1 468	1 735	1 874	2 157	1 728	12.3%
Commercial		8 842	9 147	9 048	9 949	10 664	9 446	-3.3%
Technicians		4 313	4 140	4 067	4 067	4 388	3 682	4.2%
Other		702	798	973	1 250	1 116	1 027	-12.0%
Breakdown by age	Number							
<30		2 585	2 562	2 565	2 841	3 35	2 393	0.9%
[30-50[		8 320	8 647	7 919	9 872	10 648	9 318	-3.8%
>=50		4 783	4 534	5 532	4 618	4 583	4 35	5.5%
Average age	Years	42	42	42	41	41	41	0.0%
Breakdown by contract type	Number							
Permanent		14 649	14 450	14 956	15 969	16 84	14 685	1.4%
Temporary		1 039	1 293	1 060	1 362	1 681	1 376	-19.6%
Trainees		449	148	193	275	453	339	203.4%
Employees with working hours reduction	Number	201	197	213	230	254	215	2.0%
Disabled employees	Number	235	221	201	205	180	163	6.3%
Recruitment rate	Percentage	9.7%	12.8%	9.7%	6.4%	12.5%	12.3%	-3.1 p.p.
Internal mobility rate	Percentage	15.3%	14.7%	16.3%	20.7%	16.3%	16.6%	0.6 p.p.
Leaving rate	Percentage	10.2%	13.7%	17.5%	13.8%	11.9%	11.0%	-3.4 p.p.
Free association (4)	Percentage							
Employees under Collective Work Agreements		99.7%	99.7%	99.6%	99.8%	99.7%	99.7%	0.0 p.p.
Union Syndicated Employees		74.1%	74.0%	75.0%	77.0%	76.9%	78.6%	0.1 p.p.
<b>Hygiene and safety at work (HSW)</b>								
HSW visits	Number	203	182	331	186	184	159	11.5%
Injury rate (5)	Index	1.95	1.85	1.99	2.19	2.42	1.99	5.4%
Death victims	Number	0	0	0	0	0	0	
Absenteeism rate	Percentage	4.8%	5.1%	5.4%	6.3%	4.8%	4.3%	0.6 p.p.
Lowest company salary and minimum national salary	Ratio	1.3	1.2	1.2	1.3	1.3	1.3	8.3%
<b>ENVIRONMENT (6)</b>								
Greenhouse gas emissions (7)	tCO <sub>2</sub> e	11 813	12 710	38 611	49 307	50 714	50 588	-24.4%
Electricity consumption (7)	MWh	47 760	46 464	43 750	59 214	62 527	59 664	-10.4%
Production of waste (7)	t	1 117	1 216	1 141	768	617	677	-9.8%
Water consumption (7)	m <sup>3</sup>	201 017	176 288	163 747	208 817	276 46	281 666	-1.8%
<b>SUPPLIERS</b>								
Time of payment and time contractually agreed, in Portugal	Ratio	1	1	1	1	1	1	0.0%
Purchase from local suppliers	Percentage	90.3%	90.5%	92.3%	92.2%	91.4%	92.2%	-0.2 p.p.
DONATIONS	Million euros	2.4	2.3	2.7	2.0	2.1	2.0	4.3%

(1) Primary holders with at least 1 product with a balance > 50 cents, in absolute value and with card transactions in the last 90 days, or holding financial assets ≥ 100 euros.

(2) It includes a structural change effect in the complaint handling process at Bank Millennium Poland, aiming at improving the Customer experience by optimizing the immediate treatment.

(3) Employees information (and not FTE) for: Portugal, Poland and Mozambique.

(4) The value reflects only operations where the regimes are applicable. Collective work agreement: Portugal and Mozambique; Syndicate: Portugal and Mozambique.

(5) Number of accidents per million hours worked. In 2020 the calculation methodology was changed in accordance with the GRI (Global Reporting Initiative), and the series was retroactively.

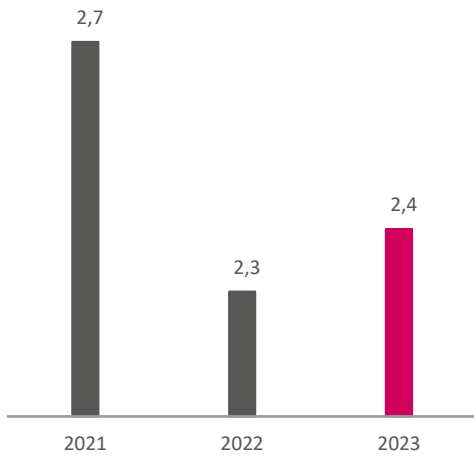
(6) Data will include Mozambique in 2023 adjusted.

(7) In order to ensure proper comparability between indicators, for the purposes of calculating the 2023/2022 variation, the 2022 reporting scope was maintained, i.e. Mozambique operations were not included.

# Highlights

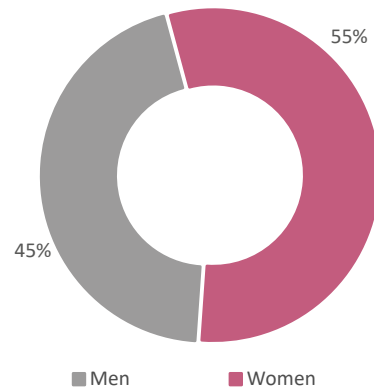
## Donations

Donations  
(Million euros)



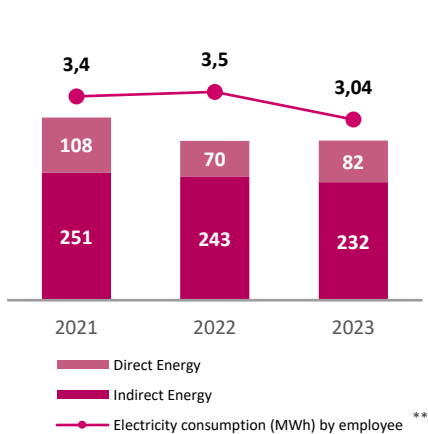
## Distribution of employees by gender

(Percentage)



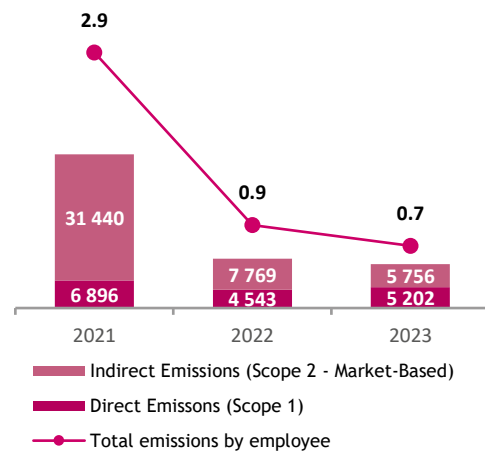
## Total of energy consumption\*

(TJ and MWh/employee)



## GHG Emissions\*

(tCO<sub>2</sub>e and tCO<sub>2</sub>e/employee)



\* In 2023 Mozambique was included in the reporting scope.  
\*\* Public Grid electricity consumption per employee.

# MAIN EVENTS

## MAIN EVENTS 2023

The BCP Group annually carries out social and environmental actions and initiatives in its main geographic areas (Portugal, Poland and Mozambique), as part of its sustainability strategy and social responsibility policy.

### JANUARY

- Bank Millennium, in Poland, is part of the Warsaw Stock Exchange's WIG-ESG index, in consideration of the work developed within the environmental, social, economic and corporate governance dimensions;
- Inclusion, for the fourth consecutive time, in the Bloomberg Gender-Equality Index, joining the group of companies that globally stand out in the implementation of gender equality, diversity and inclusion practices and policies;
- Bank Millennium, in Poland, recognised as a "Climate-Conscious Company 2022" following the Climate Consciousness Survey of Companies listed on the Warsaw Stock Exchange;
- Innovation Awards 2023 award EDIGMA, responsible for implementing the new museum experience, the award for best project in the "Smart Building" category for the work developed at the Rua dos Correeiros Archaeological Center (NARC).

### FEBRUARY

- Attribution of Rui Osório de Castro Award/Millennium bcp by Fundação Millennium bcp (7th edition), honouring the development of innovative projects and initiatives in the area of child cancer;
- Fundação Millennium bcp continues to support the GOS - Management of Social Organisations programme (25th and 26th editions), developed by AESE Business School in partnership with ENTRAJUDA (Lisbon and Porto);
- Millennium bcp installs the 2nd photovoltaic solar power plant on the TagusPark premises, a unit which, with its 1,834 modules, increases the Bank's energy autonomy and avoids the annual emission of 275 tCO<sub>2</sub>;
- Bank Millennium, in Poland, launches credit products for the installation of photovoltaic

panels and plants with differentiated conditions, promoting the transition to a decarbonised and environmentally responsible economy.

### MARCH

- The Millennium bcp Foundation supports the Junior Achievement Portugal (JAP) Learning and Venturing programme, encouraging the entrepreneurial spirit among more than 900 university students;
- Millennium bcp launches "Green CPI", a product aimed at promoting "green" property construction or urban regeneration in line with circular economy principles;
- BCP Group joins the "Supplier Engagement" programme of the CDP - Carbon Disclosure Project for the first time, in recognition of the work carried out with its suppliers to promote climate/environmental action in the supply chain.

### APRIL

- Millennium bcp, for the 3rd time, and now also Bank Millennium, in Poland, featured in the "Europe's Climate Leaders" of the Financial Times and Statista, as two of the 500 European companies with the greatest reduction in CO<sub>2</sub> emissions;
- Millennium bim, in Mozambique, supports the "Biodiversity Wall" (Muro da Biodiversidade), an initiative which aims to promote the painting of around 40 murals about Mozambique's wildlife, marine life and flora;
- Millennium bim, in Mozambique, contributes to improving the quality of the health system and supports the "National Plan for the Screening and Treatment of Children with Laryngeal Papillomatosis", implemented by Massala - Associação de Médicos no Abraço a Moçambique.

**MAY**

- Millennium bcp is once again associated with the “Portugal Chama” campaign, an initiative of the Portuguese State aimed at contributing to the prevention of rural fires and raising public awareness about risk behaviour;
- Bank Millennium in Poland, recognised again as “Best Employer 2023” in the 3rd Forbes and Statista rankings, ranking second in the financial sector;
- Millennium bcp, together with its Foundation, organises an action to collect donations in favour of UNICEF and the victims of the earthquakes in Turkey and Syria.

**JUNE**

- Bank Millennium in Poland has joined the UN Global Compact, a benchmark for responsible business practices, incorporating its 10 Principles - human rights, labour relations, environmental protection and anti-corruption - into its strategies, processes and operations;
- For Global Finance magazine, Millennium bcp is again the best Bank for Sustainable Finance in Portugal, in recognition of its leadership in financing projects that fight climate change and improve people's quality of life;
- Bank Millennium in Poland awarded for the eight time with the “POLITYKA CSR Gold Leaf 2022”, an award attributed to companies that implement Corporate Social Responsibility policies and practices in their daily activities;
- Millennium bim, in Mozambique, in partnership with the Ministry of Education and the Helpo Association, promotes learning activities for more than 600 vulnerable children from different regions of the country, encouraging interpersonal relationships, respect, tolerance

and self-esteem;

- Millennium bim, in Mozambique, is supporting, in partnership with the Khanimambo Association, the painting of a mural as part of World Albinism Awareness Day, an initiative to raise awareness of the challenges faced by people with Albinism in Africa.

**JULY**

- 15th edition of the Millennium Festival ao Largo, an annual free-of-charge initiative that presents on stage, in Lisbon's Largo de S. Carlos, a variety of symphonic music, opera and ballet performances;
- Bank Millennium in Poland, one of the leading companies in the management of Corporate Social Responsibility policies and practices, returns to the Top 10 of the Responsible Business Forum's ranking of Socially Responsible Companies in 2023;
- Millennium bcp creates a bicycle parking area (BIKE Park) at its Taguspark facilities, with the aim of promoting smooth and sustainable mobility for its workers;
- Millennium bim, in Mozambique, supports an initiative to rehabilitate 41 health centres in the province of Zambézia destroyed by Cyclone Freddy, in partnership with the NGO Friends in Global Health (FGH).

**AUGUST**

- Millennium bim, in Mozambique, promotes the 12th edition of the “Banking Olympics”, a financial literacy project that aims to contribute to the education and training of young Mozambicans by presenting banking and personal finance management concepts, as well as sustainability and entrepreneurship.

**In 2023, we continued to work alongside local communities to create social value and protect the environment and nature**





## SEPTEMBER

- Fundação Millennium bcp supports the 15th edition of the TODOS Festival - Caminhada de Culturas 2023, an initiative of the Lisbon Municipality that promotes an intercultural city through contemporary performing arts.

## OCTOBER

- Millennium bcp sees green financing highlighted as a “good practice” in the 2nd Report “Observatory of the SDGs in Portuguese Companies”, by the Center for Responsible Business & Leadership of the Católica Lisbon School;
- Millennium bim, in Mozambique, promotes the 16th edition of the Minibasket Tournament as part of its "Mais Moçambique pra Mim" (More Mozambique for Me) Social Responsibility programme, which took place in 13 cities in the country, involving around 1,230 children aged between 6 and 11;
- Millennium Volunteers, in the context of Millennium bcp's annual Social Responsibility plan, this time with Bipp/SEMEAR in yet another outreach initiative to support the integration and employability of people with special needs;
- Millennium bim, in Mozambique, delivers, as part of the "Mais Moçambique Pra Mim" (More Mozambique for Me) programme, kits of school materials to more than 1,000 children at Marrocane Primary School, in Cabo Delgado, helping to improve the teaching and learning conditions of displaced children and victims of the humanitarian crisis in the region;
- Millennium bcp recognised for 18 years of participation in the United Nations Global Compact - which in 2005 was one of the first Portuguese companies to join this global commitment - and for its adherence to its 10 Principles.

## NOVEMBER

- Millennium bcp and the European Investment Fund (EIF) sign a 405M€ InvestEU agreement to support Portuguese SMEs in developing projects on sustainability, innovation and digitalisation, social entrepreneurship and microfinance, culture, education and competitiveness.

## DECEMBER

- Bank Millennium in Poland, was again awarded with the title of "Europe's Diversity Leader 2024", a ranking produced by the Financial Times and Statista, remaining in the group of European employers that promote and support diversity in their organisations;
- Millennium bcp sees its Corporate Social Responsibility (CSR) programme “Millennium Solidário 2023” distinguished by the Fosun Foundation as part of the sixth edition of “ONE FOSUN CSR Week”, an initiative that aims to publicise and recognise the CSR programmes or actions of companies owned or participated by Fosun;
- Millennium bank, in Poland, publishes the new edition of the "Millennium Eco-Index", a report that summarises the eco-innovation potential of Polish provinces and their involvement in the country's green transformation and the implementation of sustainable development strategies;
- The "Millennium Solidário: Natal 2023" Social Responsibility Campaign brings together the Bank's employees and the Millennium bcp Foundation to support people with cancer through donations to the IPO - Instituto Português de Oncologia (Portuguese Oncology Institute) and the ACREDITAR Association;
- For the 10th year running, Millennium bcp is taking part in the six-monthly food collection campaigns organised by the Food Bank, with more than 130 volunteers nationwide.

**A benchmark bank - in Portugal, Poland and Mozambique - at the service of the economy, society and families**



# INTRODUCTION

## Introduction

Banco Comercial Português (BCP) publishes annually, since 2004, Sustainability Reports according to the GRI (Global Reporting Initiative), now in its Standards version

## Sustainability Report

The Sustainability Report, now in its 20th edition, continues to offer a global and integrated vision of the economic, social and environmental performance of the BCP Group, as well as details of each of its main operations in Portugal, Poland and Mozambique.

Relating to the formats adopted and after the issue of autonomous Reports from 2004 to 2008, the Bank decided, in 2009, to include in Volume I of the Annual Report a brief chapter on the activities carried out by Millennium in the wake of Sustainability and to publish the full version of the Sustainability Report only in digital format.

In 2010, to translate the alignment of the sustainable development and social responsibility policies with the business strategy of BCP Group, this Report became part of the Annual Report. The document Progresses and Targets was also published, a supplementary report that describes the development stage of the actions envisaged in the Sustainability Master Plan (SMP) of the year it reports to. This reporting method adopted in 2010 continued to be used in 2011 and 2012.

In 2013, Millennium bcp decided to include a chapter - Responsible Business - on Sustainability in the Bank's Annual Report and it published again - in a separate and independent volume only available in digital format - a voluntary document detailing the activities annually developed by the BCP Group, which it continued to do until 2016.

In the context of the framework established by DL no. 89/2017 of 28 July, regarding the mandatory annual disclosure of non-financial information and information on diversity by certain large companies, transposing the NFRF - Non-Financial Reporting Directive of the EU, the Millennium bcp kept, between 2017 and 2020, a dual format, materialised in the summary information included in the chapter of the Annual Report - Non-financial Statement - and in the detailed information in the Sustainability Report.

Given our interpretation of the trends and guidelines on the reporting of non-financial information and the new regulatory requirements, the Bank has decided to discontinue the practice it has followed in recent years of including a chapter on Sustainability in the Annual Report, reverting to concentrating all non-financial information and indicators in the Sustainability Report in 2021.

This document, which covers all the geographic regions of the BCP Group, intends to continue to meet the expectations of stakeholders, identified through regular thematic materiality analyzes and the continuous feedback received through the available platforms, channels and communication flows.

This document was made in accordance with the principles set forth by the GRI (Global Reporting Initiative), for the option "in accordance core" and respective supplement of the financial sector, the principles of inclusivity, thematic materiality and responsiveness of the Standard AA1000APS (2008) and verified by an external entity in compliance with the principles defined by the International Standard on Assurance Engagements 3000.

The scope and methods to estimate the reported indicators and reporting limits are detailed at the end of the report - under Methodology. The complementary information reported, namely the tables relating to: (i) GRI indicators, including correspondence with the United Nations Global Compact Principles; (ii) Sustainability Accounting Standards Board (SASB) indicators; (iii) UN Guiding Principles Framework (Ruggie Framework); (iv) alignment with the recommendations of the Task Force on Climate Related Financial Disclosures (TCFD); (v) alignment with the *Comissão de Mercado de Valores Mobiliários* (CMVM) (Securities Market Commission) guidelines for non-financial reporting; (vi) the European Union (EU) Taxonomy; (vii) the UNEP FI Principles for Responsible Banking (PRB); and now also, as part of the preparation for the evolution towards the new reporting rules on Sustainability matters applicable to the next annual cycle; (viii) the relationship with the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS), are available for consultation in the annexes to the report and on the Bank's institutional website, at [www.millenniumbcp.pt](http://www.millenniumbcp.pt), Sustainability area.

The combined reporting perimeter of (i) the **Millennium bcp Annual Report**, (ii) the Bank Millennium Annual Report and [Bank Millennium ESG Report](#), (iii) the Millennium bim Annual Report, (iv) the **Millennium bcp** Foundation Annual Report and (v) **Bank Millennium**, covers the disclosure, in its different dimensions, of the relevant information on the performance of the BCP Group on the issues identified in the thematic materiality

matrix available in the chapter "Relationship with Stakeholders".

The BCP Group, a signatory of the United Nations Global Compact since 2005, recognises the importance of the Sustainable Development Goals (SDGs) and the United Nations Agenda 2030 and, therefore, throughout this document the most direct contributions of BCP Group's activity to their pursuit are identified.

### European Regulatory Agenda

The national and European regulatory context on Sustainability matters, including those related to sustainable finance, is today, as a result of an accelerated legislative dynamic, more complex, demanding and multidisciplinary. The set of progressively extended ESG (Environmental, Social and Governance) guidelines and obligations with an impact on the governance model, value proposition and corporate reporting practices on non-financial information requires from organisations a permanent ability to adapt and adjust in order to meet the new requirements and expectations of stakeholders.

In the case of the BCP Group, the Sustainability Report addresses different reporting requirements on sustainability performance and indicators, namely:

- Directive 2014/95 on disclosure by large companies and groups of non-financial information and diversity information (NFRD - Non-Financial Reporting Directive), published in October 2014, which requires a set of organisations to report non-financial information, namely information on social and environmental performance, transposed into Portuguese law through DL no. 89/2017;
- The Paris Agreement, promoted by the United Nations and signed in December 2015, is a climate change action plan aimed at limiting global warming to well below 2°C compared to pre-industrial levels and endeavouring to limit the increase to 1.5°C, ratified by all the countries of the European Union;
- Sustainable Finance Action Plan, launched by the European Commission in March 2018, a document from which extremely relevant directives and regulations would emanate for the reporting of non-financial information by organisations that comprise the financial

sector;

- EU Regulation 2019/2088 concerning disclosure of sustainability-related information in the financial services sector (SFDR - Sustainable Finance Disclosure Regulation), adopted by the European Union in November 2019, which aims to make information on financial products and their contribution to sustainability comparable and more easily understood by investors and other information users and entered into force in March 2021. The 2nd phase of the SFDR, effective from January 2023, requires financial market participants to disclose information on the integration of "sustainability risks" into their investment decisions and the "major adverse impacts" of those decisions on environmental and social criteria, and disclosure of financial products that promote "E" and/or "S" characteristics or have a sustainable goal. Also from 2023, the reporting duty includes entity and product information, on the website, in pre-contractual information and in periodic reports;
- Taxonomy Regulation - (EU Regulation 2020/852), adopted in June 2020, published as part of the Sustainable Finance Action Plan, which consists of a classification system for "green" activities that translates the European Union's (EU) climate and environmental goals into objective criteria. The Taxonomy lists the economic activities considered to be green or environmentally sustainable. These economic activities make a substantial contribution to one or more of the EU's climate and environmental objectives: Climate change mitigation, Climate Change Adaptation, Sustainable use and protection of water/marine resources, Transition to a circular economy, Pollution prevention and control and Protection and restoration of biodiversity and ecosystems. Financial entities must report their alignment with the taxonomy in 2024 (compared to fiscal year 2023), for the environmental objectives of Climate Change Mitigation and Adaptation. One of the main indicators to be reported is the GAR - Green Asset Ratio, i.e. the proportion of assets that finance and invest in economic activi-

ties aligned with the Taxonomy in relation to the total assets covered, which will make it possible to assess the extent to which banks' assets contribute positively to the Taxonomy's goals;

- The proposed Corporate Sustainability Disclosure Directive (CSRD), published in its final version in December 2023 by the European Commission, replaces Directive 2014/94 (NFRD) and now requires a wider range of companies to publish non-financial information on their performance in accordance with the European Sustainability Reporting Standards (ESRS), adopted in the form of a delegated regulation in July 2023. The CSRD will require all large companies and listed SMEs to disclose how sustainability issues can affect them and society/environment and also to disclose their share of "environmentally sustainable" economic activities under the Taxonomy Regulation;
- Climate Act (Law no. 98/2021), published in December 2021, which, in its article 38, states that climate risk should be considered in corporate governance and incorporated into their decision-making processes and that information on identified climate risks should be reported;
- Fit for 55 is a European Union package proposed in July 2021 by the European Commission. It is part of the European Union's Green Deal strategy first presented in December 2019 and aims to reduce the European Union's greenhouse gas emissions by 55% by 2030. In the context of this plan, Millennium bcp took part in an EBA climate stress test exercise whose main objective is to test banks' progress in terms of data capabilities (and the comprehensiveness of available data); the final results of this exercise will be published by the end of 2024;
- Risk disclosure - Pillar 3 Report - Disclosures on ESG risks - from 28 June 2022, large institutions that have issued securities admitted to trading on a regulated market of any Member State as defined in Article 4(1) of Directive 2014/65/EU shall disclose information on ESG risks, including physical and transitional risks, as defined in

the report referred to in Article 98(8) of Directive 2013/36/EU. To this end, the Bank is preparing for the annual market discipline disclosure (with reference to December 2023) the response to the reporting obligations contemplated in the Taxonomy regulation and, in the half-yearly disclosure, with reference to June 2024, the complete response to the Pillar 3 ESG disclosures that will reflect advances in the measurement, management and monitoring of climate, physical and transition risks;

- Pursuant to the Directive on Markets in Financial Instruments II (MiFID II), the Bank, as a Financial Intermediary, shall, prior to making investments on the products, services or financial instruments, request the Customer to provide specific information in order to assess the Customer's investment profile and the suitability of the investment to such profile (based on Article 54(2) of the EU Delegated Regulation 2017/565 on suitability assessment and on the definition of sustainability preferences introduced in Article 2(7).

### Non-Financial Reporting Developments

The BCP Group's sustainability approach is guided by the main reporting and performance trends in environmental, social and governance issues, at national and international level, in line with the provisions of the Non-Financial Reporting Directive (NFRD), transposed to the Portuguese legal system by DL. no. 89/2017, and already anticipating the guidelines of the new Corporate Sustainability Reporting Directive (CSRD).

Therefore, in its Sustainability Master Plan, Millennium bcp includes several targets that respond to the most recent trends in Sustainable Finance and reporting of non-financial information, such as subscribing to the United Nations Principles for Responsible Banking (UNEP FI), fulfilling the targets defined under the United Nations SDGs, adapting to the new European Union (EU) guidelines on non-financial reporting, including the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD), aligning with the Regulations aimed at "Establishing a regime for the promotion of sustainable investment" EU Regulation No. 2020/852 (aka Taxonomy) or the "Disclosure of sustainability-related information in the financial services sector" (EU Regulation 2019/2088, SFDR), and the definition of targets certified by the Science Based Targets initiative

(SBTi) and aligned with the Paris Agreement is also under assessment.

The Bank considers that it plays a relevant role in the compliance with the national and international commitments, recognising the importance of the involvement and alignment of the financial sector in the transition into a sustainable and inclusive economic development model. In terms of climate changes, the Bank assumes the commitment established within the scope of the Paris Agreement and the objective of limiting global warming below 1,5º degrees Celsius. As far as ethical and responsible leadership is concerned, we underline the commitment of BCP Group to the Global Compact Principles, defined by the United Nations, which have as action purpose 10 Principles in the scope of Human Rights, Working Conditions, Environmental Protection and Anti-Corruption.

In terms of reporting guidelines, the Bank develops its Sustainability Report in line with the GRI Standards, also publishing the SASB indicators, namely those associated with the financial sector, as well as the recommendations of the TCFD and, in Portugal, the CMVM. This report also includes reporting on Human Rights in accordance with the UN Guiding Principles Framework.

On issues related to Sustainable Finance, the Bank monitors developments in the legal and regulatory environment of the financial sector (namely the diplomas resulting from the European Commission's Sustainable Finance Plan and the guidelines defined by the European Central Bank and the European Supervisory Authorities) and participates in various national and international working groups on these issues.

Additionally, BCP Group has been ensuring an increasingly effective alignment between its business processes and support operations with the ESG (Environmental, Social and Governance) areas and this is achieved by integrating environmental and social aspects in the company's activities, from the governance and risk management model to the offer and management of internal activities.

## Sustainability Policy

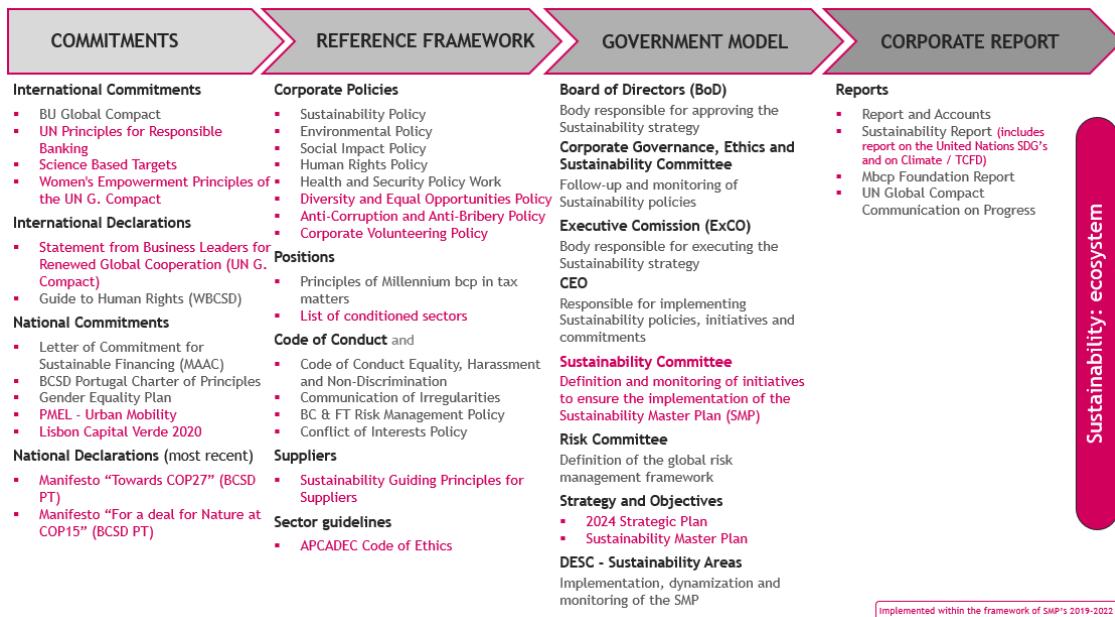
The BCP Group pursues dynamic strategies adapted to the new challenges imposed by the several interested parties with which it establishes relations. The main objective of the adopted sustainability policies, which foster a culture of Corporate Social Responsibility, has been to positively influence the organisation's value proposition in the long term, balanced with the well-being of the people, the company and communities in which it operates, while preserving natural resources, climate, biodiversity and the environment.

Within this context, the Bank's intervention is focused on three fundamental axes:

- Environment - implementation of measures that promote a fair and inclusive transition to a decarbonised economic development model, including the incorporation of the environmental component in the Bank's risk models and the supply of products and services;
- Social - involvement with the external community and with the internal community in the creation of lasting relationships of proximity and cooperation and creating shared value;
- Corporate governance - integration of sustainability principles into the Bank's decision-making processes and in the definition of its value proposal.

Thus, Group BCP assumes, as an integral part of its business model, the objective of creating social and environmental value by developing actions to - and with - the various stakeholder groups, with the goal of contributing to the development of the countries in which it operates.

## ESG Ecosystem



## Partnerships

Millennium bcp, aware of the importance of sharing good practices, public testimony and of an active participation in the pursue of Responsible Business Principles, is an associate founder and a member of the corporate bodies (Management, Executive Secretariat and Advisory Board) in the 2022-2024 term-of-office of the BCSD Portugal - Conselho Empresarial para o Desenvolvimento Sustentável, an association part of the network of the WBCSD - World Business Council for Sustainable Development.

Since 2005, it has also, as a signatory to the Principles of the United Nations Global Compact, a member of the Global Compact Network Portugal (GCNP) and, in a logic of proximity and support to the surrounding communities, of the Oeiras Solidarity Programme (POS).

As part of the development and increase of the impact of its Corporate Social Responsibility (CSR) policy, Millennium bcp and its Foundation maintain cooperation and partnership protocols, which allow, through voluntary actions, to create social and/or environmental value and contribute to the protection of the most disadvantaged segments or those with special needs of the Portuguese society, with the following institutions: (i) Food Bank; (ii) Entrajuda; (iii) C.A.S.A - Centro de Apoio ao Sem Abrigo; (iv) BIPP - Inclusão para a Deficiência / Semear; (v) EPIS - Associação Empresários pela Inclusão; and (vi) Brigada do Mar.

## Work and Reflection Groups

Millennium bcp also participates in a selected number of work groups and discussion forums on Sustainability and Sustainable Finance, a presence that should be understood within the scope of the Action Plan from the European Union, the ongoing alterations in the ruling and regulatory framework and evolution of the risk and business management practices applicable to ESG issues, in what also represents an opportunity to re-assess impacts, anticipate trends and reinforcing competences and project future transformations.

Accordingly, it is a member, among others, of the Working Groups (i) Regulatory Framework for Sustainable Financing of the APB - Portuguese Banking Association; (ii) Sustainable Finance of the EBF - European Banking Federation; (iii) Reporting and Sustainable Finance of BCSD Portugal, where it is one of the promoters of the website [www.sustainablefinance.pt](http://www.sustainablefinance.pt), and (iv) the Specialised Committee on Sustainable Finance ISO/ TC 217 of the APEE - Associação Portuguesa de Ética Empresarial and the ISO - International Organization for Standardization.

It also a member of: (v) the Technical Debate Group for Sustainable Financing in Portugal from the Ministry of Environment; (vi) from the Specialized Committee for Sustainable Finance and Sustainability from AEM - Associação de Empresas Emitentes de Valores Cotados em Mercado S.A., (vii) the Task Force on Taxonomy from APB and (viii) the International Chamber of Commerce (ICC) Working Group on Sustainable Finance.

After joining the Women's Empowerment Principles (WEP), formalised in 2020, Millennium bcp is also a member of the (ix) Steering Committee WEP Portugal since 2021, promoted by GCNP.

In 2022, the Bank joined the (x) Sustainability Working Group of the Business Roundtable Portugal Association (BRP) and, already in 2024, (xi) the APB Working Group on Prudential Treatment of ESG risks.

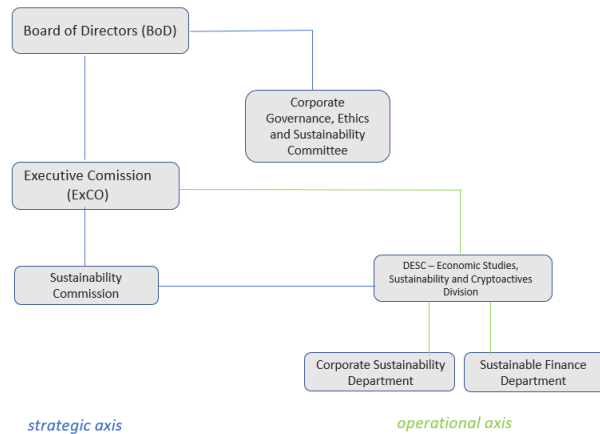


## Governance Model

Material issue: **SUSTAINABILITY GOVERNANCE**

In recent years, Millennium bcp has significantly strengthened its governance model for the themes of Sustainability and Responsible Business.

In this context, in 2020, within the scope of the Sustainability Master Plan (SMP) Millennium bcp created the Sustainability Commission ([Regulations of the SC](#)), a body with powers delegated by the Executive Committee (EC) and chaired by the CEO, which is responsible for assessing, following up and monitoring the implementation of Millennium bcp's Sustainability strategy - which includes the economic, social, environmental and climate change dimensions - having, specifically, the following tasks:



- Advise the EC in the integration of Sustainability principles (Environmental, Social and Corporate Governance) in the Bank's decision-making and management processes;
- Analysis and approval of the initiatives necessary for the implementation of actions aimed at materialising the strategic axes and lines of action of the SMP in force, as well as other amendments or adaptations necessary for the fulfilment of the targets defined;
- Supervision and monitoring of the progress of the approved initiatives, compliance with the respective deadlines and budgets and the evolution of the results achieved, as well as the main performance indicators of the SMP dimensions.

The Committee for Corporate Governance, Ethics and Sustainability (CCGES), within the scope of the powers delegated by the Board of Directors and in accordance with its Regulations, is the body responsible for recommending the adoption by the Board of Directors of policies in line with ethical principles and social responsibility and with the best practices in matters of corporate governance and sustainability and also for monitoring the evolution of the Sustainability and Corporate Social Responsibility Master Plans and issuing an opinion on the annual corporate governance and sustainability reports.

Likewise, the Committee for Risk Assessment (CRA), within the scope of the powers delegated by the Board of Directors and in accordance with its Regulations, is responsible for monitoring the material management process of risks to which the Bank is subject to, through appropriate indicators and metrics, including, among others, the new ESG risk factors, which include climatic ones.

The Regulations of the CCGES and the CRA, updated as of 12/31/2023, are available on the Bank's website, on: [Articles of Association and main internal regulations of the Bank](#)

To ensure that the management bodies, namely the Board of Directors, have the appropriate knowledge for an effective management of sustainability issues, in 2023, the training plan on these matters continued, of which we point out the course on Sustainable Finance, organized together with ISEG and lectured by Prof. Sofia Santos.

BCP Group also assumes, in an ongoing dialogue with its Stakeholders, a set of [corporate policies and principles](#) - most

of them revised in 2023 - namely:

- i. Sustainability Policy;
- ii. Environmental Policy (v.2021);
- iii. Social Impact Policy;
- iv. Human Rights Policy;
- v. Diversity and Equal Opportunity Policy;
- vi. Occupational Health and Safety Policy (v.2021);
- vii. Corporate Volunteering Policy;
- viii. Anti-Corruption and Anti-Bribery Policy;
- ix. Principles of responsible financing: excluded and conditioned projects;
- x. Sustainability Guidelines for Suppliers;
- xi. Tax Policy.

More information about the organisational model of the BCP Group is available in the [Corporate Governance](#) report.

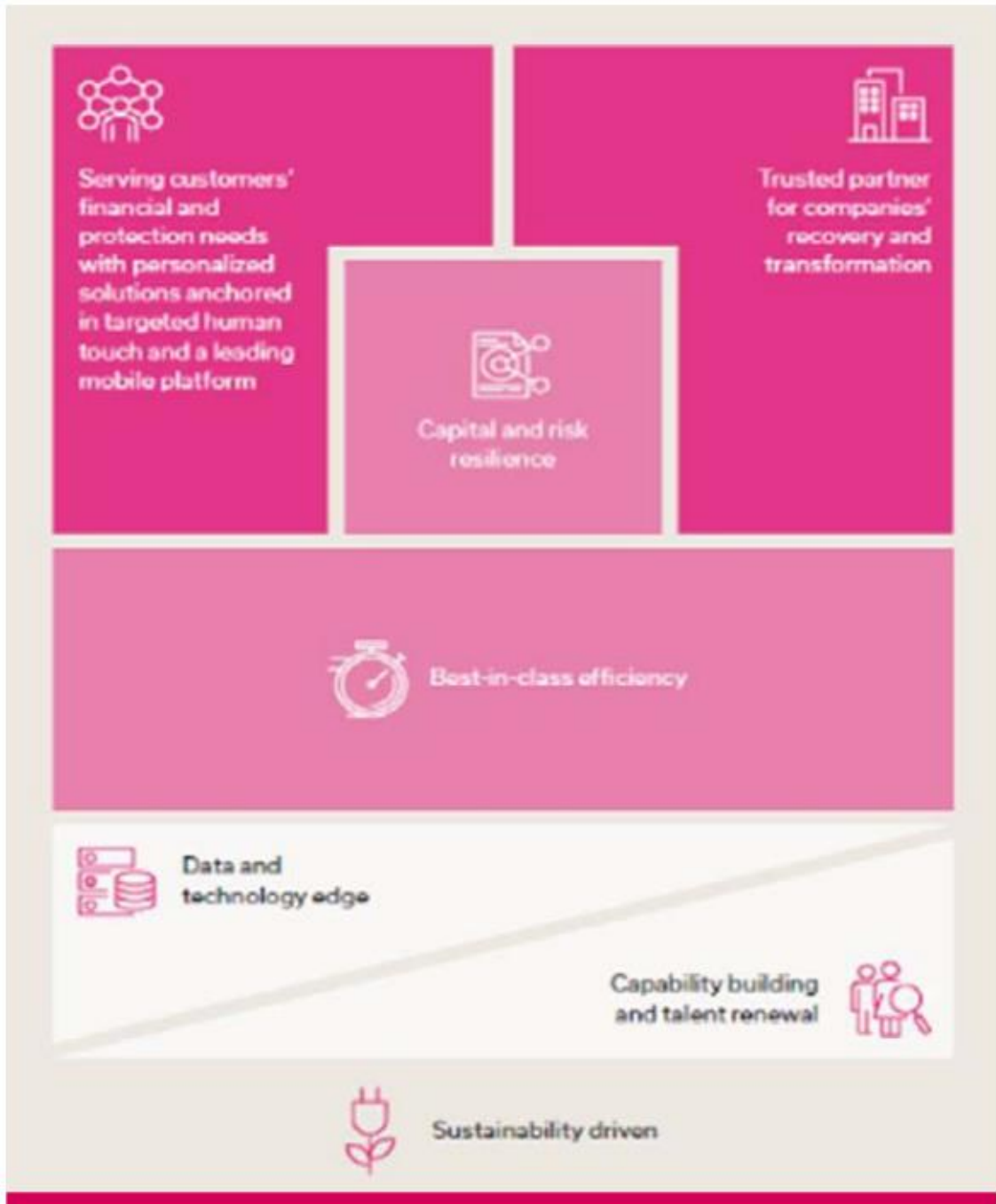
### 2021/2024 Strategic Plan

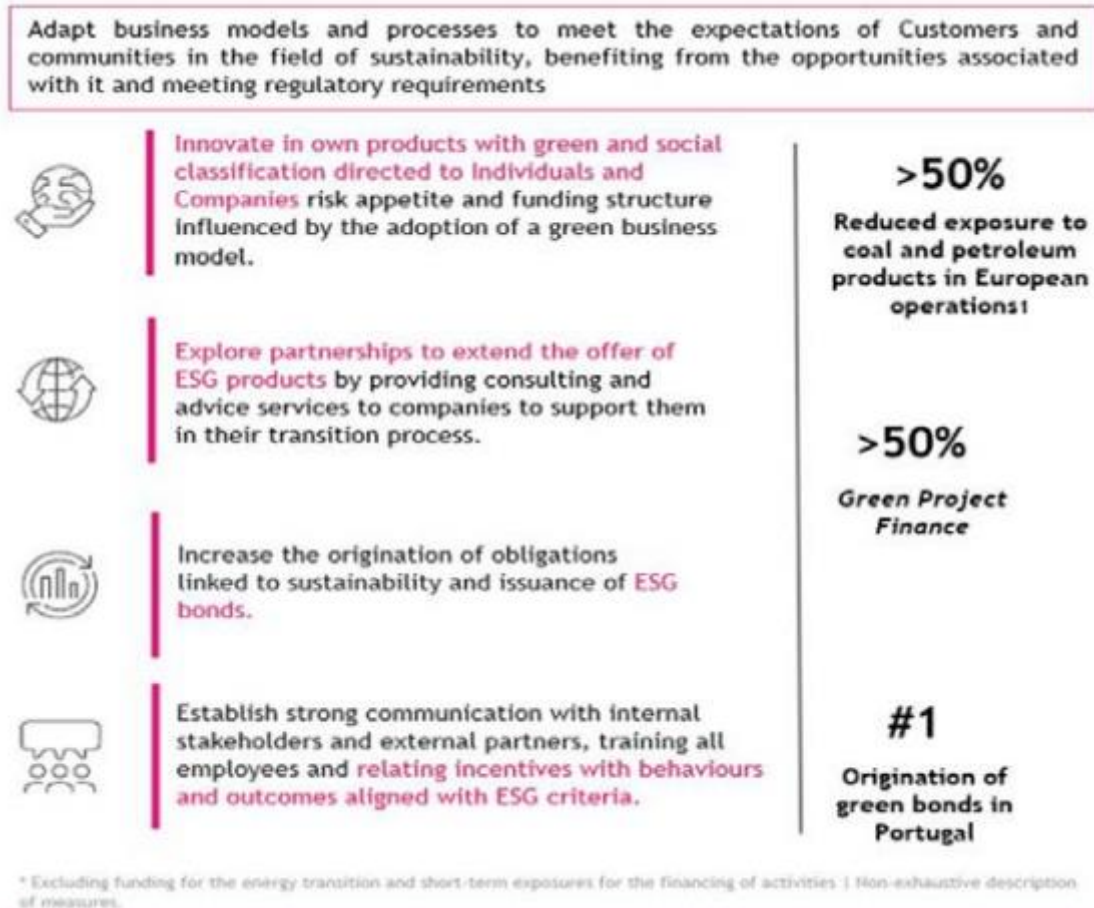
In the current cycle of the Strategic Plan “Superação 24”, Millennium bcp tries to identify business opportunities related with sustainability and also managing the physical and transition risks of its portfolio, to assert itself as a reference in the market. It is also innovating in its own products with a green and social rating addressed to individuals (ex. increasing credit and investment solutions compliant with ESG criteria) and companies (ex. loans with an interest rate indexed to “E” or “S” criteria).

In addition, the Bank continues to explore partnership alternatives to enlarge its offer of ESG products, for example in the financing of works in buildings, aimed at improving their energy self-sufficiency and the electric vehicle ecosystem. Millennium bcp will also explore partnerships to provide consultancy and advisory services to companies to support them in their green transition process.

Seeking to become the principal partner for the energy transition and mitigation of physical risks, the Bank is committed in increasing the issue of bonds linked with sustainability criteria (SLB) and of ESG bonds so as to become the leading company in Portugal in this domain, boosting the relevance of this type of bonds in the EU’s strategy for Sustainable Finance.

The objectives that Millennium bcp proposes to achieve are in line with the aspiration to affirm itself as a reference in Portugal, in this domain, during the cycle of the 2021/ 2024 Strategic Plan: average of the ratings of the three main indexes (CSA S&P, CDP and MSCI) above 80%, keep all its premises in Portugal operating with totally renewable energies (which has been happening since 2021) and reduce the exposure to sectors with a significant use of coal.





## Commitments

The BCP Group's position regarding the management of ESG issues is reinforced by the adherence and subscription to a set of external commitments and initiatives, through which efforts are maximized towards a common purpose - promote sustainable development.

Following the subscription in 2005 of the United Nations "Global Compact Principles" and re-affirmed in 2018, BCP Group commits to support its 10 Principles establishing a set of values in what concerns Human Rights, Labour Conditions, Protection of the Environment and Anti-corruption.

In 2019, within the scope of the "Think tank on sustainable funding in Portugal", promoted by the Ministries of Environment, Economy and Finances (within the context of the Route to Carbon Neutrality in 2050), which had the participation from the major banks that operate in the market, supervisors and sector associations, two reference documents were produced: (i) "[Guidelines to accelerate sustainable funding in Portugal](#)"; and (ii) "[Engagement Letter for the Sustainable Funding in Portugal](#)" - subscribed by Millennium bcp -, that seek to highlight the importance, widely confirmed in the meantime, of including environmental, social and governance risks in the financial sector's decision-making and risk management processes and which continue to constitute guidelines for the Bank.

In 2020, Millennium bcp also subscribed to the "Lisbon European Green Capital Commitment", promoted by CML - Municipality of Lisbon (Lisbon City Council), which brought together more than 200 entities with a presence in the city, including companies, schools and institutions, in a commitment to climate action and towards sustainability in order to foster a collective dynamic to meet the targets set by the Paris Agreement and accelerate the path to carbon neutrality.

In 2019, the Bank also joined the "Business Mobility Pact for the City of Lisbon", a joint initiative from the Lisbon City Council, the WBCSD - World Business Council for Sustainable Development and from BCSD Portugal, that aggregates in a public voluntary agreement, companies that operate in Lisbon and have as a common goal to improve and transform mobility in the city, making it more sustainable.

Millennium bcp also subscribed in 2019 the “CEO Guide to Human Rights” an initiative from the World Business Council for Sustainable Development (WBCSD) and from the Business Council for Sustainable Development (BCSD, Portugal). The Guide includes the policies and practices of reference and intends to contribute for the implementation and promotion of the human rights in the organizations and in their value chains.

To further enhance its commitment with human rights and an ethical and inclusive management, in 2020, BCP signed the “Statement from Business Leaders for Renewed Global Cooperation”, from Global Compact of the United Nations, an international statement focused on showing the commitment with an ethical leadership, based on good governance practices, materialised through values, strategy, policies, operations and proximity relations and involvement with all stakeholders. This commitment also aims at establishing a partnership with the United Nations, Governments and civil society to contribute for the straightening of justice and transparency, promoting equality and respect for human rights.

Also in 2020, Millennium bcp joined the “Women's Empowerment Principles” (WEP) from Global Compact of the United Nations, an important international platform for the promotion of gender equality that translates our long-term view and the will to be part of - and encourage - a collective dynamics based on cooperation and trust. Since 2017, Millennium bcp has also been part of iGen – Organizations for Equality Forum, an initiative that brings together private, public and social companies in the promotion of decent work.

Since 2017, Millennium bcp is a subscriber of the Charter of Principles from BCSD Portugal – Corporate Council for Sustainable Development. This document establishes the principles that are the guidelines for good corporate management, enabling the subscribing companies to be recognized by their clients, suppliers and by the society in general for the adoption of sustainability commitments.

Since 2018, Bank Millennium is a subscriber of the Letter for Diversity in Poland, a commitment that reaffirms its determination in respecting and promoting diversity amongst customers and employees.

In 2023, Millennium bcp subscribed to the Code of Ethics of APCADEC – Portuguese Association of Purchasing and Procurement, which brings together a set of values, principles and guidelines aimed at Procurement professionals.

A table identifying the main commitments, the proposed targets and their degree of achievement is available in Annex 9 of this Report.

**Millennium bcp is committed to a fair and inclusive transition to decarbonized development models in line with the Paris Agreement**

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## Sustainable Development Goals (SDG) of the United Nations



The Sustainable Development Goals (SDG) of the United Nations, approved in September 2015, represent the greatest global voluntary commitment— adopted by all 193 UN member States in 2015 - and thrive at improving the quality of life of the world population in the social, environmental and economical components, until 2030.

Focusing on five fundamental pillars – Planet, People, Prosperity, Peace and Partnerships – the SDGs, established within the framework of the 2030 Agenda for Sustainable Development, constitute an urgent call to action by all countries – developed and developing – for a global action partnership for a more sustainable future.

The 17 goals and the 169 targets that constitute them thus represent an opportunity to improve the quality of life of society, through global mobilization to eliminate extreme poverty and hunger, provide quality education, protect the planet and promote peaceful and inclusive societies.

Considering that its pursuit requires a joint effort by states, civil society and private entities, including companies, the Bank is committed to working actively for sustainable, socially inclusive and environmentally responsible development in all the geographies in which it operates, in particular in relation to people, whether they are workers, customers, partners or members of society in general.

The justification for Millennium bcp's involvement in achieving the SDGs can be found, first and foremost, in the Bank's matrix and values, in particular its relationship of proximity to People and its capacity to add social value, but also in the search for innovative and inclusive products and distribution channels and in the spirit of service to the Customer and to the communities in which it operates.



BCP acknowledges that the SDG represent an unifying and aspirational reference framework that will enable to produce a new “social contract” and enhance changes imposed and required by the current economical, social and environmental situation.

To be more effective in these matters, the Bank regularly reflects on the commitments advocated by the SDGs, establishing priorities that take into account the impacts that arise from its activity and those that affect its potential for value creation. In 2023, in the context of carrying out the regular stakeholder consultation process, BCP reviewed the SDGs to which its contribution should be preferably directed. Thus, are now considered, as a priority for the implementation of the 2030 Agenda for Sustainable Development, the SDG 4 - Quality Education, 7 - Affordable and

Clean Energy, 8 - Decent Work and Economic Growth, 10 - Reduced Inequalities, and 13 - Climate Action.

This Report includes a vision of the Bank's effective contribution to the achievement of the SDGs and how the alignment between its value proposition in the different operations and the needs and expectations of stakeholders is ensured.

### Principles for Responsible Banking (PRB)

Within the context of Sustainability Master Plan (SMP), Millennium bcp decided to join the "United Nations Environment Programme - Finance Initiative (UNEP-FI) and [subscribe its "Principles for Responsible Banking" \(PRB\)](#), this way stressing its commitment to responsible investment policies and awareness of the impacts of its activity, both on society and on the planet. By joining UNEP-FI and subscribing to the PRB, Millennium bcp is committed to putting sustainability at the heart of its strategy, integrating these Principles in its value proposal, processes and operations, in the different business and geographic areas.

In June 2022, the Bank formally joined the PRB and published a voluntary preliminary review of the application of the Principles in the 2022 Sustainability Report. In the 2023 Sustainability Report, Millennium bcp publishes its first mandatory report in response to the PRB, following the template provided by UNEP-FI - the Principles for Responsible Banking Reporting and Self-Assessment Template (please see Annex 7).

In this 1st mandatory report, Millennium bcp details its contribution to the six Principles: 1) Alignment; 2) Impact and Target Setting; 3) Clients and Customers; 4) Stakeholders; 5) Governance and Culture; 6) Transparency and Accountability. To respond to Principle 2 (Impact and Target Setting), the Bank used the impact analysis tool provided by UNEP-FI - PRB Portfolio Impact Analysis Tool (v.3) - and carried out an assessment of the positive and negative impacts of its activities in Portugal. Based on this analysis, the Bank has identified three main topics of impact for its activities: Climate Stability, Resource Intensity, and Housing.

In 2024, Millennium bcp will continue this analysis, defining additional targets and incremental evolution implementation plans for each of its main impact topics. The Bank intends to publish the disclosure reports proposed by the PRB, detailing their progress on each of the six Principles, in line with its annual non-financial reporting cycle.

**Corporate social responsibility must be an accelerator of a new "social contract", fair and inclusive, which, by putting People at the centre, protects the planet, the climate and biodiversity**

“

## Management of ESG risks

BCP has an annual process to identify, assess and manage the main risks to which it is exposed to. ESG risk factors, which have gained increasing relevance within the scope of the Bank's activity, both through the densification of the legal, regulatory, and supervisory framework and requirements, and through the deepening of good practices in terms of risk management, are part of this process and are assessed in terms of their potential impacts on traditional risk categories (such as credit, operational, liquidity, and market).

During 2023, the Bank renewed and strengthened its risk identification and assessment exercise with a focus on the ESG component, having reviewed existing methodologies and followed the most advanced practices available in the market – contemplating scenarios (thus ensuring a forward-looking view of the expected impacts), as well as the transmission of ESG risks to traditional categories (and the business) and, also, the inclusion of all the Group's exposures.

The results of the year are integrated into the Bank's day-to-day operations through the definition of actions for its management and mitigation, and the identification of business opportunities that result from the dynamics of the transition to a low-carbon economy.

BCP's priorities and ambitions in terms of the management of social and environmental risk factors are addressed in its Sustainability Master Plan, with lines of action and actions very focused on the integration of risks in the business, among which the following stand out:

- Continue to assess the impact of climatic and environmental, physical and transition factors on the various types of risk, using internal information that supports the adoption of quantitative models in the short/medium term;
- Continue the implementation of a framework for the management and control of climate and environmental risks;
- Develop tools that support the Balance Sheet alignment exercises (e.g., transition planning) and the projection of the respective business impacts and risk appetite;
- Operationalize the capacity for scenery and climatic stress tests.

More detailed information on climate, nature and biodiversity-related risks is presented in the chapter "Environmental Liability".

**The risk management policy is being adapted and improved, reflecting the strategic priority that the Bank attributes to ESG themes**

“



## Sustainable Finance Disclosure Regulation (SFDR)

The Sustainability and ESG factors are becoming increasingly relevant for society, Customers and for our business. In line with the commitment to promote a culture of environmental, social, and financial responsibility, namely in the fight against climate change and social inequalities, BCP Group has been working to disclose relevant information in accordance with the provisions of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 (Sustainable Finance Disclosure Regulation – SFDR).

The SFDR sets out transparency rules requiring financial institutions to disclose information on the integration of sustainability risks into their processes and products, and to consider the principal adverse impacts of their investment decisions.

In relation to financial products, with the entrance into force of this regulation on March 10, 2021, it is now mandatory to [disclose information related with sustainability](#) on the websites of the entities and on the pre-contractual documents and on periodical information.

The Bank has been involving the different areas of the organization in the full implementation of this regulation, from business to risk and processes, and has developed a governance model for monitoring and follow-up of compliance with the thereto related legal requirements.

It is our ambition to continue to be an active protagonist of this change and, in this sense, we continue to be committed to providing financial products that promote environmental or social characteristics (art. 8) or may even have a sustainable objective (art. 9).

As providers of Portfolios Management and Investment Advising services, we will continue to include the [risks in terms of sustainability](#) and to [consider the main adverse impacts on sustainability factors](#) in the processes for the selection of products used in the construction of portfolios.

Within the context of the [One-off Counselling](#) we will continue to take into account the main adverse impacts on sustainability factors in product selection processes.

In cases where, in terms of investments, the main adverse impacts on sustainability factors are not taken into account, we ensure their respective [disclosure](#) (Interfundos).

The [remunerations policy of BCP](#) includes information on the inclusion of risks in terms of sustainability. For that purpose, it includes a set of rules of good governance, contemplates provisions aimed at ensuring an alignment of its senior executives and remaining Employees with a sound and prudent management of the institution and that considers the interests of all its stakeholders, not promoting an incentive to risk-taking at levels higher than those defined by BCP, avoiding the creation, or a contribution to the creation, of situations of conflict of interest and, contributing to the ethical and sustainable development of the Company. In the case of the variable remuneration of the Executive Committee and of the Employees, one of the KPIs under consideration is the execution degree of the Sustainability Master Plan (SMP). The Chief Risk Officer (Executive Director responsible for Risk) also has a performance indicator relating to the monitoring of climate and environmental risks. With regard to the Employee Remuneration Policy, Sustainability Risks, including climate risks, are also foreseen in corporate and individual KPIs. The qualitative assessment of Employee performance, which considers a set of behaviors and practices, includes the Sustainability dimension.

Group BCP promotes the transparency of the reference framework applicable to ESG risks, disclosing on its institutional website the [Corporate Policies and Principles](#) on sustainability, which seek to positively influence the long-term value of the organization, contributing to the well-being of people and communities and to the preservation of natural resources, the environment and biodiversity.

The BCP Group is evaluated by the most relevant ESG indices and analysts (see chapter Sustainability Indices) and we continuously work to improve our policies, processes and operations, in order to achieve a positioning, which we want to be a reference, in the most relevant sustainability indices.

Detailed information on the disclosure of non-financial information according to SFDR is available on the website of Millennium, on [Institutional/Sustainability/SFDR](#).

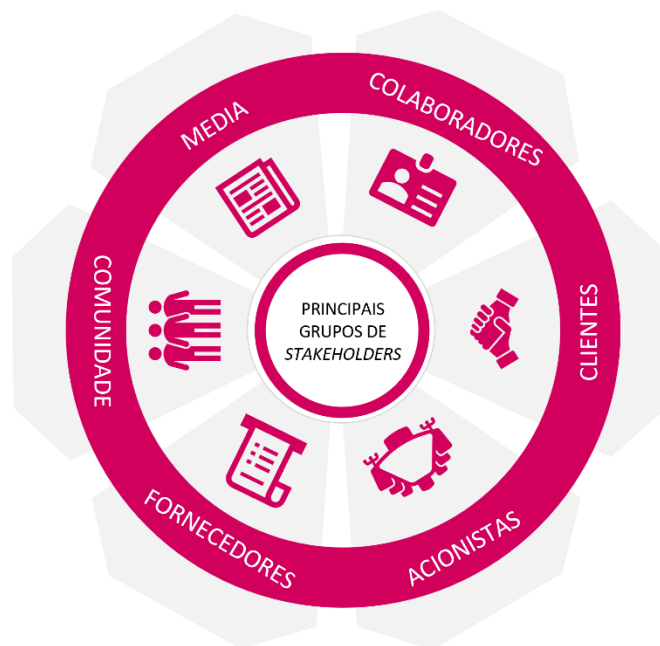
# Approach to Sustainability | Relation with Stakeholders

## Approach to Sustainability | Relation with Stakeholders

The BCP Group manages sustainability-related issues according to a strategic approach, integrated into its business model and defined according to the challenges imposed on it.

### Stakeholders Engagement

The Bank believes that its ability to create value depends on the establishment of strong and lasting close relationships of trust and respect with all its stakeholders. Hence, it promotes a systematic engagement with all stakeholders, which allows it to listen, understand and integrate their concerns, needs and expectations into the strategic business approach.

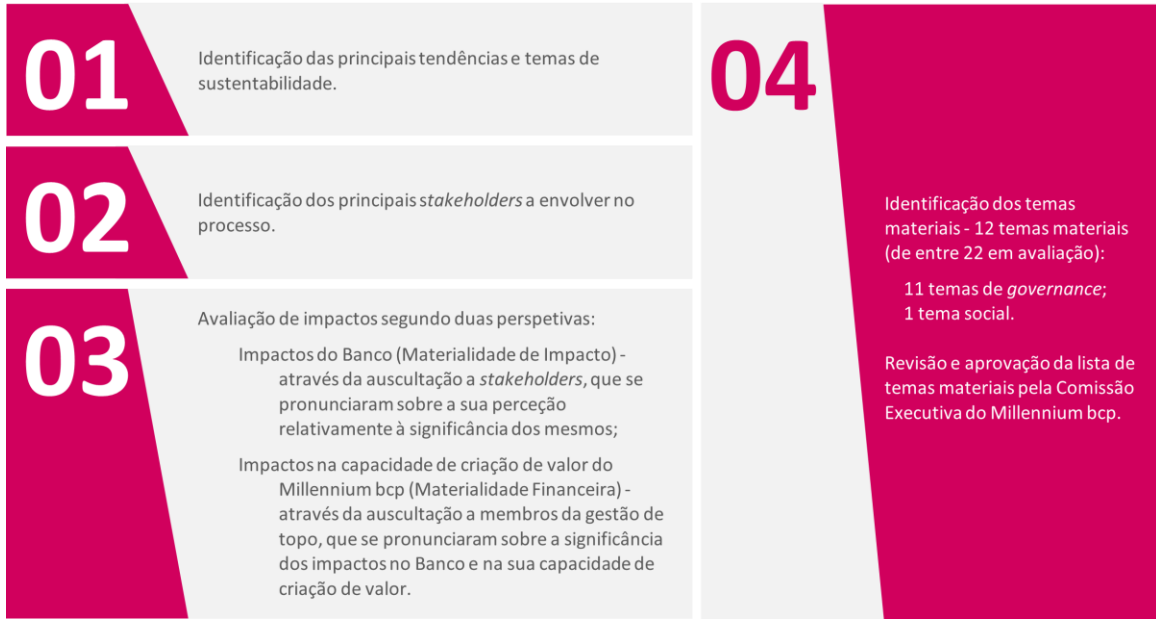


To understand the perception of its stakeholders regarding the significance of the impacts arising from the Bank's activities and operations, a new consultation process was carried out in 2022/2023, via an online questionnaire, with a representative sample of the main stakeholder groups. This exercise also allowed the Bank to understand its main needs and expectations regarding the organization's performance in terms of sustainability and served as a basis for the (re)definition of Millennium bcp's material themes, reflected in the Sustainability Master Plan (SMP).

### Thematic Materiality Analysis

The sustainability thematic materiality analysis process is carried out by the Bank every two years, with the purpose of assessing the environmental, social, economic and governance issues on which its actions should be prioritized. The findings of this analysis guide not only the information it disseminates on these aspects, but also the development of policies, strategies and action plans.

The thematic materiality analysis carried out in the 2022/2023 period followed the main regulatory guidelines, resulting from the Corporate Sustainability Reporting Directive (CSRD), regarding double materiality, crossing the two perspectives – impact materiality and financial materiality. The process included four main stages:



**Thematic Materiality of Millennium bcp**

Size	Subjects	Upstream Subject with impacts upstream of the Bank	Bank Subject with impacts on the Bank	Downstream Subject with impacts downstream of the Bank	Financial Materiality	Impact Materiality
Governance	Cyber-security, privacy and information protection		●	●		
Governance	Innovation and digitalisation		●	●		
Governance	Ethics, conduct and compliance	●	●	●		
Governance	Prevention of corruption and money laundering	●	●			
Governance	Transparency of the information provided to customers on products and services			●		
Governance	Sustainability Governance		●			
Governance	Resilience of the business model		●			
Governance	Risk management		●	●		
Governance	Satisfaction and customer experience			●		
Governance	Management of the brand and reputation		●	●		
Governance	Economic performance		●			
Social	Attracting, developing and retaining talent		●			

The identification of material issues also allows the recognition and characterization of opportunities for improvement, which constitutes a relevant contribution to a swift strategic adaptation to new realities, challenges and impositions.

## Sustainability Master Plan

Material issue:

RESILIENCE OF THE BUSINESS MODEL

Millennium bcp's approach to Sustainability in Portugal is embodied in the commitments, goals and actions defined and formalized, until 2023, in the Sustainability Master Plan. The structuring of the lines of action and the identification of the actions that make up the SMP are the result of a broad reflection on the management of relevant material issues, available resources and the regulatory, economic and market framework.

Established for the first time in 2009 for the 2010/2012 three-year period (later extended to 2013), the Sustainability Master Plan is frequently revised – SMP 2014/2015 (extended until 2018); SMP 2019/2021; and SMP 2022 – which ensures greater compliance and responsiveness in the face of the context experienced at any given time.

In 2022, following the completion of the new stakeholder consultation and thematic materiality analysis process, the results of peer benchmarking, the interpretation of external analysts' recommendations and the evolution of the regulatory framework, the SMP 2023 was defined and approved, which guided Millennium bcp's performance in sustainability matters and under which the Bank implemented a large number of concrete initiatives and actions, part of the following lines of action:

Action Line	Size
<b>a. Positive impact through a responsible and sustainable management</b>	i. Management of ESG risks
	ii. Remuneration Policies
	iii. ESG Strategy
	iv. Corporate policies and commitments
	v. Sustainable Purchases
	vi. Analysis of the corporate ESG performance
	vii. ESG Compliance
	viii. Senior Management's training and development
	ix. Knowledge
	x. Management of resources
<b>b. Positive impact through a sustainable offer</b>	i. Responsible and Sustainable investment
	ii. Development of ESG products
	iii. Management of the offer ESG risks
<b>c. Positive impact on environment</b>	i. Climate change and energy transition
	ii. Reporting regulations and frameworks
	iii. Training and environmental awareness
<b>d. Positive impact on people and communities</b>	i. Training and development
	ii. Corporate volunteer Actions
	iii. Human Rights
	iv. Financial Literacy
	v. Partnerships for Sustainability
...	...

The needs and expectations of stakeholders identified during the thematic materiality analysis process are, therefore, also through the Sustainability Master Plan, reflected in the following goals:

2023 Material Issues	Indicator	Origin/source/ report	Objective		
			2022 baseline	2023 interim evolution	2024 target
Economic performance	ROE (Group) <sup>1</sup>	Superação 24	0.04	0.055	≈ 10%
Ethics, conduct and compliance	Internal Control System (ICS scoring index) (PT) <sup>2</sup>	RAS	2.2	≤ 5.5	≤ 5.5
Satisfaction and customer experience	Global Satisfaction 1 <sup>st</sup> Bank NPS (Private Customers PT) <sup>3</sup>	BASEF	Top 2	Top 2	Top 2
	Satisfaction with Main Bank NPS (Corporate Customers PT) <sup>4</sup>	DATA E	Top 3	Top 4	Top 2
Cyber-security, privacy, and information protection	Cyber risk security rating (PT) <sup>5</sup>	RAS	> 740	> 740	> 740
	Cyber risk security rating (PL) <sup>5</sup>		> 780	> 780	> 780
	Cyber risk security rating (MZ) <sup>5</sup>		> 740	> 740	> 740
Risk management	Difference between BCP P2R and the average of comparable peers (Group) <sup>6</sup>	Sustainability Reporting	13	12	≤ 6
Sustainability Governance	Annual execution level of the Sustainability Master Plan (SMP) (Group) <sup>7</sup>	Sustainability Reporting	0.94	≥ 0.85	≥ 0.85
Innovation and digitalisation	Proportion of mobile customers (Group) <sup>8</sup>	Superação 24	0.63	> 65%	> 65%
Prevention of corruption and money laundering	No. of customers with low/medium AML risk per 100k (PT) <sup>9</sup>	RAS	0.5	≤ 2	≤ 2
Transparency of the information provided to customers about products and services	Customer complaints (BdP claims) (PT) <sup>10</sup>	RAS	Top 6	Non-Top 3	Non-Top 3
Resilience of the business model	Cost-to-revenue ratio (Group) <sup>11</sup>	Superação 24	0.37	~ 40%	≈ 40%
Management of the brand and reputation	Reputation - NPS (PT) <sup>12</sup>	BASEF	Top 1	Top 1	Top 2
Attracting, developing, and retaining talent	Training (PT) <sup>13</sup>	Sustainability Reporting	52	54	54

The Bank's approach to ESG issues is not, however, limited to Portuguese operations. In Poland and Mozambique, there are multiple actions and initiatives within this framework that, articulated in the context of the BCP Group, have been implemented over the years.

<sup>1</sup> Excludes non-recurrent items.

<sup>2</sup> Ability of the Bank to implement the internal control recommendations of the AAR (Annual Self-Assessment Report on the Internal Control System) each year.

<sup>3</sup> Ranking the 'Global Satisfaction Score 1st Bank NPS', from the BASEF study. Values referring to the end of the year. Top6 banks (CGD, BPI, BST, NB and Montepio).

<sup>4</sup> Ranking in the 'Degree of Satisfaction with the main NPS Bank' (PT Companies) from BFIN DATA-E. Annual values. Top 5 banks (CGD, BPI, BST, NB and Montepio).

<sup>5</sup> Score of the BitSight (safety procedures, practices, and incidents).

<sup>6</sup> CET1, Tier 1 and TCR. Variation of the annual difference BCP P2R vs. average of peers (diversified creditor).

<sup>7</sup> Level of global execution of commitments of the SMP in terms of the Group and locally.

<sup>8</sup> Ratio of mobile customers versus total customers.

<sup>9</sup> Ratio between (i) SARs (suspicious activity reports) reported in the month to the authorities for low and medium risk AML customers (3-month moving average) and (ii) total low and medium risk AML customers.

<sup>10</sup> Index that measures the relative position of comparable companies (CGD, BPI, BST, NB and CCAM) in terms of customer complaints (current accounts, consumer credit and mortgage loans) based on data from the "Synopsis of the Behavioural Report" of Banco de Portugal.

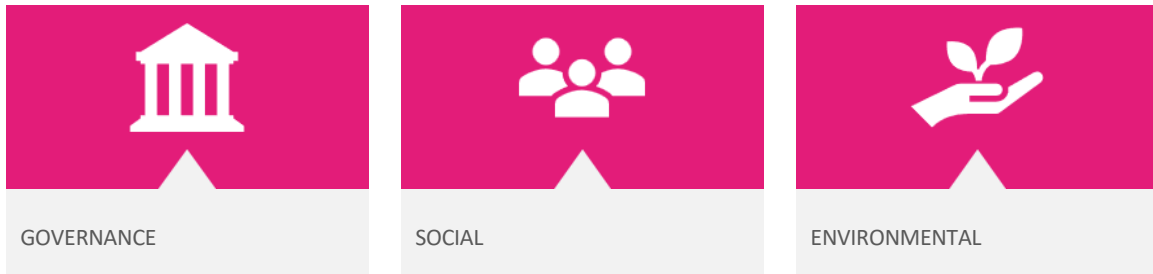
<sup>11</sup> Operating costs divided by net operating revenues. Excludes non-recurrent items.

<sup>12</sup> in the '1st Bank Recommendation Score – NPS' of the BASEF study. Values referring to the end of the year. Top6 banks (CGD, BPI, BST, NB and Montepio).

<sup>13</sup> Average of annual training hours per employee.

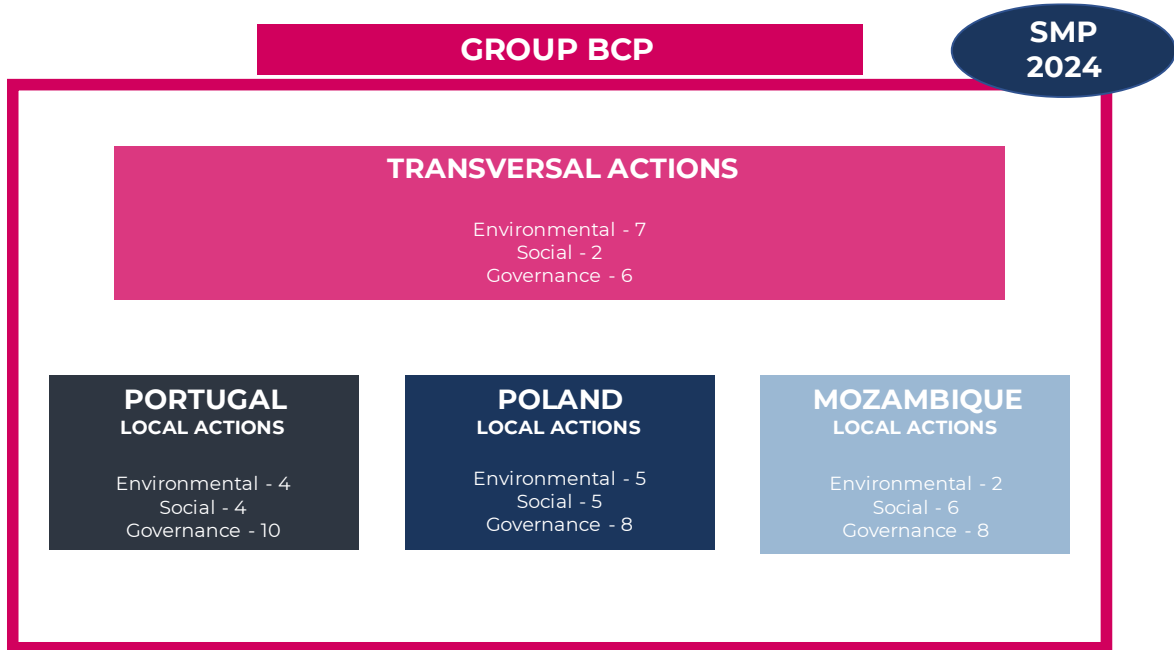
To maximize the efforts employed by the BCP Group in minimising negative impacts and enhancing positive ones, the Sustainability Master Plan approved for 2024 foresees, for the first time, a common actions component, to which are added the components of local actions in Portugal, Poland and Mozambique.

### GROUP BCP: SUSTAINABILITY MASTER PLAN 2024



Transversal Actions	Transversal Actions	Transversal Actions
<ul style="list-style-type: none"> <li>- Inclusion of ESG criteria in the selection of suppliers;</li> <li>- Sustainability Reporting: 2024 Sustainability Report;</li> <li>- Sustainability Reporting: other reporting requirements;</li> <li>- Create a dashboard to monitor the implementation of the SMP 2024 across the Group, geography and departments;</li> <li>- Prepare and approve the SMP 2025;</li> <li>- Review and, if necessary, update and publication of Policies and Principles, in accordance with the regular review period every 2 years.</li> </ul>	<ul style="list-style-type: none"> <li>- Definition, structuring and execution of corporate social responsibility initiatives;</li> <li>- Monitoring of human rights management and reporting of the process, including identification of vulnerabilities and improvement actions.</li> </ul>	<ul style="list-style-type: none"> <li>- Implementation of a process for monitoring a set of environmental KPIs, including consumption and emissions profiles as an "organization";</li> <li>- C&amp;E materiality analysis: implementation of the annual update exercise;</li> <li>- C&amp;E materiality analysis: integration of results in the Risk Identification Process and in the Risk Appetite Statement;</li> <li>- Setting targets and portfolio alignment exercise in accordance with Pillar 3 and science-based requirements;</li> <li>- Definition and implementation of the Bank's transition plan;</li> <li>- C&amp;E metrics: selection of KRIs and KPIs for the relevant portfolios and lines of business;</li> <li>- Preparation of the mandatory Taxonomy reporting in 2024, in reference to 2023.</li> </ul>

In addition to the initiatives transversal to the BCP Group, the PDS 2024 includes action plans, equally distributed by the Environmental, Social and Economic and Governance dimensions, adapted to the reality, needs and specificities of each of the geographies that make up the BCP Group's consolidation perimeter and that reflect its local commitments.



In the following chapters, the main actions carried out, initiatives implemented, their results and the performance achieved by Millennium bcp, during the year 2023, in the Environmental, Social and Economic and Governance dimensions, are presented. Specific information on the themes of Governance Model, Risk Management and Shareholder Structure can be found in the 2023 Annual Report in the Governance (and Corporate Governance Report), Risk Management and BCP Action sections, respectively.

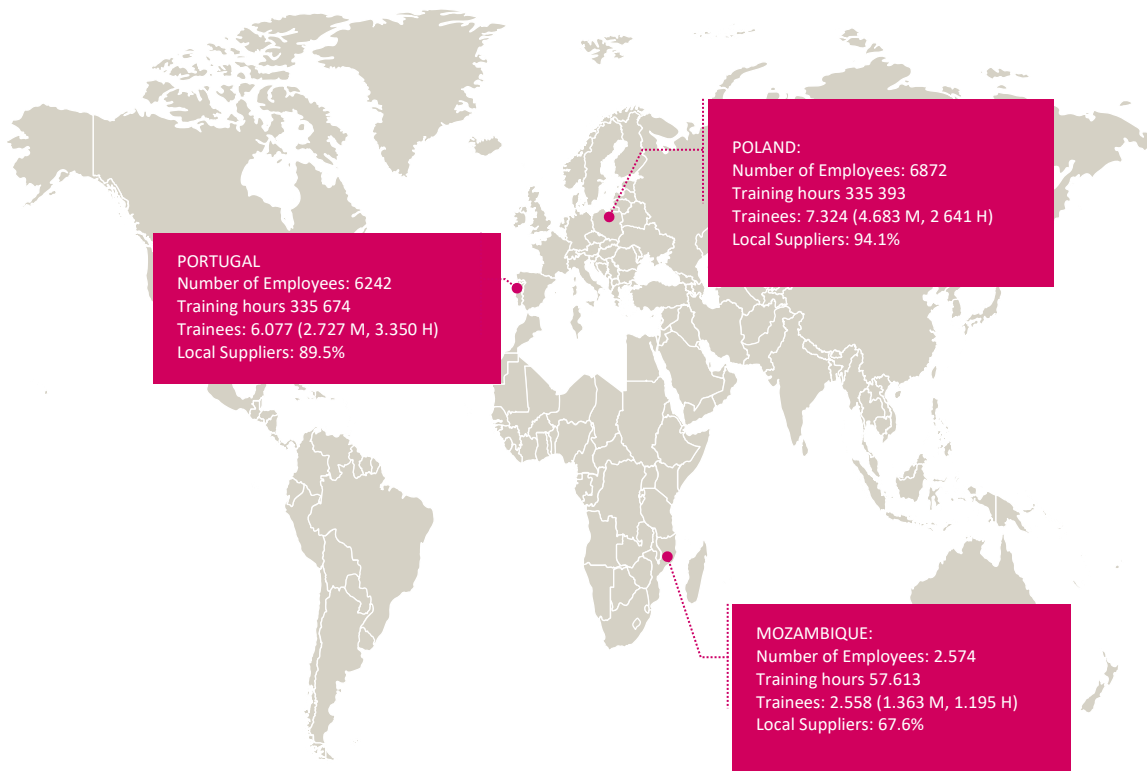



# Economic and governance responsibility



## Economic and governance responsibility

In all geographies where it is present, BCP Group has been developing its activity in a responsible manner towards Employees, Customers, Shareholders, Suppliers and remaining Stakeholders, always guiding its performance by the compliance with internal principles of rigour, the applicable legislation and the regulations issued by the supervision and regulatory authorities:

### Main highlights 2023



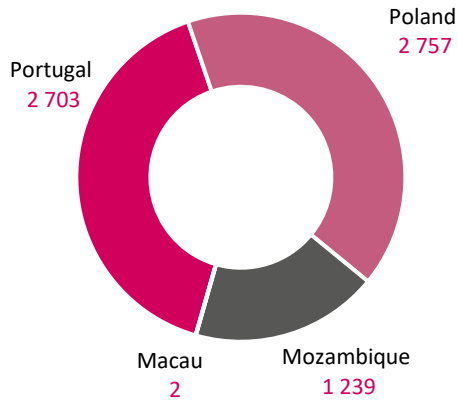
SDG	Our objectives	Our contribution in 2023
	Developing employees' personal and professional skills	<p><b>Stimulate training actions and skills development</b></p> <p>Initiatives:</p> <ul style="list-style-type: none"> <li><b>LEAD Development Program</b> - integrated management program (postgraduate) developed by ISCTE in partnership with Millennium bcp for leadership development, addressing themes such as: Servant Leadership, Assertive Communication, Agility and Change, Sustainability, Artificial Intelligence and Cybersecurity;</li> <li><b>Millennium Campus</b> - Bank Millennium's knowledge and skills development program, which aims to support the growth of innovation throughout the organization, through a series of lectures. In 2022/2023, the sessions were focused on the topic of security.</li> </ul> <p>Results:</p> <ul style="list-style-type: none"> <li>6,258 training sessions</li> <li>728 thousand training hours</li> <li>46 training hours per employee   Group BCP</li> </ul>

SDG	Our objectives	Our contribution in 2023
	<p>Strengthen the Bank's position regarding the promotion of gender equality and non-discrimination</p>	<p><b>Promoting gender equality</b></p> <p>Initiatives:</p> <ul style="list-style-type: none"> <li>• Signatory to the Commitment Agreement of the Organisations Forum for Equality (Igen);</li> <li>• Subscription of the WEPs (Women's Empowerment Principles) of the Global Compact UN</li> <li>• Stimulate discussion and reflection cycles aimed at women.</li> </ul> <p>Results:</p> <ul style="list-style-type: none"> <li>• 55% women in the total of employees</li> <li>• 31% women on the Board of Directors</li> <li>• 41% of women in Management positions (Executive Committee/Senior Management and Management): <ul style="list-style-type: none"> <li>○ 24% in Portugal</li> <li>○ 54% in Poland</li> <li>○ 27% in Mozambique</li> </ul> </li> </ul>
	<p>Promote financial inclusion products that support productive activities, the creation of jobs and entrepreneurship</p>	<p><b>42 jobs generated in Portugal in 2023 by offering microcredit</b></p> <p>Initiatives:</p> <ul style="list-style-type: none"> <li>• SAF packs (Financial Advisory Service) - contemplates solutions for restructuring and consolidation of credits, with the purpose of preserving the financial stability of individual customers.</li> <li>• Microinvest and Invest+ credit lines - to support investment projects for the creation of companies by the unemployed;</li> <li>• KFW credit line - aimed at Mozambican Micro, Small and Medium Enterprises (MSMEs), to finance investment in improving productivity and competitiveness and for job creation.</li> </ul> <p>Results:</p> <ul style="list-style-type: none"> <li>• 61 entrepreneurs supported under the support lines for business start-up projects by the unemployed.</li> </ul>
	<p>Protect labor rights and promote safe work environments for all employees</p>	<p><b>Promotion of a safe and secure workplace</b></p> <p>Initiatives:</p> <ul style="list-style-type: none"> <li>• Medical units and a dedicated medical staff on the premises;</li> <li>• In-House Medical Services, with specialties such as Nutrition, Clinical Psychology and Physiotherapy.</li> </ul> <p>Results:</p> <ul style="list-style-type: none"> <li>• 203 visits by occupational safety and health officers to the premises</li> </ul>

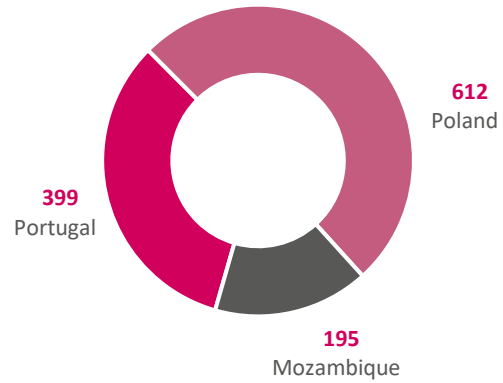
## Millennium Network

The BCP Group has its decision centre in Portugal and is the largest private Portuguese bank, counting in 2023 around 6.7 million active Customers served by a network of 1,206 branches. The international activity of Group Millennium is carried out by banking operations headquartered in affinity markets and in countries with a recognized growth potential – Poland and Mozambique - where it operates, under the Millennium brand, with 807 agencies.

**Active Clients**  
(thousands)



**Geographical decomposition of Branches**  
(Number of Branches)



Active Clients: First holders with, at least, 1 product with a balance > 50 cents, in absolute value and with card transactions in the last 90 days or with financial assets ≥ 100 euros.

Moreover, Group BCP also ensures an international presence by means of representation offices, branches, business protocols and business promoters.

**In 2023, Millennium bcp registered 6.7 million active customers, of which 2.7 million in Portugal**

“

## Accessibilities



 **Brazil**  
2 Representative offices

 **Portugal**  
398 Branches  
131\* 0 344

 **Poland**  
612 Branches  
137 91 261

 **Mozambique**  
195 Branches  
27 62 188

 **Macao (China)**  
1 Branch

 **France**  
Partnership  
Commercial protocols

 **United Kingdom**  
1 Representative office

 **Angola**  
Partnership

 **China**  
1 Representative office

 **Switzerland**  
2 Representative offices

-  Branches
  -  Branches with differentiated schedule
  -  Branches opened on Saturday
  -  Branches with access conditions to people with reduced mobility
  -  Representative offices
  -  Commercial protocols
  -  Partnership
- \* Consider branches of different networks that share the same physical space.

	 Customers (Thousands)	 Internet	 Call Centre	 Mobile Banking	 ATM <sup>(1)</sup>	 POS <sup>(2)</sup>
<b>Portugal</b>	2,703	486,476	424,462	1,381,654	1,878	97,145
<b>Poland</b>	2,757	1,935,879	233,374	2,442,272	506	3,986
<b>Mozambique</b>	1,239	13,547	1,769	854,809	465	9,496
<b>Macao (China)</b>	2	-	-	-	-	-

Note: Considered Customers/active users those who used Internet, Call Centre or Mobile Banking at least once in the last 90 days. Do not include AtivoBank Customers.  
<sup>(1)</sup> Automated Teller Machines.  
<sup>(2)</sup> Points of Sale.

The BCP Group seeks to be close to its Customers, providing diversified distribution channels – Branches, Internet, Call Centre, Mobile Banking, ATM (Automated Teller Machines) and POS (Point of Sales) – in order to respond effectively, flexibly and with proximity to the needs of Customers' contact with the Bank.

## REMOTE CHANNELS AND SELF-BANKING (active users)

	Internet	Call Centre	Mobile Banking	ATM (*)	POS (**)
Portugal	486 476	424 462	1 381 654	1 878	97 145
Poland	1 935 879	233 374	2 442 272	506	3 986
Mozambique	13 547	1 769	854 809	465	9 496
TOTAL INTERNATIONAL	1 949 426	235 143	3 297 081	971	13 482
<b>TOTAL OF THE GROUP</b>	<b>2 435 902</b>	<b>659 605</b>	<b>4 678 735</b>	<b>2 849</b>	<b>110 627</b>

Note: Those that use internet, the call centre or mobile banking at least once in the last 90 days are considered active Users. Does not include customers from AtivoBank.

(\*) Automated Teller Machines

(\*\*) Point of Sales (SIBS information)

As part of its social commitment, it promotes accessibility for people with special needs to the Bank's various contact channels: i) branches with access for people with reduced mobility; in Portugal, as well as in the Group's other operations, there is a policy of priority service in the entire branch network; ii) Internet with features that respect the recommendations issued by the Web Accessibility Initiative (WAI); in Poland, Bank Millennium was the first Bank to receive the certificate "Internet site without barriers" and iii) ATM, through the placement of equipment with facilities available for the blind, such as headphone connections and keys with programming for issuing vocal instructions. The Call Centre, available 24 hours per day in several languages - and Mobile Banking, for the rapid and easy access that they represent, are also privileged access channels for disabled or blind persons.

In Poland, the programme "Banking without Barriers" continues to be one of the main social programmes carried out by Bank Millennium. The idea of a bank without barriers, with products and services accessible to all, without exception, is not only a Corporate Social Responsibility programme, but also a philosophy of the organisation and an important component of the Bank's business strategy. It is with this reference framework and the use of innovative technological solutions that Bank Millennium has tried to eliminate infrastructural, digital and physical barriers, in access to financial and non-financial services.



Facilities at Bank Millennium for customers aimed at preventing the financial inclusion of people with disabilities:

Bank Millennium's website, Millennium's internet banking system and Bank Millennium's mobile application are constantly adapting to meet the needs of blind and visually impaired people. The contents of these websites are written in simple language that is easy for the user to understand and can be read by automated text readers. A visually impaired user can use the site with a keyboard - no "mouse" is required to navigate the website. In addition, the website has a text zoom feature and is designed for high-contrast reading.

This content, in line with the plain language index (PLI), is continuously monitored, and for digital content, the standard PLI is 60%.

Users with suitable devices can log in to the mobile app with a fingerprint or face scan. In 2023, customers also gained the ability to confirm transactions requested on the mobile app through biometrics. Our mobile app is tailored to the needs of blind and visually impaired people due to its compatibility with access-enhancing services such as Google TalkBack (Android) and VoiceOver (iOS) that allow the presentation of information through speech. Customers can also count on the help of a chatbot in the Bank's app.

Our 24/7 auto attendant can also serve as a valuable guide for daily banking. Customers can count on Milli's support on Bank Millennium's mobile app. It is able not only to greet and answer various questions, but also to make requests, such as sending an electronic transfer. The bank is working on solutions that use generative artificial intelligence, with the aim

of meeting the standards set by market-leading voice assistants such as Siri and Alexa.

The Bank conducts educational activities in the area of cybersecurity. The communication is addressed to a variety of client groups, including seniors, adolescents, parents of younger children, risk groups selected on the basis of risk profiles created at the Bank. On the website and other electronic channels, the Bank publishes alerts about new methods used by digital criminals. Besides educational activities, technical solutions are also being introduced to further protect customers from cybercriminals. In the fourth quarter of 2023, the Bank in Poland implemented a solution whereby a Bank Millennium employee can confirm their identity and verify that of the customer in the Bank's app during a phone call.

ATMs and deposit machines - people with motor disabilities can use the numeric keypad instead of the function buttons next to the screen, which means they don't need to reach very high. In addition, the ATM's numeric keypad makes it easier for visually impaired people to use the device as well. After the headphones are connected to the ATM, the user will be able to enter instructions via voice messages. In addition, people with visual impairments can use a special black-and-white screen mode to improve the contrast and readability of the messages displayed. 100% of Bank Millennium's own ATMs are customized to meet the needs of people with disabilities. In April 2023, the network of deposit machines expanded by a further 5,000 machines from the Euronet and Planet Cash networks.

Access to points of sale with architectural barriers - about 70% of the Bank's branches are accessible to people with disabilities. By modifying and modernizing its branches, the Bank is attentive to the elimination of architectural barriers, such as the chair-accessible service stations in these new Bank Millennium facilities.

Telephone service - customers using the Bank Hotline can use the voice command feature during the call, instead of using the telephone keypad.

Customers with special needs are entitled to receive the general terms and conditions of contracts and articles of association in formats that make it easier for them to familiarize themselves with their content, for example: a document prepared in large font, an audio file or a file prepared in Braille.

The Bank is also extending the idea of a barrier-free world to other areas in which it operates, i.e. in the patronage of culture. During Millennium Docs Against Gravity, Poland's largest documentary film festival, cinema films with audio description were made available to facilitate the visually impaired to access the world of culture.

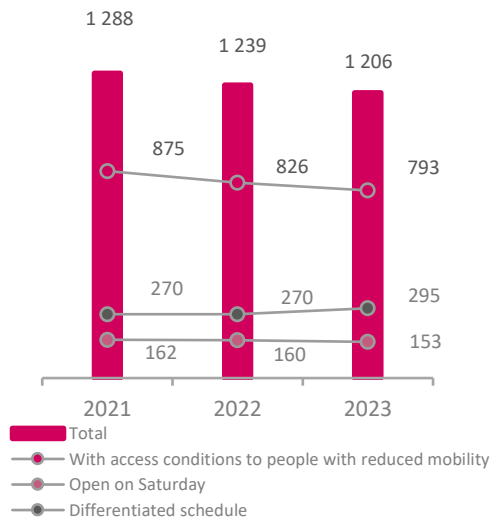
Bank Millennium is not only a financial services centre for Customers. It is also the first integrated access channel to other services, such as the mobile application, a solution where it is possible to buy municipal transport tickets, pay for parking or drive on the motorway without having to stop at toll gates. Electronic banking also allows customers to use their digital identity to establish remote contacts with government agencies.

Ukrainian citizens, residing in Poland, can find information in Ukrainian on the Bank's website and use a special hotline number, where they will be served in their language. Furthermore, they can fill out an online application for family benefits and receive communications in Ukrainian about important matters such as application deadlines and cybersecurity notices.

In the BCP Group, Mobile banking solutions, which in the whole of the BCP Group already have more than 4.6 million users (4.2 in 2022), continue reinforcing their role as the preferred channel for access to products, services and financial transactions.

The Branches continue to represent a relevant contact channel for many customers. In this context, BCP Group diversifies its opening hours in the different countries where it operates, responding to Customers' accessibility needs and requirements. Within this scope, we highlight the Branches that give access to disabled individuals, which correspond to 86% of the total network in Portugal and to 56% in the remaining countries. In Portugal, 131 branches have differentiated office hours going from 8.30 a.m. to 7.00 p.m. In Poland, the number is 137 branches (it was 84 in 2022) and in Mozambique 27 (28 in 2022). We must also mention the opening of Branches on Saturday, extended working hours that, abroad, can be found at a total of 153 branches (5 less than in 2022) representing in the case of Mozambique more than 40% of total.

### Branches accessibilities (Number of branches)



In Portugal, Millennium bcp continues transforming its branch network. The Customer Branch Experience 2.0 of Millennium bcp is an innovative approach focused on the client, made through a cultural change, the re-design of products and processes and the integration of digital channels.

In this new generation of Branches, paper continues to no longer be used and the formalization documentary of agreements is replaced by digital signatures through tablets; the treasury activity is available 24 hours a day with the smart transaction machines, the first to allow the automatic payment of cheques at any time, as well as withdrawals and deposits of coins. This equipment can also be used without a Multibanco card. The client only has to use the multichannel code provided by the Bank.

Apart from the technological innovation, the Branches also offer spaces especially devoted to

Customers, with lounge areas, free wi-fi, wireless chargers and areas providing digital experiences with access to the Bank's apps. The communication with the client is also innovative, with a digital price list and electronic advertising panels.

Within this context, the Bank already has 39 branches with this new layout in the entire country, a process that, within the context of the global renewal and modernization of the Branch Network, will be pursued during the next few years.

In addition, and since one of our commitments is the continuous improvement of access to digital information and use of online banking services for people with special needs:

- We have organized training on accessibility and its application on websites and Apps. These trainings were aimed at employees with digital-related functions;
- We continued with the accessibility assessment in the Millennium bcp Individuals App, with the aim of detecting points that need to be corrected in order to achieve compliance with the WCAG 2.1 double (AA) and maximum triple (AAA) criteria and, this way, facilitate the use by people with special needs;
- We observe accessibility principles based on WCAG (Web Content Accessibility Guidelines) in Millennium bcp's email communications, in order to facilitate the reading of customers with vision difficulties.

Also in Mozambique, as part of the initiatives to improve accessibility for people with physical limitations, Millennium bim has adopted specific measures, which include, in the branches, the installation of access ramps and doors and spaces sized to facilitate the movement of people with reduced mobility and, in the central services, the provision of dedicated toilets and elevators that allow access and mobility in these Bank buildings.



## Innovation

Material issue:

INNOVATION AND DIGITALISATION

The relationship between Customers and their Bank, and with Banking in general, has been changing significantly. This change has several origins and explanations, of which technology and the emergence of new players that open up new possibilities and options to bank Customers stand out.

The opportunity cost of not being part of this evolution movement, serving Customers in different segments with different needs, is still perceived as too high to be ignored by banks.

At Millennium bcp, the mobilisation of talent and the Bank's digital transformation, fundamental pillars of the strategic plan defined for 2021-2024, have made it possible to empower the Bank with tools, knowledge and new working methods that, combined, contribute to our ability to act and respond quickly and effectively to the challenges we face on a daily basis.

2023 was a year during which we continued to improve the mobile-focused digital experience, with increasingly efficient and innovative digital journeys, with new features and services and, reinforcing the communication strategy, increasingly personalized and targeted. The consistent investment that has been made in the App has allowed the consolidation of this channel as a central platform in the banking relationship with the Customer. The materialization of this option is reflected in the recurring leadership in the evaluation of banking Apps (IOS and Android), in which App Millennium scores 4.8, on a scale of 0 to 5, in both stores.

In Individual Customers, we kept the growth trend of the Digital Assets base, with a variation of 7% compared to the same period of the previous year, to which the growth of 11% of users of the App channel, which already represents around 86% of the total Digital Customers, contributed decisively.

This vision of the Bank's digital transformation includes different priorities, worthy of note in 2023:

- Accounts | it is now possible, through the App, to send a request to the employer with the account where the Customer intends to receive his/her salary; additionally, Customers can also subscribe to the salary anticipation;
- Digital Mobile Key | i) we made available the data update journey, with information collection via digital mobile key; ii) we have also made it possible to register in the App using the digital mobile key; and iii) we have improved the journey and enriched the offer when opening an account with a digital mobile key;
- Cards | new journey for ordering and issuing credit, debit and prepaid cards online with the availability of a digital version for immediate use;
- Mortgage Loans | i) launch of a new Mortgage Loan simulator, in which the advantages of applying for credit for sustainable properties are communicated. We reimburse 25% of the value of the dossier and set up fee (in the credit for purchase or construction), as well as the cost incurred in obtaining the new energy certificate (in the credit for works); ii) possibility of joining the 0% spread campaign;
- Manage | A new area has been created that allows a detailed view of cash inflows and outflows over time, with transactions organized into categories and information on future payments, for more effective management of finances and day-to-day operations;
- Investment & Savings | i) launch of the automated investment solution in the App, which represents a significant milestone in terms of sustainability. This product consists of an open unit-linked insurance and the investment in the funds that constitute it will favour those that aim to make sustainable investments or that promote, among others, environmental or social characteristics, or a combination of these, provided that the companies in which they invest respect good governance practices. Direct investment will follow a responsible investment process defined in such a way that the product contributes to a positive environmental or social impact or limits/mitigates negative environmental or social impacts; ii) with Apparte, Customers can make financial reserves for objectives that they define or to prepare for an unforeseen event and define the investment profile and the amount to be invested, with the Bank ensuring all investment management;
- Insurance | Móbis - Simulation and online subscription with availability of the provisional certificate at the time and the possibility of, at any time, being able to consult all information about the insurance; ii) Pétis - Simulation and online subscription of protection insurance for the pet dog or cat;
- Re-engineering of processes | new workflow solutions that allowed most of the requests addressed to the Millennium Operations Centre to be made through the service catalogue workflow, instead of using email and telephone, saving resources and reworking and promoting marked improvements in Customer Service levels. Currently, the existing service catalogue has about 771 services, of which 346 are used on a recurring basis. There are about 40,000 monthly requests that result in 150,000 individual tasks;
- Robotic Process Automation (RPA) | use of these technologies for the main credit operations, with a strong impact

- on energy consumption;
- Reducing local printing and digitizing processes | start of operations, with opening and registration directly in systems and applications, avoiding the physical circulation of documents;
- Support to the business of all Commercial Networks | through a more comprehensive model of contact management via chat - chatbot MAX -, for more effective responses on a 1<sup>st</sup> contact. MAX was a pioneer in the Bank for being the 1<sup>st</sup> Chatbot to use artificial intelligence, allowing the recognition of human conversation and providing an appropriate response to its users' doubts. In 2023, the impact was highlighted by the following indicators:
  - ✓ more than 4,100 active users;
  - ✓ over 550,000 questions answered;
  - ✓ 58% automation with answer on the first question;
  - ✓ more than 7,4000 chats served, with a churn rate of only 1%;
  - ✓ NPS with a service quality rating of more than 93 index points, out of a total of about 25,000 evaluations.

Continuation of the development of the ESG Data Platform project, which aims to implement a platform for aggregating the data underlying ESG reporting (e.g., Green Asset Ratio) and that also allows addressing business needs in the sustainability field (e.g., potential differentiation of communication or commercial conditions for operations that promote sustainability). This platform, which is based on an architecture that ensures a correct updating and centralization of data and will have a component available for automatic report generation, eliminating the need for manual intervention, will be launched in the first quarter of 2024.

In Poland, Bank Millennium is one of the leaders in innovation. Customers can choose between several payment methods without a card or wallet. They can make HCE, Apple Pay, Garmin Pay, Fitbit Pay and BLIK contactless payments. In 2023, this offer was complemented with Google Wallet and the availability of these solutions was expanded, including the availability of BLIK contactless payments to new customer groups (children and micro-businesses), and activation campaigns were organized. Customers can also withdraw cash from ATMs using a BLIK code.

Convenient and secure online payment methods have also been made available. The Bank's customers can pay for their purchases online with a BLIK code, by debit card and by defined transfer. In 2023, Bank Millennium, together with Polish Payment Standard, continued to work on a new service in the area of deferred payments - BLIK Płacę Później. Customers who shop online can take advantage of a purchase cashback program.

In 2023, customers gained additional BLIK services based on transfers to a phone number. This way, they can more easily settle accounts with family and friends thanks to the BLIK transfer request and invoice splitting feature.

Bank Millennium has been the most versatile organisation in the Polish financial market in implementing open banking solutions. The Bank offers the option to add accounts and request transfers from other banks; it also uses open banking in sales and acquisition processes (opening of individual and corporate accounts).

Customer experience is increasingly the factor that determines the advantage of one solution over others. For this reason, the Bank involves its Customers in the process of developing the design of digital solutions. The solutions that customers use on a daily basis in the mobile app and online banking system are also continuously improved.

## Information Security

Material issue:

CYBER-SECURITY, PRIVACY, AND INFORMATION PROTECTION

The information security programme implemented at the Millennium bcp is oriented towards the protection of information, taking into account its confidential nature, integrity and its availability, in accordance with legal and regulatory requirements.

Information is protected in a manner that is consistent with its importance, value and sensitivity so as to increase the BCP Group's resilience and ensure the protection of stakeholders, reputation and the activities for the creation of value.

The information security policy establishes the guidelines for the implementation and maintenance of the information security programme of Millennium bcp. It is based on a structured set of policies, rules of procedures and standards, aligned with international good practices, namely the regulation ISO/IEC 27001 - Information security management systems-Requirements and with the guidelines EBA/GL/2019/04- EBA on ICT and security risk management. The information security policies are approved by the Executive Committee (EC) and are revised every two years, or earlier if there are

changes in the internal environment that justify it.

This information security programme is oriented towards information security risk management and is supported by a set of fundamental general principles aimed at information protection, namely information security governance, human resources security, information security awareness, classification, protection and handling of information systems and communication security, security in application development and maintenance, information system access control, information security incident monitoring and response, security assessment of external service providers, information security risk assessment, and recovery capability. An information security risk management model is implemented with the integration of the results of the annual exercise into the Bank's operational risk framework, adapted to the Bank's business processes.

The Bank has an Operational Resilience Commission, dependent on the EC, that meets every two months with the objective of analysing cybersecurity metrics and providing visibility on the main relevant issues in this context. Among the different subjects covered, cybersecurity metrics stand out, including the cybersecurity rating, the vulnerabilities identified, the attempted attacks contained, the results of the continuous penetration testing process and the monitoring of attacks suffered by the Bank's customers.

To prevent, detect and mitigate intrusion attempts, illegal acts and new threats, the Bank has invested heavily in 24x7x365 security monitoring with the implementation of a Security Operations Centre (SOC) and a Threat Intelligence service, in the information security incident response process and in continuous and regular risk assessment processes of the information systems that support the business. Despite the high number of security events that are detected daily, during 2023 no information security incidents were recorded.

The Bank has a vulnerability management process that is supported in the execution of intrusion tests in continuous mode on websites and Apps exposed to the Internet and monthly vulnerability scans on the internal network, with the objective of detecting weaknesses, classifying and correcting them in accordance with a plan that prioritises their correction with SLAs (Service Level Agreement) defined according to the risk level.

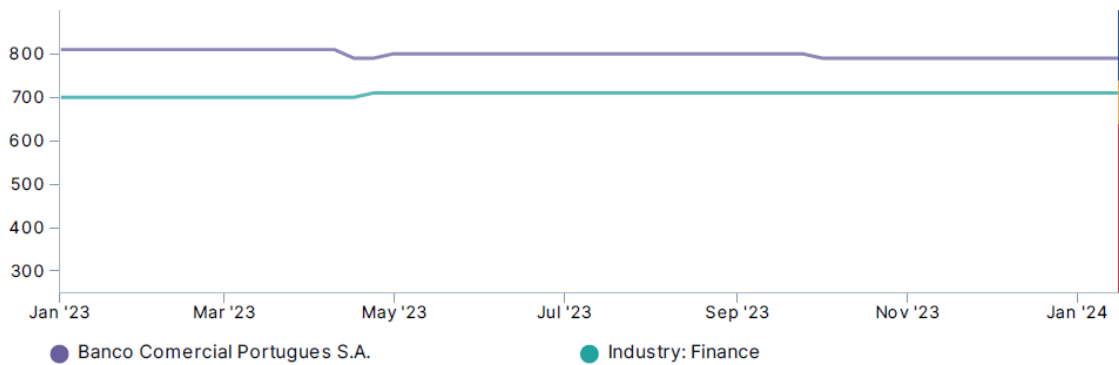
Considering that Information security is a responsibility of all, Millennium bcp promotes a regular process of information security awareness addressed to all employees and Customers of the Bank, covering a set of relevant items, namely the main information security policies and the risks and threats the Bank is subject to on a daily basis, within an approach based on practical examples of e-mail, Internet and phishing. In addition, simulated phishing and social engineering attacks are carried out aimed at Employees and outsourcers, to assess and reinforce the maturity level in information security, in order to build a more resilient and secure organisation. All new employees are targeted by the regular information security awareness programme.

The 2019/2022 strategic plan for information security was defined in order to strengthen the security defence bases and prepare the Bank to respond to the challenges that are expected, whether technological (e.g. AI) or regulatory (e.g. Tiber PT). Subsequently, the activities for 2023/2024 capitalize on the solutions implemented or consolidated in the previous strategic plan, (e.g. Next-Gen SIEM, Full EDR, Vulnerability Management, PAM, MIP & DLP; Security Awareness; Red Teaming) as support to obtain a more effective response and improve the Bank's resilience by leveraging on: i) advantages of artificial intelligence for automated threat detection and investigation by machines, simplifying complexity and accelerating responses; ii) understandable and actionable metrics through the generation of valuable information, which allows predicting situations, thus leading to more correct decisions in the area of information security; and iii) use resilience as a competitive advantage, through the concept of Minimal Viable Bank raising digital resilience and crisis simulations and wargaming (e.g. TIBER-PT and ECB Cyber Resilience Stress tests).

To reinforce the existing monitoring mechanisms, Millennium bcp joined the BitSight platform. This platform collects and analyses, in an ongoing manner, data on security behaviour and the implementation of the security measures of the associated companies, identifying signs of compromise (e.g. Infected machines, inappropriate configurations, incorrect behaviour by the users), to determine the BitSight security rating.

Companies are rated on a scale of 250 to 900, the ratings are updated daily and are available on the BitSight platform. The higher the classification is, more efficient is the company in the implementation of good practices in cybersecurity. The BitSight security rating enables obtaining an indication on global cyber security performance of the Bank and to compare it with the one from the Portuguese banking industry. During 2023, Millennium bcp consistently maintained one of the best cybersecurity ratings (790) of Portuguese banks.

The evolution of Millennium bcp's BitSight security rating over 2023 was as follows:



Additional reference to the business continuity management systems implemented in the BCP Group, through which the availability of the most critical business support processes and systems is ensured.

Main initiatives to increase security with data and operations carried out in digital channels:

- Several internal and external communication initiatives and practices were adopted, sending push notifications through the App, external emails, Bancomail and making available in the Bank's homebanking and internal portal, whenever necessary, alert articles for frauds/scams that are occurring at the time. In these communications, we address the form of attack, topics related to the safe use of Millennium bcp's digital channels, publish fake pages, fraudulent emails or SMS that aim to capture personal data, access and authentication codes, and provide a detailed explanation of how ongoing threats work;
- We produce short videos related to the safe use of digital channels explaining how cyber attacks can occur, how they spread, their common/usual characteristics, the behaviour they can adopt when accessing a banking website and the result obtained;
- We monitor a public fraudulent message box, of emails forwarded by customers and non-customers, which allows the identification and control of possible attacks, which are analysed by the internal areas responsible for security and information and allow the identification of phishing, fraud and scams and whether they affect the user's access to our digital channels, homebanking or App.
- We analyse phishing attacks and activate measures to mitigate fraud, implement security limits and blocks, in order to ensure the security of customers' assets in the use of digital channels;
- We collaborate with various external entities, such as the Associação Portuguesa de Bancos, Banco de Portugal, the Judiciary Police, the National Centre of Cyber security or Europol, in awareness campaigns on the security precautions to be adopted while using devices with an Internet connection in order to prevent frauds;
- We maintain an internal security awareness policy, which includes periodic training for the Employees of the Contact Centres to raise awareness on the theme "Security" in the internet, procedures to be adopted reported in fraud contacts and identification of needs and improvements to be adopted in the services made available by the Bank.

## Data protection and privacy

Material issue:

CYBER-SECURITY, PRIVACY, AND INFORMATION PROTECTION

Millennium bcp considers essential that its Stakeholders are aware of the rights they have for the protection of their personal data and the way according to which the Bank processes them.

The main instrument of this exercise is the Privacy Policy, which translates the Bank's commitment to (i) communicate in a transparent manner on the personal data it processes and under what conditions; (ii) ensure the security of personal data and the privacy of data subjects; (iii) provide the appropriate mechanisms for the exercise of the rights of personal data subjects; (iv) comply with the provisions of the General Data Protection Regulation ("GDPR") - and other applicable legislation, including national legislation that complements the GDPR; and (v) comply with the confidentiality duties arising from the Legal Framework of Credit Institutions and Financial Companies.

The processing of the personal data allows, among other purposes, the development and direct sale of products and services in order to better tailor the communications that are addressed to each Customer.

To this end, using mathematical and statistical models, we process personal data generated by the use of the Bank's products and/or services (e.g. data on contracted products or related to financial transactions and transactions carried out with means of payment made available by the Bank), with the purpose of assessing the profile of Customers and building consumption patterns based on their transactionality in any of the Bank's channels, thus determining the propensity of Customers towards such products and/or services - and also towards other products and/or services of a similar nature - with the aim of customizing the offers communicated to them according to their preferences, in the context of the financial activity and insurance mediation that the Bank pursues.

### - Internal Communication

Aware of the vital importance of the proper use, control and security of the data we manage, we have developed a set of training initiatives aimed at our Stakeholders, in particular the Bank's employees. Hence, in 2023, we maintained our internal dissemination and awareness initiatives on topics related to Privacy, Security and Data Protection, of which we highlight: (i) the regular publication of universal informative content, for all employees, or functionally directed, for the commercial areas, on corporate communication platforms; (ii) the launch of another edition of the "Learn and Win" competition, a pedagogical challenge on essential aspects of Data Protection; and (iii) sending a quarterly newsletter to publicize ongoing projects, opinion articles, testimonials, tips and good practices and other related news.

### - Mystery Client

In the course of 2023, 4 waves of "Mystery Client" took place, with a total 1,391 visits to Millennium bcp branches. These actions aim to evaluate the behaviours in the Customer service in the branch, within the scope of Privacy, being examples of aspects under observation the following:

Were there any documents in sight that exposed customer data or other information, unrelated to this service?
Was the monitor used by the Employee visible at any time, exposing information from other customers or other information not related to this service?
Has the Employee ever been absent leaving the computer unlocked?
During servicing, did the Employee have parallel conversations, face-to-face or by phone, exposing information on third-party matters (customers or not)?
Have you been asked for unnecessary personal information regarding the topic of the service provided?
In addition to the aspects mentioned above, was there any behaviour on the part of the Employee that felt to jeopardize the privacy (yours or others') during the service?

## - Training

As part of formal learning processes, the Data Protection Course (e-Learning), in its 2023 edition, in Portugal, allowed to strengthen and update the skills in these matters of 7,088 employees and outsourcers.

In 2023, in Portugal, 7,088 employees and outsourcers received training on Data Protection

In the reinforcement of the skills of the members of the Team responsible for managing the theme at Millennium bcp, we should underline the IAPP (International Association of Privacy Professionals) certifications, such as: (i) Certified Information Privacy Professional - Europe Regulation (CIPP - E); (ii) Certified Information Privacy Professional Manager (CIPM); and (iii) Fellow of Information Privacy (FIP).

Also in this process of continuous training, the GDPR participated throughout the year in training events and knowledge sharing forums. These opportunities to acquire and share information allowed the reinforcement of the knowledge and the increase of the Team's skills, ensuring the ability to respond to the strong evolution of trends and applicable legislation, as well as preparation for new challenges and approaches, such as Artificial Intelligence, namely:

- EU Digital Markets - Technology, Business and Regulation - Católica Faculty of Law, multidisciplinary course that integrates the latest developments in the technological, economic and regulatory fields;
- European Data Protection Congress 2023, promoted by the International Association of Privacy Professionals - IAPP, data protection professionals gathered to share knowledge on the latest developments in data protection legislation and operations;
- AI Governance Global 2023, the first global event on AI governance, promoted by IAPP;
- TrustWeek Tour, promoted by OneTrust, a provider of applications to support data protection activity, to disseminate new features and solutions, share experiences and disseminate good practices.

Within the framework of the reference corporate regulations, we approved and published in 2023 the Principles of Personal Data Processing and Protection/Privacy Policy, which can be consulted here:

[https://ind.millenniumbcp.pt/pt/Institucional/sustentabilidade/Pages/cod\\_internos.aspx](https://ind.millenniumbcp.pt/pt/Institucional/sustentabilidade/Pages/cod_internos.aspx)

## Shareholders

At Millennium bcp, the Investor Relations Division is the unit responsible for ensuring an honest, transparent and continuous relationship with the Bank's Shareholders and Investors, Analysts and Rating Agencies, as well as with financial market participants in general and respective supervisory entities.

The activity of the Investor Relations Division is characterized by:

- ensuring a rigorous, effective, and accessible relationship with investors and analysts, as well as with the financial markets in general and the respective regulatory authorities, especially in relation to the disclosure of inside information and other mandatory information, including the production of the Bank's Annual Report;
- monitoring updates in the composition of the shareholder structure;
- managing contacts established with the Rating Agencies, including the preparation and provision of regular information relevant to or related to significant events, as well as clarification of issues on profitability, asset quality, capitalization, funding and liquidity, among other;
- represent the Bank in conferences and other types of events targeted at investors in shares or BCP debt.

In 2023, as in previous years, the Bank carried out extensive market communication activity, in accordance with applicable legislation and in line with the regulator's guidelines. Millennium bcp has published more than 220 notices to the market, including the publication of more than 75 notices in the CMVM's information dissemination systems (now the Electronic One-Stop Shop), on Euronext Lisbon and also on the institutional website, in the Investors area. Of these, about 30 refer to privileged information.

To comply with the legal requirements for financial reporting, the Bank discloses information relating to its earnings and activities, including the Annual Report and Accounts, the Half-Year Financial Statements and the Interim Reports and Financial Statements. Together with the Annual Report, the Corporate Governance Report, under the responsibility of the Company Secretary Office, and the Sustainability Report, produced by the Sustainability Division, are also approved and published.

Millennium bcp provides a space to its shareholders, the "Millennium bcp Shareholder", through which it intends to be

closer to the holders of stakes representing its capital. Through the Millennium bcp Shareholder, the owners of shares of Banco Comercial Português, deposited in Portugal, may establish a closer communication with the Bank where they invested. Apart from being able to subscribe available products and services at preferred conditions, they also gain access to benefits and discounts agreed with the Bank's partners.

In 2023, 297 discount vouchers were issued within the scope of the 154 established offers/ partnerships.

The access to Millennium bcp Shareholder is free of charge and is hosted in a specific area of the website millenniumbcp.pt.

## Employees



In line with the Sustainable Development Goals (SDGs) of the United Nations.

Material issue:

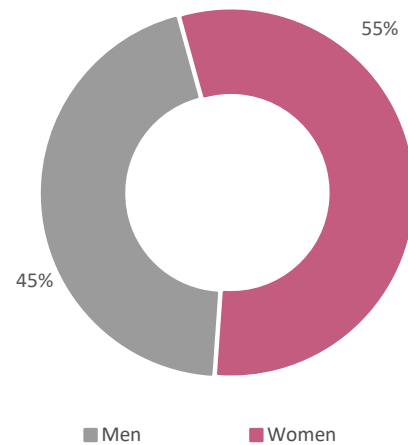
ATTRACTING, DEVELOPING AND RETAINING TALENT

GRI 405-1

Group BCP gives to all its employees a fair and equal treatment, with equal opportunities, promoting meritocracy in all stages of their professional careers, defining the remuneration of the employees in accordance with his/her category and degree of compliance with the established goals and the salary ratio of 1:1 between men and women with comparable functions, levels of responsibility and professional paths.

The general principles ruling the BCP Group contain values and performance guidelines applicable to all employees resulting in an express orientation so that, regardless of their hierarchical level or responsibilities, all Employees act in a fair manner refusing any discrimination but also in the reaffirmation of the alignment with the ten Global Compact Principles, according to which the Group recognises and supports the freedom of association and the right to the collective negotiation of work contracts and rejects the existence of any form of forced and mandatory work and of child labour.

Breakdown by gender  
(Percentage)



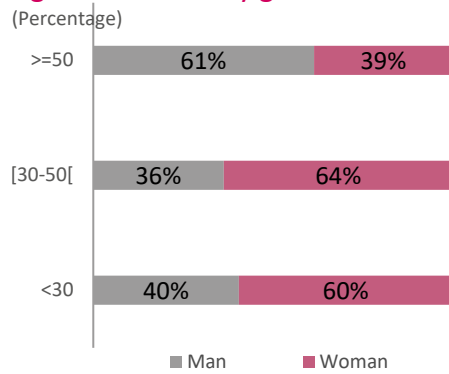
In the context of Human Rights, the BCP Group prevents the risk of violations of these rights, among other mechanisms, by making it compulsory for its employees and partners to subscribe to the Code of Conduct, in which this issue is regulated, as well as allowing anonymous reporting of violations in this regard (see "Human Rights" section).

The commitments undertaken by the BCP Group within the scope of human rights, labour conditions and equal opportunities are also enshrined in the corporate policies, of which the policies on (i) Human Rights, (ii) Diversity and Equal Opportunities and (iii) Occupational Health and Safety are an example. These policies are available for consultation on the Bank's website, in the Sustainability area:

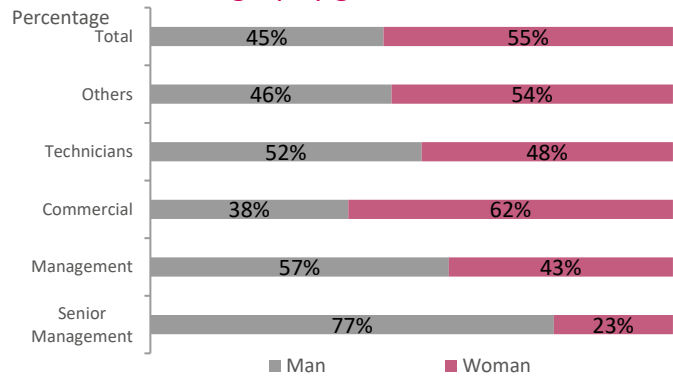
[https://ind.millenniumbcp.pt/en/Institutional/sustainability/Pages/internal\\_cod.aspx](https://ind.millenniumbcp.pt/en/Institutional/sustainability/Pages/internal_cod.aspx)

Within the scope of the gender diversity of the Board of Directors, in 2023 BCP had 31% women in its composition.

### Age breakdown by gender



### Professional category by gender



Still within the scope of gender diversity in Management functions (Executive Committee/Senior Management and Management) in 2023, globally, 41% of these functions were performed by women - 24% in Portugal, 54% in Poland and 27% in Mozambique. In commercial functions, this figure increases to 62% in the Group, i.e. 50% in Portugal, 75% in Poland and 61% in Mozambique.

The promotion and guarantee of equal opportunities, namely in what concerns gender parity, is present in all actions developed by the Bank and translates into a balanced flow of recruitment and comparable professional progression opportunities and is patent in both the Gender Equality Plan that the Bank published annually and in the Strategic Plan "Superação 24".

Millennium bcp is also a signatory to the Commitment Agreement of the Organisations Forum for Equality (Igen). This Forum, promoted by the Commission for Equality in Labour and Employment (CITE), aims to encourage its members to implement concrete and tangible actions to ensure gender equality. In fact, since 2017 we have actively participated in the various actions of the iGEN Forum, namely in the monthly meetings of the Task Force and the 2 working groups (GT) to which we belong (GT2- Gender Equality Measures and GT4-ADN iGen).

In 2020, Millennium bcp joined the Women's Empowerment Principles (WEPs) of the United Nations Global Compact, an important international platform for promoting gender equality. The Bank is also a member of its Steering Committee in Portugal, promoted by the Portuguese Global Compact Network.

Bank Millennium, reaffirming its commitment to respect and promote diversity among Customers and Employees, is one of the companies signing the Diversity Charter of the European Union, coordinated locally by the Responsible Business Forum, having integrated, in 2023, the "Europe's Diversity Leader 2024", a ranking prepared by the Financial Times and Statista.

- Gender Equality Measures;
- Management indicators regularly monitored;
- Strict application of the Remunerations and Promotions Policy;
- Increased participation of the gender less represented in the programs for the development of Leadership competences;
- Recruitment of new employees using gender diversity and wage equality criteria; and
- Work-Life balance support.

For the tenth consecutive time, Bank Millennium was awarded the title of **Reliable Employer** of the year. The award is given to companies that care about safety and working conditions, as well as the development of employees. The objective of this program is to select the best employers in Poland, that is, business entities with an exemplary Human Resources policy, which translates into high quality of products and services provided in the demanding Polish market.



In 2019, Millennium bcp had already subscribed the “CEO Guide to Human Rights” an initiative from the World Business Council for Sustainable Development (WBCSD) and from the Business Council for Sustainable Development (BCSD Portugal).

In 2023, BCP was included, for the fourth consecutive time, in the Bloomberg Gender-Equality Index, joining the group of companies worldwide that stand out in the implementation of practices and policies of gender equality, diversity and inclusion.

Millennium bcp undertakes active social responsibility policies to comply with the legal provisions that promote equal opportunities and rights in terms of gender, sexual orientation, culture, ethnicity or religion, and also in terms of the positive inclusion of people with disabilities with a disability degree equal to or greater than 60%. Towards a more diverse and sustainable organisation, we continue to remove barriers to the recruitment of people with disabilities.



In Poland and Mozambique, in addition to the offer of products and services directed at Women, initiatives are also developed, such as debates and reflection cycles, on the positioning of Women in society, in the economy and in companies.

As part of the strengthening of proximity mechanisms between employees and senior management, in addition to visits by members of the Executive Committee to branches and central services, regional meetings were held with Employees.

In Portugal, we once again carried out the Organizational Climate Questionnaire, aimed at all employees of the Group working in Portugal and representative offices, which in 2023 registered a record participation of 88.4%, which reflects the strong involvement of employees in the life of the Organization.

The average of the Global Indicators reached 75 points and satisfaction with the area where he/she works stood at 78 points. In terms of satisfaction with the hierarchy, the excellent evaluation achieved of 83 points stands out, as a result of the investment that has been made in Leadership programs.

In Mozambique, in order to measure the levels of satisfaction and motivation of Employees, an online survey "Organizational Climate Questionnaire" was also carried out, one of the main instruments of the Employee Satisfaction Management System, which once again had a high participation rate (91%).

There was an improvement in the vast majority of global satisfaction indicators, with a significant increase in satisfaction as a bank employee (+6 points), which reached 70 points. Also noteworthy are the good results of the satisfaction indices with the hierarchy and with the Organic Unit, with 78 and 74 points, respectively.

## Portugal

### Employee management and recruitment

Millennium bcp's Human Resources Management focuses on providing the organization with the appropriate talent for the organization's strategic initiatives, so in 2023 the priority was to ensure that the purpose of leading the transformation of the business in Portugal, in a very demanding regulatory context, is accompanied by the reinforcement of the sustainability, technology and digital teams, as well as control areas.

From an approach point of view, the Bank remains committed to recruiting young people with high potential to train and develop as a way to ensure sustainability in the rejuvenation of teams and the transfer of critical business knowledge.

In addition to attracting and developing young talent, the Bank has made a strong investment in the requalification of its staff in order to ensure a lifelong learning of each Employee, leveraging their experience.

Consolidating a culture of meritocracy is a permanent objective in the management of people, and the Bank has continued to recognize those who stand out for their performance, responsibility and potential.

## Talent Attraction

According to the new cycle of Millennium bcp's Strategic Plan, which includes the mission of accelerating the transformation and strengthening the positioning for the future, preparing to face and overcome the challenges inherent to the macroeconomic framework and the competitive context of the sector, attracting and retaining talent continues to be a priority. In this sense, throughout 2023, the Bank built an integrated value proposition aligned with the interests of university students with a vocation for innovation, critical thinking and a taste for banking.

We have carried out in-house and on-campus events and partnerships that have strengthened the commercial areas and especially the STEM (Science, Technology, Engineering and Mathematics) areas, contributing to achieving the goal of leading the transformation of the business in Portugal and strengthening the Bank's control areas. In 2023, Millennium bcp carried out 225 external recruitments, with an average age of 27.1 years, which signals the attractiveness that the brand has with the younger workforce.

These actions make it possible to build the bridge between the academic world and the business reality in the development of critical skills for the future professional life of students, regardless of the path they may take, and we believe that it is through a privileged and close contact with the Universities, where the generations of the future are "manufactured", that Millennium bcp launches and establishes the connection with the talent it intends to capture. It is also a cause of social responsibility to the extent that, by establishing synergies and partnerships, through Education, with Higher Education Institutions that share common objectives, it allows to open doors to the development of skills and knowledge in a real context.

Among the initiatives carried out in 2023, we highlight:

- The most notable event was the first edition of Make IT - a datathon (data science marathon) with the aim of positioning the Millennium bcp brand in the IT/Data Science market as an attractive employer - which took 42 students from 4 different universities to the final at the Bank's facilities: Universidade de Lisboa, Universidade de Coimbra, Universidade Nova de Lisboa and Universidade do Porto, from where the winning team came out (see more detailed information in the section on Training);
- Also for the first time, Millennium bcp became a partner of Magma, which allowed it to participate and preferentially access the profiles of participants in 10 events with relevant higher education institutions, such as Instituto Superior Técnico, Faculdade de Ciências e Tecnologia da Universidade Nova, Instituto Superior de Economia e Gestão, among others;
- Finally, the Bank once again participated in the FEP Master Challenge and in the events with students of QTEM (Quantitative Techniques for Economics and Management), of which it is a corporate partner, and which has allowed contact for selection purposes with students from Faculdade de Economia do Porto for various positions, namely in the areas of control and related;
- Direct and punctual actions with the Professional Opportunities Offices of some of the Faculties that allowed, for example, the realization of short-term and professional internships.

The new employees identified under several of the initiatives mentioned above are subject to the selection process that promotes, from the outset, equal opportunities and respect for inclusion.

## Career Development Programs

In addition to investing in training and skills development listed in the Training section, the Bank has invested in monitoring young talents in a close and personalized way, reflected in several dimensions.

From the outset, we have a careful onboarding process from the point of view of communication, from the selection process to the 24 months of seniority at the Bank, allowing for a positive and consistent employee experience.

Employees and Interns with the greatest potential are monitored by their Human Resources Manager in a regular and systematic way, which implies regular individual meetings in the first two years within the organization, allowing to align expectations and provide a faster and more successful integration.

Finally, in 2023, the Bank relaunched the figure of the Patron, with the aim of being a reference figure and a source of inspiration for the Employee, who can share his/her vision and help to better understand the Bank's main challenges.

## Inclusion and diversity programs

In 2022, Millennium bcp and APSA - Associação Portuguesa de Síndrome de Asperger (Portuguese Association of

Asperger's Syndrome) signed a protocol for the inclusion of their members in the labour market, which remains active.

With this partnership, and within the framework of the commitment to law No. 4/2019, that establishes the employment quota system for people with disabilities (with a degree of disability equal to or greater than 60 percent), Millennium bcp intends to help respond to the challenges that the inclusion of people with disabilities poses for everyone and to benefit from the opportunities it creates, namely by valuing the skills and potential of young people/adults who fit the profiles sought by the Bank.

The Inclusive Community Forum (ICF) is a Nova SBE initiative dedicated to the lives of people with disabilities, in which Millennium has an active participation, both through the working group meetings and the "Vencer no Mundo do Trabalho" (Winning in the World of Work) Training.

By being more inclusive, Millennium ensures a greater variety of points of view and an organization that is increasingly more diverse and sustainable and increases the number of talented employees.

## Gender Equality

The promotion and guarantee of equal opportunities, particularly on gender parity, embodied in both the Gender Equality Plan that the Bank publishes annually and the "Superação 24" Strategic Plan, is present in all the actions developed by the Bank.

Since 2017, we have actively participated in the different actions of the iGEN Forum (Forum of Equality Organizations) promoted by CITE (Labour and Employment Equality Commission), namely in the monthly meetings of the Task Force and the 2 working groups (WG) to which we belong (WG2- Gender Equality Measures and WG4-iGen DNA).

## Poland

Whereas in Bank Millennium the recruitment processes are based on internal regulations supported by specific IT systems, in order to guarantee quality, efficiency and transparency in recruitment and selection.

The Bank uses different solutions to select and recruit high potential candidates in the market. Most processes are carried out by the Human Resources Division based on passive and active recruitment methods. For special projects, the Bank relies on the support of external recruitment agencies.

Employer Branding activities are a crucial part of the Bank's activity and are dedicated to 4 groups of potential employees:

- Students and Master's/PhDs;
- IT specialists;
- Sales force;
- Experts and back office specialists.

We are constantly working to reach the widest possible audience of talented external candidates, which is why we are present at selected universities, conferences, job fairs, recruitment websites and social networks.

For candidates with no work experience, we offer internship opportunities through our Summer Internship Program. It is important to us that young people entering the labour market and focusing on professional development are able to realise their plans at our bank and build competence capital for the future. The aim of the programme is to promote the Bank as an employer and to increase interest in banking careers. In 2023, Bank Millennium guaranteed 36 students and recent graduates selected in the recruitment process to carry out internships of 2 or 3 months during the summer holidays. Interns learned new skills in 14 different divisions. The internship program was preceded by carefully planned promotional activities that strengthened the Bank's position as an attractive employer. In addition to receiving attractive salaries and individual development guidance from their supervisors, the trainees were invited to participate in trainings and, after the end of the internship, some of them received a job offer at the Bank.

In 2023, Bank Millennium continued its cooperation with renowned universities, including the Warsaw School of Economics and SWPS University of Social Sciences and Humanities. As a member of the Partner Club of the Warsaw School of Economics, Bank employees actively participate in meetings with the Council of the WSE Partner Club, in which the university's strategy and the possibilities for training students in skills relevant to the labour market are assessed. The Bank, as a teaching partner of the computer science course at SWPS University of Social Sciences and Humanities, presents students with practical solutions in the field of User Experience. This cooperation enables the Bank to better prepare professionals for the job and attract talent. Through its presence and involvement in universities, the Bank strengthens its image and builds brand loyalty among students and graduates.

The Bank's employees regularly and actively participate in academic events such as job fairs, conferences, debates or workshops, where the Bank presents itself as a stable and modern organisation.

Once again, the Bank has become a partner of the 2023 edition of "Pontes Económicas" (Economic Bridges), a nationwide project implemented by the SGH Student Government and the Economic Universities Forum. The main objective of the project is to integrate the academic communities of business schools in Warsaw, Kraków, Wrocław, Katowice and Poznań and to build partnership relationships between academia and business. The projects offer students the opportunity to participate in workshops, case studies, inspirational talks, and to meet with experienced entrepreneurs.

Between March and May, the Bank participated in seven trade fairs in Warsaw, Wrocław and Kraków, organized, among others, by Absolvent Talent Days, Pracuj.pl, Warsaw University of Life Sciences, Warsaw IT Days, Warsaw University Faculty of Management and Gdańsk. Recruiters share information about internships or jobs, present a wide range of career opportunities in a variety of fields, and talk about the recruitment process itself.

The Bank enjoys sharing its knowledge and has had the pleasure of taking on the role of partner and conference attendee to gain knowledge and find professional inspiration. In 2023, Bank Millennium participated in two conferences dedicated to Java software and the Microsoft Azure cloud. The meetings were aimed at architects, researchers, Cloud and Big Data experts, as well as university students and young people interested in the IT industry. Our experts were speakers at the conference. The main objective of the presentation was to show modern Java programming techniques and Microsoft Azure "cloud" solutions. Attendees were able to see how the Bank uses modern technologies and modern programming best practices.

The Bank takes advantage of the communication opportunities provided by social networks, such as LinkedIn and Goldenline, and popular image and recruitment portals, to reach candidates efficiently, with information about the benefits of working for the Bank and a more effective promotion of job offers.

## Mozambique

Millennium bim also recognizes that employees are one of the fundamental pillars of the business and sustainability strategy. Active talent management is crucial and, therefore, policies and practices are implemented that promote the professional growth of employees and contribute to a productive, sustainable and ethical work environment.

In 2023, Millennium bim hired 236 Employees, with a balanced distribution between genders: 114 Women and 122 Men. In terms of attraction, recruitment and selection of talent, the 5th edition of the People Grow Program stands out, which included 11 young talents, recent graduates and high potential finalists. This program combines hands-on learning with rotations in various areas of the Bank and specific training, fostering a diverse talent base that is prepared for future challenges.

In 2023, Millennium bim reinforced its commitment to teaching in Mozambique, by offering summer curricular internships for students and recent graduates, and establishing partnerships with Universities, which resulted in the awarding of prizes for students who completed courses with distinction in various educational institutions. At the same time, Millennium bim has strengthened its links with the main universities.

These initiatives demonstrate our strong commitment to education, diversity and professional development, a key component for organizational and social sustainability.

In 2023, as part of the Employees' management and career development strategy, programs focused on the accelerated development of skills and leadership were launched, of which the following stand out:

- "Talento Millennium bim" | Millennium bim, in partnership with Nova SBE, trained 27 high-performance and high-potential employees through an accelerated skills development program for about 18 months and more than 200 hours of training. This initiative aims to prepare Employees for the new paradigms, reinforcing our organizational resilience.
- "Líder MBIM 4.0" | this program, which in previous years covered top management and Employees with first and second line functions, was extended in 2023 to Employees with branch management functions and team coordination at the level of central services.

Recognizing the importance of employee motivation and involvement in the Bank's success, in 2023, a series of initiatives

aimed at increasing employee satisfaction and commitment were implemented at Millennium bim:

- ✓ To promote team cohesion and reinforce the sense of pride and identification, end-of-year get-together events were organized in all provinces, from North to South of the country. These events included dinners and moments of cultural entertainment, providing employees with the opportunity to celebrate the year's successes together, thus strengthening team spirit and involvement with the organization;
- ✓ With a significant percentage of female employees, we promote the celebration of diversity, through specific actions for Mozambican women, emphasizing our cultural values and recognizing the vital role of women in the leadership and growth of organizations;
- ✓ We reinforce our commitment to employees' families by offering activities and programs that involve their children. These activities, which include solidarity actions and donations to orphanages, in addition to the offer of children's books, aim to strengthen ties with the community and transmit the values of Mozambican culture.

These initiatives are an integral part of our commitment to creating a motivating and inclusive work environment, where every employee feels valued and an essential part of Millennium bim.

**The BCP Group aims to lead the digital and sustainability transformation of the banking business, through (best) talent**

“

## Training

GRI 404-1

The development of the personal and professional competences of the Employees is one of the Bank's priorities considering the need to ensure its ongoing alignment with the strategic goals defined by the organization. Seeking to promote excellence in the relations established with Customers, the Bank recognises the importance of ongoing training to ensure business sustainability and endeavours to provide its Employees with the tools necessary for the execution of their activities.



In overall terms, in the Group, 6,258 training actions were ministered, corresponding to more than 728 thousand hours of training, with an average of 46 hours (45 in 2022) per employee. Throughout 2023, the training effort maintained its focus on the commercial areas, but also on the technical, operational, sustainability, compliance and team management areas.

In Portugal, Millennium Banking Academy continued its development and training programs with the intention of supporting the Bank in its mission and in the progress of the strategic plan.

The main objective was to develop a new pace of transformation in the organization, which requires a strong capacity for adaptation and innovation, essential aspects to continue to thrive. To keep up with these changes, an agile, collaborative leadership mindset and a people-centered leadership culture are essential.

On the other hand, it is necessary for each employee to acquire a very clear vision of the organizational purpose, and at the same time be able to define their individual purpose. We supported leaders in managing teams, strengthening social and emotional skills to ensure effective collaboration and developing resilience in employees.

Thus, we gave special emphasis to Leadership Development Programs, boosted training in the areas of digital and invested in strengthening the Talent Integration and Development Programs. We also continued to invest in training in the technical areas of sustainability, compliance, auditing, legal and normative in light of the sector's demanding regulatory framework.

To promote a culture of learning and co-responsibility of all employees in their own development, we have implemented several initiatives, namely:

- ✓ we redesigned the user experience of the learning platform, making it simpler, more intuitive and with easier access to training courses;
- ✓ we launched a new App that allows all employees to take training courses via mobile devices; and
- ✓ we have expanded the training offer available with new online learning platforms.

Through the Digital Academy, launched in 2019, we also sought to expand the ability of employees to work in a digital environment and develop technical and cognitive skills, such as problem-solving and critical thinking, which ensure that they respond to the need to redesign processes and innovate. The total number of training hours carried out by headcount employees in 2023 was 335,674 (+2.4% compared to 2022).

By adapting the demand and supply to the different groups in the universe of the Bank's Employees: the Tech - from the areas of development, architecture, cloud, security and data -; the Business - from the areas that develop new business solutions -; the Ingenious - young people from the technical areas - and the Millennials - all the other Employees -, we continue to invest in the appropriate behavioural and technical training for the different needs, (i) to increase digital literacy (learning for all), we launched the *DigitalMente* section (30-minute videos on the Bank's technological projects and on the latest digital developments in the market), new e-Learning and webinars on how to use and monetize current digital tools (Smartphones and Office 365) and (ii) to increase technical skills and expertise in core topics and technological ones, we have started a partnership with UDEMY - an online learning platform with a wide range of courses in the different technological and behavioural areas - all so that our Employees are even more capable to respond to current and future challenges.

## TRAINING

	2023	2022	2021	VAR.% 23/22
<b>NUMBER OF PARTICIPANTS <sup>(1)</sup></b>				
In-person	14,719 (W 59%, M 41%)	58,453	38,878	-74.8%
E-learning	417,291 (W 65%, M 35%)	409,711	482,801	1.9%
Remote	83,081 (W 57%, M 43%)	47,545	59,882	74.7%
<b>NUMBER OF HOURS</b>				
In-person	82,783 (W 59%; M 41%)	176,784	124,408	-53.2%
E-learning	402,731 (W 58%, M 42%)	366,785	447,928	9.8%
Remote	208,122 (W 58%, M 42%)	117,053	154,061	77.8%
<b>PER EMPLOYEE</b>	<b>46 (W 58%, M 42%)</b>	<b>45</b>	<b>45</b>	<b>2.2%</b>

<sup>(1)</sup> The same Employee may have attended several trainings.

### Development Programs

#### LEAD Program

In October 2023, we started the LEAD Development Program at ISCTE with 21 Employees. It is an integrated management program (postgraduate) developed by ISCTE in partnership with Millennium bcp for leadership development. The LEAD Program (Lead, Understand, Act and Decide) includes 12 modules in a total of 140 hours of training and addresses topics such as: Servant Leadership, Assertive Communication, Agility and Change, Sustainability, Artificial Intelligence and Cybersecurity. In 2023, the trainees participated in 5 modules of the Program, representing 1,057 hours of training.

#### Líder Millennium Program

The *Millennium Líder* Program, which began in November 2022, continues to run with the aim of supporting Leaders in their role and challenging them to develop the necessary leadership skills to keep up with the new pace of transformation and the demand for adaptation and innovation.

The Program is aimed at all hierarchies of the Bank (Commercial Network and Central Areas), with modules adapted to different needs and sharing of good practices on topics that address (i) Giving Feedback, (ii) Conducting Conversations with 2, (iii) Motivating, (iv) Delegating Effectively, (v) Being Accountable, (vi) Recognizing and (vii) Managing my time between people and business. To reinforce these themes, 7 webinars (MLíder Talks) were held, with external experts: “Quebrar os silos. Liderar a transformação” (“Break down the silos. Leading transformation”), “(Re)carregar motivação” (“(Re)charge motivation”), “Conseguir resultados: Influência” (“Obtain results: Influence”), “Why Mindset?”, “Diversidade: Gerações side by side” (“Diversity: Generations side by side”), “Desafiar o nosso futuro” (“Challenge our future”) and “Comunicar é criar ligação” (“Communicating is creating a connection”). Between June and October, 4 leadership workshops, lasting 1 day, on Emotional Intelligence, and 1 workshop on Generational Diversity “Building Bridges”, were held, in partnership with Nova SBE University.

A total of 1,008 leaders participated in this program, corresponding to a total of 4,767 hours of training.

#### inGenious Program – young talent development

In January 2023, the closing session of the 4<sup>th</sup> edition of the inGenious Program took place, training especially aimed at the development of young talents, with the presentation to the Executive Committee of the projects developed by these teams to respond to challenges across the organization.

In September, we started the 5<sup>th</sup> edition of the program, which featured 88 young talents from the Bank's technology, analytics, investment and financial areas. An initial session was held with the hierarchies of the participants to present the program, and a workshop on generational diversity, “Building Bridges”, in partnership with Nova SBE, with the objective of demonstrating the complementarity between the different profiles existing in the organization. The inGenious program will last for 9 months, at the rate of 1 week per month. From October to December 2023, inGenious young people had the opportunity to get to know the bank's main areas, develop their networking and behavioural skills, in areas such as

Emotional Intelligence, MBTI and Design Thinking. The multidisciplinary projects, fundamental to the Bank's activity, were also initiated, which in this edition will be developed in the Design Thinking methodology, with the support of consultants. Until June 2024, they will continue to develop their soft and hard skills, with technical training appropriate to each profile.



Between October and December 2023, a total of 3,022 hours of training were invested in the program.

#### Digital Academy

The objective of this front is to build a business-oriented digital vision, in specific areas, and to train the employees of the Commercial Networks in the new tools for interaction with Customers.

The Digital Academy was launched in 2019 to respond to the training needs with a view to reskilling and upskilling employees, and was structured to adapt the training offer to different groups of Bank employees with different needs: Tech - from the technology areas (development, architecture, cloud, security and data) -; Business - from the areas that develop new business solutions and Millennials - all remaining Employees.

To respond to the emerging challenges of these populations, in 2023, we continued to invest in behavioral and technical training appropriate to the different needs, to increase digital literacy (learning for all) and increase technical skills and expertise in core and technological topics.

Throughout the year, we held (i) 4 new webinars under the heading *DigitalMente*, on the Bank's technological projects and on the latest digital developments in the market, (ii) we increased the number of accesses to the online learning platform UDEMY Business, which offers a very comprehensive range of courses in the areas of technology, we continued to carry out training actions, namely in the areas of microinformatics, data, development and also in agile work methodologies, through Scrum certifications.

#### SAS Academy

As part of the development of technical skills necessary for the function, training courses are held in SAS, with the opportunity for certification for Bank employees who are part of areas of high technical demand in the area of data. The SAS course includes sessions in e-learning format, mentoring, live web and certification exam. In 2023, 39 trainees completed 1,072 hours of training.

#### Microsoft Information Protection (MIP)

Microsoft Information Protection (MIP) is a Microsoft technology solution that aims to classify and protect information. MBA made an e-learning course available to all employees, interns and outsourcers in order to make known the MIP tool, its various labels and how to apply them. This one-hour training, of a mandatory and transversal nature, corresponded to 5,644 hours of employee training.

Thus, in 2023, in global terms, at Millennium bcp, 43,853 hours were invested in training in the digital area (20,931 hours in 2022), with a total of 6,077 participants registered in training initiatives, mostly in format and -learning.

## Onboarding Programs

In order to integrate and ensure the appropriate training for each person at the right time, the Millennium Banking Academy continued to invest in onboarding programs to reinforce the behavioral and technical skills needed by those who arrive or change functions.

#### Leadership Onboarding

Preparing the Bank's future leadership remains one of the priorities, taking into account market demands, in times of high volatility and high turnover. At the beginning of their role, we give the opportunity to the new Leader to develop their behavioral skills, through self-knowledge and effective knowledge of the team (Myers-Briggs Type Indicator - MBTI), to know and develop the behaviours that are expected of them as a Leader, "Ser Líder Millennium" ("To Be a Millennium



Leader"), and to prepare for the moments of interaction with their Employees, "Momentos de Verdade" ("Moments of Truth"), through the sharing of experiences and good leadership practices.

After the initial training, the participant joins the Millennium Leader Program and the specific training programs, appropriate to each segment.

In 2023, 60 new Leaders (47% women; 53% men) were trained, for a total of 966 hours.

#### Onboarding New Retail Network Functions

##### a) Branch Managers

As part of the Leadership Training Program, and for the hierarchies of the Retail Commercial Network, the Onboarding Training took place in March 2023 with specific content of a behavioural nature, culture of rigor, commercial systematics, Customer experience, pricing decision and risk analysis (Individuals and Business). There were 11 recently appointed Branch Directors who valued the applicability of the themes, the proximity of the trainers and the exchange of experiences.

##### b) Prestige Platform (Customer Managers and Branch Managers)

We have created a training roadmap for those who arrive in the segment with immediate availability of courses in e-learning format on the most relevant topics for the role, complemented with face-to-face training moments on: 1. Programação para o Sucesso (Programming for Success) (NPL); 2. Escrever com persuasão (Write persuasively); 3. Propósito e Felicidade (Purpose and Happiness).

Two editions of this program took place in 2023 (March and November, with a total of 49 participants). Evaluation of excellence on the usefulness and applicability of the contents, as well as on the intervention of the trainers.

##### c) Business Platform (Customer Managers and Business Branch Managers)

This program has a segment-specific technical training component on specialized credit products, digital offer and customer risk analysis and a behavioural component. In 2023, an edition of this program was held in March, involving 13 new Business Managers.

##### d) #1 Customer Experience Certification Program (Prestige & Business)

This program addressed the pillars of customer experience and service choreography (ROUTE), included a training day and an individual certification role play for the application of the knowledge acquired. It takes place at the beginning of each year.

In 2023 we involved, in addition to the new Managers, other employees who had not yet completed this training, namely Branch Managers. Thus, between January and April, we had a total of 88 participants, of which 30 were Branch Managers. At the end of the program, a synthesis of the strengths, areas to be developed and recommendations was made, very useful for the development of the business and employees.

#### New Employees Onboarding

Continuing the onboarding process for new employees (permanent or intern), in 2023 we carried out:

- Three Welcome Sessions in the face-to-face format and with the presence of the Executive Committee, where new employees are invited to learn more about the Bank's strategic vision and values, and challenged to some group activities highly valued for the conviviality and exchange of experiences they provide. In February, May and September, we gathered a total of 262 new employees and interns.
- The training for the Commercial Network that involves the Employees who are part of the branches and Pontos Ativo (Ativo branches) has a total of 7h30 divided into: 1. Customer Service and Sales; 2. Phone Sales; 3. IT Applications. The objective is to provide interns with technical and behavioral skills for interaction with the Customer. In 2023 we had a total of 5 editions (February, April, June, September and November) to which was added a specific one for Summer Interns. In total, 260 employees and interns participated.

In addition to these sessions, all employees and interns must also complete a training course transversal to all Employees, Millennium bcp Training, which includes several training courses in e-learning format that includes the courses Code of Conduct, Sustainability, Safety and Hygiene at Work, Data Protection, Information Security, Importance of Data Governance, Anti-Money Laundering and Counter-Terrorism and Microsoft Information Protection (MIP).

Employees of the Commercial Networks also have a specific path that includes courses in e-learning format necessary for the performance of their duties, including certifications in Mortgage Credit, Insurance, MiFID and Credit Intermediation for the employees of the ActivoBank Commercial Network.

Also noteworthy is the creation of e-learning training on PAB, an application to support treasury transactions of the Retail Network, and the review of the remote course on Good Treasury Practices.

## Welfare and Social Responsibility

### Training within the scope of Inclusion

In 2023 Millennium bcp held *Vencer no Mundo do Trabalho* (Winning in the World of Work) Training sessions for two more classes, continuing the contribution to the community that arose under the Inclusive Community Forum (ICF), promoted by Nova SBE.

This training aims to promote key concepts that improve the social skills and employability potential of people with disabilities. In these sessions we train good practices with exercises that contribute to personal and professional success of the trainees. The training is given to two people: people with disabilities and the technicians who accompany them. In the two classes held, the associations Novo, Pais em Rede Delegations of Aveiro and Sintra, Casa de São Francisco de Assis (former Casa do Gaiato de Lisboa), APSA, CADIM, CMC Dep. Employability were represented. A total of 17 trainees were covered (and respective Technicians). Between and after the training sessions, workbooks were sent to the participants, in order to facilitate the assimilation of the concepts worked in the virtual room. In addition to videos and exercises, the training includes a practical section on preparing for a job interview.

### Happiness Training

The subject of Happiness has aroused more and more interest in the organization, as it allows to strengthen the social and emotional skills of Employees with a reflection on the well-being and performance of the teams.

Thus, as of May 2023, we started the Purpose and Happiness module in a face-to-face format, with a duration of three hours for the Central Areas distributed over 12 training classes.

We also introduced the Purpose and Happiness module in the Prestige Onboarding Program in the 2<sup>nd</sup> half of 2023, having held two training sessions aimed at Prestige Branch Customer Managers and Managers.

The weblive Happiness module continued to be worked on within the scope of the Ingenious Program and at the beginning of 2023 in the B#1 Prestige Program aimed at Branch Managers, Customer Managers and Assistants.

334 Employees participated in the Happiness Training sessions, totalling 889 hours of training.

## Legal Certifications

### MiFID II Certification

In 2023, we continued the process of training and certifying the knowledge of Employees for the provision of investment information and advice, within the scope of the Markets and Financial Instruments Directive II.

This directive entered into force on 3 January 2018 and introduced changes in the functioning of the markets, aiming at greater investor protection, more transparency in the sale of financial instruments and the elimination of conflicts of interest. This training aims to ensure that all Employees of the Commercial Networks and some of the support areas have the appropriate knowledge for their activity.

CMVM Regulation 3/2018 establishes in Article 2 - Qualifications, in its item 3, that the financial intermediary (Bank) ensures the continuous training of its Employees through the attendance of annual training actions with a duration of no less than 30 hours, in the case of those who provide investment advisory services or portfolio management services on behalf of others, or 20 hours, in the case of those who provide information to investors.

In 2023, the renewal of MiFID II certification was carried out during the 2<sup>nd</sup> half of the year, in the two areas, information provision and advice (investment advice), safeguarding respectively the minimum hours of training in each area.

In the case of the annual renewal of MiFID II Certification - Provision of Information, it corresponded to the courses on

sustainability impact in MiFID II, basic notions of Macroeconomics, financial markets, financial intermediation activity and investment services, ethics and conduct in the marketing of financial instruments, market crimes and preventive control and mitigation measures, prevention of money laundering and terrorist financing and sustainable finance and MiFID II, with an estimated time of 20 hours of training.

Regarding the annual renewal of the MiFID II Certification – Advice (Investment Advisory), it corresponded to the same courses chosen for the provision of information, plus the courses on disclosure of information on sustainability in the financial services sector, product governance and sustainable finance, duty of adequacy and portfolio management theory, with an estimated time of 30 hours of training.

The total number of employees involved in the MIFID II Certification and Annual Renewal processes was 3,731, which corresponded to 96,719 hours of training.

#### Credit Certification

Certifications in Mortgage Loans and Credit Intermediation are mandatory training for the entire financial system, in accordance with DL No. 74-A/2017 of 23 June and DL No. 81-C/2017 of 7 July, respectively, covering all Employees involved in the preparation, sale and conclusion of credit agreements and the associated services usually offered.

A total of 2,234 hours of training were carried out in the scope of the certification of Mortgage Credit Commercialization and Credit Intermediation by 112 employees.

#### Insurance Certification

In compliance with Regulatory Standard 6/2019 of 3 September and the requirements in terms of Insurance Certification, we continued our efforts to ensure the certification and updating of the knowledge on insurance matters of all Employees with PDEAD - People Directly Involved in the Activity of Insurance and Pension Fund Distribution. In this context, 58,470 hours of training were carried out for 3,628 employees.

#### Euro Banknote and Coins Knowledge Course

Millennium bcp conducts e-learning training courses on the euro banknote and coin and their security features, aimed at employees who handle cash, courses that fully meet the training requirements and objectives required by Banco de Portugal.

The course on euro banknotes has a 6-hour duration and includes the following modules: Characteristics of banknotes; Genuineness checks; Fitness checks and damaged banknotes. 1,346 employees completed this training, for a total of 8,076 hours.

The training course on euro coin knowledge has an average duration of 2 hours with the following modules: Characteristics of coins; Checking genuineness; Unfit coins for return to circulation. 873 employees completed training, for a total of 1,746 hours.

### Other Training Programs and Actions

#### Code of Conduct

In November 2023, MBA made available a new version of the e-learning "Code of Conduct", aimed at all employees, outsourcers and interns. This course aims to recall the set of fundamental principles and values of professional ethics that, on a daily basis, should govern our performance. By December 31, 2023, 2,930 employees had completed the "Headcount" course, corresponding to as many hours of training.

#### B#1 Prestige

Started in April 2022, the B#1 Prestige Program, aimed at employees in the Prestige segment, ended in April 2023. The objective of this initiative was, based on a diagnosis of individual needs, to develop skills and techniques and behaviours with a focus on the Customer, and 14 themes were made available throughout the year, including e-learning and synchronous training in teams. The final balance was very positive: more than 600 employees involved, 4,000 courses completed and 6,000 hours of training.

#### M Mais Forte (Stronger M)

To reinforce the knowledge of employees in the commercial areas, a knowledge test is carried out in each commercial cycle (4 times a year) that addresses ongoing campaigns with visibility, priorities by business segment and topics related to digital channels, complaints and customer experience. In 2023, 2,896 Retail Network Employees took the knowledge test, for a total of more than 10,000 hours.

#### Goodhabitiz

In order to boost and develop a culture of continuous learning, take advantage of micro-learning and the advantages of online learning, in February 2023 we made available to ActivoBank the Goodhabitiz learning platform that offers more than 100 courses in the area of personal development. Throughout the year, we developed several initiatives to launch and promote the courses on this platform. The final balance, both in terms of the number of users and the comments collected, led to the decision to extend the platform to all Millennium bcp employees, which will occur in early 2024. In 2023, 128 courses were held on this platform, corresponding to 421 hours of training.

#### Duties of Assistance and Information to Consumers in Mortgage Credit

In compliance with a determination by Banco de Portugal, in October we launched an e-learning course aimed at the entire Commercial Network, which is mandatory and aims to strengthen employees' knowledge of the obligation to comply with the Mortgage Credit Information Duties. In total, 2,661 employees completed the course, which is now part of the training paths for the different functions of the Network.

#### SelfBankers Certification

With the motto "Todos somos SelfBankers" ("We are all SelfBankers") and the objective of making the most of and keeping the Network's machine park operational, training began in June 2023 for the first group of employees selected to take the SelfBankers Certification. The Program took place between June and October and had several phases: 1. Training in e-learning; 2. Self-assessment test of knowledge; 3. Preparation meetings; 4. Final Certification Test. A total of 1,779 employees of the Mass Market Network completed the certification course, corresponding to 17,790 hours of training.

#### Higher Education Incentive Program

As part of the incentive to the permanent development of the Employees' skills, Millennium bcp provides, in certain situations and where the relevance to the functions performed by the Employee is demonstrated, the payment of external training or co-funding of academic qualification actions.

In 2023, 26 Employees participated in this program.

#### Control Areas Training (DAU/ROFF/COFF)

The Bank's Control areas participated in various technical trainings, namely on internal fraud, operational risk and SREP (Supervisory review and evaluation process). These trainings aim to respond to a demanding training plan and comply with guidelines from supervisory entities and corresponded to 931.5 hours of training.

#### Board of Directors Training

In 2023, the training plan for the integration of new non-executive Directors was continued. At the same time, training was held on Remuneration Policies, Sustainability and Cybersecurity, aimed at all members of the Board of Directors. These training sessions allowed 100 hours of training to be carried out.

#### Other Initiatives

##### BUSINESS ROUND TABLE PORTUGAL - PRO\_MOV – Lab Sales

The labour market is changing radically. A change accelerated by the green and digital transition, which is calling into question many of the existing professional functions and requiring new skills. To face this challenge and get a place in the job market, the Portuguese, like millions of workers around the world, will have to update their skills (upskill) or convert their knowledge by acquiring new qualifications (reskill).

The PRO\_MOV Program is one of the lever programs in the requalification of unemployed people with a professional qualification/experience less adjusted to the current needs of a changing labour market. This Program has the active participation of recognized companies in various sectors of economic activity in Portugal. Millennium bcp is present in two

laboratories: Sales and Digital.

In 2023, we continued our participation in the Skills Reskilling Program PRO\_MOV through the Sales Lab. We received three trainees for on-the-job training for three months, one of whom stayed to work at DBD (Direct Banking Division). It is planned to scale this initiative in 2024, substantially increasing the number of participants in this program.

#### MAKE IT

In 2023 we bet on a new initiative, a Data Science competition for finalist students from four of the best Portuguese Data Science Universities. This initiative had two main objectives - Brand Awareness (to reinforce the Millennium bcp brand in the IT/Data Science market as an appealing and attractive entity) and to Attract Top Talent (to attract talent in Data Experts). 36 teams and 128 students competed in the university phase, with a €1,000 Prize for the Winners. In the grand finale, held at Tagus Park, with a data science challenge to solve in 24 hours, 12 Teams competed (the 3 best teams from each University), in which the winning team received a prize of €5,000 and prizes of €2,500 and €1,500 were also awarded to the second and third place teams respectively. With this initiative, the Bank was able to create a strong impact on young university students and leave a positive mark on their academic career, and in the meantime, several participating members have joined the Bank in Professional Internship and some have already assumed contractual functions.

In 2023, at Millennium bcp, in Portugal, pursuing a strategy that always guarantees more and better training, but also that accompanies the Bank's digital transformation, the objective was to increase the reinforcement of skills on digital topics (more than 5 hours of training per worker).

With an average of 7.0 hours of training per employee on digital topics recorded in 2023, which compares to the average of 3.5 hours in 2022, we increased training effort by 110%, achieving the objective proposed for 2023.

In 2024, the objective will be to continue to ensure an average of more than 5 hours of training per employee on digital topics.

In Poland, the bank also continued to invest in the training of its employees always with the purpose of developing technical and behavioural competences, able to improve quality and efficiency in the work developed and in the compliance with the goals of Bank Millennium, always in line with its corporate values.

Bank Millennium continues to organize training and coaching programs, which cover all employees, with actions focused preferably on responding to internal or external regulatory requirements, such as topics such as health, safety and hygiene at work, data protection or information security, as well as promoting training programs on management, sustainability, leadership and various conferences.

Most relevant trainings held in 2023:

#### Millennium Campus

Knowledge and skills development program aimed at supporting the growth of innovation across the organization. The participation offer in this program is aimed at all employees, allowing them to look at many issues from a different perspective. The lectures are held online, while the recordings and supports are made available on the training platform and via intranet within the scope of the "Millennium World". In 2022/2023, lectures related to safety topics were held.

#### Development Fridays

Program that aims to enable the exchange of knowledge and experience among Bank's employees. Speakers include experts who share their knowledge and experience through lectures, content that is available online.

#### Training for employees of the Corporate Banking Division

Employees working in the area of corporate banking have participated in several training courses with the aim of updating their qualifications and expanding their knowledge on the evolution of products and procedures, including sustainability matters. The most important trainings focused on the investment credit process, a new module of the credit process management system and changes in the conditions for opening and operating accounts.

#### Training for employees of the Direct Banking Division

In this segment, mention is made of the following trainings: 1) specialized introductory training for new employees; 2) Quality Philosophy workshops; 3) sales techniques: "Oferta ativa" ("Active offer"), "Trabalhando com números" ("Working with numbers"); 4) consolidation loans to improve product knowledge and sales; 5) insurances "APK em conversa com o cliente" ("APK in conversation with the customer"); "Empréstimo sob proteção" ("Loan under protection"); 6) customer service workshops: "Júniors", "Jovens adultos"; (Young adults); 7) "Torne-se um Mentee" ("Become a Mentee") development - a course that prepares experienced employees to provide support through a dedicated internal line - ; and 8) "Academia de Talentos" ("Talent Academy") project - use of MS Office and CC tools in a manager's work, "Planeamento de trabalho - cronograma" ("Work planning - schedule"), "Feedback eficaz" ("Effective feedback"), "Execução de workshops" ("Workshops execution"), "Linguagem simples" ("Plain language").

#### First Aid Training

In 2023, we organized a series of first aid trainings. Interested employees had the opportunity to participate in on-site first aid training (at the Bank's headquarters in Warsaw, Gdańsk and Wrocław) and short online briefings conducted by qualified rescue teams cooperating with SEKA. In addition, we also proposed workshops for the children of our employees. The project was received with great interest and aimed to spread knowledge on how to safely administer first aid in life or health-threatening situations.

In 2023, several training sessions were also carried out for employees of the Branch Network, Regional Directors and Corporate Banking Account Managers.

#### Managers Certification

Training program for the managers of the sales outlets in the Bank's own network. The following stages are part of this program: The ABC of the manager contemporary, Targets, Development, Motivation and Team Training.

#### Development training for point of sale managers

A training programme has also been carried out to support managers in further developing their skills. In 2023, the first of the scheduled training actions - "Autogestão no Tempo" (Self-Management in Time) - was launched.

Overall, in 2023, Bank Millennium, in Poland, provided 335,393 hours of training, more than half in the form of e-learning sessions, and 7,324 employees were trained (4,683 Women and 2,641 Men). Most of the training courses focused on topics related to the sale of products and services and *Compliance*, with a focus on anti-corruption policies and procedures.

In Mozambique, the year is marked by the 6<sup>th</sup> year of activity of the Millennium bim Academia (MBA). This corporate training academy, the first of a Bank in Mozambique, has the mission of developing, in an environment of continuous

learning and sharing of knowledge, professionals with an ethical sense, with a technique of excellence and rigour in action.

Training is also a strategic pillar at Millennium bim, with 57,388 hours of continuous training invested in 2023 (equal distribution between men and women). The year was marked by a focus on operational rigour, through mandatory training on subjects such as code of conduct, money laundering, cybersecurity and operational risk.



The training of the Employees of the Commercial Network was also one of the fundamental pillars, having carried out several training actions on products and services, as well as behavioral training, which aim to leverage excellence in Customer Service.

In addition, digital training stands out, where the collaboration with technological partners in the provision of approximately 1,000 hours of specialized training, aimed to promote innovation and sustainable competitiveness. This initiative has allowed a greater dynamization of the learning process of the employees of the technology teams, enabling the realization of training actions more adjusted to their needs.

The onboarding of New Employees is also one of the vectors of the Millennium bim Academy, with the aim of ensuring knowledge of the guidelines that guide the banking activity from the moment they join the Bank. In 2023, 195 new employees participated in the training. In this initial training, the following topics stand out: Operational rigour; Products and Services, Excellence in Customer Service, as well as training on the essential tools to carry out your daily work.

This investment not only drives innovation and competitiveness, but also fosters a culture of continuous learning, which is essential for the sustainability of Millennium bim.

## Evaluate and recognize

GRI 404-3

At BCP Group, the individual performance assessment models, based on a process of counselling and guidance towards the development of skills, gives rise to opportunities of dialogue between the senior staff and their Employees, enabling the further deepening of a culture of personal accountability for the development of their careers.

In Portugal, the individual performance appraisal system implemented by the Bank - M Performance - is based on an annual system, with the following steps:

- Definition of Objectives, taking place at the beginning of the year, where the objectives for the year ahead are agreed between managers and employees;
- Mid-term Meeting, to be held in September and October, where an analysis of the degree of achievement of the defined objectives is carried out, and the actions that are necessary to correct any negative deviations that may exist are defined. At this stage, objectives that have become inappropriate due to the evolution of the function and tasks performed by the employee since the beginning of the year can also be adjusted;
- Annual performance evaluation, a stage in which the employee carries out his/her self-evaluation and the manager performs the evaluation, followed by the advisory meeting with the employee, where he/she presents and justifies his/her evaluation and suggests improvement actions. After the meeting, the employee should indicate their agreement or disagreement with the evaluation and, if desired, record the comments. Evaluations that merit disagreement from employees are reviewed by the next level manager and reported to the Director in charge of the area. This evaluation system has two components: one for the evaluation of behaviours, including those related with sustainability, which is equal for all Employees and is worth 30%, and another for the evaluation of objectives, personalized, which is worth 70%.

At the same time, a quarterly evaluation model was developed with the 360-degree methodology that is applied in the areas of digital development, where each employee evaluates their team co-workers and his/her manager. The manager evaluates all members of the Team and is also evaluated by his or her own manager. At the end of the process, each employee receives information with the average rating of their team co-workers and the rating of his/her manager. Managers receive information with the average rating of their team's employees and their manager's rating. The dissemination of this information aims to identify each employee's strengths and points for improvement, in order to define and execute improvement plans, in a logic of continuous development. This evaluation system is exclusively behavioural, that is, it only evaluates behaviours and not objectives.

The performance appraisal cycle (M Performance) completed in 2023 continues to deserve a good level of appreciation by the vast majority of stakeholders, evaluators and evaluated, evident in the satisfaction rates with the process.

	Evaluators	Evaluated
Total Responses	833	4,174
Very satisfied	33.97%	28.94%
Satisfied	50.78%	49.74%

In Portugal, along with performance evaluation, the M Development, which already has 5 editions, continues to be a fundamental tool for employees to express their professional desires and aspirations and actively contribute to their development. By means of this tool, the employees express their training needs or development of specific skills, depending on the professional development they envision. Sharing the desires for change or evolution allows promoting a more efficient management of employees' expectations.

Together with a constant attitude of encouraging the appreciation of workers, excellent performances are stimulated and rewarded, among other ways, via i) merit-based promotions; (ii) distribution of commercial incentives; and iii) attribution of annual variable remuneration. It is always weighted the balance between the stimulation of individual performance and the recognition of an excellent result and the harmony with a sustainable risk profile, in the present and in the future.

The identification of the performances to be rewarded is based on the performance evaluation or on commercial objectives of general knowledge, following transparent rules that promote alignment with the Bank's strategy.

The commercial incentives system is intended for Employees of the Commercial Networks (Retail, Private, Companies, Corporate, Large Corporate and Ativobank) as , well as Employees of other Divisions of the Bank who meet the indicated criteria (Investment Banking, Treasury Markets & International, Credit Recovery, Specialised Recovery, Real Estate Business and Specialised Monitoring) and consists in assigning a variable remuneration based on the contribution for the earnings.

Besides, and together with the incentives systems of the commercial networks associated with business results and the variable remuneration in central areas, Millennium bcp keeps a transversal recognition program, denominated Millennium People.

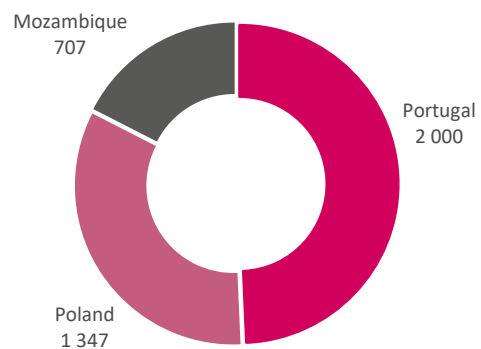
In 2023, 21 Employees were recognized in the annual categories, 21 Employees in the Millennium Impact category, 67 Employees in the Millennium Excellence category and 3 Employees in the Millennium Trainer category.

**Millennium Impact:**

The Millennium Impact award honours Employees with hierarchical functions at the first and 2nd level of the structure who have led projects and or teams in a decisive way for the Bank's success in the period under analysis. It is the Executive Committee that selects the Employees to be rewarded.

**Millennium Excellence**

**Promotions**  
(Number of Employees)



It is always weighted the balance between the stimulation of individual performance and the recognition of an excellent result and the harmony with a sustainable risk profile, in the present and in the future.



This category rewards individuals who have made exceptional contributions and who, due to their attitude, have had a relevant impact on the results of the teams in which they are inserted. The selection is made by the Coordinating Manager and the eligibility criterion is to be at the top of the performance evaluation in the last two years.

#### Millennium Trainer:

This category intends to value and recognise the Bank's Employees who make exceptional contributions as Instructors at the Millennium Banking Academy, making a sustained contribution to the sharing of knowledge, good practices and distinctive attitudes. Among the trainers who contributed the most to the hours of training provided, in class or via e-learning, will be identified and awarded the three instructors best evaluated by the trainees.

In addition to the Recognition Awards, with an impact on the motivation and visibility of the best performing employees, at the end of 2023 Millennium bcp, in Portugal, carried out another wave of the employee satisfaction survey, which registered a record response rate of 85%. The dimensions of leadership and commitment record very favourable indicators, but Divisions with scores that show opportunities for improvement will be challenged throughout 2024 to develop action plans with specific initiatives to address team feedback.

In Mozambique, Millennium bim, the evaluation process occurs annually and allows a continuous, systematic and objective assessment of the performance of the employees, contributing to their professional development and allowing the necessary information to be obtained for effective coaching.

In 2023, with the involvement of several areas of the Bank in this country, we implemented significant improvements in the process, making evaluations more objective and based on clear criteria, which is essential for the development and growth opportunities of employees.

In Poland, the 7th edition of the IMPAKT recognition program was held, in which employees reward their co-workers. The program integrates the community and builds a culture of cooperation and mutual appreciation. In 2023, 50 employees were recognized for their commitment, quality improvement, innovative solutions, and acceptance of challenges to inspire others.

Once a year, the best employees and managers are awarded the President Award for their professional achievements. In 2023, the awards were delivered to 14 employees.

Bank Millennium has defined and published "Instructions on how to conduct employee evaluations in Bank Millennium S.A., which contains guidelines on the preparation of rules for employee evaluations, in particular the evaluation of work performance or competencies. Evaluations are conducted based on objective and previously communicated criteria.

The rules for evaluating employees are aligned with the nature of the work and refer to attitudes of cooperation, efficiency, quality and level of commitment in the execution of the tasks entrusted to them, taking into account risk mitigation and the application of best banking practices. Depending on the group and the tasks performed, employees are evaluated monthly, quarterly or semi-annually.

At Bank Millennium, variable remuneration is an additional motivational component of overall compensation, shaped through differentiated incentives whose objective is to motivate employees to achieve their business and organizational plans. Millennium's award systems and periodic evaluation criteria have been adapted to the specificity of the work performed by employees in the various areas of the Group. The rules for awarding bonuses are defined for individual groups of employees in the performance appraisal rules and regulations and conditions for awarding awards.

The amount of the bonus pool always depends on the overall results and the general condition of the Bank. Bonuses are paid monthly or semi-annually in the Bank's commercial network and in the other headquarters units involved in serving private customers or quarterly for employees at the Bank's Headquarters.

The BCP Group continues to bet on the ongoing improvement, believing in the value that can be generated by the innovation processes, stimulating creativity and the sharing of experiences by all Employees.

In the Table GRI (Annex 1), the indicator 404-3 breaks down the number of employees evaluated in Group BCP.

The internal programmes for the generation of ideas – Mil Ideias, – in Portugal, - Call 2 Action-, in Poland and – Ideias que Contam– Ideas that Matter in Mozambique are based on the recognition that the Employees are a creative force that generates ideas of value, representing a means to value and increase their individual abilities through the direct participation with an idea and indirect through comments or votes.

In Mozambique, with the "Forum- Ideias que Contam (Ideas that Count), a space for sharing and discussing ideas, which throughout the year involved 164 Employees, who were responsible for 240 ideas or comments, 9 ideas are being implemented and 102 are under analysis.

These programs, which are still being re-evaluated in Portugal and Poland, have the potential to support the improvement of the organization's internal processes, the increase of the value proposition in the offer of products and services to Customers and the ability to adapt quickly to new realities, namely those resulting from the transformation dynamics imposed by sustainability or digital. It also creates a context that favours the identification of good practices that can be extended to the entire organisation.

## Workforce evolution

In 2023, the number of Employees of the BCP Group decreased by 0.3% (55 fewer Employees) compared to the previous year. Around 60% of the Group's Employees BCP worked in international activities.

### EMPLOYEES

	2023	2022	2021	Var. % 23/22
<b>TOTAL IN PORTUGAL</b>	<b>6,242</b>	6,252	6,289	-0.2%
Poland	6,872	6,987	7,079	-1.6%
Mozambique	2,574	2,504	2,648	2.8%
<b>TOTAL INTERNATIONAL</b>	<b>9,446</b>	9,491	9,727	-0.5%
<b>TOTAL FOR THE GROUP</b>	<b>15,688</b>	15,743	16,016	-0.3%

In Portugal, the reduction in the workforce compared to 2022 is not significant, with a decrease of 10 employees. Resignations and retirements are the reasons with the greatest weight in the total number of departures. Resignations decreased compared to 2022. The retirements showed an increase associated with the natural evolution of the average age of employees (49 years) combined with the Bank's efforts to rejuvenate the workforce.

In terms of admissions, Millennium bcp maintained its strategy of strong investment in the recruitment of candidates with distinctive and agile skills, namely in the fields of digital, technology and analytics. Also in the field of risk control, auditing and sustainability functions, special attention was paid to the profiles recruited in order to ensure the maintenance of the levels of rigor, excellence and ethics that characterize us.

In Poland, the number of Employees of Bank Millennium was reduced by approximately 1.6% (115 fewer Employees than in 2022) to 6,872, most of whom are women, who represent 66% of the bank's total Employees, with an average age of 39 years.

In Mozambique, Millennium bim ended 2023 with 2,574 employees (2.8% more than in 2022), with 236 new employees hired (151 to fill functions in the commercial area and 74 in the central services), with gender balance (114 Women and 122 Men). Workers in this country have an average age of 36 years and 10 years of seniority.

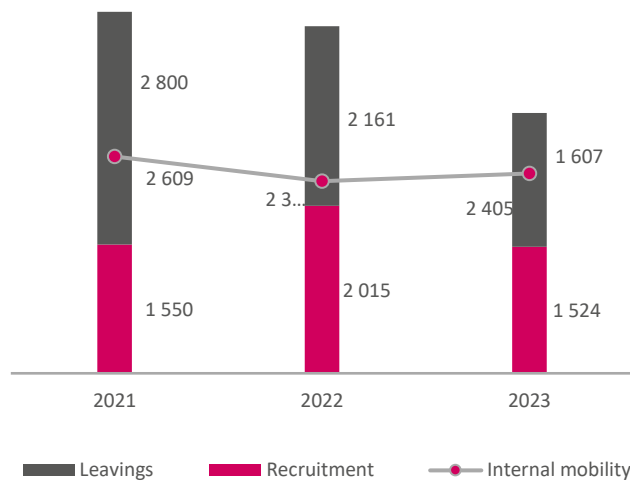
As a result of the recruitment policy, the percentage of employees with a degree continued to rise in 2023, now representing 64% of the workforce.

The BCP Group sees mobility as an opportunity for the Employees to develop their professional careers and their skills, and therefore fosters their contact with different realities of the Bank whenever possible. Accordingly, the internal mobility processes assume a strategic importance for Millennium since they enable the strengthening of critical thinking and the search for new opportunities for improvement, contributing for the reinforcement of more collaborative models.

In 2023, 15.3% of the Group's Employees were involved in internal mobility processes, particularly in Mozambique where 43.5% of its Employees moved from their areas/ departments.

**Employees Turnover and Mobility**

(Numeber of Employees)



**Suppliers**

GRI 204-1

At the BCP Group, the process for selecting suppliers mainly obeys to criteria of global competence of the company, functionality, quality and flexibility of the specific solutions to acquire, continuous capacity of providing the service and compliance with sustainability criteria. In all the Group's operations, it is given preference to purchasing from Suppliers of the respective country, registering 90.3% in payments to local suppliers.

The Bank's main suppliers are companies that publish their economic, environmental and social performance, assuring a responsible purchase of goods and services.

Since 2007, Group BCP, especially in Portugal and in Poland, includes, as an attachment in its contracts with suppliers [The Sustainability Guidelines for Suppliers](#) which include various aspects such as legal compliance and ethical conduct, human rights, environmental and labor practices, prevention, health and safety, and the application of these principles in the contracting of third parties.

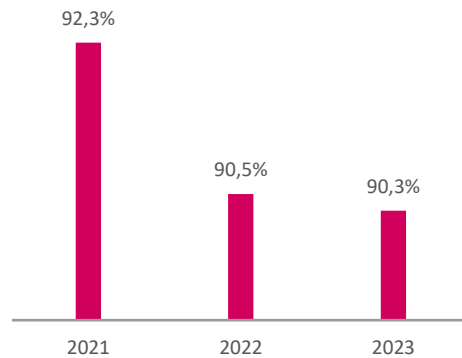
Since the beginning of 2022, in Portugal, we have developed and started sending to the largest suppliers (in 2023 contracts over 50,000 Eur) the Sustainability Questionnaire for Suppliers, a due diligence process that aims to understand the alignment of supplier companies with sustainability requirements and with the Guiding Principles of Sustainability for Suppliers defined by the Group, An instrument that has helped to evaluate, so far, 110 suppliers, with an average evaluation of 0.6 (on a scale of 0 to 1).

The Millennium bcp's suppliers are also subject to a quality and adequacy evaluation process, based on: i) the relationship they maintain with Technical Competence Centres; ii) performance assessment actions and the identification of areas for improvement; and iii) on existing decision-making processes to execute investments and renew contracts. This evaluation of the quality and adequacy of suppliers is also made by the application of a specific performance questionnaire which includes parameters related to the level of compliance with the Supplier Principles. In 2023, 490 suppliers were evaluated, and the average score was 4.41 (in a scale of 0 to 5).

In Portugal, Millennium bcp participates in the Commitment to make Timely Payments from ACEGE, an initiative that intends to

**Payments to local Suppliers**

(Percentage %)



encourage the timely payment to suppliers, being an ethical exercise, which contributes not only for the entrepreneurial success but also to enhance the economy's competitiveness. The ratio payment/deadline agreed in Group BCP is 1.

Millennium bcp also subscribed the Charter of Principles of BCSD Portugal- Conselho Empresarial para o Desenvolvimento Sustentável. This document establishes the principles that are the guidelines for good corporate management, enabling the subscribing companies to be recognized by their customers, suppliers and by the society in general for the adoption of solid sustainability commitments. The Charter encourages subscribers to go beyond legal compliance, adopting rulings and practices recognized and in line with management, ethical, social, environmental and quality standards in any context of global economy.



At the same time, the Bank subscribed to the Code of Ethics of APCADEC – Associação Portuguesa de Compras e Provisionamento, which brings together a set of values, principles, and behaviours that *Procurement* professionals must follow, thus allowing to reinforce a posture of professionalism and transparency, leading to a reduction of financial, operational and reputation risks of organizations.

In Poland, Bank Millennium's supplier relations are governed by the Guiding Principles of Sustainability for Suppliers, also using the Sustainability Questionnaire for Suppliers in the supplier selection and evaluation process, like what happens in Portugal. In addition, 100% of new contracts signed have a clause that obliges suppliers to apply the principles of the Bank Millennium Group's Code of Ethics.

In Mozambique, a process is underway to introduce the Sustainability Questionnaire for Suppliers to ensure compliance in procurement activity with Human Rights and other sustainability requirements.

In this country, all service contracts also have an evaluation process, which allows the quality of goods and services to be assessed, and annual surveys are carried out on the Satisfaction of Services provided by suppliers, which includes the evaluation of service levels; management and governance practices; environmental, insurance, price and quality, among other evaluation attributes. The survey aims to measure the overall user satisfaction rate in the Bank and recommend improvement actions when the indicators are below 75%.

## Ethics and professional conduct

Material issue:

ETHICS, CONDUCT AND COMPLIANCE

The BCP Group considers that the respect for its defined mission and values and also the compliance with its strategy depends, first and foremost, on each Employee and therefore it fosters a culture of rigour and responsibility, based on permanent information disclosure, training and monitoring mechanisms able to ensure strict compliance with the established rules of conduct.

## Compliance Office

Material issue:

PREVENTION OF CORRUPTION AND ANTI-MONEY LAUNDERING

The Compliance Office's mission is to assure that all the management bodies, the functional structures and all the Group's employees comply with the legislation, rules and requirements (internal and external) that guide the activities carried out by the Bank and its subsidiary companies in order to avoid the risk of the institution incurring in legal or regulatory sanctions, financial losses or negative effects in terms of reputation, resulting from non-compliance with the laws, codes of conduct and good business practices and duties that bind the company.

- Main actions of the Compliance in terms of prevention of money laundering and financing of terrorism

Within the scope of the Prevention of Money Laundering and Terrorist Financing (AML/CFT), the performance of the compliance function, in 2023, based on a risk-based approach, focused on attention to compliance with the following duties:

- Identification and diligence for the appropriate pre-validation, substantive and formal, of the opening and maintenance of entities and accounts and credit operations, in a context of increased risk, highlighting the effect of the war in Ukraine, with the issuance of successive packages of sanctions;
- Examination of operations, namely the filtering of transactions, an essential process to guarantee the compliance with the sanctions and embargoes declared by the national and international competent authorities, as well as their monitoring to detect and prevent potentially irregular situations;
- Control - improving the IT systems and monitoring mechanisms, adapting them to new regulatory requirements and new risk factors, contributing to the effectiveness of the AML/CTF risk management model;
- Communication, by adapting governance and processes so as to timely inform the competent authorities whenever there is suspicion or sufficient reason to suspect that certain funds or other assets, regardless of the amount or value involved, come from criminal activities or are related to financing, in a context of growing risk factors in this area;
- Collaboration with all entities responsible for the supervision and supervision of the activity of BCP and its Subsidiaries in Portugal;
- Of Cooperation with the Directorate-General for Foreign Policy of the Ministry of Foreign Affairs and with the Planning, Strategy, Evaluation and International Relations Office of the Ministry of Finance, ensuring compliance with the regulatory and legal framework in terms of restrictive measures;
- Training - through the compliance with a training and communication plan.



This functional perimeter, based on dedicated technological solutions, also foresees the definition and management of risk models according to the evolution of the various competing variables to establish *scorings* to be applied to operations. Also worth noting is the development of new, more efficient solutions, based on automation processes for analysing the risk factors underlying new account openings and the *screening* of transactions, and the effort to update internal rules in order to align them with recent changes in the legislative environment.

Of the various initiatives undertaken in 2023, we point out the following:

- The implementation of automated processes related with filtering of transactions in order to ensure an ongoing and timely compliance with sanctions and embargoes enacted by the several international organisms, within a more demanding international context, resulting from the war in Ukraine;
- The reinforcement of the control of the risk ML/TF in the customer *onboarding* component on the segments and jurisdictions involved in the business relations;
- Reinforcement of the integrated vision model of the Customers in the business relationship with the Bank and the inherent risk factors, in order to strengthen the effectiveness in the fulfilment of AML/CFT duties, mainly identification and diligence, control, examination and communication;
- Continued development of automated solutions that promote alignment and cooperation between the Bank's first and second lines of defence in the fulfilment of the various AML/CFT duties;
- Reinforcement of controls over Correspondent Banks, ensuring a timely periodic review of their AML/CTF practices and policies according to their risk, the evaluation of which now includes a set of new risk factors, in compliance with the recent regulatory changes and restrictive measures related to the war in Ukraine;
- Ongoing strengthening, training and specialisation of the Compliance Office teams within the scope of the AML/CTF, in its various dimensions.

As for the update of internal regulations, in 2023, we must point out, among others, the reinforcement of its regulatory framework regarding the opening and maintenance of Customers and current accounts to ensure full alignment with the new regulatory guidelines.

- Anti-corruption measures, prevention measures, reporting of irregularities and the Bank's and the Group's actions in these situations

During 2023, the BCP Group strengthened its regulatory framework on the subject of corruption prevention, now having a Plan for the prevention of risks of corruption and related infractions of the BCP Group entities in Portugal, defining, among other provisions, the governance model, prevention mechanisms, corruption prevention training and culture, corruption circuits and reporting and

evaluation system.

As foreseen in the above-mentioned plan evaluation system, in 2023, the Annual Report on the Implementation of the Internal Control System to Fight Against Corruption was issued and is available in the public.

The Anti-corruption and Anti-bribery Policy is included within the scope of the set of policies related to sustainability, and defines that any act of corruption and bribery is illegal, unacceptable and contrary to the values and principles of ethics, integrity and transparency of the Group, which rejects completely and regardless of the circumstances, any form of corruption and bribery. It is in this context that the BCP Group recognises the importance of developing its activity founded on compliance values and rules and of ensuring business integrity. The BCP Group's approach to any indication or manifestation of corruption and bribery is one of zero tolerance, requiring its Employees to refrain completely from such acts.

The activities of BCP Group are performed around fundamental principles of compliance with the law and internal regulations in force, as well as with the highest standards of ethics, responsibility, transparency, rigour and professionalism.

The BCP Group ensures that its activity, in the various countries where it operates, is conducted not only in compliance with the legal requirements imposed in the fight against corruption and bribery, but also following the best practices applied in this field, making sure that the values that guide the Group are put into practice by Employees in the performance of their duties. As a signatory to the 10 Global Compact Principles proposed by the United Nations, the Group is committed to complying with the principles laid down, including combating corruption in all its forms, namely bribery, extortion and facilitation payments (Principle no. 10). The Anti-Corruption and Anti-Bribery Policy supplements the principles and rules of conduct established by the Bank in its Code of Conduct, internal rules on which all Employees receive regular training, regardless of their position or place of work.

This Policy is also in line with the principles of other internal regulations of the Bank, namely the Related Parties Identification regulations, the Policy for the Prevention and Management of Conflicts of Interest and the Sustainability Guiding Principles for Suppliers.

Regarding the reporting of irregularities, the Anti-Corruption and Anti-Bribery Policy, in its own context, defines that any corruption and/or bribery practice, potential or real, or very strong suspicions must be immediately communicated to the Audit Committee via the communication system of irregularities defined in the Regulation on the Communication of Irregularities, so that this Committee can determine the appropriate measures to be applied.

The communication of irregularities may be undertaken by Employees, lawyers, agents, or any other persons who provide services to them, either on a permanent or occasional basis, in any entity of the Group, or by shareholders or any other persons. The insufficiency of information, evidence or proof does not exempt a worker from the duty of reporting. The Audit Committee is responsible for managing the system for reporting irregularities and ensuring the confidentiality of communications.

#### - Cooperation with Authorities

Compliance with the duty of communication and interaction with the competent authorities with regard to transaction communications and the response to requests for information is ensured, obtaining the appropriate authorizations from third parties, when applicable.

We should mention that, in the context of the war in Ukraine, the exercise of the duties of collaboration and cooperation has been important to allow compliance with the sanctions and embargoes on sanctioned jurisdictions, decreed by international bodies.

#### - Internal mechanisms for dissemination and training of Employees

In 2023 the fostering of the compliance culture was one of the Bank's important initiatives, both through the regular development of the Training Plan and through outreach communication programmes to all areas of the Bank, in particular the commercial networks. The headings "100% Compliance", "Expedients", "10 Commandments of compliance", "Better to prevent" and "Compliance Express" are the most visible faces of the transformation that began in 2019, where through weekly items aimed at all Employees and commercial structures of the Bank, it is sought to make known, clarify and support employees regarding the most important aspects to be considered both in terms of the risk of financial crime, as in the other risks of compliance and regulatory compliance, with a simple but informative and formative language. Innovative solutions were also employed, which included the participation of Employees from the Bank's 1<sup>st</sup> line of defence on a broad spectrum of *compliance* and conduct risks.

In these various sections, themes related to, among others, were addressed:

- PBC/FT (precautions to be taken when opening an account depending on the type of Customer, the importance of updating Customer data and KYC - Know Your Customer, information on beneficial owners, the specific risks of PEPs, mule accounts and trade finance operations); Code of conduct (conflicts of interest, corruption, gifts and communication with external entities);
- Code of conduct (conflicts of interest, corruption, gifts and communication with external entities); Sanctions and embargoes;
- Sanctions and embargoes;
- Internal Control

Good practices in the sale of financial products were profusely addressed.

Also noteworthy is the availability of a specific page on the Compliance Office Intranet that allows Commercial Networks to track, in a simple and quick way, which Customers have outdated identification data.

The most important training actions include:

- Course, by electronic means, on the Code of Conduct for all the Bank's Employees;
- Course, by electronic means, on AML/CTF for all the Bank's Employees;
- A set of training actions that ensure the necessary certifications in the Markets in Financial Instruments Directive (MiFID II);
- Set of trainings that ensure the necessary certifications in the sale of insurance in the Bank's Networks;
- Training by remote means to the commercial networks of the Bank on the importance of the document *Know Your Customer* and of the need to properly know the ultimate beneficial owners (UBO);
- In-person training addressed to the commercial network on the requirements for the opening of a digital account;
- Training session, via remote means, addressed to Employees in the communication and marketing areas, dedicated to the compliance in advertising campaigns;
- Specific training for Compliance Office employees: internal and external training, face-to-face and remote, aimed at ensuring and updating regulatory, legislative and internal knowledge on topics inherent to the functions performed, among which we highlight the following themes: Advanced Training in Compliance, Fraud (face-to-face training and provided by an external entity), MiFID II Certification and Sustainability;
- Integration training and InGenius programme in compliance matters: participation in the training programme for new Employees.

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## TRAINED EMPLOYEES <sup>(1)</sup>

AML/CTF, Market Abuse, Internal Control, Monitoring of Transactions and Legal Issues.

GRI 205-2

	2023	2022	2021	VAR.% 23/22
Activity in Portugal	10,244	18,866	45,816	-45.7%
International activity	65,295	45,816	30,299	42.5%
<b>TOTAL</b>	<b>75,539</b>	<b>64,682</b>	<b>76,115</b>	<b>17.3%</b>

(1) Attendance at training courses.

Within the context of internal communication, it should also be noted, in the application of Notice No 3/2020 of Banco de Portugal, which regulates the governance and internal control systems and defines the minimum standards on which the organisational culture of the entities subject to Banco de Portugal's supervision must be based, and in compliance with Article 63 thereof on the systematisation of information, the Compliance Office ensured, in 2023, the availability, in an integrated and up-to-date manner, of the information regarding the matters provided for in the Annex to the aforementioned Notice, in a format accessible to all employees. This information is structured to cover the following topics:

- Shareholder structure, organisation and governance;
- Internal control system;
- Key function holders;
- Description of the Group's business;
- Code of conduct;
- Remuneration policies;

- Subcontracted activities.
- Monitoring of conduct and control on the commercial activity

The Compliance Office maintained its role in the governance of the new product development process, namely in the validation of compliance with the requirements of the internal rules regulating the process of sending proposals for the creation, change, reintroduction and elimination of products/services.

In 2023, the internal regulations for the approval of new products were changed, including the concept of "Pooled Approval" for Investment Funds and ETFs, a review of the concepts of Investment Product and Target Market (positive and negative), scenario analysis of financial products and structured deposits produced by the Bank detailed in the regulations, and also the obligation to submit concrete quantitative data on sales outside the positive target market, i.e. within the negative target market of the product in the formal annual Monitoring process, among other small improvements to strengthen the process.

It is worth highlighting that the Bank promoted the strengthening of the monitoring process of compliance with regulatory requirements in relation to advertising campaigns and other behavioural matters of the Bank, which included a training session, through electronic means, aimed at Employees in the communication and marketing areas, dedicated to compliance with advertising campaigns and initiated a quarterly reporting process to the Compliance and Operational Risk Commission.

- Actions or activities developed for the international alignment (of all operations of the Group)

In pursuit of the alignment of strategies and priorities in the risk management of the Group's Operations, the effort to update the Group policies, also applicable to International Operations, continued, ensuring the absence of overdue documents and highlighting the adoption of Group policies related to the Code of Conduct and Conflicts of Interest.

In addition, the Compliance Office reinforced its monitoring of the Compliance function's activity in those operations, implementing a series of initiatives, of which the following are of particular note:

- Continuation of the effort to adapt the response capacity of the Group's entities to the challenges that compliance and regulatory issues have been posing, namely by promoting training actions with local Compliance teams;
- Consolidation of control procedures, namely on new business relationships and high ML/TF risk products;
- Monitoring and collaboration in the resolution of control deficiencies identified by external auditors;
- Collaboration in the implementation of new IT platforms to reinforce AML/CFT;
- Reinforcement of the process of sharing information on risk clients, within the scope of AML/CFT, for greater harmonization of their risk classification, promoting the effectiveness of the duty of examination and completeness of information in the exercise of the duty of communication.

The issuance of monthly analysis reports on the transactionality of high-risk customers was ensured.

We must mention the Issuance of Self-Assessment Reports on the adequacy and effectiveness of the organisational culture and governance and internal control systems of the Group's various operations, within the scope of the requirements defined in Notice 3/2020 of Banco de Portugal;

- Involvement in working groups of Regulators, associations or other entities for the promotion/dissemination and reinforcement of compliance and the fight against financial crime, corruption and fraud

In 2023 the Bank joined several working groups within the Portuguese Banking Association (APB), in which it contributed to the identification and development of several initiatives and actions aimed at strengthening the ML/Tf prevention system and internal control of the Portuguese banking market.

- Lobbying

Although *lobbying* is not yet regulated in the Portuguese legal framework, there are only draft laws in the Portuguese Parliament, BCP makes no provision for this practice in its internal regulations, and it is forbidden to Bank Employees.

This position does not imply that participation in bodies representing the banking industry is not allowed, as mentioned in the previous paragraph, or the participation in regulatory public consultation processes to be issued.



As for contributions to Political Entities, the BCP Group does not grant any type of monetary or financial donations to political parties or related entities, under the terms of the Portuguese law in force (Law 19/2003 of 20 June - Financing of political parties and electoral campaigns, article 8 - Financing Prohibited), in the context of the Anti-corruption and Anti-bribery Policy approved by BCP in 2021 and revised in 2023.

#### Summary of changes/improvements to the current version of the Code of Conduct

In 2023, the Bank updated the Group's Code of Conduct, with the following most significant changes:

- Two general principles of conduct have been added for entities covered by the Code: sustainability and confidentiality;
- Strengthening corruption prevention practices by formalising new internal regulations on the prevention of corruption and related offences in line with the latest practices in the sector;
- Adjustments to the criteria related to "gifts", making them more demanding, seeking to differentiate gifts according to social usages and strictly prohibited gifts correlated with the Bank's activity;
- Added a point on training, so that employees always seek to be up to date through the training and internal dissemination provided by the Bank;
- A new provision on the price list of each product has been added, namely that it must be drawn up on the basis of public information, reinforcing the prohibition of any practices typified in the law that have the purpose of distorting or restricting competition in a significant way;
- The way in which communications with Customers and other external entities should be carried out has been reviewed;
- Adjustment of the requirements of exclusivity in the provision of work, aligning the Code with article 129 of the Labour Code.

Relations of cooperation and loyalty have also been maintained with the judicial authorities and with national and international conduct supervision authorities. Within this scope and by its own initiative, it made a total of 2,720 communications to local Judicial Entities and replied to 347 requests.

#### COMMUNICATIONS TO LOCAL JUDICIAL ENTITIES

	2023	2022	2021	VAR.% 23/22
<b>OWN INITIATIVE</b>				
Activity in Portugal	1,636	427	339	283.1%
International Activity	1,084	1,223	1,444	-11.4%
<b>RESPONSE TO REQUESTS</b>				
Activity in Portugal	226	200	174	2.7%
International Activity	121	1,484	2,073	-91.8%
<b>TOTAL</b>	<b>3,067</b>	<b>3,334</b>	<b>4,030</b>	<b>-8.0%</b>

#### Policies for the fair design and sale of financial products and services

GRI FS-15

The Code of Conduct (internal reference GR0021), foresees in its Article 24 the protection of Customers' assets, which stipulates that the Group must ensure, through all legal and regulatory instruments at its disposal, the protection of the assets whose management or custody has been entrusted to it and that the instructions received from and requested by Customers must be executed with respect for the safeguarding of their assets, within the constraints imposed on the exercise of financial intermediation activities, and executed with diligence, rigour and transparency.

## Product and service design policies

The Policy for the Approval of New Products (internal reference GR0033), applicable to all the countries where BCP Group operates, determines the principles and guidelines on the risks associated with the launching of new products and changes in the characteristics of products being sold, as well as the need to identify, cancel or mitigate these risks in a clear and objective manner, determining also the products whose sale is prohibited.

This PANP- Process for the Approval of New Products, has the following main objectives:

- i. Promote the best risk management and control practices associated with the launching and trading of new products and services by the Bank , ensuring that the process is made effective with adequate assessments, evaluations, operational procedures and that the products and services trade have their risks duly identified, annulled or mitigated;
- ii. Promote a culture of compliance with the duties of satisfying the Customer's needs ensuring that the new developed and traded products are appropriate to the financial needs, knowledge and profiles of the segments target of the new products;
- iii. To promote adequate efficiency levels when launching new products or altering existing products, namely when decreasing their time-to-market, adequately and securely in terms of risk.

Thereon, the PANP encompasses the process of preparing, approving and launching new products and significantly altering products being sold, and mainly attempts to ensure that:

- i. The various risks are duly analysed and managed considering the Bank' goals and strategy and the risk appetite set forth by the Bank's management body;
- ii. comply with the rulings and recommendations of supervisory authorities and regulators;
- iii. Meet, in terms of features and information, the Customers' needs and rights;
- iv. The premises in what regards the Bank, the Customer, the market or the regulation that approved the product remain unaltered, while sold.

This process of development of products and services, formalised in a specific service order (internal reference OSO027), must obey to the Policy for Approval of New Products. This service order (applicable in Portugal) establishes the approval circuit for launching new products and services and changing the characteristics of products being offered for sale (creation, change, reintroduction or elimination of the offer), guaranteeing:

- Customer protection - ensuring that customers have access to transparent, clear and complete information that identifies the characteristics and risks of the different types of services/products made available, so that the customer is able to make an informed decision;
- Preservation of the Bank's solidity - ensuring that the sales/subscription processes do not allow any failures of conduct that may affect the Bank's reputation and the customers' confidence;
- Mitigation of situations of possible conflicts of interest - ensure strict control of the incentives given to commercial areas and ensure the introduction of mandatory disclaimers in the documentation of products/services that alert to the situations identified (e.g. sale/subscription of products/services from related parties), in order to protect the reputation of the Bank and the confidence of its customers.

In 2023, this service order was revised to increase the competences of the DESC (Economic Studies, Sustainability and Cryptoassets Division) in the process of development of products and services. . Hence, it is now stated in that internal regulation that the DESC analyses whether the products and services are aligned with the policies and principles related to sustainability (internal references GR0046 and GR0047), as well as validates all product documentation, considering the information requirements arising from the regulation on ESG products, ensuring that in the pre-contractual information there is an explanation as to whether the product or service takes into account the main negative impacts on sustainability factors and how it does so.

Regarding approval procedures for new investment products consisting of transferable securities or whose rate of return is dependent on changes in securities, the Bank shall ensure that the securities in question do not contravene the principles of responsible financing, so that the new products do not finance, invest in or be associated with projects or companies whose main activity is carried out in excluded or restricted sectors.

Most of the investment products that make up the Bank's distribution offer, namely investment funds, financial insurance and certificates, have been reclassified in accordance with the provisions of SFDR (Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector), allowing for easy apprehension of investment products containing:

- i. Transparent pre-contractual information regarding the integration of sustainability risks or why they are not relevant (Article 6 of the SFDR);
- ii. Pre-contractual information with transparency with regard to the promotion of environmental or social characteristics, not having sustainable investment as the main objective (Article 8 of the SFDR);
- iii. Pre-contractual information with transparency with regard to the main objective of sustainable investment (Article 9 of the SFDR).

To complement the training requirements for employees who can provide investment services to clients, in addition to the training administered by the Institute for Banking Training (IFB) and the mandatory training provided for in MiFID II, the Bank has created a standard report for the international investment funds it distributes, which aggregates sustainability information provided by the respective producer and Morningstar. This new model incorporates information on environmental and social factors, namely with regard to the risk and ESG involvement of the portfolio and the main negative environmental and social impacts, allowing employees to better clarify customers on these matters for each product.

The sustainability questionnaire (QESG) was also developed for customers who use investment services, which is presented whenever advisory or portfolio management services are at stake. This questionnaire is a variation of the suitability test and allows us to ascertain the environmental, social and governance preferences of customers. Although recent, QESG is constantly evolving to meet the expectations of the supervisor, the market and investors.

Within the scope of banking products and services, in 2023 several ESG characteristics and objectives were incorporated.

In terms of digitalization, the account opening service through a digital mobile key was implemented, through the ActivoBank app, the Millennium app or an online page for this purpose, accessible on the public website of Millennium bcp companies. Using this tool, individual and corporate customers can open an account in a fast, simplified and dematerialized way, using automatic data collection, authentication and digital signature of contractual documents.

The digital follow-up process in Mortgage Credit processes was also approved, to include the possibility for the customer to attach all the documents related to their credit process and accept the respective approval letter. This new functionality allows the customer to submit the necessary documents as well as issue and accept letters through digital channels, without having to go to the branch and reducing the consumption of the Group's material resources.

Regarding housing credit for acquisition or construction, a campaign was implemented to return the dossier commission and the formalization commission in cases where the financed property has an energy certification of at least B. With regard to housing credit for works, it is possible to obtain benefits if the property has energy certification A or A+ or, in the case of properties with a lower energy rating, which as a result of the works improve their energy class by at least 2 levels.

Regarding benefits for companies, real estate development credit services for sale or income, exempt the promoter from the payment of the study fee and the contracting fee, in cases where the developer presents a BREEAM certification with a Very Good or Excellent or Outstanding rating, and/or a LEED certification with a Gold or Platinum rating. To ensure that the granting of the benefit remains aligned with the pursuit of environmental objectives, the promoter shall restore the value of the discount applied if it is found that, after the completion and obtaining of the definitive certificates, the criteria inherent to the initial certifications have not been applied.

Within the scope of personal loans, ActivoBank has developed a new product for the acquisition of energy efficiency solutions, namely electric and conventional bicycles, scooters and mini scooters, sustainable appliances A+ or higher, placement of more efficient windows, thermal insulation of roofs, walls or floors, entrance doors, water efficiency, boilers, biomass recuperators and more efficient lighting systems.

## Credit Risk Policies

The principles and guidelines relating to the credit activity undertaken by the financial institutions of the Banco Comercial Português Group are formalised in a Group code applicable to all geographies. These entities must guarantee and adapt their activities to the risk that the business presents to the parties involved, as well as to the legally admissible exposure. Risk management in the BCP Group is based on a strong culture of rigor, reflected in the overall attitudes and behaviour of all employees involved in credit risk management, with a view to ensuring that credit is granted to borrowers who meet the criteria defined in this code, guaranteeing proper capital management, aligned with profitability and sustainability goals, where environmental, social and governance factors are included. It should be pointed out that transactions with related parties are regulated in accordance with the provisions of the applicable regulations (in particular Notice no. 3/2020 of Banco de Portugal and the Legal Framework for Credit Institutions and Financial Institutions), which require a specific approval procedure and the guarantee of the compliance with the legally defined price and contractual conditions.

Aiming to comply with the applicable regulatory requirements and guidelines issued by national and European institutions, the service order establishes the guiding principles, rules and decision-making powers for the process of granting, monitoring and recovering credit in the BCP Group, in its activity in Portugal and in Macao. As a result, the requirements and procedures specifically applicable to each loan granting are created according to the level of risk associated with it, the type of counterparty and whether it is classified as a Group Related Party, or not. Additionally, the document determines the procedures applicable to loan recovery.

In 2023, in the attribution of the customer's Credit Strategy, in addition to factors intrinsic to it, more transversal factors began to be considered, such as the assessment of sectoral risk and ESG impacts (periodically reviewed with the support of the DESC - Economic Studies, Sustainability and Cryptoassets Division).

It is also now provided that medium and long-term credit proposals to customers who, under the terms of the rating standards in force, must have a risk rating assigned by the Rating Division, must be accompanied by a business plan of the individual companies and/or the economic group in which they are integrated. as well as information that allows us to assess the respective ESG rating, and/or the ESG risks that result from the nature of the business, namely in financing such as CLS loans, equipment or real estate leasing, credit for real estate development and investment credit, commercial paper and bond loans.

In March 2023, a new group code dedicated to the principles of management and control of environmental, social and governance risks was created, which sets out the ESG management model of the BCP Group according to the model of three lines of defence and the responsibilities of the different bodies and commissions involved. In relation to credit risk policies, GR0047 has integrated sustainability principles into all stages of the credit granting and monitoring process, especially considering climate and environmental risks, highlighting the following:

- identification, management, and mitigation of the physical and transition risks that may directly affect customers' ability to pay and the security of the Group's assets;
- implementing due diligence to understand customers' vulnerabilities prior to granting credit;
- consideration of ESG risk factors in credit reviews and assessments;
- incorporation of a promotional pricing policy based on criteria established by BCP's Green Taxonomy;
- large companies are now subject to an internal ESG risk analysis process in the ordinary credit risk analysis process.

In the December review, the responsibilities of each of the Stakeholders were increased, namely the monitoring by the Credit Division (DCR), the Risk Office (ROFF) and the Economic Studies, Sustainability and Cryptoassets Division (DESC) of the number and total amount of transactions involving excluded, restricted or sensitive sectors or activities, in accordance with the Sustainable Finance Principles defined by the Bank.

We must underline the development of a model for integrating ESG risks into the credit granting process, which involves the Rating Division (DRAT), DCR and DESC and promotes the involvement of clients in the sharing of data on climate, environmental and social aspects related to their activity, through the standardization of questionnaires aimed at them, as well as by automatically screening the data collected in order to obtain ESG scores that reflect the exposure and vulnerability of companies to risk factors, thus filtering out customers and transactions that need a more in-depth analysis of ESG risk factors. In this context, enhanced due diligence involves analyses at the company level, verifying the financial viability or the amount of exposure of the company to this category of risks, and at the transaction level, ascertaining whether the projects to be financed correspond to sectors or activities excluded or conditioned by the principles of responsible financing or whether they may result in reputational damage to the Bank.

## Policies on Conflicts of Interests

In the Code of Conduct, the issue of conflicts of interest involving Customers is addressed in Article 27, in which it is defined that:

- The Group organises itself in a way that enables it to identify potential conflicts of interest and act in a manner so as to avoid or reduce as much as possible their occurrence.
- In case conflicts of interests occur, the Group must act in a way that guarantees that the client is provided equitable and transparent treatment, giving prevalence, in accordance with the applicable legal and regulatory provisos, to the client's interests under the terms of the conflicts of interests policy approved.

It is through the "Policy for the Prevention and Management of Conflicts of Interest" that the principles, governance model and fundamental processes adopted for the identification and management of situations of conflict of interest that occur within Banco Comercial Português, S.A. or any entity directly or indirectly controlled by it, integrating the Banco Comercial Português Group, are defined. This Group Code implements in Banco Comercial Português Group the guidelines issued by the European Banking Authority on Governance and other regulations in force, formalizing the governance principles applicable within the scope of the provision of investment services and activities and ancillary services provided for in the Securities Code. In addition, it identifies the control process to allow for an effective and prudent management of conflicts of interest at an institutional or personal level, including segregation of functions, information barriers and the specific process of deciding on transactions with "Related Parties", in order to defend the interests of the stakeholders, of the Bank and of the Group. In addition, it specifies the internal responsibilities regarding the management of conflicts of interest, the involvement and responsibilities of the internal control functions and the regular reporting model.

This regulation is complemented by the " Policy on Related Parties", which is based on the International Financial Reporting Standards (IFRS)/International Accounting Standards (IAS), namely IAS 24 - "Related Party Disclosures", complemented by national legislation, in particular by the Legal Framework for Credit Institutions and Financial Institutions, as well as by Notice no. 3/2020 of Banco de Portugal, which establishes the minimum mandatory content of a Related Party Policy. The standard ensures the disclosure by the Group's subsidiaries of the necessary information to comply with the reporting obligations resulting from IAS 24, fulfilling the obligations arising from transactions, directly or indirectly, with Related Parties in which any entity of the Group participates, namely restrictions on the granting of credit, as well as the acquisition of goods/contracting of services, related to the management and supervisory bodies of the Group's credit institutions or holders of a qualifying stake equal or above 5% of the share capital of BCP, or entities related to them, as well as other entities legally qualified as such. The decision-making process is outlined by the standard, identifying the powers assigned to each division as well as the necessary interactions to ensure adequate regulatory compliance.

## Personal conduct policies

The Code of Conduct establishes the fundamental principles and rules to be observed in the exercise of the activity developed by the entities that form Group Banco Comercial Português underlying the conduct, good practices and observance of the institutional values by the universe of people that form the Group. The entities of the BCP Group, the members of its management and supervisory bodies, as well as its Employees, guide their actions by principles of respect for the rights of people, for the preservation of social and environmental sustainability, and for institutional culture and values, committing to adopt behaviours of integrity and honesty in all relations that they establish with each other, with their Customers, or any other person or entity with whom they have a relationship. Relevant topics are developed, such as Inside Information, Communication of Transactions, Conflict of Interests (including with Customers), Gifts, Loyalty, Reputation, Duties to Customers, Asset Protection or Customer Claims.

## Internal Audit

Internal auditing is an independent, permanent, assurance and consulting activity designed to add value and improve the operations of Group Banco Comercial Português. For that purpose, it provides assistance to the Group in achieving its objectives, through a systematic and disciplined approach, oriented towards the assessment and strengthening of the effectiveness of risk management processes and governance and internal control systems.

The Audit Division plays the role of the 3rd line of defence of the internal control system of Banco Comercial Português, whose main mission is to assess, as a whole, and report to its stakeholders - in particular, the Audit Committee and the Board of Directors - the suitability and effectiveness of the organizational culture, risk management process, internal control system and governance models.

The Audit Division issues recommendations based on the results of the audits made, focused on the strengthening of the internal control system and on the accomplishment of the Group's strategic interests. The exercise of the internal audit function is governed by the guidelines of the Institute of Internal Auditors (IIA), including the Definition of Internal Auditing, the Code of Ethics, the International Standards for the Professional Practice of Internal Auditing and the principles of internal auditing defined by the IIA, of which the following stand out: integrity and professional competence, confidentiality, independence and objectivity.

The Internal Audit carries out integrated audits to the risks and controls of the processes defined at the Bank, in an end-to-end perspective. The audit programmes include the assessment of behavioural issues, the compliance with the legislation and with all the remaining rules and codes of conduct, the proper use of the delegated competences and the respect for the performance principles in force in what concerns the relations established with the Clients, internal and external.

In the course of 2023, the Audit Division monitored the status of implementation of the action plans following the recommendations of the audit carried out in 2022, focused on the management of environmental and social risk factors (ESG) of Banco Comercial Português, which assessed the adequacy, completeness, implementation and monitoring of the Sustainability Master Plan, its connection with the Overcoming 24 Strategic Plan and the adequacy of the risk factor management model ESG. In 2024, the Audit Plan includes actions to monitor and certify the implementation of developments in policies and procedures related to ESG risk management and the Bank's process of assessing the materiality of climate and environmental risks. Especially in what concerns the audit programs addressed to networks, we must point out the procedures for the prevention and detection of practices eventually showing signs of money laundering.

The prevention and mitigation of the risk of fraud as well as the detection and investigation of internal fraud attempts or situations and the execution and monitoring of the consequent eventual disciplinary or judicial proceedings are also a priority in the distribution of resources allocated to the Audit Division. Furthermore, all the claims, complaints or denouncement of situations that show socially inappropriate behaviours by the Employees, either among themselves or relating to Customers, are also assessed and investigated and will originate disciplinary proceedings whenever deemed justified.

In 2023, the preventive controls carried out and the subsequent individual assessments of potentially irregular situations as well as of situations reported by other organic units of the Bank originated 107 preliminary investigation proceedings. In the same year, 7 disciplinary proceedings were concluded against the Bank's employees in Portugal, and no proceedings were kept in progress at the end of the year. None of the cases concerned situations of corruption, and one of the cases concerned an employee who, according to the investigating authorities, was part of a network dedicated to money laundering.

## DISCIPLINARY PROCEEDINGS FOR BREACH OF RULES

GRI 2-27

	2023	2022	2021	VAR.% 23/22
Activity in Portugal				
Internal Rules	6	19	24	-68%
External Rules	1	0	0	-
<b>TOTAL</b>	<b>7</b>	<b>19</b>	<b>24</b>	<b>-63%</b>

The Coordinating-Manager of the Audit Division is also the individual in charge for coordinating the internal audit function in all the subsidiary companies of Group Banco Comercial Português, namely with its own internal audit team, within which he participates in the respective Audit Committee's, assesses its proposals for a Strategic Plan and Activity Plan and regularly monitors their execution and the implementation of the recommendations issued based on the audits carried out, promoting the harmonization of analysis

procedures and criteria and the sharing of knowledge, namely by collaborating in the preparation and execution of audits relating to matters of common interest to the various institutions.

The standardization of the practices in force in the internal audits of the several operations of the Group increased throughout the years either by the adoption of joint approach methods, safeguarding eventual differences due to local regulations or by the setting up of audit teams, at Group level, responsible for the execution of audits relating to specific issues in any of the countries where the Group operates

Accordingly, in 2023, the Bank's Audit Division carried out audits in all those subsidiaries, selecting its scope based on the issues and risks most relevant to the Group, for which it usually relies on joint teams of auditors from the Bank's structures and subsidiaries.

At the end of 2023, the Audit Division had a staff of 55 Employees.

## Products and Services

Material issue:

TRANSPARENCY OF THE INFORMATION PROVIDED TO CLIENTS ON PRODUCTS AND SERVICES

GRI FS7, FS8

The BCP Group offers a complete and broad range of financial products and services, and continues, under the development of its business lines, responsible for offering an increasing number of products and services which incorporate social principles and respect for the environment and nature.

BCP Group is also aware that the implementation of social and environmental criteria and standards in the commercial offer is translated into a more efficient risk management, reputation value and higher quality of the products and services offered to customers, meeting the needs and ambitions of a market increasingly related with sustainability.

## Microcredit



In line with the Sustainable Development Goals (SDGs) of the United Nations

In Portugal, Millennium bcp maintains its commitment to Microcredit activity, with its value proposition still being recognised in the Portuguese market as an alternative for the funding and of promotion and feasibility of entrepreneurial actions, continuing to perform a relevant role as an effective instrument in the fight against unemployment, poverty, and social exclusion.

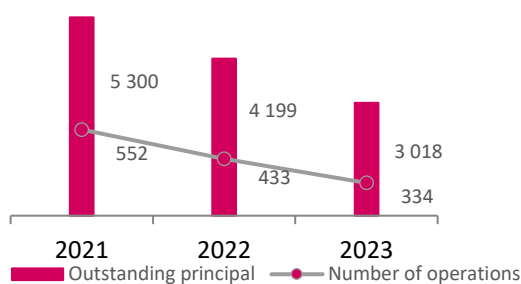
Millennium bcp continues to be a reference bank in the support of Microcredit projects, with lines with European guarantees, namely from the European Investment Fund, available for these operations.

The year 2023 saw a decrease in demand for these operations, which can be justified by the good economic performance and the low unemployment rate in Portugal.



### Microcredit loan activities

(Thousand euros)



to Microfinance.

Millennium bcp's Microcredit, created in 2005, is recognised as a comprehensive service providing permanent support to the Customer throughout the duration of the funding contract. Since 2005, 7,452 jobs were created resulting from projects funded by Millennium bcp's Microcredit.

### Financial Advisory Service (FAS)

Millennium bcp, with the objective of continuing to support Customers in financial difficulties, preventing and avoiding situations of default, maintained the provision of SAF packages (Financial Monitoring Service), which includes solutions for restructuring and consolidating credits, and which aims to preserve the financial stability of our Individual Customers with on-going liabilities. The Bank's concern continues to be proposing to Customers the solution more adequate to their budget, so

In this context, the activity for the year 2023 was reduced, registering 27 operations, for a total of approximately half a million euros of credit and the creation of 42 new jobs. The volume of active credit granted to the 334 operations in the portfolio, on 31 December 2023, totalled 3,018 million Euros.

Likewise, in a period when this type of project has little expression, Millennium bcp was not sought for promotional actions by national entities linked to the usual dissemination of these opportunities.

It should be noted that Millennium bcp is a participant in the European Microfinance Network, with which it maintains regular contact to monitor European issues related



that they can keep meeting their liabilities by reducing costs with the credit payments.

In this context, in 2023, the total value of restructuring amounted to 158 million Euros, compared to 90 million in 2022.

In Poland, Bank Millennium provides a debt consolidation loan, with the option of amortization of debts to other banks, to customers looking for an opportunity to reduce the costs of servicing in their current liabilities. In addition, customers can benefit from the deferral of the payment of an instalment of a demand or consolidation loan (credit holidays), which is an important help if the funds earmarked for an instalment in a given month are to be used for other purposes.

In the event of credit default or the customer reporting potential repayment problems, the Bank offers customers the possibility to negotiate the establishment of new mutually convenient payment terms. The conclusion of an annex or restructuring agreement containing, in its contents, amendments to the terms and conditions of reimbursement of existing liabilities, adapted to the client's financial situation and capabilities, is possible in any form - both during a visit to the Bank's premises and through electronic banking channels (online). The Bank offers clients a wide range of possible restructuring solutions, including, inter alia, reducing the value of instalments paid, extending the term of the loan, changing the payment date. Several online solutions are also implemented in the Retail area, allowing the customer to start self-help activities. Depending on the customer's situation, the Bank allows and offers individual groups of customers the possibility, among other things, to change the repayment schedule on their own (online).

### Companies Support Solutions



In line with the Sustainable Development Goals (SDGs) of the United Nations.

Continuing the work implemented during the Portugal 2020 community framework, in 2023 the Bank developed several initiatives to proliferate practical information and share knowledge with Clients and Stakeholders (informative emails, clarification sessions, meetings), on the investment support opportunities arising from the Recovery and Resilience Plan (RRP), as well as the Portugal 2030 Community Framework. It should be noted that investments supported by EU funds have as a transversal concern the minimization of environmental impact, being in some cases specifically and directly aimed at this purpose - case, for example, of support for the decarbonization of industry.

In this context, Millennium bcp has a specialized team dedicated to the permanent monitoring of the financial needs of customer projects in the implementation phase, having carried out around 800 support operations, totalling 382 million euros contracted in the year.

In the dimension of the events organized by Millennium bcp, the highlight is the Millennium Talks Alentejo initiative, which took place under the motto "Innovation for Sustainability". The 6th Millennium Talks conference brought to the center of the discussion issues such as the financing of small businesses, but also how they can grow under sustainable foundations, both in environmental, social and economic terms, and brought together more than 400 people at Arena d'Évora.

As part of the creation of an offer of Green/Sustainable products for Company Customers, the dedicated Business Marketing Team participated in several events on Sustainability, organized by National and International entities, such as: European Investment Bank Group, Qorus, PwC, aicep Portugal Global, Portuguese Chamber of Commerce and Industry, ICC Portugal, Leaseurope, ALF - Portuguese Association of Leasing, Factoring and Renting, among others.

### Portugal

- Corporate Credit Lines

Millennium bcp is a pioneer bank in the market in the intermediation of financial instruments to support economic agents, coming from national and European government entities.

The year 2023 was a year of particular relevance in strengthening the Sustainability offer through this type of action. Amongst the solutions provided, we highlight the Guarantee Lines of the European Investment Fund (EIF) under the new European InvestEU Programme for the period 2023 to 2027, namely regarding Sustainability, Digitalisation, Innovation and Social. Millennium bcp has signed a guarantee agreement with the EIF for a loan portfolio worth €310 million.

These new credit lines will facilitate access to finance for SMEs (ENI, Microcredit, SMEs and Mid capitalization) and Public Companies. Eligible projects are included in the Sustainability domain, making the transition path to ESG criteria. This way, the Bank promotes and fosters accessibility to services, products, infrastructures, and technologies, making companies and their facilities more inclusive and decarbonized.

Other areas covered by the InvestEU Programme concern Innovation and Digitalisation, as well as social entrepreneurship, microfinance, cultural and creative sectors, training and education, and SME competitiveness.

Mid Cap and Large Corporate companies, with investments in the field of Innovation, were supported through the protocol signed with the European Investment Bank (EIB), covering all economic sectors.

As part of protocols signed with the Portuguese Development Bank (BPF) and the Mutual Guarantee Societies (SGM), the Bank launched the Social Sector Financing Line in the context of environmental transition, new projects or the requalification of social facilities.

For the tourism sector and under the protocol established between Millennium bcp and Turismo de Portugal, the Bank continued to provide the credit line that enables companies to invest in projects aimed at the re-qualification of tourism undertakings and the creation of new ones, of restaurants and leisure activities, with a minimum overall score of 40 points in the two measures: environmental management and accessibility.

With the Decarbonization and Circular Economy Line and with special emphasis on applications to support the decarbonization of industry, the Bank is supporting the financing of projects to reduce energy consumption or the transition process to a circular economy.

Regarding support for the Agriculture and Fisheries Sector, the year 2023 was marked by a significant reduction in the credit lines made available by the main institutional agents in the sector, namely those that are more cyclical, such as those in Fisheries, or those of extraordinary support that seek to respond to situations of Extreme Weather or Forest Fires.

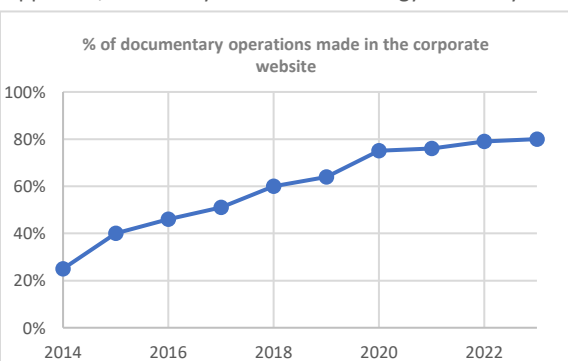
In this context, the Bank maintained the possibility of financing under the protocols signed with the Institute for the Financing of Agriculture and Fisheries (IFAP), through the Short Term IFAP Credit Lines, and with AGROGARANTE, the Mutual Guarantee Society (SGM), through the General Protocol. A total of 131 operations were closed, with a financing value of more than 11 million euros.

- Corporate Credit products and activities

In 2023, steps were taken to create conditions for the offer of new Green/Sustainable products for Customers and projects classified as sustainable to meet the needs of the Market and Customers and continue to increase Sustainability in Millennium bcp's corporate credit business.

Real Estate Development

Within the scope of Real Estate Development projects, Millennium bcp supported Sustainable/Green projects, with international LEED and WELL certifications, such as "Orient Green Campos" in Parque das Nações, as well as affordable housing projects, framed in the Controlled Cost Housing regime, as is the case of "BeLiving" in Loulé, and projects with a sustainable approach, essentially based on the energy efficiency of the installed systems; a good example is the "Miraflores Garden" in Oeiras.



Trade Finance

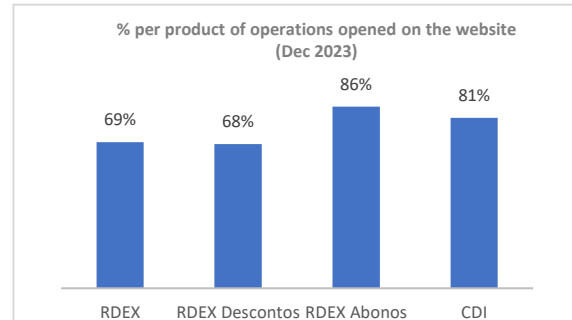
In Trade Finance, Millennium bcp continued to intensify the digitization of document operations on the company portal, contributing significantly to the sustainability of this business area, improving the level of service, and reducing the administrative burden for Customers and the Bank.

At the end of 2023, Millennium bcp has around 80% of the total operations carried out digitally.

Some products are already completely dematerialized, with completion rates on the portal higher than the total, such as the discount of allowances (86%) and the opening of import documentary credits (81%).

#### Factoring & Confirming

Also, the online contracting process for Factoring and Confirming operations on the company's website, has allowed the growing digitization in the contracting of this type of operations from an end-to-end perspective, namely in the market segments of ENIs and Small Companies, contributing in a relevant and sustainable way to the dematerialisation of this type of product through a reduction in physical visits to Branches, an increase in the level of service for Customers, as well as a reduction in the administrative burden for Customers and for the Bank.



At the same time, the transactionality associated with Factoring & Confirming operations is carried out mainly through the use of automatic channels, namely the company portal, contributing to the significant dematerialisation and simplification of processes.

In transactions and/or instructions such as sending Confirming Remittance files, Factoring Credit Assignments and requests for anticipation of revenues, there has been a growing use of the online channel, with usage rates of around 90%.

In 2023, the analysis of the process continued in relation to the development of an offer of new Sustainable Factoring & Confirming products for Clients whose economic activity (PPA) is on the BCP Green Taxonomy list, which allow to meet the needs of the Market and Customers within the scope of the energy transition and/or development of projects with purposes aligned with environmental practices, and corporate governance (ESG).

#### - Leasing and LTR

In business credit, we also gave special importance to Green Mobility. Pollution of cars through the emission of CO<sub>2</sub> and other polluting gases is one of the main causes of pollution emitted into the atmosphere, with a high environmental impact. It is in this context that the Leasing and Renting sectors are of particular importance in the important commitment to achieve carbon neutrality by 2050.

In 2023 we supported our customers in the acquisition of 1,084 green vehicles in car leasing, and 100 green vehicles in ALD, corresponding to a volume of 44 million euros. We closed the year growing 37% (YoY) in car leasing, with a significant component in Sustainable credit.

During the year, we continuously developed several initiatives aimed at simplifying operations, implementing processes that facilitate access to information and improving the level of service we provide to our Customers.

#### Poland

In Poland, Bank Millennium provides loans for the construction of photovoltaic units or plants. With this product, environmentally friendly solutions, the energy transition are supported, while responding to the increase in electricity prices. The product is available in two options:

- Photovoltaic loan - self-consumption, with which we can finance 100% of the net construction costs of micro and small photovoltaic installations with a capacity of up to 1 MWp, intended to produce renewable energy entirely for the company's own needs. The loan amount is a maximum of PLN 2 million;
- Photovoltaic loan - mix with which we can finance 80% of the total net construction costs of a photovoltaic installation with renewable energy production for sale and own consumption, with a minimum of 50% self-consumption. The investment may also involve the purchase and installation of energy storage up to and including 10 MW. The maximum loan amount in this option is PLN 20 million.

Companies can also apply to the Bank for a Technology Loan, which offers financing in the form of a non-refundable technology bonus provided by the Gospodarstwa Krajowego Bank. The Technology Loan is a continuation of the line known in the past as the Technological Innovation Loan. It allows companies to obtain financing of up to 70% of the eligible costs of an investment project that involves the implementation of a new technology, understood as any significant and beneficial change in the process, which has not previously been used in the business, and which, at the same time, improves the characteristics of the product manufactured or the service provided. The deadline for applications ended in May 2023.

For customers seeking financing for green investment projects, an Environmental Credit is available. It can be used for investments in energy efficiency, energy savings, including thermal modernization of buildings, switching from energy sources

used to greener sources, and replacing equipment, facilities, or process lines with more energy-efficient ones.

Environmental Credit is a project funded by the European Funds for a Modern Economy (FENG) Operational Programme. Support under this programme is offered to companies in the micro, small and medium-sized enterprises sector (up to 250 employees) and enterprises in the small mid-cap (up to 499 employees) and mid-cap enterprises (up to 3,000 employees) category.

The Environmental Loan is a new form of financing for green projects, with support for businesses in the form of a non-refundable green bond that covers up to 80% of eligible investment costs. Applications for support are accepted by the Gospodarstwa Krajowego Bank (BGK). The submission of an application to BGK is conditional on obtaining a loan commitment letter. Bank Millennium is one of the creditor banks that issues the necessary commitment letters to obtain financing. The call for applications in this round closed in August 2023. In 2024, it is planned the launching of 2 new notices for the Environmental Credit line.

The Millennium Leasing is consistently involved in the financing of investment projects on energy saving, in compliance with the Environmental Policy of Group Bank Millennium and industrial policy. To this end, Millennium Leasing uses the financing of equipment for energy generation from renewable sources. Since 2019, Millennium Leasing has been particularly active in the development of the MilleSun program, designed to finance photovoltaic investments. The rental of panels is a solution aimed at commercial enterprises that want to reduce energy consumption costs and change social awareness regarding environmental protection and interested in building their environmentally friendly image and ensuring the economic efficiency of their investments. Millennium Leasing cooperates with the main trusted suppliers of this type of facilities, offering secure financing on preferential terms and conditions and a greatly simplified process for renting green investment projects. In 2022, Millennium Leasing launched financing for heat pumps under the MilleSun Program, and in 2023, for energy storage facilities.

In 2023 Millennium Leasing continued to implement the Mój Elektryk Program, which guarantees customers subsidized lease payments for zero-emission vehicles. The aim of the program is to reduce air pollution emissions by reducing the consumption of fuels that generate emissions in transport. It supports and encourages the choice of zero-emission vehicles. Millennium Leasing participates in the Program since 2022. Subsidies range up to PLN 4,000 for motorcycles, scooters and quad bikes, up to PLN 27,000 for passenger cars (for transport up to 8 people) and up to PLN 70,000 for delivery vehicles up to 3.5t.

In 2023, Millennium Leasing launched a pilot Preferential Program for green asset financing, which it expects to fully implement in 2024.

The transition of the economy and the implementation of sustainable development policies by customers will be a growing source of demand for the financing offered by Millennium Leasing in the future. We anticipate that this growth will be primarily directed towards:

- investments in energy-saving machinery and equipment to reduce the amount and cost of electricity used per unit of product;
- low-emission modes of transport that support the reduction of CO<sub>2</sub> emissions in the transport of people and cargo;
- technologies for the generation and storage of energy from renewable sources.

## Mozambique

Millennium bim, in Mozambique, provides the KfW Credit Line in partnership with the German Development Bank. This fund is aimed at Micro, Small and Medium Enterprises (MSMEs), with two forms (generic and specific) for the agricultural sector. Generic fund: intended for financing investment in improving productivity and competitiveness and for job creation; and Specific Fund: to finance investments in improving the productivity of companies in the sector.

The following lines are also available:

- Credit line FECOP Calamities- created within the scope of the cooperation established between the Government of the Portuguese Republic, the Government of the Mozambican and the Mozambican Banking Association. It is aimed at financing investment projects and provide treasury support operations for Mozambican micro, small and medium-sized companies in the regions that the Government decreed as the most affected by the natural disasters. This tranche comprises all the operations impacted by the Covid19 pandemic.

- Credit line AIMO (Industrial Association of Mozambique) - aimed at supporting the development of industrial investment projects, treasury, and support to the imports of small and medium-sized companies, part of AIMO.

- Credit line Mulher Empreendedora - credit to support individual businesses, small and medium– companies managed by Women. This product intends to promote the development of projects related with the entrepreneurial spirit of women in

Mozambique and boost the growth and appreciation of the Mozambican women through her involvement in activities that contribute for the growth of the economy;

## Individuals Support Solutions

The BCP Group provides products and services that, while meeting the needs and expectations of individual customers, also incorporate social benefits. Among these, we underline the following:

### Portugal

#### Personal Loans

Throughout 2023, the following products remained on the market:

- University Credit with mutual guarantee - under this credit line, which ended on 31/12/2023, 175 loans were granted in the amount of 2.3 million Euros. The volume of credit granted to the 2,265 operations in the portfolio amounts to 19.1 million euros;
- University Credit (Personal Training Credit) - in this type of credit, which allows financing Customers who do not meet the requirements to access the Mutual Guaranteed Credit line, 26 loans were granted in the amount of 423 thousand Euros;
- Car leasing for new 100% electric vehicles - a product that benefits from the exemption of the initial commission (dossier commission) - 53 operations were carried out, in the amount of 2.5 million Euros;
- Sustainable Buildings Personal Loan (formerly known as Renewable Energies) - this credit product, which benefits from a lower rate, was adjusted at the end of the year, to include new purposes, now covering all investments that aim, in addition to the production and storage of renewable energy, to increase the energy efficiency of Residential Buildings - 61 loans were granted in the amount of 682 thousand Euros;
- Energy Efficiency Personal Loan - 7 operations were granted in the amount of 93 thousand Euros.

#### Home Loans

The incentive for properties with better energy ratings (Green Housing Credit) was maintained, translating into the reimbursement, after contracting a Mortgage Credit for the Acquisition or Construction of properties with energy class A+, A or B, of part of the value corresponding to the Dossier and Formalization Fees. This offer is also applicable to financing for work on properties that already have an A+ or A energy class, or that obtain an improvement in their 2-level energy certification as a result of carrying out the works, benefiting Customers, in these cases, from a credit worth equivalent to the Dossier Fee and the cost of the Energy Certificate. During the year, this incentive was attributed in 1,613 operations.

Millennium bcp, with the objective of continuing to support Customers in financial difficulties, preventing and avoiding situations of default, maintained the provision of SAF packages (Financial Monitoring Service), which includes solutions for restructuring and consolidating credits, and which aims to preserve the financial stability of our Individual Customers with on-going liabilities. The Bank's concern continues to be proposing to Customers the solution more adequate to their available budget, so that they can keep meeting their liabilities by reducing costs with the credit payments.

In this context, during 2023, 2,624 contractual changes were made (1,589 real estate loans and 1,035 consumer credits), totalling a restructuring value of 158 million euros (90 million in 2022) e) covering 2,305 customers (1,306 real estate loans and 999 consumer loans).

At the same time, Millennium bcp continues to provide the Western Union Money Transfer service, allowing its Customers from the most diverse geographies who work and reside in Portugal to continue to support their family members in their countries of origin. These regular transfers can now be made in a distinctive way through the APP or the Website, with all the convenience, availability, and security.

#### Insurances

During 2023, the partnership in the sale of insurance with Ageas (Oeste) maintained a high dynamic, with novelties in the offer, process improvements and considerable investment in digital channels, namely in the App. We highlight:

- At Médis, the launch of Mental Health coverage, the Traveler's Consultation in the Online Physician service, and also Medis Dental and Light insurance for the corporate segment;

- Launch of the "Repatriation from Here to There" insurance for foreign citizens who intend to settle in Portugal;
- As for financial insurance, it was guaranteed that the entire offer is classified according to Art 8 of the SFDR. "Double" products were launched that combine Unit Linked and Savings with guaranteed capital, a guaranteed capital PPR and a Closed Unit Linked PPR. The big news was the launch of an automated investment product with exclusive trading in the App based on three strategies of an open Unit Linked, called Easy Invest.
- Regarding digital channels, the launch of journeys on the App was intensified, with the subscription of Móbis car insurance, Médis Light, Pétis pet insurance, the new financial product EasyInvest, Servicing of Retirement products and Pending Operations for health products without a medical questionnaire. We invested in multiple dynamization actions with associated campaigns, which allowed us to increase the weight of digital sales in Insurance products.

### Integrated Solutions

In 2023, the strategy of valuing the offer associated with the holding of an integrated solution was reinforced with the launch of a savings product with an exclusive remuneration for the holders of these solutions.

Positioning itself as the reference bank for young people, Millennium bcp has extended the "0€" University Offer also to graduate, master's or Doctor Clients who domicile their salary and adhere to the digital statement.

At the end of the year, Millennium bcp made available a new banking solution - unique in the market - aimed exclusively at Customers 55+ with integrated solutions for banking products and services: M Advantage+, with two levels of offer that include hospitalization expenses, health care, home help and services available in pharmacies of the M advantage+ network.

Thus, Millennium bcp:

- Reinforces its position as a promoter of the health of its 55+ Clients;
- It embarks on a new chapter in its strategy of launching integrated solutions by segment, allowing its customization.

### Term Resources

The Bank has been increasingly concerned about the inclusion of ESG features in resource products. In 2023, the questionnaire to assess preferences in ESG issues was developed, which aims to collect information from Clients within the scope of Advice and Portfolio Management, allowing the offer to be directed according to the preferences in terms of sustainability shown by Clients. We direct the offer to digital channels and in the branches we privilege the sending of emails with the documentation to the detriment of paper printouts.

All Investment products marketed by the bank are now valued taking into account the current SFDR regulations, MiFID updates and taxonomy principles, and are not made available for marketing if the valuations are deficient in these objectives/principles.

## Mozambique

### Products and services with Social benefits

- IZI Microcredit – short-term financing (up to 45 days), available to Customers with salary domiciled at the Bank who meet a set of eligibility criteria, to meet small daily expenses. This product has no interest rate, and a fee of 4% is applied to the amount to be financed and is presented in amounts brackets ranging from 500 to 5,000 meticaís (MZN). In 2023, this financing recorded a positive evolution, with around 5.1 billion MZN being financed in 1.6 million operations.
- Salary credit - short-term financing (up to 4 months), with subsidized interest rate and amount up to 100,000 MZN. This financing allows eligible Customers with a salary domiciled at the Bank to meet specific needs, making it possible to apply for a consumer credit without having to go to a branch, immediately and fully digitally, through Mobile Banking (IZI and Smart IZI), and pay it in monthly instalments. The product was accessible to 25,000 customers until December 2023 (in the pilot phase), with a universe of 6,438 users. Around MZN 269 million were financed in 11,917 operations, demonstrating that it is a product with potential for adherence by our customers.

### Products and Services aimed at inclusion and accessibility

- Millennium IZI - the Bank's most transactional and accessible Mobile Banking platform, made available in 2013 through the USSD (\*181#) section of national mobile operators. It continues to stand out for its number of users, more than 832 thousand, and an average of 17.7 million transactions per month. With no cost of use for the Customer, it provides a wide range of features, with answers on the phone screen and/or by SMS, of which the following stand out: balance and movement queries, transfers, purchase of Credelec top-ups and card usage features. In 2023, it is worth mentioning two new features: salary credit and the management of the transactional limit of the Mobile Banking+ channel.
- Mtop and Mtop+ transactional packages - a set of products and services made available to Private Clients, in the form of packages, which allows the Clients' profiles to be adjusted to a more appropriate offer of products and services sold by the Bank, providing a better service at a more affordable cost. The MTop and MTop+ transactional packages comprise a Debit Card with exemption from annual fees, free withdrawals at ATM Bim, free monthly combined Statements, exemption from the fee for intrabank transfers in Mobile Banking accident insurance guarantee of 20,000,00 MZN and immediate access to digital channels (Mobile, Internet Banking and the transactional Millennium bim Line). In addition, the Mtop+ package gives the subscriber access to a TOP credit card, its attribution depends on the Customer's credit capacity.
- IZI Smart App - the 2nd most transactional mobile banking platform, with 250.6 thousand users, suitable for smartphones and tablets with android and ios operating systems, available to private customers from all segments. Investing on the digital transformation of products and services, the year 2023 was marked by the availability of some more time deposit products on this platform, with emphasis on the Savings and Campaign Deposit Plans "Millennium 4X4 Deposit".

### Launching of of incentive to the savings products and/or services

- Millennium 4X4 Deposit - 180-day term deposit, with a minimum constitution of 5,000 MZN, made available in a savings incentive campaign at the end of the year, which enabled its subscribers to participate in a contest, where several prizes were drawn. This product, in addition to competitive rates, provides the application user with flexibility in the management of their savings, allowing them to be set up and managed in a fully digital way.

## Poland

Bank Millennium and its local subsidiaries offer products and services to improve the living conditions of its customers, facilitating the management of their finances and savings, while also seeking to positively impact the environment.

The Bank's goal is to provide appropriate solutions that make Clients' lives easier and help them achieve their financial goals. This approach is illustrated by the Millennium 360° - Personal account present in the bank's offer as of April 2022. The offer of the Millennium 360° Account is universal and designed to meet the needs of different groups of customers, regardless of their age and income.

More and more Poles are using online banking services daily. The surveys show that 80% of the Polish people use mobile banking services regularly, while almost half of account holders have not visited a branch for more than six months. For 41% of the Polish people, the convenience of online banking is one of the top two criteria for selecting an account, after no fees. The Millennium 360° account - a free account combined with a wide range of personalized services in the mobile app with which we want to meet customer expectations.

In addition to being free, once a simple condition is met (5 card payments or BLIK, or 1 payment for people between 18 and 26 years old), the debit card as well as BLIK contactless payments are also free and no fee is charged for withdrawals. . This means that customers with mobility issues (elderly or people with disabilities) can use ATMs in convenient locations, without incurring fees for withdrawals from third-party ATMs. Domestic transfers in PLN, standing orders and direct debits and BLIK transfers to a telephone number are always unconditionally free of charge.

The Very Useful package, offered in conjunction with the 360° Account, allows you to use home repair, medical assistance, or computer services. Customers who cannot afford doctors' home visits can benefit from this in case they or their children fall ill.



This package also provides for the assistance of a plumber or an electrician or the repair of equipment such as household appliances, radio and television equipment, smartphones and tablets. By selecting an account in the Very Useful Package, customers can take advantage of 7 interventions per year. This package is free for 3 months after opening the account.

With younger customers in mind, the Bank's offer also includes the 360° Junior Account for customers who have not yet turned 18. Seeking to help them take their first steps in the world of finance, the Bank does not charge fees for account management, while debit card and ATM withdrawals are free, provided they make at least one payment per month by card or by BLIK. Children aged 7 to 12 can use a mobile app and a 360° Junior Account card, designed to meet the needs of younger users. These modern tools help introduce children to the world of finance and teach them how to use technology safely.

Millennium Bank also provides mortgage loans for the renovation or modernization of properties, under which Customers can use the funds to replace the roof or central heating system.

One of the measures implemented within the scope of the Bank Millennium Group's strategy is the integration of ESG factors in the selection processes of assets in investment portfolios. Given the growing trend of European and global investors using sustainability criteria in investment decision-making and considering the bank's business strategy, Millennium TFI's product offering has been modified. Millennium TFI has transformed three separate sub-funds into the Millennium Specialized Open-End Investment Fund in accordance with the requirements of Article 8 of the SFDR. They promote environmental, social and corporate governance aspects (light green products) by including them in investment selection criteria and applying certain restrictions to investment. Customers who want to support sustainability in their investment decisions can now find the right products in the Millennium TFI range.

The Sub-Funds that meet ESG criteria are available both at Bank Millennium's points of sale and through electronic channels, i.e. the Millenet online banking system and the Bank's mobile application. Clients can choose from three sub-funds designed as funds of funds:

- Spokojny Plan Sub-Fund | whereas it invests mainly in global debt instruments;
- Plano Wyważony Subfund | que equilibra investimentos em instrumentos globais de dívida e capital;
- Wyważony Plan Subfund | balancing investments in global debt and equity instruments;

In these sub-funds, sustainability (ESG) issues are assessed as a risk to the value of the investment. Investment risk is assessed within an internal ESG risk rating system and considers ESG ratings published by independent agencies and analysts, reports from the issuer on observed ESG principles, the type of industry in which the issuer operates, and other public information that may serve as a source for the issuer's ESG assessment.

Each of the above-mentioned sub-funds invests at least 50% of its assets in other "green" investment funds that meet the SFDR criteria. Additional limits have also been introduced to limit the share of funds (instruments) with poor or no ESG ratings, as well as restrictions for issuers that do not follow good practices.

All new customers, regardless of how they have established a relationship with the Bank, receive a set of communications that inform them of the functionalities of their account, the mobile application and Millenet, as well as the Bank's offers. The communication is personalized according to relevant criteria so that the information offered has value for the customer (for example, if the customer has already started using a certain option, they will not receive the message in which it is presented). In onboarding communications, we also address issues related to the security of electronic channels and good practices in the context of cybersecurity.

#### Application for children

Children's app - the Bank has made available a special version of the mobile app for children aged 7 to 12. This application is not only a useful gadget, it is also a tool to introduce children to the world of finance and to use technology safely. During the activation, the app recognises the user and adapts the version to his/her age. The children's app supports payments by phone or BLIK. It is friendly to younger users and designed together with them – it has a simplified menu, children-friendly, a language and a children-friendly design. At the same time, it gives parents full control over their children's spending, special transaction limits, and the option for a child to block a card and for parents to block a card using its app. The app grows with the child. After turning 13 years old, the version of the application installed on the birthday person's cell phone automatically changes to the version currently available for people over 18 years old, offering a greater number of services.

**The BCP Group provides solutions, products and services focused on the Customer and designed to protect the Future, People and the Planet**





## Social Inclusion



In line with the Sustainable Development Goals (SDGs) of the United Nations

In Portugal, within the scope of Entities that incorporate the social industry, Millennium bcp keeps available the Non Profit Association Account, a current account with special conditions that does not require minimum deposit to open and has no maintenance and overdraft fees. 318 accounts with these features were opened in 2023, corresponding to a total of 5,322 accounts in the Bank's portfolio.

Regarding the support to enterprise creation investment projects by unemployed persons, through the following credit lines: i) Microinvest Line - which financed 40 entrepreneurs to a total of 622 thousand Euros; and ii) Invest+ Line which supported 21 entrepreneurs, to a total value of 861 thousand Euros.

Within the scope of the inclusion of individual Clients (resident and non-resident) with low incomes in the financial system, the Bank was one of the banking institutions that voluntarily provided the current account – Minimum Banking Services–, without associated costs, which can be used with a debit card and through online banking. In 2023, 5,669 accounts were opened, presently accruing to 26,705 accounts.

## Charitable Cards

In Portugal, the credit cards issued by Millennium bcp continue to promote solidarity:

Loyalty Programme - gives Customers the possibility of exchanging the points on the card into donations to charitable institutions. In this context, the Visa/Mastercard Network cards (Points Catalog) delivered 271 donations for a total value of about 3,615 euros (199 donations in the amount of 2,675 Euros in favour of the Portuguese League Against Cancer and 72 donations in the amount of 940 Euros in favour of AMI);

Launch of digital cards - digital versions of debit, credit and prepaid cards are now available on any channel, allowing immediate use in digital payments with smartphones or smartwatches or online purchases.

This is another important step in the experience that Millennium provides to Customers: the card available on the spot. The physical card is issued and sent to the Customer's home or to a Branch if the Customer has requested the diversion.

In addition, the trend observed in the previous year was maintained, with a total of 10,974,280 statements issued, of which 95% were in digital format and only 5% on paper.

We 2022", launched for the first time in Portugal of produced from cereals, which contains zero plastic and has zero impact on CO<sub>2</sub> levels, the GO! Changer. The card GO! The Changer also supports the cleaning and decontamination of the beaches, with a contribution of €1 for each card sold, and with 0.1% of the value of purchases on the VISA network, for the Brigada do Mar Association. The Associação Brigada do Mar, as a Non-Governmental Organization for Development, it entered into a partnership with Millennium bcp within the scope of the SDG (Sustainable Development Goal) – Protect marine life, and specifically in the development of actions aimed at protecting biodiversity and environmental intervention.

It is important to highlight the work that the Bank has been developing in this dimension, embodied in the fact that the vast majority of cards issued in 2023 have already been produced in 100% recycled plastic (rPVC), which provides the same print quality and durability as common PVC and greatly reduces the impact on the environment.

With a universal in scope, although on a different scale, many of our Customers already pay with their mobile device, using Apple Pay and Google Pay services, anywhere in the world.

Innovation must also be stimulated by the need for inclusion. In this sense, Millennium bcp is moving forward with the issuance of cards with cut, so that customers with visual impairment can easily identify the correct position in which they should insert the card at ATM or POS.

The first card to be launched in 2024 with this feature is the Classic credit card. This novelty will be gradually applied to all Individuals and Companies cards.

In Poland, Bank Millennium cooperates with the WWF Polska (Worldwide Fund For Nature) since 2008. WWF is an independent environmental organization supported by more than 35 million people, with an active global network in nearly 100 countries. The mission of the WWF is to stop the environmental degradation of our planet and shape a future where people live in harmony with nature, protecting the world's biodiversity, sustainably using renewable resources, and reducing pollution and waste.

The Bank's and WWF's joint initiatives aim to promote nature and climate conservation actions. From 2022 onwards, the activities revolve around the motto "Forest – home for animals, breath for people and climate protection". On International Earth Day in April 2023, Bank Millennium launched a new WWF Millennium Mastercard. The card features a new image of a lynx – the largest representative of the cat family in Europe, which is under strict species protection in Poland. For each main card issued, the Bank donates PLN 50 to WWF Poland. The Bank also provides additional funds to support the organization's statutory activities.



Also in Poland, the goodie eCard is a convenient and environmentally friendly way to give a virtual gift. The card can be set up in just a few moments on the goodie mobile app. In addition, the goodie app provides access to electronic versions of store flyers from various commercial networks, reducing paper consumption.

In Mozambique, the Bank provides the debit card "Woman", which offers, besides discounts on a set of commercial establishments and access to the several online channels, a health insurance that covers treatment expenses for breast and uterine cancer and childbirth health care. This card is part of the "Women's Solution", a set of financial products and services designed in detail to meet their needs and facilitate the management of their activities.



### SRI Funds (*Socially Responsible Investment*)

GRI FS11

The BCP Group meets the needs of Investors that consider it relevant to cover, in their investments, social and environmental risk factors, placing Responsible Investment Funds at their disposal for subscription:

In Portugal, SRI funds are available for sale on the *Online* physical platforms of Millennium bcp and ActivoBank, with the decision being made in 2022 to classify this type of product under the SFDR (Sustainable Finance Disclosure Regulation), in accordance with their contribution/promotion to environmental and/or social sustainability:

- Article 8<sup>o</sup>- *Light Green*: investments associated with the product promote environmental and/or social sustainability;
- Article 9<sup>o</sup>- *DarkGreen*: the goal of the investment is exclusively sustainable.

Millennium bcp had 344 sustainable Investment Funds on sale at the end of 2023 (323 Articles 8 and 21 Article 9) whose accumulated amount in the portfolio amounted to 7,073 million euros, which represents an increase of 25% compared to 2022 (5,632.2 million euros), of which about 97% is Article 8. At the end of the year, the total amount invested in these Funds represented around 81% of the Bank's total investment fund portfolio, compared to 71% at the end of 2022.

In relation to ActivoBank, it had 283 funds with subscribed PUs (261 Art. 8 and 22 Art. 9), in the amount of 110.704 million euros, representing an increase of 13.1% versus 2022. At the end of the year, the total amount invested in these Funds represented around 73% of the bank's total investment fund portfolio.

In Poland, Bank Millennium integrated ESG factors in the asset selection processes in investment portfolios, to respond to the growing concerns of investors with sustainability criteria in their investment decisions. Bank Millennium had 32 SRI funds with subscribed PUs (30 Articles 8 and 2 Article 9) in 2023, for a total amount of 1,116 million euros, which represented around 9.25% of the total funds in the portfolio. Bank Millennium SRI funds are available for sale either at branches or through electronic channels (homebanking and APP).

## Service Quality

Material issue:

CUSTOMER SATISFACTION AND EXPERIENCE

In Millennium bcp the quality of service is ensured by the ongoing implementation of initiatives that contribute to achieve an enhanced rigour and control of execution, ensuring that the operational and business processes function in an efficient and reliable manner, being continuously monitored and perfected, thus contributing to a progressive increase of customer satisfaction.

## Customer Satisfaction Studies and Surveys

GRI 2-29

In Portugal, Millennium bcp continues to be focused on the model of "Assessment of Customer experiences". In the 24 hours after interaction with the Bank, the Customer is invited to answer a brief questionnaire to assess Customer satisfaction with his/her experience with the Bank and the corresponding level of recommendation.

The year 2023 continued being a year in which, in general, Banking in Portugal made downward adjustments in the distribution network, in the number of Employees at Branches and doing the migration of Customers to automatic channels. These factors, combined with strong market pressure, had an impact on Customer Experience and Satisfaction.

The NPS (Net Promoter Score) indicator - the difference between the percentage of Promoter Customers (who rate 8 or 9 on a scale of 0 to 9) and the percentage of Detractor Customers (who rate between 0 and 5 on the same scale), which reflects the level of recommendation with the Bank, registered, in 2023:

- Prestige Customers recorded a decrease to 59,7 points NPS, less 4.3 points than in 2022. This figure includes the Prestige Customers of the "Physical" Network, which recorded a value of 61.4 NPS points, 4.3 points less than in 2022, and the "Direct" Prestige Customers (remote monitoring), in which there was also a decrease to 54.3 NPS points, 3.9 points less than in 2022;
- The same trend was observed in the NPS of the Business Customers, however with less relevance, recording also a decrease, moving down to 64.5 NPS points, less 1.0 points versus 2022;
- Also in the Mass Market Customer segment, there was a slight increase in NPS translated into an increase of 0.4 points, to 73.9 NPS points;
- Based on these results by segment, Millennium bcp's overall NPS is 70.4 NPS points, an indicator that had been evolving positively since the evaluation process began in 2013, reaching in 2021 the highest value ever (72.5 points) and which, for the second consecutive year, retracted slightly.

Another issue dealt with was the recommendation of the service provided by the Employee / Account Manager. This indicator, after reaching the best global Service Recommendation NPS value ever in 2021, retracted slightly in 2022 and remained relatively stable in 2023, at 84.0 NPS points (-0.3 points compared to 2021), continuing to position itself at a level of excellence. Of note, the performance recorded this year in the Mass Market and Business Segments, reaching the highest value ever in this indicator.

The Bank assessed over 117,500 experiences of Customers who visited Branches of Millennium bcp or were contacted by Client Managers.

In addition to the experiences of Customers with Branches and Customer Managers, on which the aforementioned indicators are based, Millennium bcp recurrently evaluates other experiences of Customers, namely (i) Opening Accounts for Individuals, Companies and Portuguese Diaspora, (ii) Complaint Management, (iii) interaction with the Contact Center, (iv) Portuguese Diaspora Customer Service, (v) Mortgage Credit in its various aspects, (vi) the moment of Account Closing in order to determine the reasons for abandonment by Customers, (vii) the use of the Millennium Transaction Machines (MTM) and (viii) the 1st Anniversary of the Integrated Solution.

Overall, in 2023, 41 surveys were carried out, using different methodologies, to monitor Customer satisfaction with the various Direct Channels and Business Networks, translating into more than 201,000 experiences with Millennium bcp evaluated by Customers.

As for the satisfaction rates with the remote channels of Companies, they remained at high levels, of which the 85% of User Customers who answered that they were satisfied or very satisfied with Internet Banking - Companies and the 78% of Mobile Banking Companies are examples.

Millennium bcp's Quality and Satisfaction Models Department maintains a policy of simplifying and optimizing processes, opting, whenever possible, for more efficient and sustainable channels for conducting surveys.

In this way, some processes of Evaluation of Experiences, which had exclusively human intervention through telephone contact, have been migrated to automatic channels, and the new processes have been initiated, right from scratch, through these automatic channels. This allows not only a more robust process by increasing the number of responses, but also more sustainable in terms of costs and resources. This year, examples of migration processes are the Evaluation of Prestige Customer Experiences and Customers after Account Closure and, of new processes, the evaluation of Customer Experiences after 3 months of Account Opening.

Throughout 2023, we conducted 4 Mystery Customer actions, totalling 1,392 visits to Millennium bcp Mass Market branches and 560 visits to branches of other banking institutions. The purpose of these actions is to assess customer servicing to be able to continuously improve the experience of our customers when they visit our Branches. We obtained a global score of 82.05%, which compares with the average global score of 67.8% of the other institutions and is above that obtained in 2022 (81.6%).

These results prove the continuous investment in improving Customer service and the positioning of Millennium bcp in the use of the best practices.

#### - Reinforcement of Skills and Employee Satisfaction

In order to provide a better service experience to our Customers, within the scope of Internal Communication, it is worth highlighting some initiatives promoted to strengthen the knowledge and skills of employees in the provision of an excellent service:

In conjunction with the Millennium Banking Academy, some behavioural and technical training was provided to the Network, of which we highlight:

- B#1 Prestige | completion of the training initiative that began in 2022 and aimed to enable the employees of the Prestige Platform with skills in different themes;
- Self Bankers Certification Program | a training initiative that, in two editions, throughout 2023, covered practically all employees of the Mass Market Platform, with the aim of providing them with knowledge about Self-Banking Equipment and its use/maintenance;
- Duties of Information and Assistance to the Consumer in Mortgage Credit | training initiative to raise awareness of compliance with the legal duties associated with Mortgage Credit, which covered all Employees of the Mass Market and Prestige Platforms.

Several internal communication items were also promoted for all employees, with a view to improving knowledge and skills in customer service. Examples of this are the "Momento #1" project (training content on topics with an impact on the Customer Experience), and multimedia content on new products, processes and campaigns (news, videos, direct with the Network...).

The "Customer Experience Forum #1" was also launched, held monthly, in which different areas of customer service (products, segments and channels) are seated, to share quality indicators, and identify areas of action and improve customer service.

As employees are one of the strategic pillars of the BCP Group, their level of satisfaction - with a direct impact on the quality of the service guaranteed to Customers - is an important endogenous indicator for measuring the effectiveness and efficiency perceived by the Bank.

In this way, as usual, an opinion survey was carried out on satisfaction with the internal service with all Employees who interact (directly or indirectly) with other areas to perform their functions, with the objective of, within the scope of a continuous improvement policy, identifying opportunities for improvement and optimization of processes, operations, technological solutions and procedures in force. This study is carried out on an annual basis, and the overall value obtained in 2023 was 76.8 index points (p.i.), slightly below that recorded in the previous year (78.5 p.i.), but remaining at a positive level.

In the course of 2023, 14 specific surveys were carried out with Employees, a significant part of which were in cooperation with DRH - Human Resources Division. Among the themes evaluated are corporate volunteering actions and events held by the Bank, such as the Summer Festivities or the Open Day of Shooting Sports.

As in previous years, the satisfaction with the inGenicious Program was evaluated by new employees who joined the 4th edition, essential for the continuous improvement of the integration and development process of young talents. We also carried out another 16 recurring surveys, which aim to monitor satisfaction with various internal operational processes and IT services.

- Market Studies - Satisfaction, Quality of Service and Image

With the objective of enhancing the measurement of the satisfaction and loyalty of the several Customer segments, Millennium bcp continued to follow-up several external market studies made by specialized companies so as to get indicators enabling to position the Bank in the sector and assess, in an ongoing manner, the market's perception in what concerns the quality of the service provided, the Bank's image and the products and services it trades.

One of these studies is the CSI Banca, carried out by Marktest. It is a reference study for the banking sector, based on an econometric model that aims measuring the satisfaction and loyalty of the Customer and its perception of the quality of the products and services pursuant to a benchmarking rationale.

The CSI Banking Global Index is the result of two indexes, one that evaluates the satisfaction of Customers who preferentially use Banks' branches (CSI Branch Index) and another that evaluates the satisfaction of Customers who preferentially use Digital Banking solutions (CSI Digital Channels Index).

In 2023, Millennium bcp showed greater market pressure, falling to #2 in the ranking in CSI Canais Digitais and #4 in the ranking in CSI Balcão, with scores of 76.7 pts and 75.2 pts, respectively, below those of the previous year. As a result, in the CSI Banca index it was positioned this year in TOP3 among the 6 largest banks operating in Portugal, with a score of 76.2pts, with Crédito Agrícola being excluded from the analysis.



**Melhor Banco para Empresas**  
**Banco Principal**  
**Banco Mais Inovador**  
**Banco Mais Eficiente**  
**Produtos Mais Adequados**

Another study monitored is BFin, conducted by DATA E, dedicated to the description of the banking sector in Portugal from the perspective of companies, regarding the products and services offered by banks.

In the 2023 study, Millennium bcp is once again considered, for the sixth consecutive year, as the "Leading Corporate Bank" in Portugal.

Millennium bcp is also elected, in terms of the image it conveys, as the "Most Innovative Bank", the "Globally Most Efficient Bank", the "Bank with the Most Suitable Products for Companies" and the "Globally Better Bank for Companies".

In the "Consumer Choice" study, Millennium bcp is once again distinguished in Portugal, in the "Large Banks" category, as "Consumer Choice" in 2024, with a final score of 84.4%. This is the fourth consecutive year that the Bank has received this distinction. In 12 editions of the Consumer Choice Award, Millennium has won 8 editions.

Consumer Choice aims to publicly promote the companies that have services and products with a high level of satisfaction and acceptability among consumers, helping them to make an informed purchase regarding a given product and service.

In addition to this distinction is the "Five Star Award" 2024, in the "Large Banks" category, with an overall rating of 79.0%, above the main competitors. App Millennium also won this award in the "Banking Apps" category, with an overall satisfaction rating of 81.3%.





Millennium bcp applied for this study for the 1st time in 2022, winning the award in these two categories for the second consecutive year in 2023.

The Five Star Award, a study by Five Star Consulting Portugal, is an evaluation system that annually measures the degree of satisfaction that products, services and brands grant to their users, having as evaluation criteria the main variables that influence the purchase decision of consumers, including Satisfaction through Experimentation, Recommendation, Trust and Innovation.

2023 was a year in which Millennium bcp was, once again, rewarded and recognized for its consistent path of digital transformation and strong investment in innovation, in multiple reference awards.

The Millennium App was also elected "Product of the Year 2023", in the "Banking Apps" category by Product of the Year Portugal.

In the World's Best Digital Bank Awards, promoted by Global Finance magazine, Millennium bcp won in ten categories. In Portugal, it was distinguished as the: Best Consumer Digital Bank, Best Consumer Mobile Banking App, Best Consumer Information Security and Fraud Management, Best in Consumer Social Media Marketing and Services, Best in Consumer Lending and Best Consumer Open Banking APIs.

In addition to the distinctions related to the Portuguese market, Millennium bcp also won in several categories in Western Europe, namely: Best in Consumer Social Media Marketing and Services, Best in Consumer Open Banking APIs, Best Corporate Information Security and Fraud Management and Best Corporate Information Security and Fraud Management.

Also, the iziBizi, the first Invoicing and Management Program with a Bank Account that merges the Cloudware Business invoicing and management software with Millennium bcp's financial services and Open Banking API, was also distinguished in 2023 as "Best Digital Project - Financial Services" at the ACEPI Awards - Navegantes XXI and in the "Top Tech of the Future by a Bank" category at the PayTech Awards 2023, awards that recognize excellence and innovation in the use of IT in the financial and payments sector around the world.

Millennium bcp also maintained its leadership in the recognition as "Best Digital Bank" in 2023, for the 6th consecutive year, with 56% of nominations in the total number of Customers in the BrandScore Banca study, another study we monitored, carried out by Scopen.

The main objective of this study is to evaluate the impact of Brand and Communication on Notoriety, Image, Customer Loyalty and Attractiveness to new Customers.

In this study, Millennium bcp is also recognized as the "Best Corporate Bank", also for the 6th consecutive year, with 44% of the nominations.

- Quality KPI'S

As Quality Key Performance Indicators (KPI's), we continue to adopt the Global Satisfaction (NPS) and Bank Recommendation (NPS) indicators from Marktest's BASEF Study.

In 2023, Millennium bcp will once again position itself at #1 in the ranking in both KPIs, among the five largest banks operating in Portugal.

For 2024, the objectives are the same, with the aim of achieving the TOP2 among the TOP5 of the largest banks operating in Portugal.

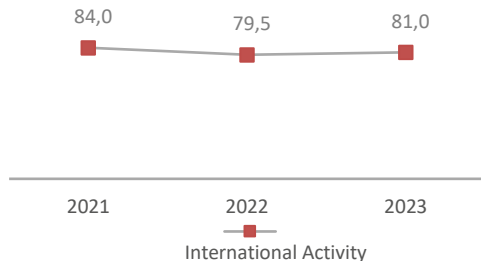
The awards and the good results obtained in 2023 recognize the excellent service that Millennium bcp provides daily to customers, both individuals and companies, offering products with convenience and security through branches and digital channels, the result of a large investment in innovation. We are continuously looking for new ways to improve the service we provide to our customers.

- Consumers

In 2023, 34 Surveys were sent to the Bank by DECO - Portuguese Association for Consumer Protection (32 in 2022), on the most diverse topics, with an average response time of 8 days (in 2022 it was 10 days).

Millennium bcp is committed to meeting the expectations of its customers with convenience and agility, in a personalized and high-quality manner, with solutions supported by excellent human service and state-of-the-art mobile and digital platforms, to continuously maintain the quality of service and its reputation as a Bank, as provided for in the [CUSTOMER CHARTER - Individual Customers](#).

**Satisfaction levels - External Costumers**  
(Pontos índice)



In the international activity, customers' overall satisfaction levels with the Bank recorded an improvement of 1.5 index points, moving from 79.5 to 81.0 i.p..

This improvement is due to Mozambique, whose value went from 71.0 to 73.0 p.i., but also to Poland, which recorded an increase of 1.0 p.i. and now has a satisfaction level of 89.0 p.i.

In Mozambique, the goal for 2024 continues to be to achieve an overall customer satisfaction index of 75 points.

In this context, several studies have been carried out in this country to know the opinion, needs and expectations of

customers, of which the following stand out:

- "Business Network Customer Satisfaction Survey", an annual online survey aimed at contributing to the increase of cross-selling and the financial relationship of the Company's Customers. Overall satisfaction increased by 3 points compared to the previous year, to 70 points. The buy-back intention and the recommendation level increased by 2 points compared to the levels reached in 2022, 71 and 67 points, respectively;
- "Prestige Customer Satisfaction Study", an online survey aimed at improving the quality of services provided, increasing cross-selling and supporting the acquisition and retention of Prestige Customers. Overall satisfaction rose by 2 points to 74 points. The Repo and recommendation levels also rose. The intention to buy back increased by 3 points and currently stands at 75 points. The recommendation level increased by 1 point to 69 points. Satisfaction with the Customer Manager remained at the levels reached in 2022, 73 points;
- "M-Top Customer Satisfaction Study", an online survey with the objective of assessing the quality of services provided in the segment. Overall satisfaction remained at the levels reached in 2022, 73 points. The buy-back level decreased by 2 points to 73 points. The recommendation level also decreased by 1 point to 69 points. Satisfaction with the Manager registered a sharp decrease of 6 points, standing at 66 points;
- Regarding the Bank's remote channels, and to know (i) the satisfaction of Customers with the experience of using IZI and (ii) reasons for not using the channel, the "Study of the evolution of dormant IZI Customers (active and non-active)" was carried out through an online survey and a telephone survey. The Bank's degree of overall satisfaction fell by 4 points compared to 2022, to 79 points. The level of recommendation of the Channel stood at 81;
- "bim Line Satisfaction study", a telephone survey carried out by the Employees of the Quality Division, to assess (i) the satisfaction of Customers with the experience of contact with the bim Line and (ii) reasons for not using the channel. The level of recommendation of the Channel stood at 80;
- To increase the moments in which the satisfaction of corporate customers is measured, the quarterly online survey "NPS Assessment of Corporate and Corporate Customers" was introduced in 2023, which aims to assess the degree of recommendation of the Bank. Globally, the level of recommendation of the Bank was 69 points;
- "Evaluation of the Satisfaction of Prestige Customers", a phone survey made to measure the satisfaction of the Customers with the Interactions they have with the Bank and the segment's degree of recommendation. The level of overall satisfaction was 69 points, 2 points increase versus 2022. The moments of Interactions evaluated were: (i) Account Opening; (ii) 6 months after Account Opening; (iii) Manager Contact/Visit; (iv) Financing Process (Granted); (v) Claims Management; and (vi) 6 months after transfer to the Prestige segment;
- In the "Assessment of the NPS (Net Promoter Score) of the Millennium bim Branches", carried out through USSD sessions, Customers are invited to give their level of recommendation of the Bank, after: (i) make a transaction over the counter; (ii) perform an operation on IZI/Smart IZI/IZI on Whatsapp; (iii) credit card activation; (iv) disbursement of NVC credit; (v) completion of a claim; (vi) contact with the BIM Line; (vii) account opening;

(viii) periodic evaluation of Prestige Clients; (ix) carry out a transaction in ATM BIM; (x) make a transaction on the deposit machine, and (xi) subscribe to other credits. In 2023, 218,167 Customers were interviewed and the overall NPS was 83, rising 13 points.

To ensure a quality and consistent Customer service experience, Millennium bim continued to monitor Service Quality, through the Operational Quality Index, a management support instrument that measures the rigour in the execution of operations and the branches' compliance with Service Levels in 5 metrics: (i) Time spent in the sending of account opening processes, (ii) Number of account opening processes that are returned (iii) % of de reversions in cash operations , (iv) % mistakes in ATMs e (v) Loan processes not handled on the day they take place. The overall *score* in 2023 was 3.4 points (objective: 3 points).

Regarding Internal Customers, the following Surveys were carried out in 2023:

- The bank made the “Suppliers Satisfaction Survey” with the purpose of assessing the quality of the services provided by the outsourcing companies, that recorded a response rate of 66%, and enabled identifying improvement opportunities in the services provided.
- In its 12th edition, the bank launched once again the “Internal Customers Satisfaction Survey” with the purpose of contributing for the improvement of internal service by identifying the main obstacles faced by the Employees that depend on other areas of the bank to perform their functions. This survey had a high participation rate of 88%. The overall level of satisfaction with the services provided by all the Millennium bim Divisions was 77 points, an increase of 7 points compared with 2022.
- In order to evaluate the experiences of providing internal service by the Employees of the Commercial Network, the "Evaluation of the experience of the support provided to the Network" was carried out, where the following processes are evaluated: (i) Account Opening; (ii) Issuance of Payment Order Issued; (iii) Contracting of Credit; and (iv) contact with SOS Rede.

We also continue to monitor 13 areas of central service operations through the Balanced Scorecard, a management support tool that measures performance indicators through a simple, actionable scorecard ranging from 1 to 5 (lowest to best performance). The KPIs of each OU are distributed into 6 categories: Efficiency, Financial, Risk, Service (NS), People and Strategy. In 2023, all the OUs evaluated showed positive results.

In Poland, Bank Millennium also benefits from robust processes and instruments to assess the quality of the service rendered to customers and recorded in 2023 a global satisfaction of 89 i.p. The objective for 2024 is to maintain the customer overall level of satisfaction above 85 points.

As in previous years, Bank Millennium carried out annual satisfaction monitoring studies in the Mass Market, Affluent, Small Business and Corporate areas, which provide a holistic view of all the Bank's business segments. The main objective of these studies is to monitor the levels of satisfaction and recommendation of our Customers in the main lines of business and to identify the main *pain points* and *delighters* that influence them.

In the Mass Market, satisfaction and recommendation remain at a very high and stable level, reaching in 2023 the level of NPS 50 and a fraction of satisfied customers of 93%. As in previous years, the Customers indicate as the Bank's strengths a competitive offer (mainly our new Millennium 360° account), high quality of service, as well as modern solutions (mobile banking - a dominant advantage especially among younger customers). The high level of satisfaction and recommendation was proven by an external NPS benchmarking study conducted by Minds&Roses. Bank Millennium is in the TOP3 of the most recommended banks in Poland.

The quality of the service is evaluated by the Mystery Shopper audits, which are carried out on a quarterly basis. The current approach is not just to monitor the implementation of standards by branch consultants. In our opinion, it is a tool to shape attitudes through communication, indicating roles and tasks in the process of working on quality. A tool that puts the Customer at the center, supports the implementation of business objectives and develops sales skills.

The quality activities developed by Bank Millennium were recognized in one of the most prestigious rankings of service quality - the Newsweek survey. Bank Millennium won first place in the Traditional Banking category and in the Remote Module. In addition, Bank Millennium also took its place in the Złoty Bank ranking carried out by Puls Biznesu. The end of the year brought another award - Bank Millennium took the podium in the 'Customer Satisfaction Ranking' carried out by ARC Rynek.

Knowing customer expectations is a critical element of any project that aims to change the process, product, communication or sales/service model at Bank Millennium. The solutions developed, before their implementation, are tested through surveys and interviews with customers and employees.



The philosophy of monitoring Customer surveys in all business lines is based on two pillars: moments of truth and closing the cycle. Within this approach, i) we measured the Customer experience at carefully selected moments; ii) we follow the Customer, choosing the method and timing of the evaluation; iii) we focus on strengthening the relationship with the Customer; iv) we look for opportunities to improve processes, procedures and products.

## Claims

Concerning claims on products and services, one of the priorities of the BCP Group is to ensure the ongoing improvement of its management in the countries where it operates, either by optimizing, simplifying and accelerating the reply procedures or by the regular assessment and monitoring of the satisfaction of the claimants with the solution presented to them. The identification and assessment of the origin of the claims aiming at their correction is also part of an unequivocal orientation of the Bank for Customer service.

In Portugal, the claims are managed by the commercial areas and by the Customer Care Centre (CCC).

	2023	2022	2021	VAR.% 23/22
<b>CLAIMS RECORDED</b>				
Activity in Portugal	69 234	66 557	53 976	4.0%
International activity	153 938	135 271	118 777	13.8%
<b>CLAIMS SOLVED</b>				
Activity in Portugal	64 735	53 821	42 859	20.3%
International Activity <sup>(1)</sup>	144 844	132 323	118 450	9.5%

(1) Includes justified complaints regarding Customer data privacy in Poland (94) and Mozambique (9) resulting from operational lapses in the processing of personal data.

In Portugal, the number of claims increased 4.0% compared to the previous year, with a total of 69,234 (66,557 in 2022), mainly explained by issues related to cards, namely the acquisition of products and services through digital channels, which represent around 80% of all complaints filed. Despite this increase, we were able to improve the average resolution time to 4 days (it was 5 days in 2022), which contributed to the Bank's constant effort to resolve claims submitted by Customers as quickly as possible.

The Customers of Millennium bcp may also bring to the Client Ombudsman claims due to actions or omissions by the Bank's corporate bodies and Employees. All the claims addressed to the Ombudsman Office are firstly handled and managed by the Bank's concerned areas and the Ombudsman Office is exclusively responsible for analysing and issuing a final opinion to claims received in connection with prior claims presented by the Customers that obtained an unfavourable decision.

The Customer Ombudsman is a body independent of the Bank's hierarchical structures and carries out its activities in accordance with its own Regulations, defending and promoting the rights, guarantees and legitimate interests of Millennium bcp's Customers who approach it.

## CLIENT OMBUDSMAN'S OFFICE

Activity in Portugal	2023	2022	2021	VAR.% 23/22
<b>RECORDED CLAIMS</b>				
Claims	2,802	2,918	2,788	-4%
Requests*	-	93	255	-
<b>NEW CLAIMS</b>				
Concluded	105	78	61	35%
In favour of the Customer	5	11	7	-55%
In favour of the Bank	100	67	54	49%
Average Response Time (days)	5	6	12	-17%

(\*) Note: As of the 2<sup>nd</sup> half of 2022, the Ombudsman's Office started to include Requests in the general category of Claims.

Thus, looking at the activity developed in 2023, the Client Ombudsman assessed 2,695 Claims, forwarded to the Customer Service Centre, responsible for ensuring the analysis and final response to claims; and 107 Appeals (80 in 2022, up 34%), which by their nature, were analysed and answered by the Client's Ombudsman Office.

The Appeal provision rate was 5%, compared to 14% in 2022, and the average response time was 5 days.

The matters - from a financial product or service perspective - that raised the highest number of claims from Customers were

those related to "Current Accounts" (26% vs 31% in 2022), with the main topics being the maintenance and closure of accounts and "House Credit" (17% vs 10% in 2022), with a focus on changes in contractual conditions and repayment/settlement.

When one assesses the business areas with a greater number of claims, the one showing the highest number is Retail Banking, with 81% followed by ActivoBank with 15%.

In Mozambique, there was a very significant increase in the number of claims, which amounted to 61,213 (32,124 in 2022), and the worsening of the respective average resolution period to 35 days (29 days in 2022), explained essentially by the Errors Considered, claims that were accepted by the Bank, despite there being no actual error.

Poland recorded a decrease in claims by around 10% (from 103,147 to 92,725), with the average resolution time remaining at 7 days. This reduction was mainly due to the decrease in claims related to house loans and current accounts.

In order to reduce the number of claims and prevent their causes, Bank Millennium acted in three areas:

- Prevention - involvement in the design and implementation phase of new products and services and participation in the review of processes;
- Elimination - identification and correction of procedural constraints, services and products based on reported claims;
- Emergency - actions to reduce and mitigate the impact of unexpected service failures on customers, in order to minimize the number of claims.

As a result of this holistic approach, 145 new initiatives were designed in 2023 as part of the "Voice Of Customer" (VOC) claim elimination program, 114 of which have already been successfully implemented.

At the same time, a number of measures have been taken to simplify the process of handling claims in order to reduce the analysis time and increase the level of customer satisfaction:

Registration of all claims (retail and corporate) in the MilleResolver2 claims centre, and a series of changes have been introduced to optimize the daily work in the application (robotization).

In 2023, we continued "Rumo à Qualidade" ("Towards Quality") project, whose main objectives are:

- Regular training, by e-mail, to all employees responsible for handling customer claims;
- Regular workshops for the development of writing skills in clear and empathetic language in solving customer problems;
- Monthly qualitative evaluation of responses to claims in the following dimensions: 1) merit and solution of customer problems; 2) information structure (visual transparency); 3) writing sentences according to the rules of plain language; 4) maintenance of relationships.

Continuous monthly monitoring of customer satisfaction with the claims process, with the following results:

- 79% - Clear Language Index - score for the claim processing units,
- 87% - result of the answers' qualitative assessment.

The high quality of problem resolution and responses translates into high customer satisfaction with the claim process – 86% in 4Q2023 (satisfied and very satisfied). Thanks to the measures taken, in 2023 customer satisfaction with the claim process improved by 5% compared to the previous year. The year 2023 is the best since the survey began.

We continue with the "Close The Loop 2.0" program, which consists of contacting customers who, in a telephone satisfaction survey, have commented negatively on the claim handling process. The goal is to use customer feedback to improve the products and services provided by the Bank and thus increase customer satisfaction.

The quality initiative "Abraçar o Problem" ("Embrace the Problem") was continued. This initiative aims to support frontline employees in solving customer problems. Employees are periodically provided with information on how to resolve the customer's issue on first contact.

In 2023, we have optimized the process of handling card claims, thanks to which the customer now receives a much faster refund.

“

“Escolha do Consumidor” (Consumer Choice): Millennium bcp is once again distinguished in Portugal in the "Large Banks" category

## Fiscal Policy

GRI 207 - 1, 2 and 3

The social responsibility of the companies requires an increasing adoption of behaviours and commitments with the communities of which we are part of, such as the protection of environment, of social well-being and the quality of governance of institutions. More recently, conscious, and fair tax behaviour by companies has gained prominence as an integral dimension of the corporate social responsibility of organisations. The companies face high tax burdens (taxes, charges, and contributions), a fact that often leads to fiscal planning, able of jeopardizing the desired fiscal responsibility standards.

The payment by the companies of a fair amount of taxes is becoming one of the main challenges of the European Union (EU (2018) Action Plan for Fair and Efficient Corporate Taxation in the EU) and of the OECD in Report BEPS – (Base Erosion Profit Shifting), the action of which includes controlling tax avoidance behaviours. In this context, the concept of tax governance arises as a fundamental part of corporate social responsibility, requiring companies to adopt good tax governance practices, such as: (i) compliance and timely payment of its tax obligations; (ii) the management of tax risks and (iii) the good relationship with the Tax Authorities, shareholders, investors and other stakeholders.

The good practices of fiscal responsibility of the companies also comprise the promotion of principles such as fiscal transparency, the careful and transparent definition of fiscal strategies and the disclosure of tax governance practices. Aware of the relevance of this theme, BCP complies with the tax burden it is subject to and adopted a policy of fiscal transparency based on the good practice of disclosing the amount of its taxes and contributions, as stated in notes 6 to 31, disclosing the annex to the consolidated financial statements.

It is also through this relevant contribution that BCP assumes itself as an institution that provides a relevant contribution towards the development of a more inclusive, fair and sustainable society.

There are several international organizations that have promoted the disclosure of non-financial information, including tax information. In the latter case, the Global Reporting Initiative (GRI) and the GRI 207 – Taxes standard are particularly prominent, which came into force on January 1, 2021<sup>14</sup> and which the BCP Group incorporated into its tax policy.

The GRI - 207 standard contains the following tax disclosure guidelines: i) the company's tax policy and strategy; ii) identification and management of tax risks; iii) the tax burden associated with the jurisdictions where companies carry out their activities, requiring extensive reporting of information, country to country; iv) and withholding taxes made, aspects presented below.

### Fiscal policy and strategy

BCP discloses on its corporate website, on the page related to Sustainability / Main Corporate Policies and Principles, the Principles it adopts in tax matters:

[Principles on Tax matters\\_BCP\\_jan2024 \(millenniumbcp.pt\)](https://www.millenniumbcp.pt)

### Identification and management of tax risks

BCP Group no longer carries out relevant activities in countries, territories, and regions with clearly more favourable tax systems, as laid down in Ministerial Order no. 150/2004, of 13 February, pointing out the following aspects:

- The entities BCP Finance Company and Millennium bcp Bank & Trust, with registered office in the Cayman Islands were liquidated in the course of 2022;
- The cancellation of the banking license of BCP Finance Bank, based in the Cayman Islands, has already been requested, whose liquidation is expected to take place in the course of 2024.

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<sup>14</sup> GRI 207 – The new global sustainability reporting standard for tax. Available in: <https://www.globalreporting.org/standards/media/2482>

## Disclosure of tax information

GRI 207 - 4

The activities of the BCP Group are subject to several types of taxes, rates and financial contributions, which, when considered globally, establish the level of taxation to which the BCP Group is subject. In notes 6 and 31 of the disclosure of the annex to the consolidated accounts, the amounts of sectoral contributions and income taxes borne by the BCP Group are highlighted; This chapter highlights the remaining taxes that are borne or collected and delivered to the State within the scope of the activities carried out.

The BCP Group discloses quarterly in its Annual Reports the main characteristics of the tax systems applicable in the countries where it operates, such as nominal income tax rates, the framework of tax losses/benefits and the most relevant legislative changes. Moreover, the information publicly disclosed in this context includes an analysis of the reconciliation between the nominal and effective income tax rate applicable to the BCP Group on the individual and consolidated basis. Through this analysis, the BCP Group explains the weight in its earnings of the income tax accounted for, which includes, overall, the impact of current tax and the impact of deferred taxes associated with existing temporary differences. Considering the International Financial Reporting Standards (IFRS) that govern the preparation and disclosure of the financial statements of the BCP Group, the analysis presented does not represent the tax paid or received by the BCP Group in the period to which it relates.

The BCP Group, as a group of multinational companies, fully complies with the annual communication and reporting obligation, which translates into a financial and tax declaration per country, and which results from the transposition to Portuguese tax law (Article 121-A of the IRC/corporate tax Code) of the provisions of Action 13 of the OECD project on BEPS. This reporting obligation is fulfilled in Portugal by BCP, as the ultimate parent entity of a group of multinational companies, according to the established legal deadlines, respecting the last reporting period to the financial year of 2022.

Information included in the 2022 financial and tax return by country

Below we reproduce the financial and tax information by country reported by BCP to the Portuguese tax authorities, as the ultimate parent entity of a multinational group of companies, in respect of the 2022 financial year (amounts in thousands of Euros):

Tax jurisdiction	Earnings			Profit before income tax	Income tax paid (on a cash basis)	Estimated tax for the period	Specific taxes paid on the banking sector*	Share capital	Retained earnings and other equity items	Number of employees	Net tangible assets other than cash or cash equivalents
	From operations with independent entities	From operations with related entities	Total								
Portugal	4,135,407	74,987	4,210,393	377,256	2,808	3,237	88,511	22,099,325	-15,429,283	6,222	301,632
China	33,403	8,245	41,648	18,554	1,787	1,947	0	0	18,646	23	3,713
France	0	0	0	0	0	0	0	0	25,619	0	0
Netherlands	82,913	0	82,913	82,805	0	75	0	18	43,694	0	0
Cayman Islands	65	6,310	6,375	5,041	0	0	0	230,882	55,433	1	0
Poland	4,874,216	90,647	4,964,864	-157,587	56,341	56,333	120,946	285,042	894,327	6,987	123,712
Mozambique	381,439	3,826	385,265	136,238	-1	36,115	0	65,997	379,404	2,504	83,868
Brasil	12	0	12	-1,066	0	0	0	12,425	-12,347	6	208
Ireland	6,179	0	6,179	462	0	0	0	40	14,498	0	0

\*Information on the specific banking sector Taxes that have been paid is not reported to the tax authorities in the Financial and Tax Statement by country.

Presented below is the financial and tax information by country that BCP must report to the Portuguese tax authorities, as the ultimate parent entity of a multinational group of companies, in relation to the year 2023 (amounts in thousands of Euros):

Tax jurisdiction	Earnings			Profit before income tax	Income tax paid (on a cash basis)	Estimated tax for the period	Specific taxes paid on the banking sector*	Share capital	Retained earnings and other equity items	Number of employees	Net tangible assets other than cash or cash equivalents
	From operations with independent entities	From operations with related entities	Total								
Portugal	3,941,693	118,382	4,060,075	914,970	7,675	7,400	72,564	3,775,193	3,234,443	6,212	327,661
China	48,618	6,431	55,049	10,271	1,967	1,244	0	0	13,253	23	3,116
France	0	0	0	0	0	0	0	0	25,619	0	0
Netherlands	0	0	0	-761	255	-70	0	18	43,002	0	0
Cayman Islands	20	0	20	-647	0	0	0	230,882	54,787	1	0
Poland	6,535,189	117,348	6,652,537	290,540	141,044	134,957	13,226	314,813	1,104,441	6,872	131,452
Mozambique	425,583	4,852	430,435	147,127	-3	31,578	0	63,766	359,900	2,574	84,541
Brasil	17	0	17	-798	0	0	0	14,508	-14,217	6	171
Ireland	21,233	0	21,233	7,578	0	0	0	40	13,076	0	0

\*Information on the specific banking sector Taxes that have been paid is not reported to the tax authorities in the Financial and Tax Statement by country.

We underline the following relevant aspects to justify effective income tax rates lower or higher than the nominal rates in force in the most relevant tax jurisdictions:

- In addition to autonomous taxation on IRC (corporate tax) and State and Municipal Surcharges, the expenditure on income taxation of the BCP Group in Portugal in 2022 and 2023 translates mainly into expenditure on the reduction of Deferred Tax Assets as a result of deductible temporary differences recorded in previous years in terms of loan impairments, post-employment benefits and impairments relating to investment in subsidiaries. The expenses in question are also influenced by the non-tax deductibility of some taxes on the banking sector in Portugal.
- As of 31 December 2023, had not yet begun in Portugal and in Poland the legislative process for the transposition into national law of Directive (EU) of the Council 2022/2523 of 15 December 2022 on ensuring a global minimum level of taxation for groups of multinational companies and large domestic groups in the Union, establishing common measures for the minimum effective taxation of those groups.
- In terms of the activity developed in Poland, the income tax values in 2022 and 2023 were strongly conditioned by the constitution of provisions related to legal risks associated with the home loan portfolio granted in foreign currency and by the taxes on the banking sector, partly non-deductible for tax purposes.

- The amounts of income taxes borne in Mozambique in the years 2022 and 2023 are related to the autonomous taxation that is levied on interest on public debt earned in that jurisdiction.
- The results obtained in China, within the scope of the activity of the Macao Branch, are also taxed in Portugal at the income tax level.

### Specific taxation on the banking sector

The specific taxation on the banking sector bears a significant weight within the BCP Group and, as a rule, it is not related to the result of the economic activity developed, thus reducing part of the shareholder value. Poland and Portugal assume, in this context, for different reasons, as countries with a higher level of taxation.

In the case of Portugal, the significant level of taxation, is translated both in terms of the number of contributions and the amounts collected, even after the change and harmonisation of the regulatory framework of the resolution mechanisms and their financing within the European Union from 2015. In fact, since 2015, the two domestic resolution contributions and the contribution established by European Union law under the Single Resolution Mechanism have coexisted, with an additional solidarity levy on the banking sector since 2020, created under the pretext of the VAT exemption applicable to most banking operations but which in no way benefits banking institutions.

The values of taxes on the banking sector paid by the BCP Group in Portugal amounted to the following amounts:

	(Euros)					
	Banco ActivoBank		Banco Comercial Português		Portugal	
	2023	2022	2023	2022	2023	2022
<b>Contribuições e impostos sobre o setor bancário</b>	<b>602 673</b>	<b>513 395</b>	<b>71 961 317</b>	<b>87 997 835</b>	<b>72 563 990</b>	<b>88 511 231</b>
<i>Financiamento do Fundo de Resolução Nacional</i>	<i>444 096</i>	<i>380 243</i>	<i>46 960 328</i>	<i>55 086 809</i>	<i>47 404 424</i>	<i>55 467 052</i>
Contribuição sobre o setor bancário	355 137	252 181	37 558 709	36 546 661	37 913 846	36 798 842
Contribuição para o fundo de resolução nacional	88 959	128 062	9 401 619	18 540 148	9 490 578	18 668 210
<b>Segurança Social e Fundo de Garantia de depósitos</b>	<b>108 577</b>	<b>83 152</b>	<b>7 322 223</b>	<b>7 113 569</b>	<b>7 430 799</b>	<b>7 196 721</b>
Adicional de solidariedade sobre o setor bancário	64 570	45 851	6 828 546	6 644 480	6 893 116	6 690 331
Contribuição para o fundo de garantia de depósitos	44 007	37 301	493 677	469 089	537 683	506 390
<b>Receitas de autoridades não residentes</b>	<b>50 000</b>	<b>50 000</b>	<b>17 678 767</b>	<b>25 797 457</b>	<b>17 728 767</b>	<b>25 847 457</b>
Contribuição para o fundo único de resolução	50 000	50 000	17 678 767	25 797 457	17 728 767	25 847 457

In the BCP Group, as can be seen from the table above, the amount of contributions and taxes on the banking sector amounted to around 72 million Euros, with a reduction being observed compared to 2022 as a result of both the reduction in the Contribution rate for the national resolution fund set by the Bank of Portugal (from 0.057% to 0.029%) or the value of the Contribution to the single resolution fund determined by the Single Resolution Council.

In the case of Poland, after an increase in 2022 of the mandatory contributions resulting from the contribution to the Polish institutional protection fund, which did not exist in 2021, it was found that the creation of this new contribution was partially compensated, in 2022 and 2023, by the reduction in the amounts paid to the deposit guarantee fund (in 2022 were paid, only the figures for the first quarter of the year) and the suspension of the payment of the special tax on the banking sector following the activation of the Polish subsidiary's Recovery Plan.

The values of taxes on the banking sector paid by the BCP Group in Poland amounted to the following amounts:

(Thousand Euros)

<b>Group Millennium Bank</b>		
	<b>2023</b>	<b>2022</b>
<b>Contributions and taxes on the banking sector:</b>	<b>13 226</b>	<b>120 946</b>
Special tax on the banking sector	-	36 107
Contribution to the Resolution Fund	13 226	17 821
Contribution to the deposit guarantee fund	-	8 046
Institutional protection Fund	-	58 972

### Other contributions borne by BCP

In 2022 and 2023 financial years, the banking activity developed by BCP Group in Portugal also supported the following Taxation:

(Euros)

	<b>Banco ActivoBank</b>		<b>BCP</b>		<b>BCP + ATB</b>	
	<b>2023</b>	<b>2022</b>	<b>2023</b>	<b>2022</b>	<b>2023</b>	<b>2022</b>
<b>Encargos de exploração (inclui provisões utilizadas):</b>	<b>3 183 533</b>	<b>2 717 728</b>	<b>50 402 000</b>	<b>62 461 431</b>	<b>53 585 534</b>	<b>65 179 159</b>
IVA suportado	3 107 252	2 656 475	44 025 633	52 920 557	47 132 885	55 577 032
Imposto do Selo	73 973	59 301	5 169 754	7 026 863	5 243 728	7 086 165
IMI e Adicional ao IMI	-	-	698 036	2 322 853	698 036	2 322 853
IMT	-	-	395 031	92 466	395 031	92 466
IUC	2 308	1 952	113 545	98 692	115 854	100 644
Pagamentos a Reguladores / Supervisores (BCE/BdP, CMVM)	301 755	173 980	3 591 176	3 435 043	3 892 931	3 609 023
<b>Encargos sociais exceto fundos de pensões</b>	<b>2 235 671</b>	<b>1 989 433</b>	<b>72 099 660</b>	<b>67 487 738</b>	<b>74 335 330</b>	<b>69 477 172</b>
TSU	1 794 344	1 587 500	58 221 877	54 624 598	60 016 221	56 212 098
Contribuições para os SAMS e outras de natureza similar	441 327	401 933	13 877 783	12 863 140	14 319 110	13 265 074

### IRS/IRC withholding tax and stamp tax collected in the banking activity

With respect to taxes collected by the BCP Group in the banking activity carried out in Portugal and transferred to the Portuguese State (third party charges), their value exceeded 300 M€ in 2022 and 332 M€ in 2023, and it should be stressed that the activity of tax collection on behalf of the State absorbs significant resources:

(Euros)

	<b>Banco ActivoBank</b>		<b>BCP</b>		<b>BCP + ATB</b>	
	<b>2023</b>	<b>2022</b>	<b>2023</b>	<b>2022</b>	<b>2023</b>	<b>2022</b>
<b>Impostos retidos / cobrados a terceiros:</b>	<b>7 432 239</b>	<b>6 204 219</b>	<b>324 568 358</b>	<b>294 217 466</b>	<b>332 000 597</b>	<b>300 421 685</b>
IRS	3 300 001	2 394 131	153 613 927	139 058 650	156 913 929	141 452 781
<i>Colaboradores e pensionistas</i>	1 926 309	1 742 242	114 707 221	109 996 629	116 633 530	111 738 871
<i>Clientes e outros</i>	1 373 692	651 889	38 906 706	29 062 021	40 280 399	29 713 910
IRC	9 617	8 274	26 648 424	11 504 859	26 658 042	11 513 133
Imposto do Selo	3 903 835	3 575 360	107 493 965	101 299 656	111 397 800	104 875 015
IVA (valor líquido coletado)	218 785	226 454	27 365 123	33 020 252	27 583 908	33 246 706
IMI e Adicional ao IMI repercutido em terceiros (Leasing)	-	-	9 446 919	9 334 050	9 446 919	9 334 050

The world today is changing and various international institutions are charting a path towards **greater transparency and greater sustainability (ESG), including fiscal sustainability (Tax ESG)**. In this sense, the **Global Reporting Initiative (GRI 207 – taxes)** recommends greater tax disclosure regarding the company's tax policy and strategy and the management of its risks. The BCP Group complies with international principles and guidelines of conscious and fair tax behavior (fair share of taxes), disclosing its tax policies and strategies to the market and society in general.



**BCP is an institution with a relevant contribution to the development of a more inclusive, fair and sustainable society**



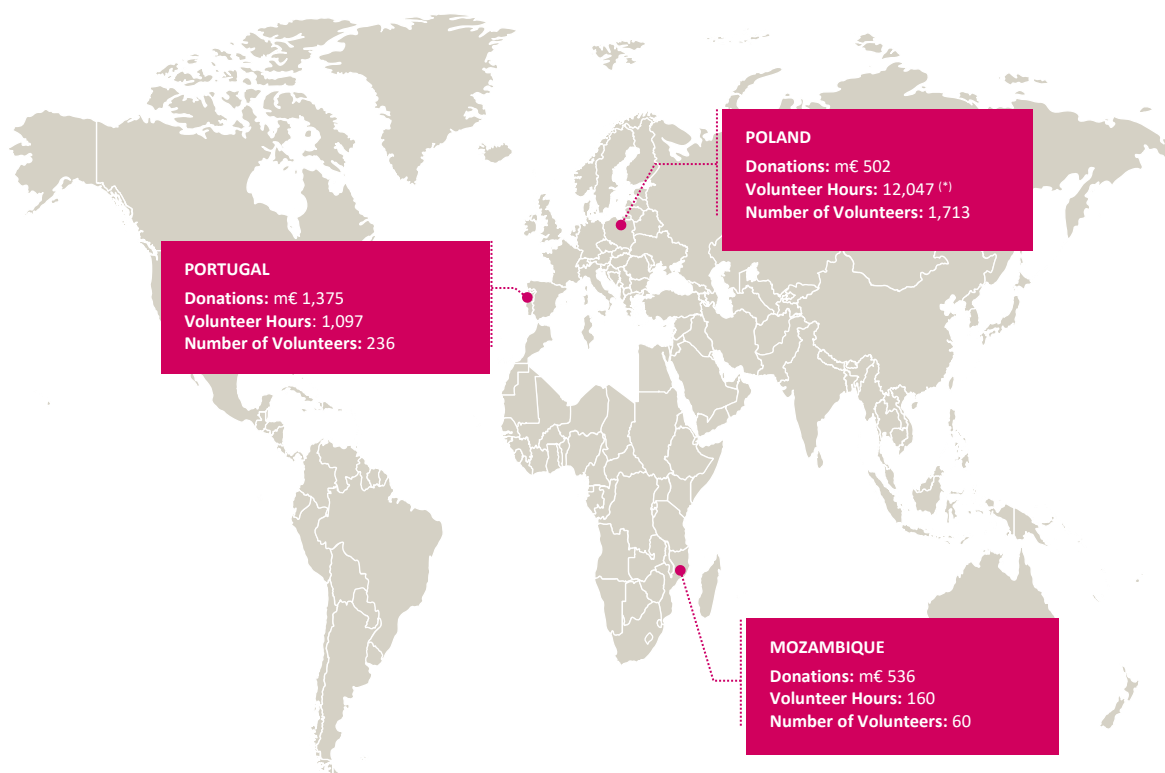
# Social Responsibility

## Social responsibility


The BCP Group’s strategy aims at promoting a culture of social responsibility, developing actions for and with several groups of Stakeholders to, directly and indirectly, contribute to the social development of the countries where it operates.




Thus, it is within this context of proximity to the community that the Bank has been materialising its policy of social responsibility, giving priority to its intervention in cultural, educational and social initiatives.

### Main highlights 2023



\*Includes the volunteer program “Our People’23: Save the Planet”, implemented in 2023. Details about this Program in the section “Participate and Share”.

SDG	Our goals	Our contribution in 2023
	Promoting employment and social innovation through support to social companies	<p><b>Financing, support and products addressed to social enterprises</b></p> <p>Initiatives:</p> <ul style="list-style-type: none"> <li>Associações sem Fins Lucrativos ('Non-Profit Associations') account - account with special conditions.</li> </ul> <p>Results:</p> <ul style="list-style-type: none"> <li>Opening of 318 'Non-Profit Associations' accounts, which corresponds to a total of 5,332 accounts in the Bank's portfolio.</li> </ul>

SDG	Our goals	Our contribution in 2023
	<p>Contribute to improving the quality of life and reducing poverty</p>	<p><b>Community donations and collaboration on community support initiatives</b></p> <p>Initiatives:</p> <ul style="list-style-type: none"> <li>• Initiatives of proximity and creation of social value, namely volunteering actions, which will be developed by the Foundation, DESC - Corporate Sustainability and the Human Resources Division, within the framework of the Corporate Social Responsibility Plan in force.</li> <li>• Cooperation protocols with "CASA - Centro de Apoio ao Sem Abrigo" and with "BIPP/Projeto Semear".</li> <li>• Partnership between Millennium bcp Foundation, Millennium bcp and EPIS - skills volunteering through which a group of Millennium bcp Employees/Volunteers give explanations to students from disadvantaged backgrounds.</li> <li>• Corporate Volunteering Action in collaboration with SEMEAR - Terra de Oportunidades project, a sustainable program for the socio-professional inclusion of young people and adults with DID (Intellectual and Developmental Difficulties).</li> <li>• "Girl Move" Project - a partnership that aims to help young Mozambican women to have access to more and better training, in order to break the cycle of poverty and, in this way, build their own future and contribute to a better, fairer and more inclusive society.</li> </ul>
	<p>Promote the financial literacy of the population, contributing to a more informed management of personal finances and promoting entrepreneurship</p>	<p><b>Promotion of financial literacy actions</b></p> <p>Initiatives:</p> <ul style="list-style-type: none"> <li>• "Afinal de contas" - a section launched on social networks and on the Millennium App with the aim of deconstructing banking or financial themes.</li> <li>• Digital Literacy Program in partnership with APB - Associação Portuguesa de Bancos (Portuguese Association of Banks) on digital banking, aimed at the senior population that is not yet familiar with the use of electronic banking.</li> <li>• European Money Week and European Money Quiz, promoted together with APB.</li> <li>• "Financial ABC" Program - financial literacy program of the Bank Millennium Foundation, in Poland, which aims to introduce basic financial concepts to pre-school children.</li> <li>• Banking Olympics - a project whose main objective is to train young people in Mozambique in terms of financial knowledge, allowing them to make responsible decisions in their savings management.</li> </ul>
	<p>Protecting labour rights and promoting safe and secure work environments for all employees</p>	<p><b>Promotion of a safe and secure workplace</b></p> <p>Initiatives:</p> <ul style="list-style-type: none"> <li>• Medical units and a dedicated medical staff on the premises.</li> <li>• Internal Medical Services, with specialties such as Nutrition, Clinical Psychology and Physiotherapy.</li> </ul> <p>Results:</p> <p>203 visits by occupational safety and health officers to the premises</p>
	<p>Contribute for the development of entities in the social economy sector by the provision of training in management</p> <p>Ensure equal opportunities at work and reduce inequalities (internally)</p>	<p><b>Training for managers of social entities within the scope of the GOS Program (Management of Social Organizations) by AESE</b></p> <p>Results:</p> <ul style="list-style-type: none"> <li>• The 2023 edition had 53 participants (Lisbon and Oporto).</li> </ul> <p><b>Promotion of equal opportunities</b></p> <p>Initiatives:</p> <ul style="list-style-type: none"> <li>• Participation in Inclusion Labs - meetings of the Inclusive Community Forum (ICF) working group.</li> <li>• Participation in the initiatives of iGen – Forum of Organizations for Equality.</li> <li>• Training "Vencer no Mundo do Trabalho" - support in the promotion of training that addresses key concepts to improve social skills and the employability potential of people with disabilities.</li> </ul>

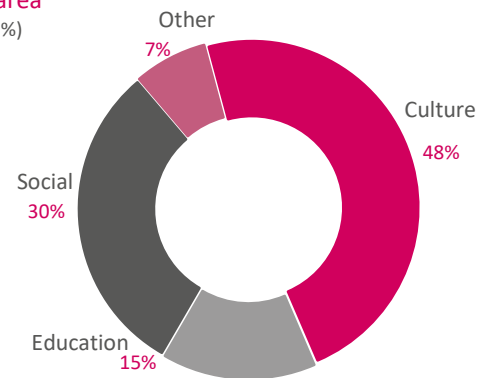
SDG	Our goals	Our contribution in 2023
		<ul style="list-style-type: none"> <li>Partnership with APSA - Associação Portuguesa de Síndrome de Asperger – with a view to the inclusion of its members in the labour market.</li> </ul> <p>Results:</p> <ul style="list-style-type: none"> <li>58% of the total training hours provided are aimed at women</li> <li>Number of employees with disabilities: 235</li> </ul>

## Participate and share

At Millennium bcp, employees have the possibility to dedicate part of their time to participate in volunteering initiatives, putting their professional and personal skills and competences at the service of the community. In 2023, 9 actions were carried out (5 social, 1 environmental and 3 financial education and literacy) for a total of 989 hours spent, between employees and family members, covering 14 regions of Portugal. The entities that received the help and proximity support were: Banco Alimentar; SEMEAR/Bipp; Entrajuda; C.A.S.A; Brigada do Mar; EPIS; ICF; and schools from Baixa da Banheira, Loulé, Almada and Vale de Cambra (APB Program).

Of the several volunteer actions carried out with the communities, we highlight:

Donations allocated per intervention area (%)



Carrying out a Corporate Volunteering Action of an environmental nature - garbage collection on Carvalhal beach - Grandola, Portugal, in a total of 3.0 kms. The action, which was attended by 22 volunteers from different areas of the Bank, was carried out by "Brigada do Mar", a Portuguese NGDO - Non-Governmental Organization for Development, whose main activity is the decontamination of the coastline, within the scope of the Collaboration Protocol established between the Bank and this Organization in 2021. About 800 kg of garbage were collected in this initiative.

With SEMEAR - Terra de Oportunidades/Bipp, responsible for a sustainable program for the socio-professional inclusion of young people and adults with IDD (Intellectual and Developmental Difficulty), based on training, development of skills for employability and professional insertion, we carried out a volunteering action with environmental and social impact.



This initiative, which took place on the agricultural land explored by SEMEAR in Oeiras, where this institution is dedicated to the production of organic vegetables, was attended by 16 Millennium volunteers who participated in the cultivation and planting work integrated in joint teams with the beneficiaries.



Christmas lunch promoted by CASA - Centro de Apoio ao Sem Abrigo

This solidarity initiative had the participation of 7 Millennium volunteers, who helped in tables support, serving meals, cleaning and the general organization of the event. This lunch, a true embrace of sharing and solidarity, provided, both to the beneficiaries and the volunteers, a moment of sharing with impact.

This initiative was developed within the framework of the new Corporate Volunteering Policy and the Program that materializes it, whose objective is to promote a culture of participatory corporate citizenship, with a view to contributing to the development of the communities in which the Bank is present and responding to the challenges that arise in the social, environmental and corporate governance axes, aligning its activities with the Group's Sustainability strategy.

We once again participated in the regular food collection campaigns promoted by Banco Alimentar, held in May and December, which were attended by 134 volunteers (70 in May and 64 in December), including workers, family and friends, distributed

across nine of the warehouses in Portugal (Lisbon, Oporto, Santarém, Coimbra, Funchal, Aveiro, Setúbal and Palmela), helping in the separation and packaging of donated food.

In 2023, the partnership established between Millennium bcp, its Foundation and EPIS - Empresários pela Inclusão Social was continued, with the aim of bringing together a group of Employees / Volunteers of the bank with interest and availability to give explanations to students in the 2<sup>nd</sup> and 3<sup>rd</sup> Cycles of schooling from disadvantaged backgrounds (with a higher risk of failure and school dropout), thus helping to promote their social inclusion through school. 18 workers (10 in 2022/2023 and 8 in 2023/2024) volunteered to give explanations of different subjects, through digital media, for 1 hour/week.

EPIS is responsible for the largest civil society engagement program in promoting the social inclusion of young people through school success and professional insertion, working in close partnership with the Ministry of Education, Regional Governments and Municipalities across the country.

Millennium bcp also renewed its support for "Vela Sem Limites" project, an initiative of the Cascais Naval Club that allows the regular practice of sailing to several dozen people with disabilities.



In 2023, Millennium bcp and its Foundation signed cooperation protocols with "CASA - Centro de Apoio ao Sem Abrigo" and "BIPP/Projeto Semear", also delivering support of €10,000 to each of these institutions; and with Vela Sem Limites, to whom a donation of €6,000 was made.

These protocols provide for several initiatives of proximity and creation of social value, namely voluntary actions, which will be developed by the Foundation, DESC and the Human Resources Division, within the framework of the annual Corporate Social Responsibility Plan.

In Poland, social programs are essentially managed by the Bank Millennium Foundation and focus mainly on financial education, cultural sponsorship, academic support and volunteering. Bank Millennium Group attaches great importance to the involvement of its employees in social campaigns. To allow them to pursue their own volunteering ideas, internal competitions are held to motivate the work of the banking community, in which grants are awarded to be used in the execution of solidarity projects for employees.

Bank Millennium and the Foundation are not indifferent to environmental problems, which is why a volunteer program called "Our People'23: Save the Planet" was implemented in 2023, focused mainly on protecting the planet and aimed at all employees of the Bank and the Group in Poland (see Bank Millennium Foundation section).

The programme is divided into two interdependent parts: sports challenge and eco-volunteering. The sporting aspect of the campaign was based on the involvement of volunteer employees in sports activities. Every kilometre travelled and every calorie burned contributed towards the goal of donating PLN 250,000 to the Bank Millennium Foundation. 1,508 volunteers were involved in the activities, covering a total of 311,444 kilometers and burning 18 million calories between April 24 and June 25, 2023. As part of the second part of the campaign, on eco-volunteering, 26 different eco-initiatives were implemented thanks to the amount donated to the Foundation. The eco-volunteering collectively involved 125 volunteers.

For the "Our People'23: Save the Planet" grant program, the Bank Millennium Foundation awarded an aggregate value of PLN 250,000, which supported a total of 27 volunteering actions, involving 1,713 employees and totaling 12,047 hours, the vast majority (947) carried out in the "Our People'23: Save the Planet" eco-volunteering component.

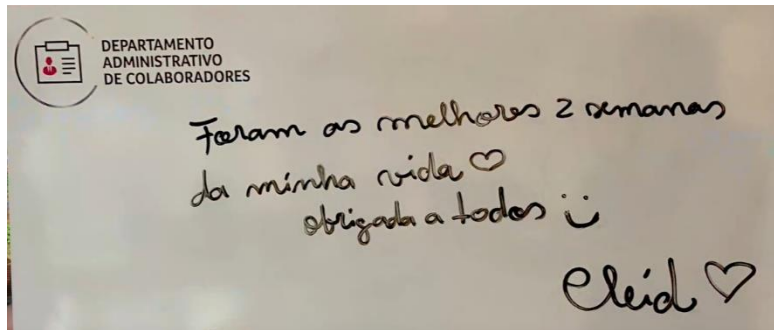
In Mozambique, the commitment to be an active agent in the social development of the country is also assumed by the workers of Millennium bim who, through the "Millennium bim Responsável" project, participate in actions of social and community interest, contributing to the improvement of the quality of life and well-being of the population. This project has been an example of the supportive, civic and altruistic attitude of Millennium bim employees.

The Bank's "Millennium bim Responsável" corporate volunteering project involves employees and their families in actions of collective interest, implementing structuring projects in institutions without the human and financial resources to implement them.

Reference for the "Girl Move" Project, an association that aims to help young Mozambican women to have access to more and better training, in order to break the cycle of poverty and, in this way, build their own future and contribute to a better society. Millennium bim ensured the complete training of 1 GirlMover, 2 Guides and 30 Muarussis (girls from the community).e) It is an advanced leadership and social entrepreneurship program for young university students across the country. Support is provided to these young women at the most diverse levels, namely in the field of education, making them role models for adolescent girls in their community.

When they improve a girl's life through education, health, security and enhance opportunities, these changes have a positive multiplier effect on society. The girl, by becoming a trained mother, an active citizen, a prepared professional, becomes the greatest asset in her community to break the cycle of poverty. The Girl Move project believes that by empowering Mozambican girls and women they can become the country's main development agents.

In 2023, Millennium bcp, in Portugal, which is also part of the companies that have supported the "Girl Move" project since the outset (since 2016), hosted Girl Mover Cleid Sande for an internship at the Bank, in a fully face-to-face format that involved several Bank Divisions, and which also included a Volunteering experience with Semear. In the words of Girl Mover Cleid Sande, "It was the best two weeks of my life."



From the point of view of the human resources function in liaison with the external community, the involvement of the PROV MOV Program, coordinated by the Business Roundtable Portugal Association (ABRT), of which Millennium bcp is a founder, for the requalification of people at risk of unemployment is one of the key initiatives.

In 2023, Millennium bcp was involved in three different requalification laboratories and collaborated in the launch of the respective classes, as well as the allocation of vacancies for Professional Training in a Work Context (PTWC).

	Classes	PTWC at Millennium bcp
Digital	7	4
Sales	2	3
Business Intelligence	2	1 (to start in 2024)

The Bank has also organized, encouraged and monitored, in what constitutes an important contribution to the materialization of its Social Responsibility policy in Portugal, internal solidarity actions that promote a culture of proximity and add social value. From amongst these initiatives, we must highlight:

“Millennium Solidário – Natal 2023”

As part of the traditional Christmas solidarity campaign, the Bank and Millennium bcp Foundation have partnered, this time, with two institutions that treat and support people (adults and children) facing serious health problems: Instituto Português de Oncologia de Lisboa de Francisco Gentil and ACREDITAR - Associação de Pais e Amigos de Crianças com Cancro. This campaign, which is part of Millennium bcp's Sustainability strategy and Corporate Social Responsibility policy, is the result of a successful partnership between the Bank's employees and the Millennium bcp Foundation, which supported "ACREDITAR" with 2,500 Euros and "IPO - Lisboa" with 20,000 Euros.



The Social Impact policies of Millennium bcp and its Foundation, which provide for the development of actions that create social value and consolidate a culture of partnership and proximity to the surrounding communities, had in this initiative a renewed example of materialization of principles of solidarity and corporate social responsibility, revealing a citizenship - individual and collective - consequent and with a (real) impact on people's lives.

Employees and Millennium bcp Foundation donate 5,000 euros to UNICEF

Millennium bcp and its Foundation have partnered with UNICEF to support the victims of the earthquake that struck a large area of Turkey and Syria last February, causing thousands of deaths and homelessness. 36 donations were made by employees in the amount of 1,740 euros, which were complemented by a donation of 3,620 euros from the Millennium bcp Foundation.

UNICEF - United Nations Children's Fund is the main humanitarian agency that works specifically for the promotion and defence of children's rights, being present in more than 190 countries and territories, providing humanitarian aid without discrimination of race, colour, sex, language, religion, political opinion or other. The most disadvantaged children and the countries with the greatest needs are given priority.

Oeiras Solidária Program (POS) and local proximity actions

The Bank publicized and promoted, using its communication channels, various initiatives of the Oeiras Solidária Program (POS), an organization of which it is a member, but also of social sector entities, such as CERCIC Oeiras or CERCICA. It was in this context that the Bank once again made its facilities available for the annual sale of Magic Fireflies, with the main objective of contributing to the raising of funds in favour of CERCIS.



In 2023, we reinforced corporate volunteering actions, with the actions carried out in the main geographies of the BCP Group involving the participation of 601 volunteers (236 in PT, 205 in PL and 30 in MZ), which corresponded to 2,504 hours of environmental volunteering and Social. To these values must be added the 1,508 volunteers (10,800 hours) who, at Bank Millennium (Poland), contributed to raising support for initiatives to support communities and protect nature.

This added value allowed us to exceed the target of 4% increase in hours attributable to volunteering when compared to 2022, in which we recorded a total of 3,066 hours.

In 2024, materializing a strong social commitment that allows us to be (always) closer to communities and People, we aim to increase by 10%, when compared to the same period last year, the total number of Volunteer hours at Millennium bcp.

Material issue:

SOCIAL AND ENVIRONMENTAL AWARENESS

Millennium bcp, in Portugal, also carried out a number of supporting actions to institutions and initiatives able of generating social value, of which we highlight:

- Regular support to institutions through the donation of IT equipment and office furniture that is no longer used, but is in condition to be reused. In 2023, including computer equipment and furniture, the Bank donated 443 assets to 14 institutions;
- Millennium bcp donated 50,000 Euros to the organization that promoted the World Youth Day, held in Portugal between the 1<sup>st</sup> and 6<sup>th</sup> of August, in what was the largest gathering of young people from all over the world, which was attended by Pope Francis;
- Millennium bcp participated once again in the campaign "Portugal Chama", a prevention campaign launched by the Portuguese State to avoid forest fires, protecting the people, the forest, rural ecosystem services and minimising the environmental, economic and social impact of fires;
- In Culture, the highlight was the 15<sup>th</sup> edition of the Festival ao Largo Millennium bcp, an annual initiative with free access that took place, once again, at Largo do Teatro Nacional S. Carlos. Musical diversity, dances and the presentation of young talents were part of the event. Millennium has also made the commitment to be the main patron of the Territory Program, of Victor Córdon Studios, recognizing the importance of supporting young talents, from the most varied national dance schools.



In Mozambique, the Bank's social commitment is embodied in the "Mais Moçambique pra Mim" program, one of the BCP Group's benchmarks in the field of Corporate Social Responsibility and outreach to local communities, which continued to give priority to projects in the areas of health, education, culture and community development:

#### Health

The contribution in the area of health translates into support for the implementation of projects that can provide a higher quality of the Mozambican Health System, either through long-term projects or by responding to requests for immediate intervention.

##### - Campaign for the treatment of Children with Laryngeal Papillomatosis

In order to contribute to the improvement of the quality of the Mozambican Health System, we support the project entitled "Plano Nacional Moçambicano de Rastreio e Tratamento de Crianças com Papilomatoses Laríngeas", implemented by "Massala - Associação de Médicos no Abraço a Moçambique". As part of this project, a mission of specialist doctors, members of "Massala", carried out free surgical interventions to about thirty children at the Laryngeal Papillomatosis Screening and Treatment Centre of the Maputo Central Hospital from 24 to 28 April 2023.

##### - Rehabilitation of 41 Health Units in Zambezia Province

In 2023, in partnership with the Non-Governmental Organization Friends in Global Health (FGH), we supported the rehabilitation of 41 Health Centres in Zambezia Province. The initiative aimed to contribute to the improvement of health care in communities affected by the devastating effects of Cyclone Freddy.

#### Community Intervention

Community development is another of Millennium bim's main focuses of intervention. The continuous support given to social institutions, schools and communities in the various provinces aims to contribute to a better quality of life for people and to the social development of the country.

##### - Rehabilitation of the São José de Boroma Sanctuary

We support the rehabilitation process of the São José de Boroma Sanctuary, in the province of Tete, a historical heritage site that is more than 100 years old. With this initiative, the bank has joined the promotion of the heritage of the Tete region and its tourism projection at national and international level. With this support, we reinforce our commitment to continuously and actively contribute to the construction, improvement and preservation of national historical heritage, allowing a greater appreciation and enjoyment of the cultural elements of the province of Tete and the country.



#### - Celebration of Children's Day

As part of the Children's Month Celebration, we brought fun and learning to more than 600 vulnerable children. These actions took place in Tete, Chibuto, Matutuine and Maputo, where we provided a day of fun and learning for children, stimulating values such as interpersonal relationships, respect, tolerance and self-esteem. In addition, the initiative raised awareness among the academic community and society in general about the importance of social inclusion.

#### - Festival of recreational activities

As part of the existing partnership between "Mais Moçambique pra Mim" and the Ministry of Education and Human Development, specifically in the implementation of the social inclusion and recreational activities project, another edition of "Brincando Sem Fronteiras" took place in June 2023. This project is aimed at children with special educational needs between the ages of 6 and 12. In 2023, the project was carried out at the São Carlos Lwanga Community School, located in the Mahate neighborhood in the city of Pemba and had the participation of 200 children.

#### - Screening of the musical Os Saltimbancos TP50

In partnership with the TP50 group, we contributed so that children from the Community of Sant'Egidio had access to a children's event, associating different artistic manifestations, such as music, dance, theatre, singing and photography, stimulating healthy habits in a learning environment with empathy and fun. The children involved in this initiative followed the screening of the children's musical "Os saltimbancos".

#### - Offer of food products to the Inhambane Kindergarten

Several essential goods were delivered to improve the living conditions of the children housed in the Inhambane Provincial Nursery. This delivery was conducted by the athletes involved in the Minibasketball Project.

#### - Issuing Identity Cards

Within the scope of the Minibasquete project, a campaign was developed to issue Identity Cards to all children who did not have this document, covering about 14 children.

### Sports

Millennium bim believes that projects aimed at training and sports practice help prepare children for their future challenges, by acquiring fundamental principles for their development as men and women. Betting on sport is believing that, through the practice of various sports, it is possible to transmit values and structuring principles in the growth of young Mozambicans, as well as to alert the general population to the importance of physical activity and the need to have a healthy lifestyle.

#### - 16<sup>th</sup> Millennium bim Minibasketball Tournament

This tournament, supported by Millennium bim for 16 years, celebrates the practice of sports and the healthy development and well-being of young people. Started on August 5, 2023, this edition had 2 competition poles: South zone and Central and North zone, with the participation of 1,230 children from 6 to 11 years old. At the end of the tournament in the South zone, which took place in the province of Inhambane, Identity Cards were issued to 60 children participating in the tournament and food products were delivered to the Provincial kindergarten, which houses 25 children in vulnerable situations.

### Culture

Having access to culture is fundamental for the aggrandizement of human beings. This has been one of the Bank's areas of intervention and represents a clear commitment to support the development of Mozambican arts and culture.

#### - A Escola do Caminho Longo

In February, we inaugurated, in partnership with the Helpo Association, the photographic exhibition called "Escola do Caminho Longo", an initiative that portrays the dilemmas experienced by the victims of the humanitarian crisis in Cabo Delgado Province. The life-size exhibition depicts the escape of 20 children who had to abandon their villages to survive the attacks, walking hundreds of kilometers for several days in an attempt to reach safety.

#### - Albinism Awareness

We support, in partnership with the Khanimambo Association, the painting of a mural, created within the scope of World Albinism Awareness Day. The mural, which is located in downtown Maputo, is a creation of renowned artist Sebastião Coana, and aims to raise awareness among the community in general about the importance of protecting and valuing people with Albinism. With vibrant colours and symbolic elements, the artwork aims to convey a message of acceptance of difference, respect, and equal rights.

## Environment

### - Painting of the Wall of Biodiversity

We supported the "Wall of Biodiversity" project, an action that aimed to promote the painting of about 40 murals on the protection of Mozambican wildlife, marine and flora. The murals are located between the exit of Maputo International Airport and the bridge of Lusaka's Accords avenue, making them the first calling card for the country, through its main entrance, the City of Acacias.

### - Conference on the dissemination of climate resilience and environmental conservation potentials

In June 2023, we supported the holding of the "I Conference on the Dissemination of Climate Resilience Potential and Investment Attraction for Environmental Conservation". This conference was promoted by the Gorongosa District Government, and served to consolidate business relations with the institutions present. The event was attended by the Governor of the Province and several private, Governmental and Non-Governmental (NGOs) entities.

## Financial Literacy

In all its operations, the BCP Group assumes as one its strategic goal the increase of financial literacy. An example of this commitment are the actions that the Bank has been continuously developing to increase the financial knowledge of citizens, particularly the youngest, always bearing in mind the importance of the widespread adoption of responsible banking behaviours and informed decision-making. In this context, the Group promoted a diverse set of initiatives throughout 2023, among which we highlight, in Portugal:

Within the scope of the "Financial Education" Working Group of the Portuguese Banking Association (APB), in which Millennium bcp participates, throughout the year, APB promotes or associates itself with various events aimed at the development of financial education among different target audiences.

From the European Money Quiz, a financial literacy game dedicated to young people, to financial literacy sessions for the general public, to the financial literacy content site – "Saber de Contas"... there are many initiatives that aim to promote greater culture and financial inclusion among civil society.

"No Banco da minha Escola"



Throughout the 2023/2024 school year, the APB Financial Education Working Group, in collaboration with a group of volunteers from Associated Banks, toured and will continue in 2024 to travel the country from North to South promoting financial literacy in dozens of 3<sup>rd</sup> cycle and secondary schools.

"No Banco da Minha Escola" addresses the following topics:

- 1<sup>st</sup> Period: Family Budget Planning and Management (Cost vs. Income);
- 2<sup>nd</sup> Period: The financial system and basic financial products (Credit, Deposits, Payments, Insurance);

- 3<sup>rd</sup> Period: Preventing Online Fraud (the types of fraud that exist and the precautions to be taken when using digital channels).

These clarification sessions are aimed at students between the 7th and 12th grades and follow the program guidelines of the Financial Education Framework, promoted by the National Financial Education Plan (PNFF), of which APB is a partner.

In 2023, in addition to having reinforced financial literacy content on online security, we created a section on social networks and in the Millennium App, entitled "Afinal de contas", with content that simplifies users' daily lives. The objective is to address topics such as filling out the IRS return and the delivery dates, the payment of IMI or the operation of the young IRS. We also explain some investment products, such as ETFs, or any other banking or financial topic that deserves to be deconstructed for users (Digital).

The realization of another edition of the "European Money Week", and the "European Money Quis", which, in Portugal, are promoted by APB.

The European Money Week, launched by the European Banking Federation (EBF), is an initiative to promote Financial Education that takes place every year, in March, and which has the participation of more than 20 countries at European level. During that week, the banking associations of the various countries involved develop a set of activities aimed at promoting financial education among different audiences, namely children, young people and entrepreneurs. This project's main objective is to draw attention to the importance of greater and more comprehensive financial education in Portugal and Europe, raising awareness in the community of the importance of adopting appropriate behaviour in present and future financial choices.



The European Money Quiz is a European competition, played online, to promote the financial literacy of young people and test their knowledge in matters such as savings, debt, family budget management, digital security, among others. The competition takes place in two stages. First, the national finals to determine the two winners for each country. Then the European final, where finalists from different countries will compete head-to-head in Brussels to try to become European champions of the EMQ.

Also in Portugal, with the aim of continuing to amplify the publication and dissemination of content on Sustainability topics, in particular on Sustainable Finance, the Bank maintained its support for the ECO Green Capital project. Among the initiatives carried out and materials published, we highlight the presence in the ECO Sustainability Yearbook and in the Green Economy Forum, ECO Green Capital's annual conference dedicated to the green economy, sustainable finance and energy transition. Following this partnership, the Bank's sustainable initiatives, products and services were also promoted, such as the installation of photovoltaic panels in Millennium bcp Branches or the Green Real Estate Development.



The Bank also maintained, with the same objective, its support for the Jornal de Negócios project on Sustainability. Of the activity carried out in 2023, we highlight Millennium bcp's participation in a conference of CEOs on Sustainability topics - "Miguel Maya - A Sustentabilidade faz transformar a forma de fazer banca" -, but also its presence at the three ESG conferences that discussed topics such as: Environmental (Decarbonization, Circular Economy, Preservation and Natural Capital); Social (Equality and Diversity, Well-being, Sustainable Cities); ESG Governance (Sustainable Finance, Sustainability Communication and Digital Transformation in Sustainability).



In Mozambique, in 2023, the bank developed the following initiatives in the area of Education:

- ADPP Protocol

ADPP is a humanitarian Non-Governmental Organization (NGO) that has been operating in Mozambique since the 1980s. The Bank has been supporting this NGO in the training of primary teachers (grades 1-7) since 2021. This funding is intended to create a generation of passionate educators by actively promoting new approaches to teaching and learning, and to make teachers capable of leading various community development initiatives in rural areas of the country.

- Banking Olympics

With the aim of introducing the newest banking and personal finance management concepts into everyday life, the Banking Olympics aims to contribute to a generation that is more informed and aware of the choices they should have at a financial

level. This project also makes it possible to raise the level of financial knowledge among the school-age population, through the creation of propitious moments for discussion and presentation of doubts and suggestions regarding the topics addressed.

For the first time in Nampula province, northern Mozambique, we held the 12th edition of the Banking Olympics, a financial literacy project that has been in place since 2010, whose main objective is to train young people in matters related to the financial system, the environment, savings and entrepreneurship. Students from the 15 schools in Nampula had the opportunity to participate in workshops and make study visits to the Millennium bim facilities in Nampula.

In this province, we had as the winner, the Secondary School of Muatala, which presented the project "Um livro + conhecimento".

In Maputo Province, the project covered 5 Secondary Schools, and the Mártires de Mbuze Secondary School was the winner, with the presentation of the Project on Environmental Education and Sustainable Recycling.

#### - Marrocane Project

More than 1000 students from the Morocane Primary School in Cabo Delgado benefited from school supply kits. This support is part of the social responsibility strategy that includes actions to improve the teaching and learning conditions of displaced children and victims of the humanitarian crisis in this part of the country.

For 10 months, a campaign to collect monetary support for the purchase of school supplies took place through Digital Channels. This campaign allowed the Bank's Customers and Partners to contribute to minimizing the negative impact of the humanitarian crisis in that part of the country. The amount acquired in this campaign was used to purchase school supplies that were delivered to students in the district of Marrocane.

#### - International Money Week

On March 24th, at the Emília Daússe Secondary School, in Inhambane, we participated in the celebration of the International Money Week (Global Money Week), through the exhibition of products and services to promote financial literacy. Under the motto "“Planifique seu Dinheiro, plante seu Futuro” (“Plan your Money, Plant your Future”)", this year the initiative included workshops, debates, paintings, drawings, staging, simulation, quiz and a fair, with the aim of empowering children and young people to make the right financial decisions and ensure greater financial resilience.

In Poland, in addition to the financial literacy initiatives carried out by the Bank Millennium Foundation, with emphasis on the "Financial ABC" program, a financial literacy program that aims to introduce basic financial concepts to pre-school children, in 2023 the Bank focused its support on online safety education:

The problem of fraud or embezzlement in which bank customers are the injured parties concerns the entire banking sector in Poland and worldwide. Given that customer awareness is of fundamental importance in each case, in terms of the safe use of online financial services, banks, and this includes Bank Millennium, intensively educate their customers in collaboration with the Polish Banking Association, but also with their own initiatives, reminding customers about the online risks they face and the need to comply with security rules. Bank Millennium publishes warnings and recommendations on safety rules on its website. Whenever the Bank receives information about a new criminal action or a new method of fraud, it immediately publishes notices to customers on its portal, in special campaigns and on social networks. Bank Millennium also adopts various preventive measures and responds to all signals that may constitute an attempt to deceitfully obtain customer information or funds.

The number of fraud attempts through electronic channels has remained high since 2020, which justifies the continuity of educational activities. Customers have continuous access to information and video materials on the Bank's website and on mobile. As part of the "Spr@wdzam" campaign, Bank Millennium has created a special page with questionnaires on its portal, where customers can test their knowledge of security issues and learn new information (<https://www.bankmillennium.pl/sprawdzam> ). The quizzes were supplemented with video clips mimicking the format of a game show. The films were also published on the Bank's YouTube channel.

Educational campaigns for customers are delivered through several channels:

- banners on the Portal, on the mobile app and Millenet;
- PUSH messages on the mobile app;
- messages in the contact box available on Millenet and on the app;
- SMS to less active customers on digital channels.

The campaigns are regularly updated and targeted at a variety of target audiences, including seniors, teenagers, parents of younger children and also selected groups based on risk profiles created at the Bank. We see the need for additional communication with non-Polish-speaking customers, which is why we prepare communication in English and occasionally in

Ukrainian. Communication plans and content are created through cooperation between various departments, namely the Security Division, Electronic Banking Division, the Quality Division and the Customer Knowledge Division. In addition, we examine customers needs in this area to better tailor educational activities to their level of knowledge and expectations.

Cybersecurity issues are also discussed in other contexts, for example, when establishing a relationship with a new customer or submitting an application for an electronic money loan. Customers can also call a special helpline operated by a team of trained cybersecurity consultants.

A series of videos featuring children and commentaries by the Bank's experts, created as part of the Bank Millennium Foundation's activities, is also available on YouTube.

Customers taking their first steps in digital banking can use the website [www.bankmillennium.pl/pierwszykrokonline](http://www.bankmillennium.pl/pierwszykrokonline) since 2020.

In 2023, cooperation with the CFO Club of the ICAN Institute, which has more than 900 members, was maintained. The CFO Club is a development and networking initiative that brings together CFOs of companies operating in Poland. Company representatives can participate in both webinars and presentations during on-site meetings. The topics discussed during the meetings are related to the most current challenges faced by CFOs and CFOs of companies. In 2023, the topics of the meetings included: 1) modern financial management methods, 2) data analytics and artificial intelligence, 3) ESG strategy, 4) effective cooperation and communication.

As part of the 6<sup>th</sup> edition of the Forbes Family Business Forum - a joint initiative of Forbes magazine and Bank Millennium - 9 meetings were held with entrepreneurs throughout Poland. It is an annual event that brings together family businesses. Bank Millennium has been the Strategic Partner of the Family Business Forum since 2018. During this year's series of meetings, a lot of time was devoted to the need to implement the principles of sustainable development and the importance of investments in this area, among others, taking into account EU-supported funding.



(Millennium Volunteers at the Lisbon Food Bank – December 2023)

**Within a context of accelerated transformation of the banking relationship and of the channels that support it, BCP Group also assumed the priority of contributing to the improvement of the financial and digital literacy levels of the communities it serves**



## Employee Benefits

GRI 401-2

The BCP Group provides a diversified set of social benefits to its Employees that go beyond what is set forth in the legislation applicable in the different countries where it operates.



## Health and Safety

GRI 403-3

In Portugal and in Poland, the employees benefit from medical units and a group of full-time physicians, who ensure the provision of curative and occupational medicine and medical assistance. The employees are also provided with a regular and broad medical check-up, largely surpassing what is defined by law for occupational medicine.

In Portugal, with the aim of reinforcing the health benefits for Employees, the Bank also guarantees, in the Internal Medicine Services at Taguspark, follow-up in the specialities of Nutrition (653 consultations vs. 543 in 2022) and Clinical Psychology (1,114 consultations vs. 853 in 2022), specialities also available to Employees located in Porto. The Physiotherapy Office is also available at Taguspark and at the Clube Millennium bcp headquarters in Lisbon. In addition, a service is available for clinical analyses.

In Mozambique, Millennium bim has in its registered office: i) a medical office, which, in addition to medical appointments, also offers various specialities and basic health care; ii) a HIV office, ensuring prevention and follow-up of this disease; and iii) social support office, offering counselling to Employees with serious social problems that also provides, whenever necessary, legal and psychological support.

### HEALTH SERVICES <sup>(1)</sup>

	2023	2022	2021	VAR.% 23/22
<b>MEDICAL SERVICES</b>				
Consultations made	26,203	25,220	24,472	3.9%
Check-ups carried out	8,465	10,426	8,344	-18.8%
<b>HEALTH INSURANCES</b>				
Individuals involved	43,141	44,733	46,862	-3.6%

<sup>(1)</sup> Includes active Employees and retired Employees.

The Employees of Group BCP as well as their families also benefit from health insurances , free of charge, or with subsidized conditions which ensure very wide cover plans.

In Portugal, for more complex situations, the employees, whether active or retired, their spouses and children, may also have access to healthcare at Clínica Universidad de Navarra. In 2023, 221 consultations were carried out, which resulted in 90 hospitalizations.

The disclosure, through internal communication corporate platforms, of information on issues related with health and well-being, prevention of illnesses and healthy life habits are a practice transversal to all operations of Group BCP.



In Poland in 2023, the medical service provider was changed and the scope of medical services offered in the standard medical package was expanded. As part of the newly negotiated medical package, employees now have access to a greater number of specialist doctors, medical procedures and access to comprehensive medical diagnostics. Standard medical packages include, among other things, access to limited psychological consultations, preventive health programmes (vaccinations, laboratory tests), as well as periodic dental examinations extended to include dental prophylaxis. As part of annual and ongoing health prevention, a medical diagnostic programme is available, focusing on the most common cancers in women and men.

The private healthcare plan allows all the Group's employees to have equal access to basic and specialised medical appointments, detailed diagnostic tests and preventive programmes. In addition, employees can acquire health packages for their immediate families. Upon termination of employment, retired employees will also be able to continue with the private healthcare plan on preferential terms.

Bank Millennium Group employees in Poland enjoy the same social and financial benefits regardless of the type of employment contract (fixed-term/indeterminate) and working hours (part-time/full-time). The value and extent of the benefits depend on the employee's life and financial situation. A private healthcare plan is offered to employees for at least half of the equivalent to full-time. The scope of the plan varies for different positions. Retired employees and people on parental leave also benefit from access to medical care.

Also in Poland, the Regulations of the Corporate Social Benefits Fund regulate the Bank's social activity. According to these Regulations, the Bank pursues the following initiatives:

- carrying out leisure, cultural, sporting, recreational and tourist activities;
- organising events and group meetings;
- providing material or financial assistance;
- providing financial assistance in individual events, in a particularly difficult financial, family or life situation (financial assistance that does not have to be repaid), also in states of emergency or epidemiological risks.

The subsidiaries take advantage of the social benefits offer provided by the Bank, but finance it through their own Social Benefits Funds.

In Mozambique, the commitment to employee health and well-being was reinforced by:

- holding educational talks and screening sessions, as well as improving medical assistance conditions;
- introducing improvements to the conditions of medical care and medication, including updating the amounts of co-payments;
- holding educational talks to make employees aware of the causes, signs, symptoms, risk factors and treatment of various illnesses, such as: Uterine Myoma, Diabetes and Hypertension, Kidney Failure, Breast Cancer, Prostate Cancer and HIV/AIDS.

In addition, screening sessions for breast and cervical cancer, participation in family planning, HIV counselling and testing, blood pressure assessment were held to safeguard the health and well-being of employees and their families and, as part of the drive to promote a healthy lifestyle, a new meal service was introduced in the headquarters building, which covers around 1,000 employees. This new service provides access to meals in comfortable, high-quality conditions, with breakfast, lunch and snack options.

These actions are fundamental to maintaining a healthy and productive working environment.

The Bank maintains a policy of making social benefits available to employees, which it endeavours to improve and complement each year, always with the aim of meeting the needs expressed by employees.

Financial initiatives were developed to mitigate the impact of rising interest rates and, in an effort to ensure a balance between employees' financial needs and their ability to pay, the maximum amount of credit for social purposes was increased.

In the aftermath of Cyclone Freddy, significant resources were mobilised for disaster relief for employees and their families, including assistance to rebuild homes. This support was provided through the immediate granting of an amount for the purchase of basic necessities and the allocation of a non-refundable amount for the reconstruction of houses, plus the granting of a credit line with a subsidised interest rate.

Partnerships for health benefits were also set up with various entities to provide benefits to employees and their families. Of particular note are the protocols that grant permanent discounts for medical assistance for breast, cervical and prostate cancer screening, partnerships with gyms and kindergartens.

Millennium bim once again contributed to the celebration of Christmas, offering presents to 2,643 of its Employees' children.

In Portugal, since 2017, Thursdays at Millennium bcp's facilities have been "Farm" days. The covered patio of the restaurant area at Taguspark now hosts a farmers market every week to sell different food products, from fruit to smoked meats. This initiative, which resulted from an idea presented by Employees, aims to give access to those working at Taguspark to seasonal produce, with a good price/quality relation and without having to leave the bank's premises.

It is also available since the beginning of 2018, an innovative space near the meals area in Taguspark called the Books Bank a library based on a rationale of sharing wherein any employee of the Bank may take a book at his/her choice home, provided that he/she replaces it by another one.. The Books Bank is made by all Employees. Therefore, the more the library is used, the more books it has.

One must also make an additional reference to the internal information flow, which, based on corporate communication platforms, publishes contents regarding business, operational, training and technological issues, but also contents on social responsibility, employee advantages and many other general interest pieces.

In Portugal alone, in terms of internal communication, 5,714 pieces were published on the intranet, 327 of which with videos produced by Millennium TV. From the regular items, a note for content on Sustainability, Financial Literacy and Healthy Living.

It is also published a weekly newsletter, transversal to all countries where Group BCP operates, the "About us", a communication vehicle through which the news and the most relevant events that mark the activities of Millennium in Portugal, Poland and Mozambique are shared. In 2023, 100 editions were carried out (Portuguese and English), with an average circulation of 6,242 units per edition..

BCP Group provides a work place that enables its employees to undertake their activities with minimum risk and maximum productivity. So as to guarantee these conditions, the premises are monitored regularly, there are occupational safety and health (HST) inspection visits to the premises, so as to find and correct malfunctions. During 2023, the Group carried out 203 visits and 2 air quality analyses.

Also in this context, and with a view to reinforcing Millennium bcp's commitment to the Health and Safety at Work of its Employees - which is a permanent concern in the management of its daily activity - the specific corporate policy on this matter incorporates elements that reflect the reality of Banco de Portugal and the applicable legal and regulatory context, but also good practices of voluntary implementation.

The Bank maintained a regular and constant flow of information and training on matters of Health and Safety at Work throughout 2023, of which the following examples in Portugal are: i) "*Minuto Seguro*", an internal communication item that disseminates video content with information brief on topics ranging from emergency response plans, plants and teams to access to Bank facilities and security systems; ii) specific training on health, hygiene and safety at work, which covered 311 employees (in 2023 only new employees or those returning from long-term absence were invited to take this training). 42 Employees received specific training on means of 1st intervention against fires.





As part of its Social and Environmental Responsibility policy, Millennium bcp has a partnership with CP - Comboios de Portugal encouraging the use of trains for long-distance journeys. This partnership makes it possible to reduce the costs of employee travel, while at the same time making it possible to travel more comfortably and quickly, to use mobile phones and computers and to enjoy free newspapers and magazines and a welcome drink. In addition, any Employee has access to a 15% discount on the purchase of tickets for personal journeys on the Alfa Pendular and Intercidades services, in comfort or 1st class seating.

In addition, to make travelling easier for Employees who work at Taguspark, Millennium bcp provides a free daily bus service between Lisbon and Taguspark, every working day and at different times in the morning and evening.

### Remote Working

Millennium bcp, in Portugal, based on the experience of teleworking due to the Covid-19 pandemic, approved in 2022 a new "Regulation on teleworking" in addition to the one legally provided for. This regime foresees, for compatible functions (essentially Central Services), the possibility of using a hybrid work regime, with a weekly distribution of 60% in the workplace (3 days) and 40% in remote work (2 days), at each employee's discretion, thus promoting a better balance between work and personal life.

In Poland, on the other hand, the Bank recommends that employees work 50% of their time in the office and 50% remotely, with the heads of the Organic Units authorised to change these proportions as required, with regard to the tasks and projects underway and the effectiveness achieved by the teams.

This hybrid regime allows for a better balance between professional and personal/family life, reconciling the interests and priorities of the Bank and its employees, while also helping to reduce commuting.



**The BCP Group offers a diversified set of social benefits to Employees, which have been reinforced to respond to new challenges and improve the balance between Professional and Personal life**

## Credit

BCP Group employees have the possibility of getting credit to purchase a permanent residence under special conditions. The credit is granted abiding by the credit risk assessment principles set by the Bank's regulations. The Employees may also benefit from loans for social purposes that, among other, serve to meet credit needs in order to face education or health expenses, repairs made in their own domicile or in a rented one and the acquisition of other goods and services with an exceptional nature.

### LOANS TO EMPLOYEES <sup>(1)</sup>

	(Million Euros)					
	2023		2022		2021	
	Amount	Employees	Amount	Employees	Amount	Employees
<b>HOME LOANS</b>						
In portfolio	374.4	5,833	437.3	6,637	574.4	7,395
Granted in the year	21.2	175	17.9	148	22.8	158
<b>SOCIAL PURPOSES</b>						
In the portfolio	10.3	2,230	10.2	2,047	9.64	2,210
Granted in the year	4.0	922	3.7	848	2.4	876

<sup>(1)</sup> Includes active Employees and retired Employees.

In Portugal, Employees with term contracts do not have access to the specific conditions of the credit lines for the acquisition of a permanent residence or to loans for social purposes. Part-time employees have access to the benefits common to all, but whenever those benefits are related to the number of years, the value of the benefit is computed based on effective work time.

## Parenting

Supporting the needs of parents in the early years of their children's lives and pregnancy protection are also Millennium bcp's priorities.

Aware of the demands that maternity and paternity entail, the Bank has had a Parenthood Protection Programme - "*Bebé Millennium*" (Baby Millennium) - in place since 9 September 2015, which aims, on the one hand, to celebrate the special moment when they become parents and, on the other, to create the necessary conditions for Employees to find a balance between work and family life.

In 2023 we celebrated the birth of 100 babies with the granting of individual Millennium Baby Vouchers worth €849.42 and around 1,324 were able to enjoy their children's birthday afternoon with them.

It is a program that continues to be highly appreciated by our employees not only because it offers several benefits to the employees, but also because the same enables Millennium bcp to be part of a very significant moment in the life of our Employees and respective family.



To support children in entering pre-primary and secondary education, under the Parental Protection Program, parents have half a day off to accompany their children who are going to enter the 1st and 5th grade.

Also, within the scope of social and corporate responsibility, Millennium bcp has been reinforcing the support and assistance provided to employees in situations of prolonged absence due to illness, through its medical services.

The bank also provides financial support of a social nature for active employees, retirees and pensioners in cases of special economic and social need, adapting the corresponding means of financial support to each case.

The provision of community gardens for employees, located in Taguspark, has had a very positive impact on employees, promoting team spirit as well as environmental sustainability and healthy living practices.

In Poland, an operation where 66% of the staff is composed of women, most of them mothers, the new Bank Millennium programme "Yes for Parents" helps them to balance their professional life with their personal and family life. This initiative, apart from the relevant information (rights, family health, etc.) - available for consultation at a digital platform - and of several social benefits, also enabled the creation of three nurseries at the Bank's central services in Warsaw.

## Support to Education



In line with the Sustainable Development Goals (SDGs) of the United Nations.

BCP Group continues to encourage the permanent development of its employees' skills and in addition to the contents detailed in the "Training" chapter, Millennium bcp also provides for the payment of external training or the co-payment of academic qualification courses in certain situations, where the relevance to the duties performed by the employee is demonstrated.

In Portugal, in terms of education and through monthly subsidies, the Bank also supports: i) Employees who qualify as Student-Employee, granting a total of 7,371 Euros, to 44 Employees; ii) Employees with children of school age, supporting 3,257 Employees, totalling 1,165 thousand Euros; and iii) school-age children of deceased Employees. The bank supported 81 children and young people with 231,575 Euros.

## Inclusion and Diversity Programmes

As part of its diversity and equal opportunities policy, Millennium bcp renewed its signature of the “Commitment to Inclusion” of the Inclusive Community Forum (ICF) in 2022.

ICF is a Nova SBE initiative dedicated to the lives of people with disabilities. Its objective is to promote a more inclusive community, through the construction of a network made up of everyone who intervenes in these people's lives, challenging them to play an active role in co-creating solutions, namely companies.



The Journey to Inclusion is the path proposed by ICF to companies that want to be more inclusive in relation to people with disabilities and that, to this end, decide to sign the “Commitment to Inclusion”. This journey emerged as a response to a market need – the creation of a set of clear steps to achieve inclusive recruitment.

In 2022, the Bank also entered into a partnership with APSA – Associação Portuguesa de Síndrome de Asperger (Portuguese Asperger Syndrome Association), with a view to including its associates in the labor market.

## Culture and Leisure

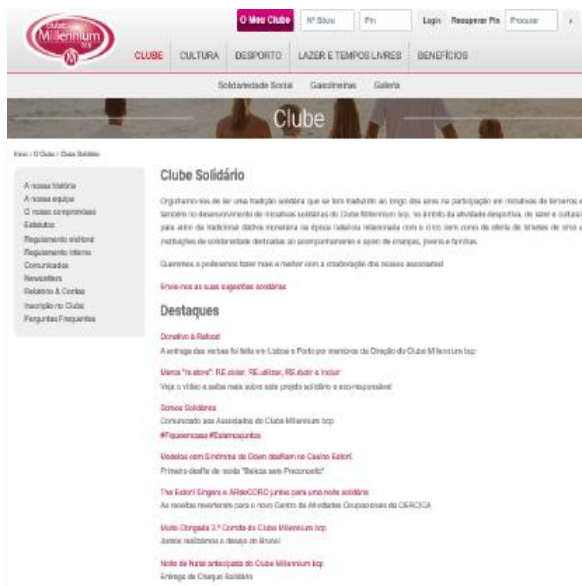
Activity of Clube Millennium bcp - Initiatives developed in 2023

The Millennium bcp Club is the Cultural and Recreational Association for employees and former employees of the Banco Comercial Português Group, and its mission and objective is to encourage the practice of cultural, leisure and sporting activities, promoting socialising among its Members and their families and also their participation in civic, humanitarian and solidarity causes, thus contributing to improving their well-being and promoting quality of life.

To fulfil its objective and mission, the Club offers its 34,455 members (10,515 full members and 23,940 members of their families) a wide range of initiatives and a variety of promotions and discounts on products and services.

The year 2023 saw the resumption of activities in the post-covid period, developed, whenever recommended or possible, in a mixed format, in person and remotely (online), which made it possible to promote a greater number of activities outside the usual Lisbon and Porto circuits where more than 67% of its members are concentrated. It should be noted that the percentage of Members living outside the major urban centres increased by around 7% in 2023.

This diversification meant that in 2023 it was possible to fulfil 14,235 enrolments for activities directly promoted by the Club, distributed as follows: 4,997 related to attendance at the Christmas Circus, 4,748 related to sporting activities, 2,402 cultural, 583 leisure and 1,505 related to ticket requests for the different initiatives publicised, all the result of a very remarkable demand-based membership, which is reflected in the hundreds of thousands of visits to the Club's website (www.clubemillenniumbcp.pt) and more than 1,570 thousand page views (up 12% on 2022), evidence of the members' interest in and recognition of the actions carried out.



Of these many activities, the most noteworthy are the various Christmas circuses (Lisbon, Porto, Faro, Funchal and Ponta Delgada), the distribution of 1,466 Christmas presents to Members' children under the age of 12 on 31/12/2023, as well as enrolment in various events, of which, given the high number of participations (always over a hundred), the V *Corrida do Clube* (Run of the Club) stands out, requests for tickets to the Zoo, Oceanarium, Dino Park and Óbidos Vila Natal and Torres Medieval Fair, tickets which are made available to Members at a reduced cost, as well as participation in guided tours of a cultural nature to places of historical interest and museums. Likewise, in terms of activities promoted on the Club's premises, we should highlight the music, painting, language, gymnastics, yoga and Pilates and jewellery classes.

The charity aspect was not neglected, with the distribution of more than four hundred tickets for the various circus shows to IPSSs supporting children and senior citizens, as well as, in this case with the sponsorship of the Millenniumbcp Foundation, a donation of €5,000 divided equally between two IPSSs dedicated to supporting children with special needs. Our jewellery section also held a charity sale, the proceeds of which were also donated to an IPSS that supports underprivileged children.

Also noteworthy are the hundreds of partnerships that allow members and their families to purchase goods and services under more favourable conditions, such as discounts at gyms, hotels, restaurants, travel agencies and fuel distribution companies.

Always with the same quality standards as in previous years, we will continue to work in favour of our members, with the aim of expanding the range of activities available, counting on our Shareholders, the Management and all Club employees, as well as the indispensable presence, collaboration, critique, participation and enthusiasm of the Millenniumbcp Club Members, who are its raison d'être.

## MEMBERS OF CLUBE MILLENNIUM BCP

	2023	2022	VAR.% 23/22
Active Employees	5,096	5,118	-0.4%
Retired Employees	5,419	5,493	-1.3%
<b>Subtotal</b>	<b>10,515</b>	10,611	-0.9%
Family members	23,940	23,979	-0.2%
<b>Total</b>	<b>34,455</b>	34,590	-0.4%
Total registrations in modalities on the website	14,235	14,020	1.5%

Source: Members database and website December 2023

### Support for Culture - Bank Millennium

For over 30 years, cultural involvement has been an important part of Bank Millennium's social activities. The Bank supports national and local cultural initiatives. It is a 360° patron of culture, promoting art in almost all its forms, both erudite and popular, including music, painting, sculpture, cinema, theatre, photography, literature and performance, always on the premise of being a long-term partner.

For 18 years it has been a patron of the Millennium Docs Against Gravity festival, the largest film festival in Poland, for more than 20 years it has sponsored the International Traditional Jazz Festival "Old Jazz Meeting Złota Tarka" and is also a long-standing sponsor of the Lidzbark Nights of Humour and Satire, one of the most important Polish cabaret events.

In 2023, Bank Millennium became a partner of the Inside Seaside festival, a new event on the Polish music scene. The Inside Seaside Festival is a major new cultural event with a good, diverse programme of music and accompanying events for music lovers from all over Poland. The organisers chose a new formula and an unusual date for music festivals, filling a gap in the Polish music market.

In addition, the Bank once again sponsored the "Cultural Start-up". This is an initiative of the city of Gliwice, which supports innovative ideas, unique events and art at the highest level. This is a proprietary programme of the Victoria Cultural Centre in Gliwice aimed at organisations, artists, entertainers, event and workshop organisers - professionals and amateurs - who have something unique to offer in the field of culture and art.

#### - Millennium Docs Against Gravity Film Festival

The most important cultural project supported by the Bank is the Millennium Docs Against Gravity festival. It is the largest film festival in Poland and an important documentary festival in the world. Bank Millennium has been a partner of the festival for 18 years and is also the founder of the festival's grand prize.

In May 2023, the 20<sup>th</sup> edition of the Millennium Docs Against Gravity festival took place, once again using the hybrid formula. The festival presented 190 of the best documentaries from around the world, including short and feature films. They were accompanied by meetings with artists and protagonists and debates on important themes addressed on screen. As every year, the festival tackled a range of important issues - from ecology to diversity, politics, psychology, human rights, art, pop culture and family relationships. The festival was held in eight cities and online on the festival platform. The 20<sup>th</sup> edition of the Millennium Docs Against Gravity festival was attended by more than 144,000 people.

The Millennium Docs Against Gravity Film Festival is the biggest celebration of documentary film in Poland and its popularity grows every year. The authors of the festival, as well as its patron - Bank Millennium - aim to bring knowledge about the modern world to as many people as possible. The festival's presence in multiple cities and, from 2020, online, allows the best documentaries from around the world to reach a wide audience. Thanks to this, Millennium Docs Against Gravity achieves its main objectives - cinema and social education, bringing audio-visual culture to a wide audience, not only in big cities, but also in smaller centres.

#### - MyBenefit Platform

In Poland, Bank Millennium has an online shopping platform where purchases can be made with resources from the Social Fund. On the platform, employees can enjoy more than a thousand different benefits related to tourist, cultural, sports and recreational services. Employees can choose the benefits they are interested in and use them at any time and place. The platform also offers the MultiSport card, which gives employees full access to various sports activities, such as swimming pool, gym, fitness, squash, dance and yoga classes, combat sports and climbing wall. The card gives employees the opportunity to live a healthy and active life. They can also buy a card for their family members at negotiated prices. Retired employees can also benefit from the offer of a sports card upon termination of employment, as part of a card specially dedicated to senior citizens.

#### - MilleKlub

Employees associated with MilleKlub, a club of a recreational nature that promotes initiatives outside their professional activity – sports, travel, culture and art – can submit ideas/initiatives in this area and manage them until they come to fruition, being able to benefit from co-financing of up to 50 % of project costs. Moreover, the Kids Projects also enables the co-financing of projects to stimulate family activities.

The Employees of Group BCP also have preferential access to cultural events and spaces sponsored by the Bank in the various Countries where it operates, for example in 2023 the Concerts of *Festival ao Largo* (Portugal), the film festival Millennium Docs Against Gravity film festival (Poland) and the Art Nucleus Exhibition (Mozambique).

In Mozambique, the Millennium bim Club continued its activities with the goal of supporting the development of initiatives related to sports, culture, and leisure, to promote the Employees' identification, cohesion and involvement with the Bank, while promoting healthy habits, regular exercise and artistic expression.

## Human Rights

At a time when the world is facing enormous political and socio-demographic challenges, there is growing pressure on organizations to be active agents of promotion and respect for Human Rights. Whether through regulation, through initiatives such as the Proposal for a Due Diligence Directive published by the European Commission, or through voluntary initiatives, both national and international, such as the UN Global Compact or the UN Guiding Principles Reporting Framework (more details on this framework presented in the table attached to this report), organizations are required to adopt and communicate concrete management practices in these matters, not only in their own operations, but across the entire value chain.

The respect for Human Rights is a principle transversal to all axes of action, activities, operations and geographies of the BCP Group. As a financial sector organization, aware of the significant potential for influence it has with other organizations, the Bank has implemented a set of internal instruments and mechanisms, and established several external commitments that underpin efforts to manage and protect human rights throughout its value chain.

### BCP's Human Rights Journey



### Ambition for the Future (2024)

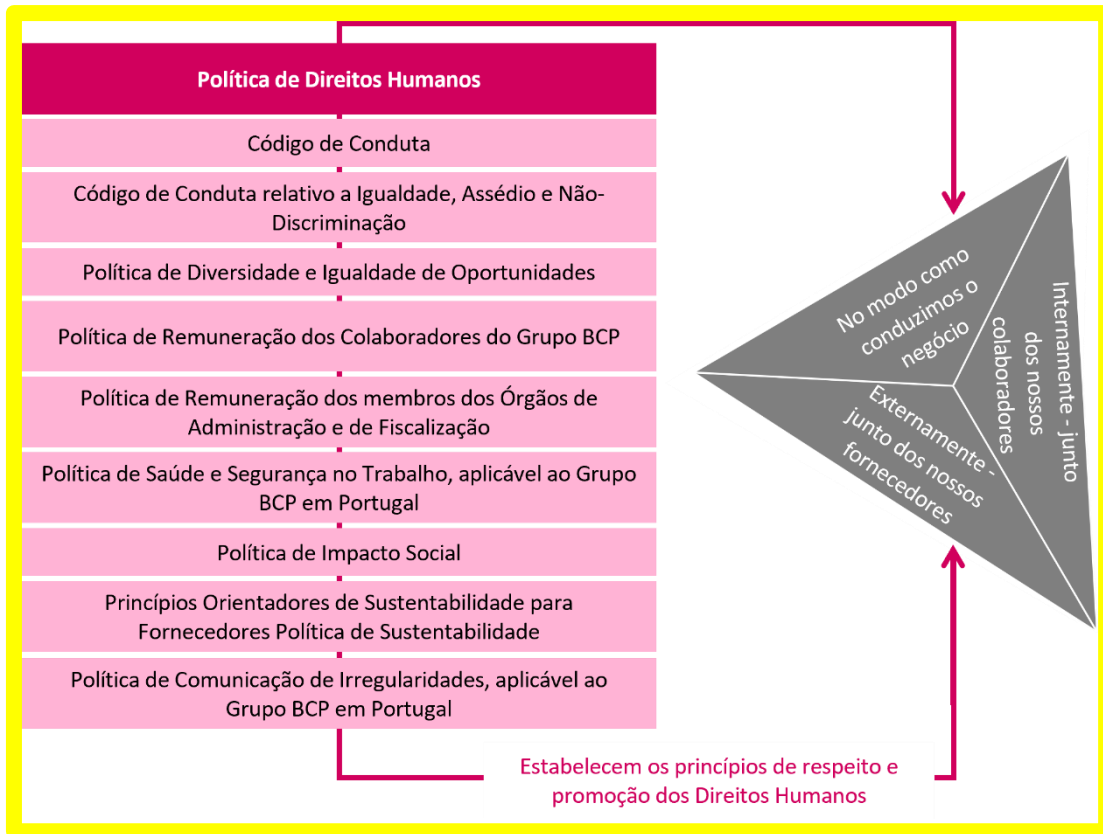
The Bank's Human Rights Journey has been planned annually in a structured manner in the Sustainability Master Plan (SMP). The SMP 2024 continues the actions to manage and promote Human Rights throughout the value chain established in 2023, among which the following stand out:

Axle	Action
<i>Governance</i>	Inclusion of ESG criterion in the selection of suppliers.
<i>Social</i>	Implement human rights management process in Group BCP and disclosure of data, including identification of vulnerabilities and improvement actions.
	Execute regular human rights self-assessments in Group BCP as a whole.

The Bank's approach to the theme transcends the legal requirements in force, and is guided by the Human Rights Policy, which is aligned with the main national and international guidelines, principles and commitments:

- United Nations Universal Declaration of Human Rights;
- International Labour Organisation (ILO) Conventions on fundamental principles and rights at work;
- Guidelines of the Organisation for Economic Co-operation and Development (OECD);
- Principles of the United Nations Global Compact;
- Declaration of Business Leaders for Global Cooperation of the UN Global Compact;
- Guide of the CEO on Human Rights of the World Business Council for Sustainable Development (WBCSD);
- Charter of Principles of the Business Council for Sustainable Development Portugal (BCSD);
- UN Guiding Principles Framework.

In addition to the above-mentioned Policy, the Group has other [regulatory policies and instruments](#) that include relevant guidelines on this themes. The implementation of the principles established by them allows the BCP Group to better ensure the prevention, minimization and elimination of adverse impacts related to Human Rights throughout its value chain.



Together with the policies and regulatory instruments, the BCP Group's approach to Human Rights management integrates other internal mechanisms and procedures, specific for this purpose or transversal to other themes. All of them are subject to regular reviews to ensure the greatest alignment and applicability in the face of the demands of the current context.

#### Risk management

The Bank's risk management process covers issues related to Human Rights, namely in Operational Risk, in the categories of Employee Relations, Occupational Health and Safety Issues, Employee Discrimination, Customer Relations, Product/Service Design, Regulatory, Legal and Tax Duties and Outsourcing. In 2023, and as in previous years, the results of the Self-Assessment of Operational Risks in operational processes showed moderate exposures to this set of risks.

#### Whistleblowing mechanism

In order to report any irregularities or violations of the above policies, the Bank provides a whistleblowing mechanism (see more information in the Ethics and Professional Conduct chapter), which is confidential. In 2023, no situation related to Human Rights was reported.



Self-Assessment

To identify the main Human Rights issues and risks in the BCP Group's value chain, a Human Rights self-assessment was carried out in the geographies in which the Group operates – Portugal, Poland and Mozambique – which covered five key areas (as shown in the figure).

In this self-assessment, no risk situation with potential assessable impact was identified. However, and from a risk management and minimization perspective, the areas in which the Bank's operations can be intensified were identified and improvement plans were defined and implemented in the various geographies.



Training

Employees are key players in the implementation of best practices in respect and promotion of Human Rights. For this reason, the Bank is committed to communication, awareness and training in these matters. The training courses are, for the most part, provided within the scope of continuous training programs aimed at Employees, such as in Portugal, in 2023, the courses on (i) Code of Conduct, (ii) Sustainability and (iii) Happiness, Emotional Intelligence, Stress Management, Diversity and Inclusion and Emotional Management, already carried out by 3,162, 3,787 and 396 Employees, respectively. These training actions, which covered Human Rights topics, made it possible to record, in Portugal, an overall value of 10,275 hours of training.

Human Rights	Employees	Time
Ethics and Conduct	3 162	4 194
Happiness, Emotional Intelligence, Stress Management, Diversity and Inclusion and Emotional Management	396	1 518
Sustainability	3 787	4 563
<b>Total</b>	<b>7 345</b>	<b>10 275</b>

Management of suppliers

The BCP Group has sought to encourage respect for Human Rights among its suppliers as well. For that purpose, it has defined as mandatory the commitment of all suppliers to the Guiding Principles of Sustainability for Suppliers. These Principles, which have been developed in accordance with the Universal Declaration of Human Rights and the Principles of the UN Global Compact, include a specific topic on Human Rights and related topics, which reflects the conduct expected of suppliers in this regard.

Service providers/Outsourcers and main suppliers (contracts over €50,000) are subject to an additional due diligence process, materialized through the response to an ESG questionnaire that also includes Human Rights topics (see more information in the "Suppliers" section).

## Fundação Millennium bcp

• Culture, Knowledge and Social Solidarity are the three main focuses of the activities performed by *Fundação Millennium bcp*. During 2023, the Foundation sought to support projects in these areas in order to contribute to the development of society in its various aspects, and encourage the activity of the supported entities, so that they enrich their potential for innovation and sustainability.



In Culture, it supported projects aimed at valuing the national museums, for the recovery of architectural and artistic heritage and to promote contemporary art and new artistic talents in a wide range of fields.

In this context, we highlight the signing of a new protocol with *Museu Nacional de Arte Antiga* (MNAA), for the 2023-2025 triennium, which will allow the recovery of relevant pieces from the museum's collection, for the close collaboration with *Museu Nacional de Arte Contemporânea* (MNAC), supporting the development of its activities and ensuring the existence of quality programming at the Millennium bcp Gallery, sharing the Bank's artistic collection, but also for the cooperation protocol with *Centro de Arte Oliva*, for the realization of the commemorative program of its 10<sup>th</sup> anniversary.

A strong dynamism of *Núcleo Arqueológico da Rua dos Correiros* (NARC) was maintained, providing free guided tours to all those who want to know this National Monument and its new museum exhibition experience.

In Science and Knowledge, *Fundação Millennium bcp* has been favouring research, training and scientific disclosure projects with a special focus on the area of health and postgraduate programmes in leading Portuguese universities.

Concerning Social Solidarity, it tried to promote relevant projects in social innovation and structuring social programs able of contributing for local development, namely in the assistance to the most vulnerable parts of society.

The growing relevance of environmental issues and the recognition of the importance and commitment to the goal of the Sustainable Development Goals of the United Nations (SDGs) have motivated the Foundation to actively participate in forums and discussion groups on these matters, especially those organized within the framework of *Centro Português de Fundações* which aim to increase the contribution of the foundational sector to the implementation of the SDGs.

In order to create greater awareness among the entities it supports for (i) environmental issues and (ii) the fulfillment of the SDGs, the Foundation began to ask the supported entities to reflect on the impacts that the actions developed have on these two aspects.

Also within the scope of Millennium bcp's Corporate Social Responsibility, the Foundation integrates an internal multidisciplinary team with the Human Resources Division and the DESC - Corporate Sustainability Area, with a view to promoting, planning and monitoring solidarity actions and deepening a volunteering program that provides opportunities for the Bank's employees to create social and/or environmental value and strengthen proximity ties with local communities.

In 2023, the Foundation applied for the renewal of its Public Utility Status (EUP). The recognition of the work carried out on behalf of the community in which it operates motivated the postponement of this request, and by order of August 11, 2023 of the Secretary of State for the Presidency of the Council of Ministers was published in the Official Gazette, 2<sup>nd</sup> Series on September 8, 2023, the Foundation's EUP was renewed again, taking effect from February 28, 2024, for a period of 10 years.

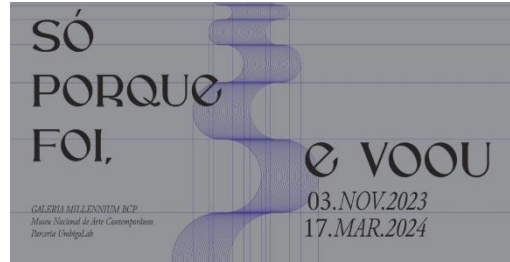
The Foundation supported, in 2023, a total of 127 projects, 58% of which were in the Culture area, 10% in the Knowledge area and 32% in the Social Solidarity scope.

## Culture

In Culture, the Foundation provided support to the following initiatives:

### Conservation and Disclosure of the Bank's Assets

- Museu Nacional de Arte Contemporânea (MNAC):
  - i. As part of the protocol signed with *Museu Nacional de Arte Contemporânea* (MNAC), the exhibition "Jorge Barradas no Jardim da Europa" was supported, curated by the researcher and Art Historian, Carlos Silveira, which presented close to 100 works, from institutional and private collections, with emphasis on the collection of Millennium bcp, of *Fundação Calouste Gulbenkian* and *Museu Nacional do Azulejo*. The exhibition was inaugurated on 04/04/2023 and was exhibited at the Millennium bcp Gallery at MNAC until 27/08/2023 and received 23,957 visitors.
  - ii. Also at the Millennium bcp Gallery, with the support of *Fundação Millennium bcp*, the exhibition "Só porque foi, e voou", in partnership with Umbigo LAB and with the curatorship of the students of the Master's Degree in Curatorial Studies of the College of Arts, University of Coimbra, took place. The exhibition was inaugurated on 03/11/2023 and will be open to the public until 17/03/2024, having received, in 2023, 6,865 visitors.



Under the existing protocol, in the component of support for the MNAC activities, a set of supports was granted that contributed to the museum developing and implementing its programming in terms of exhibitions, but also to democratize access to knowledge about them through publications, mostly bilingual. It also contributed to the continuation of the Museum's musical programme (*Noites de Verão*) as well as to specific aspects of its operation. In terms of Educational Service, it has also enhanced the dissemination of knowledge at different age and gnosiological levels of access to artistic literacy, necessarily contributing to the improvement of the life quality of its users.

Within the scope of the MNAC's Educational Service, a schedule of visits aimed at schools, families and visitors of different age groups is still available. During 2023, the museum received about 58,904 visitors.

- *Arte Partilhada - Centro Internacional de Artes José de Guimarães* (CIAJG) / Workshop

Support for the project "Primitivo: uma cartografia atípica a partir de Portugal" which is a consequence of the results of the Iberian Modernisms project and the Primitivist Imaginary by Joana Cunha Leal, Co-IR and Mariana Pinto dos Santos.

- *Arte Partilhada - Loan of works from the BCP collection*

In the field of Shared Art, it is worth noting the loan of a significant number of works belonging to the BCP collection for integration in a wide range of exhibitions that were open to the public in 2023:

- *Museu e Centro de Artes de Figueiró dos Vinhos* - 5 paintings by José Malhoa to be part of the exhibition "A importância do riso: José Malhoa e Rafael Bordalo Pinheiro";
- *Casa das Histórias Paula Rego* - 4 paintings from Paula Rego for the exhibition "Paula Rego: Anos 70";
- *Fundação Champalimaud* - 3 oil paintings by Armanda Passos for the exhibition "Armanda Passos, Pintura a óleo em retrospectiva";
- *Atelier-Museu Júlio Pomar* - 1 oil painting by Júlio Pomar for the exhibition "Em matéria de matérias primas: Júlio Pomar, André Romão, Jorge Queiroz, Susanne S.D.Themlitz";
- *Museu de Arte Contemporânea da Madeira* - 1 Tapestry by Lourdes de Castro (Tapeçarias de Portalegre) for the exhibition "Como uma ilha sobre o mar: Lourdes de Castro";
- *Millennium bcp Casa da Música Branch* - 3 oil paintings by Armanda Passos for the exhibition "Armanda Passos - aniversário do nascimento";
- *Museu Nacional de Arte Contemporânea* - 1 tile panel, 1 oil painting and 6 drawings by Jorge Barradas for the exhibition "Jorge Barradas, No Jardim da Europa";
- *Mosteiro de Ancede - Centro Cultural de Baião* - 7 paintings by Manuel Cargaleiro for the exhibition "Eu sou... Cargaleiro";
- *Lisbon Humberto Delgado Airport / Group Exhibition in Leiria* - 1 silkscreen print by Maluda and 1 silkscreen print by Maria Menez;

- *Museu de Neo-realismo* - Vila Franca de Xira - 1 oil painting by Querubim Lapa for the exhibition "Querubim Lapa, uma poética neorrealista";
- *Museu da Marinha* - 3 oil paintings by João Vaz for the exhibition "A Beleza da Água. O Museu de Marinha e João Vaz";
- *Casa das Histórias Paula Rego* - 1 drawing by Paula Rego for the exhibition "Mudam-se as histórias, mudam-se os estilos";
- MAAT - *Museu de Arte, Arquitetura e Tecnologia* - 1 oil painting by Paula Rego;
- *Musée Mohammed VI d'art moderne et contemporain à Rabat*, Marrocos - 2 oil paintings by Arpad Szenes and 5 oil paintings by Vieira da Silva;
- *Centro de Arte Oliva* - 37 painting from several artists, for the exhibition "Revolução da Noite";
- *Museu Nacional de Arte Contemporânea* - 1 oil painting by Aurélia de Sousa and 1 oil painting by Columbano Bordalo Pinheiro for the exhibition "Só porque foi, e voou".

- Núcleo Arqueológico da Rua dos Correeiros (NARC)

Classified as a National Monument since 2015, this space allows the public to get in touch with archaeological remains from the last 25 centuries of Lisbon's history through guided and completely free tours. Visitors have at their disposal brochures that summarize the main characteristics of the Nucleus, and there is also a more exhaustive catalogue of the history of the site. During 2023, the *Núcleo Arqueológico da Rua dos Correeiros* received 9,526 visitors (7,900 in 2022), of which 1,811 were visits from educational institutions.



The Innovation Awards 2023 awarded EDIGMA the award for best project in the "Smart Building" category for the work developed at NARC as the company responsible for the coordination and implementation of the new smart museum experience. The ceremony of these awards, considered as the "Oscars" of audiovisual and interactivity, took place in Barcelona, at *Museu Nacional de Arte da Catalunha*, where excellence in the design, integration and management of the refurbishment of NARC was globally recognized.

## Museum Activities

- Fundação Centro Cultural de Belém (CCB)

As "Mecenas da Garagem Sul", and within the scope of the collaboration protocol signed for the period from 2022 to 2024, the Foundation supported the initiatives developed in this space dedicated to architecture. Among the different initiatives carried out, the exhibitions "Sala de aula, um olhar adolescente", "Escola do Porto Santo: uma obra de Raúl Chorão Ramalho" and "Habitar Lisboa: uma perspetiva arquitetónica sobre uma crise contemporânea" deserve to be highlighted. In 2023, *Garagem Sul* programs and exhibitions received a total of 17,319 visitors. The educational service covered 4,761 visitors who participated in guided tours, workshops and activities for families. The conferences, debates and equivalents were attended by 2,078 people.

- Museu Nacional de Arte Antiga (MNAA)

A new protocol was signed, for the 2023-2025 triennium, with *Museu Nacional de Arte Antiga* and *Grupo dos Amigos do Museu Nacional de Arte Antiga* through which the Foundation became a strategic patron of the MNAA for the conservation and restoration of a set of pieces that are in need of urgent and profound intervention to ensure their material and heritage integrity. This protocol covers the interventions in "Painéis de São Vicente", whose first phase of restoration and study took place between 2020-2022, in the sixteenth-century relief in polychrome stucco representing the "Defesa de Pavia por Santa Clara", in a precious group of six large painted papers, of Chinese manufacture, dating from the eighteenth century, representing the cycle of manufacture and trade of porcelain and, also, in a nineteenth-century bronze version of the so-called Medici Venus. During 2023, *Museu Nacional de Arte Antiga* received an estimated number of about 218,500 visitors.

- Museu Nacional Soares dos Reis (MNSR)

Support for the realization of the exhibitions:

- Portreto de La Animo - Arte bruta e etc*, curated by António Saint Silvestre. From the Esperanto expression *portreto de la animo* – which in Portuguese means "portrait of the soul" – the exhibition provided a meeting between works from the collection of *Museu Nacional Soares dos Reis* and Treger Saint Silvestre collection, on deposit at *Centro*

- de Arte Oliva*. Portraits and self-portraits present themselves as tools for exploring the inner world and its multiple expressions. This exhibition and the parallel activities were the focus of the "Arte & Saúde" program in 2023 through a cultural offer aimed at minimizing the impact of mental illness. The exhibition welcomed 32,000 visitors;
- ii) *Exposição Teresa Gonçalves Lobo e Domingos Sequeira*: a dialogue in time, curated by Bernardo Pinto de Almeida, which results from the MNSR's initiative to share works from its collections with contemporary artists. This exhibition will be open to the public from January 25 to April 28, 2024.

- Museu Nacional do Azulejo

Support for the recovery of a tile clock from the period 1730-1750 and the acquisition of audiovisual equipment to ensure the production of materials to disclose the Museum's activity on social networks and other communication channels. In 2023, *Museu Nacional do Azulejo* received 246,720 visitors.

- EGEAC / Museu de Lisboa

A protocol was signed with EGEAC, for 2023 and 2024, with a view to supporting the "Museu Acessível" project, with interventions at *Museu do Aljube* and *Casa Fernando Pessoa*. MUSEU ACESSÍVEL project includes a framework of measures that make EGEAC's Museums more accessible and overcome barriers that prevent or hinder the cultural participation of people who have sensory deficiencies or disabilities – among others, people with low vision or blind, deaf people, people with intellectual disabilities, neurodivergent people and people whose first language is not Portuguese.

- Museu Nacional dos Coches

Support was maintained for the conservation and restoration of *Berlinda Processional* (inventory number V0063) dating from the eighteenth century, a hypomobile vehicle of religious apparatus used to transport *Imagem da Virgem na Procissão de Nossa Senhora do Cabo Espichel* (cult dating back to the mid-sixteenth century).

#### Heritage Recovery

- Mosteiro dos Jerónimos

- i) Support for the continuation of ecological practices for the conservation of stone in the Cloisters of *Mosteiros dos Jerónimos*. This support follows the support granted in 2020 that allowed, for the first time in Portugal, the use of new products and methodologies, environmentally friendly, in the stone conservation. This conservation project through ecological practices was distinguished by APOM with the award, in 2021, of the "Intervenção em Conservação e Restauro" prize;
- ii) The Foundation supported the 1<sup>st</sup> phase of the conservation process of the silver tabernacle of the main altarpiece of *Mosteiro dos Jerónimos* church, whose first approach and enhancement consisted of the preventive and curative treatment of the pathologies detected, as well as their adequate and correct lighting.

#### Other cultural initiatives

- São João da Madeira Municipality - *Centro de Arte Oliva*

Support for the celebrations of the 10<sup>th</sup> anniversary and the activities developed by *Centro de Arte Oliva*, a place that seeks to boost the contact, knowledge and interpretation of the visual arts of the 20<sup>th</sup> and 21<sup>st</sup> centuries and which stands out as one of the institutions in the country that regularly works with contemporary art and brut/outsider art. Through its activity structured in exhibition projects, educational programs and collaborative initiatives, it seeks to make everyone's relationship with the arts vital, accessible and participatory.

- Círculo de Artes Plásticas de Coimbra - Bienal de Arte Contemporânea de Coimbra

Support, within the scope of *Anozero - Bienal de Arte Contemporânea de Coimbra*, of the "solo show'23" that brought to the Santa Clara-a-Nova Monastery, in Coimbra, the exhibition "não sofra mais" by the Icelandic artist Ragnar Kjartansson. This exhibition was open public to between April 14 and July 16, 2023. Over the course of 93 days, the exhibition presented 13 works, attracting 14,585 visitors from 63 countries. In this event, about 40 pedagogical actions were carried out involving about 2,000 people.

- Brotéria

Support for the exhibition "Pintura sem fim" that took place between January 19 and February 15, 2023 and which brought together a wide range of painting works executed on canvas, its traditional pictorial support. The exhibition, which brought together an unusual amount of painting, was available to the public free of charge and was visited by about 1,600 people.

- Ar.Co

Contribution to the development of the program of commemorations of the 50<sup>th</sup> anniversary of *Ar.Co*. The celebrations had their official opening with the opening of the exhibition "I-II-III-IV-V cinco décadas do Ar.Co - Centro de Arte e Comunicação Visual", which took place at *Museu Nacional de Arte Contemporânea* between March 7 and May 28, 2023. The exhibition included around 60 works covering the areas of drawing, painting, sculpture, installation, photography, ceramics, jewellery, graphic arts, moving image.

- ARCO Lisboa

*ARCO Lisboa* is one of the most relevant international art fairs that took place between 25 and 28 May 2023 at *Cordoaria Nacional*. Organized by *IFEMA MADRID* and the Lisbon City Council, ARCO is a meeting point for collectors, gallerists, artists and professionals from all over the world.

*Fundação Millennium bcp* sponsored the Millennium Art Talks, a space for debate and reflection that promotes thinking about contemporary art. In 2023, the Millennium Art Talk was organized by *EGEAC* and curated by Ángel Calvo Ulloa and Marta Mestre and in which prominent professionals in the field participated.

In 2023, the Vera Cortês gallery was awarded the First Prize *Fundação Millennium bcp* for the best stand at *Feira Arco Lisboa 2023*, an initiative that aimed to recognize and support the work of gallerists.

The event was attended by 86 galleries from 23 countries, representing around 300 artists. The event, at *Cordoaria Nacional*, registered 13,984 visitors, including 372 young people under 25 years of age who visited the event at the free time for this age group.

- Exhibit Art Management - Drawing Room Lisboa (6<sup>th</sup> edition)

The event, dedicated to contemporary design, took place from 25 to 29 October 2023 at *Sociedade Nacional de Belas Artes*. This year's edition, which received around 8,400 visitors, was attended by 23 national and international galleries, representing more than 65 Portuguese and international artists with a program with several parallel activities, including the Millennium Art Talks, with programming by the Portuguese curator Maria do Mar Fazenda.

Within the scope of this initiative, the following awards were granted in 2023:

- *Aquisição Fundação Millennium bcp Talento Emergente* award, which supports an artist under 35 years of age through the acquisition of work and its inclusion in Millennium bcp – Katarzyna Pacholik collection (Poland, 1990), represented by *Galeria Silvestre*;
- *Projeto Artístico Destacado* award, which distinguishes an artist of this year's edition – Gabriela Albergaria, represented by *Galeria Vera Cortês*, who presented an exhibition with works where she interprets gardens as elaborate constructions, representation systems and descriptive mechanisms used to represent the natural world;
- *Projeto Curatorial Galeria* award, which distinguishes a curatorial proposal from a participating gallery - *Galeria das Salgadeiras*, based in Lisbon, a project conceived by Ana Matos, which brings together the works of artists Rui Soares Costa and Rui Horta Pereira under the concept of "labyrinth".

- Carpe Diem Arte e Pesquisa - Arte Jovem 2023 Award

Support for *Arte Jovem Fundação MbcP 2023 Award*, an initiative that aims at promoting the works of artists who have just entered the world of art and provide a broader view of national artistic production, creating the opportunity for the first exhibition with curatorial monitoring and catalogue. The selected works, by 10 artists, were brought together in an exhibition that opened on October 12 and lasted until November 11, 2023, in Pavilion 31 of *Centro Hospitalar Psiquiátrico de Lisboa*.

The Foundation attributed two awards:

- "Viagem a Madrid Millennium bcp" award: taking place during the art fairs and parallel events of that city, which was awarded to Joana Duarte from *Faculdade de Belas Artes* of the University of Lisbon;
- "Aquisição Fundação Millennium bcp": consists in the acquisition of a work to be part of the of Millennium bcp collection and was awarded to Mariana Maia Rocha from *Faculdade de Belas Artes* of the University of Oporto, with the work "A

voragem do tempo”.

The Jury of the 2023 edition of the *Arte Jovem* Award was made up of the artistic duo Rosana Ricalde and Felipe Barbosa, the researcher Glória Diógenes and the independent curator Katherine Siroiss.

- Nebula - Associação Cultural

Support for the development of the Chiado, Carmo, Paris 2024 Project, coordinated by Professor José Quaresma, from FBAUL (*Faculdade de Belas Artes* of the University of Lisbon), which includes the publication of a book and five art exhibitions evoking the passage of Salgueiro Maia (and what he symbolizes for the women and men he influenced) through the arteries of these two cultural neighborhoods — Chiado and Carmo —, when, as he walked along Rua Garrett, Calçada do Sacramento and Largo do Carmo, he filled with hope all those he met there.

- Fundação Eça de Queiroz – Literary Award Fundação Eça de Queiroz / Fundação Millennium bcp

This biennial award aims to encourage the production of literary works in Portuguese, as well as to pay tribute to Eça de Queiroz, one of the greatest national and international figures in Portuguese literature and culture.

The prize for the 2023 edition, which distinguished a fictional work (novel or novella) written in Portuguese and published in Portugal in 2021 and 2022 by a national author aged no more than 40 years at the time of publication, excluding previous winners, was awarded to Joana Bértholo with the work "A História de Roma".

- Fólio 2023 – Livraria de Fundos

The project proposes the sharing of programming between the FOLIO MAIS section of *Festival Literário Internacional de Óbidos* and the inauguration of the *Casa do Comum* cultural centre, in Lisbon. *Ler Devagar*, curator of the aforementioned section of FOLIO and promoter of the new Cultural Centre, thus intended to take the programming from Óbidos to Lisbon.

In both spaces, the cultural programming privileged lesser-known authors and singer-songwriters within the Portuguese cultural circuit, in particular artists and authors from Portuguese-speaking countries (Brazil, Angola, Cape Verde, Guinea, among others) and artists who had less representation on the large stages and cultural programming spaces.

- SPIRA / Mundo do Património

Support for the realization of *Feira do Património - Bienal Ibérica do Património Cultural AR&PA 2023*, which took place between October 12 and 15 in Angra do Heroísmo, Azores. *AR&PA* is a reference event in the Cultural Heritage sector in Portugal, being a privileged meeting point and debate forum for professionals and institutions dedicated to Cultural Heritage.

The 2023 edition was attended by 50 stands. A total of 80 activities were carried out. The cultural program had about 2,000 participants.

- Associação CIVOC - “Cascais Ópera - Concurso internacional Ópera Cascais” project

Support for the "Concurso Internacional de Ópera de Cascais", an initiative that is a novelty in the international panorama of lyrical competitions and which will have its inaugural edition between 6 and 14 of April 2024, at *Centro Cultural de Cascais*, at *Casino Estoril*, at *Casa das Histórias Paula Rego*, with its final being held at *Teatro Nacional de São Carlos*, in Lisbon. Designed as a 'showcase' for the most promising among the new values of operatic singing, *Cascais Ópera* is open to candidates from all over the world and of all vocal typologies, aged between 18 and 32 years.

- Francisco de Lacerda A Música e o Mundo Associação Cultural

Support for the Composer *Francisco de Lacerda / Fundação Millennium bcp* award, created by *Francisco de Lacerda - A Música e o Mundo*, Cultural Association, which aims to promote national musical creation and reward works by Portuguese or foreign composers living in Portugal, this award being one of the most relevant distinctions for orchestral composition in Portugal.

In the 2023 edition, the jury, consisting of composers Magnus Lindberg, Christian Mason, Aspasia Nasopoulou and Vasco Mendonça, elected as the winner the work "Ecos das Trovas" by Luís Neto da Costa.

- Banda de Alcobaça - Cistermúsica 2023

The 2023 *Temporada Cistermúsica* kept its commitment to a range of different artistic and sound experiences that captivate different audiences, covering centuries of musical history, from ancient music to contemporary creation, with formats ranging from chamber music to several symphonic concerts and other major productions, and the Foundation's support was, above all, directed to the *Rota de Cister* programming network which, starting from *Mosteiro de Alcobaça*, seeks to disseminate and value the Cistercian heritage built in Portugal.

In the 2023 edition, 58 shows were held, in which 1,177 national and international performers participated, spread over 33 stages and with 10,000 spectators.

- BOCA

Support for 2023 activities, including:

- BoCA *Bienal de Artes Contemporâneas 2023*, "Presente Invisível": bringing together 35 cultural institutions (theatres, museums, cultural centres, heritage and natural spaces), the BoCA Biennial ran from 2 September to 15 October 2023 (6 weeks). It included the production of new creations by 63 artists, from 13 nationalities, having achieved an occupancy rate of 98%.

- Artistic residencies: BoCA has produced 5 Artistic Residencies in different creative spaces (Victor Córdon Studios, Lisbon; Goethe Institut, Lisbon; *O Espaço do Tempo*, Montemor-o-Novo; *Fábrica da Cerveja*, Faro).

- Programming and Participation / *A Defesa da Natureza*: continuity of the project started in 2021, which combines art and environment and calls on civil society and artists, on the one hand, to plant trees by assigning a title to each new natural/artistic creation and, on the other hand, to program artistic and educational activities for these same spaces, over 10 years. In 2023, 525 trees were planted in Lisbon, in a partnership between BoCA and the Green Structure department of the Lisbon municipality, which brought together more than 100 citizens residing in Lisbon who planted and named their tree/artistic creation.

- *Programa Educativo* / BoCA Summer School: 5 workshops in different artistic areas (theater, dance, visual arts, music, cinema) directed by artists of international prestige.

- *Programa Educativo* / *Mutantes – Entre o Teatro e o Museu*: a transdisciplinary project of training and creation of new artistic paradigms, coordinated by Sara Franqueira, and the partnership of BoCA with several cultural institutions in the city of Lisbon (*MAAT*, *Culturgest*, *Centro Cultural de Belém*, *Teatro do Bairro Alto*, *Museu do Chiado*).

- *Programa Educativo* / BoCA Sub21: training and creation project aimed at young people between 15-21 years old

- Mediation in higher and artistic schools / BoCA: transversal to the entire program and continuously, Mediation inhabits each activity, establishing links with 19 secondary, artistic and higher education institutions for actions to raise awareness about programming and taking artists from the BoCA Biennial to masterclasses.

- National and International Circulation: the artistic projects commissioned and produced by BoCA (shows and performances) premiered in Lisbon and Faro as part of BoCA 2023 and circulated in other geographies of the country and the world: Paris, Antwerp, London, New York, Madrid, Toulouse and Porto.

The 4<sup>th</sup> edition of BoCA – Biennial of Contemporary Arts, an international biennial of contemporary arts, brought together a total of 51,000 spectators.

- O Espaço do Tempo

A project that supports national and international creators through its artistic residency program (in Montemor-o-Novo) in the areas of theatre, dance, performance, music, visual arts and the arts in general, directed especially for emerging contemporary creation.

Additionally, *O Espaço do Tempo* promotes and organizes *Plataforma Portuguesa de Artes Performativas* - a biennial event where the most relevant works of Portuguese performing arts are presented to national and international programmers, curators and artistic directors. In 2023, the 8<sup>th</sup> edition of this event took place between 6 and 10 June 2023, during which 18 Portuguese performing arts shows, premiered between 2021 and 2022, were presented. The initiative was attended by 80 programmers and Artistic Directors from international and national structures.

- AICA - International Association of Art Critics

Support for the *AICA/MC/Millennium bcp Visual Arts and Architecture Awards*, which are awarded annually in Portugal to a visual artist and an architect.



These awards intend to distinguish Portuguese artists and architects who, for their work and personal path, provide a contribution of excellence for art and culture.

In 2023, the prizes for 2022 were awarded, with Luísa Cunha being distinguished, for the exhibition "Partitura #4" and for the intervention in the "Gabinete" space, at MAAT, with the piece "Não", and Ricardo Carvalho, for the solo exhibition "Todas as Direções" held at the Note gallery.

- Associação Portuguesa de Historiadores de Arte

Support for the 2<sup>nd</sup> edition of the APHA/Millennium bcp - José Augusto França Awards. These awards are intended to distinguish the best master's thesis and the best doctoral thesis in Art History, presented in this scientific field in Portuguese Universities in the years 2020 and 2021, through the sponsorship of their publication.

- RHI Arte Institute

The RHI is an initiative organized by the Arte Institute, with the aim of internationalizing contemporary Portuguese art and culture. In the 2023 edition, held under the theme RHI - Revolution Hope Imagination, it took place between 5 and 13 May in 12 cities: Évora, Cascais, Loulé, Braga, Lisbon, Torres Vedras, Alcobça, Leiria, Faro, Oporto, Vidigueira and Funchal.

A total of about 1,500 spectators were reached who attended the 33 organized events (lectures, workshops and multidisciplinary events) in person or online.

The cultural moments were documented on the online platform RHI\_Think (rhi-think.com) which will continue to promote these shows throughout the year, allowing anyone in the world to have access to their content.

- CULTURXIS

The 18<sup>th</sup> Festival Internacional dos Açores aimed to promote a more diversified cultural offer in the region. For the first time, the festival, which took place between August 31 and September 16, 2023, had sessions on all the Azores islands.

Throughout the festival, 22 shows were held, ranging from classical music to performing arts, jazz and hybrid performing arts. The shows were directly witnessed by more than 7,000 spectators, and the event had an additional projection provided by the publicity carried out by the media.

## Science and Knowledge



In line with the Sustainable Development Goals of the United Nations (SDGs)

### Scientific Investigation Projects

- Fundação Rui Osório de Castro

A new protocol was signed with *Fundação Rui Osório de Castro* for the three-year period from 2023 to 2025 which aims, through the attribution of an award, to promote the development of innovative scientific works that deal with the pediatric oncology issue and that are capable of encouraging and promoting the improvement of care provided to children with cancer disease.

In the 7<sup>th</sup> edition, 9 applications were submitted, and *Fundação Rui Osório de Castro / Millennium bcp Award* was awarded to Isabel Antunes, from IPATIMUP and i3S, with the project "Desvendar o papel da glicobiologia nos sarcomas pediátricos: Abrir portas para novas estratégias terapêuticas".

In this edition, the jury also awarded an honourable mention to Ana Vieira, from IST "ALL4WISH" and Rui M. Reis, from University of Minho, with the project "Papel da CD24, uma proteína do "checkpoint" imunológico, na biologia e terapia de meduloblastomas".



- Universidade Nova / Instituto de Higiene e Medicina Tropical

Support for the 6<sup>th</sup> National Congress of Tropical Medicine, which took place between April 18 and 21, 2023, dedicated to the theme "Tropical Medicine and Sustainable Development". Within the scope of this initiative, pre-congress courses, thematic panels, guest conferences, oral communications and selected posters were held.

The event also included the photographic exhibition "Parcerias em Medicina Tropical: Histórias e Memórias".

- Federação Portuguesa de Formação Profissional e Emprego de Pessoas com deficiência e Incapacidade

Support for the International Congress on Socio-professional Inclusion, which was under the theme "The socio-professional inclusion of people with disabilities - the state of the art and future perspectives".

The event took place at *Centro de Artes e Espetáculos*, at Figueira da Foz, on November 22 and 23, 2023, with 133 participants attending the event.

## University Education

- *Aprender e Empreender* - Junior Achievement 2023

This initiative aims to undertake entrepreneurial programmes with university students by creating new micro companies. Under the format of a university and entrepreneurship competition and with the guidance provided by professors from several universities, the students learn how to create and manage a company.

This initiative allows students to develop a wide range of personal skills and allows educational institutions to offer their students a more global view of the set of career opportunities. In addition, and due to the fact that it is connected to an international network, participation in this program allows students to broaden their horizons and get to know new realities and generates, for teachers, opportunities to create synergies with other national and international educational institutions.

During the 22/23 academic year, 13 universities, 927 students and 45 volunteers were involved in this initiative.

The final of the national competition was won by the Trade team, from the Universidade de Évora, with a project for a platform for the exchange of services between university students that aims to develop soft skills. This team represented Portugal at the Gen-E 23 European Entrepreneurship Event that took place between 11 and 14 of July, in Istanbul, Turkey.

- Universidade Católica - CEPCEP

Support for the celebrations of the 40<sup>th</sup> anniversary of the *Centro de Estudos dos Povos e Culturas de Expressão Portuguesa* (CEPCEP), which was marked by 4 public events on topics of great relevance: *Seminário Lições da Pandemia Aprender com uma Experiência Limite* (January 2023); *Seminário Uma agenda de Investigação para o Futuro* (March 2023); *Seminário A Sociedade do Cuidado* (June 2023) and *Congresso Português Global - Língua, Cultura e Ciência no Século XXI* (November 2023).

- Museu Nacional do Teatro e da Dança – Estudar a Dança Award

Support for the *Estudar a Dança* award, which is intended to reward academic works of exceptional quality that contribute to the knowledge of this art and stimulate its development. This is an annual award, which is directed alternately to master's dissertations and doctoral theses.

In 2023, the prize for the competition was awarded, which covered Doctoral Theses defended in the last five years (between 30 September 2017 and 30 September 2022) in polytechnic institutes and national universities.

## Basic Education

- Associação Empresários pela Inclusão Social (EPIS)

Support for the Association's activities aimed at promoting initiatives for creating job opportunities and social reintegration of people, families or groups in exclusion or risk of social exclusion situations, with a special focus on promoting the social inclusion of young people through school success and professional integration.

In the 2022/2023 school year, EPIS programs to promote school success closely monitored 8,922 children and students in 251 schools in 36 municipalities and 4 Azores islands.

The academic success of *EPIS* students in the 2<sup>nd</sup> and 3<sup>rd</sup> cycles and secondary school, monitored by *EPIS* for more than a year, reached 85.4%, 2.4 pp more than in the previous school year. In primary school, the academic success of the students monitored was 99.8%.

In the 2023/2024 school year, *EPIS* extended its presence to 254 schools in 37 municipalities and 5 Azores and Madeira islands.

Within the scope of the BCP Group's Corporate Social Responsibility Policy, a partnership was established in the 2022/2023 academic year between *Fundação Millennium bcp*, Millennium bcp and *EPIS* with the aim of bringing together a group of Millennium bcp Employees / Volunteers with interest and availability to give tutoring lessons to students in the 2<sup>nd</sup> and 3<sup>rd</sup> schooling stages from disadvantaged backgrounds (with a higher risk of school failure and dropout), thus helping to promote their social inclusion through school. The success of this initiative led to its renewal in the 2023/2024 school year.

## Social Action

In line with the Sustainable Development Goals of the United Nations (SDGs)



Within the scope of Millennium bcp's Corporate Social Responsibility, the Foundation supported actions of different entities, covering several sub-areas of intervention, such as childhood/adolescence/seniors, poverty and disability, of which the following are highlighted:

- AESE - Associação Estudos Superiores de Empresa - Programa GOS

Support for the holding of *Programa GOS - Gestão das Organizações Sociais*, resulting from a partnership between *AESE* and *ENTREAJUDA* and aims to provide management training to managers of entities in the social economy sector, exclusively non-profit, seeking to respond to the training needs felt in this sector.

In 2023, 53 trainees benefited from *Programa GOS*, at national level, representing 37 entities from north to south of the country, including the autonomous regions (in Porto, there were a total of 23 direct beneficiaries, from 15 entities in the social economy sector located north of the Mondego River, and, in Lisbon, 30 direct beneficiaries, representing 22 entities located south of the Mondego and Islands).

- Banco Alimentar Conta a Fome

Support for the campaigns for the collection of food carried out by this institution that seek, throughout the year, to respond appropriately to the impact of the pandemic that many families continued to feel.

The 21 Food Banks support 2,600 charities that help around 400,000 people in need (100 tons of food delivered per day).

The foundations' support is channelled for the purchase of paper bags used in the food collection campaigns. The bags are used once again in the following campaigns or, if damaged or dirty, re-sent to the campaign Paper for Food.

- 55 MAIS+

Project that aims to activate, value and integrate people aged 55 and over into society to prevent or counteract loneliness and reinforce self-esteem and well-being. To this purpose, it has developed a technological and human platform, connecting the needs of citizens and the services provided by people aged 55+ (food, pet-sitting, monitoring of seniors and children, watering plants, ...) by a competitive and fair value for all.

At the end of 2023, 3,585 Talents with 55+ were registered, with 12,216 hours of activity provided throughout the year in 1,199 services performed. Since the beginning of the project, *Talents 55+* have performed more than 42,400 hours of service (more than 5,000 services), achieving a remuneration of more than €250,000.



- Associação Dignidade

The abem Program is a Medicine Solidarity Network whose mission is to allow access to medicines prescribed and reimbursed

by the National Health Service (SNS) to those who do not have the financial capacity to purchase them. The beneficiaries are referred by local entities (*Municipalities, Caritas, IPSS and Misericórdias*) so that the support is carried out in proximity and with humanity.

Abem is based on a collaborative network of local entities and pharmacies. This initiative has a national scope, being present in all districts and autonomous regions.

In 2023, there were 35,210 beneficiaries of the ABAEM program, which involved 188 referring entities and 1,165 pharmacies. Given the average value of support per beneficiary, the donation granted allowed supporting around 61 beneficiaries for a period of 1 year.

- Associação Terra dos Sonhos - We Guide and Sonhos Transformadores projects

*Sonhos Transformadores*: their main objective is to provide children and young people with serious illness, or in the terminal phase, with the fulfillment of their dreams. By contributing to a better state of mind, we increase levels of hope by creating magical moments that reinforce the importance of positive emotions in situations of great vulnerability.



WeGuide: aims to improve the quality of life and promote the well-being of people with serious chronic illness, and their caregivers. It materializes through the performance of a Health Guide, a professional whose function is to accompany the patient over twelve months. It is premised on authentic and inclusive communication, and always aims to empower the patient, or their informal caregiver for the self-management of the disease, enhancing a greater humanization of the system.

The Foundation's donation made it possible to make the dream come true for two children and to accompany a child and his caregiver for 6 months.

- Associação Mais Proximidade Melhor Vida

Aid for the carrying out the 2023 activities of this Association that seeks to reduce the impact of loneliness and isolation and contribute to improve the quality of life of the elderly.

- Ajudaris

Every year, *Ajudaris* challenges schools to join the project by reflecting on a theme linked to the 2030 agenda. After this exercise, with methodologies adapted to the children and young people ages, stories of different literary genres emerge. In the 2023 edition, the "Peace" theme was worked on.

In the 2023 edition, 2,560 stories were received and 610 stories were selected for publication, spread over 6 illustrated books by illustrators from several parts of the world. One collection had a print run of 24,000 books that were distributed, for the most part, by school libraries, hospitals and municipal libraries. 42 face-to-face activities were promoted and we carried out 10 training sessions on creative writing strategies with a focus on children with special educational needs.

- Associação Ukrainian HUB - Amarelo Azul Project

Within the scope of this project, the realization of 3-month business educational "Business camp" for Ukrainian refugee women is promoted with the aim of supporting companies and startups founded by Ukrainian women, refugees in Portugal, making them drivers of future economic recovery through access to global resources - financial, intellectual, technological.

The Foundation's support translates into the awarding of a prize that distinguishes the 3 best projects presented at the Business Camp.

- SOL- Associação de Apoio às Crianças Infectadas pelo VIH/Sida

Support to the project *ConSOLidar Laços* - Summer Camps that provided 15 children/young people infected with HIV with a differentiated holiday, where, among all, they shared experiences and doubts directed to the common factor, being HIV-positive. Through a welcoming environment and lots of fun, the SOL Association aimed to clarify possible doubts that exist and improve the behaviours of each young person in the face of their disease.

- MOG - Movimento Oncológico e Ginecológico

Support for the activities of the Ovarian Cancer and other Gynaecological Cancers Movement, an association that aims to improve the quality of life of all women suffering from ovarian cancer or other gynaecological cancers.

- APADP - Associação de Pais e Amigos Deficientes Profundos

In collaboration with the Millennium bcp Club, the Association's activities were supported, whose mission and objectives are to promote and ensure the well-being, quality of life and social inclusion of citizens with profound disabilities.

- Associação Rumo à Vida

In collaboration with the Millennium bcp Club, the Association's activities were supported, an IPSS (charitable institution) in the municipality of Matosinhos aimed at children, young people and adults with intellectual disabilities and whose mission is to provide a structured education/training of excellence, with a view to the development of their autonomy and inclusion in active social life, supported by an experienced multidisciplinary team.

- Fundação do Gil

Support for the construction of a Child Development Unit - the Gil Clinic - which aims to provide answers in the area of Mental and Emotional Health of children and adolescents, centered on the family.

This space aims to support in the areas of psychology, child psychiatry, family therapy, speech therapy, occupational therapy and psychopedagogical support, among other specialties.

- EAPN - Portugal

Support for the development of the activities of the National Observatory for the Fight Against Poverty, whose mission is to permanently monitor the phenomenon of poverty and social exclusion in Portuguese society.

For more information on *Fundação Millennium bcp* activities during 2023, including its impact on the SDGs, see the Activity Report at: <https://www.fundacaomillenniumbcp.pt/en/a-fundacao/informacao-cooperativa/>

**In 2023, the Foundation supported 127 projects in the area of Culture, Knowledge and Social Solidarity.**



## Bank Millennium Foundation

The year 2023 was the 33rd birthday of the Bank Millennium Foundation. Another year of two important programs: **Financial ABCs**, an educational program familiar from previous years, which is directed to the youngest children and their parents, and **Our People'23: Save the Planet**, a sports charity program.

Taking advantage of the opportunities presented to the Foundation this year, it was possible to focus even more on the needs of the Polish society in terms of financial education and raising awareness about protecting the Planet. These needs became both a challenge and a goal to achieve in the past year.



### DOUBLY ECO: FOCUSING ON ECONOMICS

The **Financial ABCs** program was continued, with two editions held in 2023, during which the program carried out 439 educational workshops for children in 119 kindergartens. During the workshops, almost 10,000 children between the ages of 3 and 6 were able to acquire financial knowledge through play. The goal of these sessions was to provide preschoolers with financial education, to raise their awareness of different forms of money and develop the habit of planning and saving.

### DOUBLY ECO: FOCUSING ON ECOLOGY

The Foundation have decided to promote employee initiatives that this year focused on protecting our Planet. That mission was pursued through the **Our People'23': Save the Planet** program - to expand the awareness of environmental protection and the dangers of pollution among employees. The scale of the problem is great, and the problem itself does not just affect one person or one organization, but society as a whole. The campaign had two stages: sports and eco-volunteering.

### FINANCIAL ABCs: CARING ABOUT FINANCIAL EDUCATION FROM EARLY AGE

Since 2016, the Bank Millennium Foundation has cooperated with the Verba Foundation in carrying out an educational program for preschoolers called Financial ABCs. The program is an original initiative of the Foundation implemented under the honorary patronage of the Ministry of Finance.

According to a survey conducted for Bank Millennium Foundation, more than 75% of parents of preschoolers believe that the age of 3-7 is the best time to start their financial education. The survey also showed that parents are open to their children's development in finance and entrepreneurship areas and that financial education itself is seen by the vast majority as a necessary part of education in today's world.

### WORKSHOPS IN KINDERGARTENS

The young participants of the workshops were introduced to another edition of the adventures of Mr. Sebastian, which was enriched this year with topics of digital world and online payments. The goal of the workshops was to use interactive methods to teach children about the value of money, its forms, the skills of financial planning and saving, and how to navigate the world of finances consciously and safely. The program helps to develop healthy savings habits and respect for money.



The employee volunteers support communication with kindergartens, assist animators during workshops in distributing diplomas, books and running games. The games proposed during the workshops promoted independence, openness, charity, pro-activity and creativity. The Financial ABCs program provides educational materials in the form of a guide for parents and a textbook featuring the adventures of Mr. Sebastian. These materials are available on the Foundation's website and on YouTube.

## 10TH ANNIVERSARY EDITION

In 2023 the Bank Millennium Foundation organized 3 anniversary events celebrating the 10th edition of the Financial ABCs program in 3 Bank Millennium headquarters: in Warsaw, Gdańsk and Wrocław. Children had an opportunity to meet the hero of the program, Mr. Sebastian, and to participate in financial workshops. Additional attractions were provided in the form of various games with professional animators, an illusionist show, lots of balloons, delicious snacks, and cake. At the end, each child received a gift of books, stickers and a mascot.

From the inception of the Financial ABCs program until the end of 2023, the Foundation organized more than 3,157 workshops and trained 70,000 children in kindergartens across Poland

## GLOBAL MONEY WEEK 2023

This year, from March 20 to 26, the annual Global Money Week (GMW) awareness campaign was carried out globally. It was also celebrated by Bank Millennium Foundation. “Plan your money, plant your future” was the official theme of this year's edition. Financial literacy, responsibility, a thorough understanding of finances and awareness of financial behavior from an early age is one of the priorities of the Foundation.

Bank Millennium Foundation celebrated this year's GMW campaign by participating in panel discussions with, among others, the Warsaw Banking Institute Foundation representing the Polish banking community, and the GMW Foundation, which establishes an annual cross-community forum for discussion, exchange of experiences, cooperation, and educational activities in the field of finance.



## OUR PEOPLE'23: SAVE THE PLANET

Over the past years, in programs organized by Bank Millennium Foundation, the volunteers have proven more than once that the desire to do good and to provide help is in their blood. This is why Bank Millennium Foundation launched the Our People'23: Save the Planet program last year.

The main focus of the program was to protect our Planet. Due to human activities, more and more climate threats arise every day and pollution levels are increasing. All this leads to irreversible changes not only in the climate, but in the entire ecosystem.

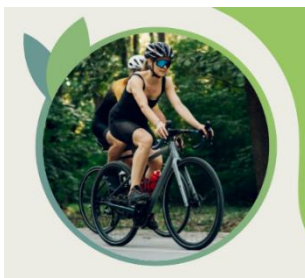
The Foundation is not indifferent to environmental issues - that is why in 2023 it has made a joint effort to take care of the Earth's needs and put ecological values first. It is a very broad theme that encompasses numerous topics, for example the preservation of biodiversity, the loss of which is the greatest threat to life on Earth.

The Foundation has committed to the goal of raising environmental awareness, promoting ecological values such as: separation of waste, increasing the number of plants in its spaces, protecting animals and forests and raising environmental awareness among the public.

The Our People'23: Save the Planet program has helped to achieve the environmental goals while engaging volunteers in both sports and volunteering activities and the results are tangible proof of how much we can accomplish together.

## SPORTS CHALLENGE

The sports part of the campaign was based on engaging employee volunteers in sports activities. Each kilometer covered and calorie burned contributed to the stated goal of donating 250,000 PLN to the Bank Millennium Foundation for the implementation of the eco-volunteering program.



1,508 volunteers became involved in the sports activities, traveling a total of 311,444 kilometers - 131,272 km kilometers on foot and 180,172 km kilometers on wheels - and burning 18 million calories between 24 April and 25 June 2023. Such a huge contribution of Bank employees to sports activities guaranteed the success of this part of the campaign.

The campaign not only promoted ecological values, but also encouraged a healthy lifestyle with intensive physical activity, which in turn benefits not only our health and well-being, but also the environment. To achieve their exercise goals, the volunteers gave up driving or taking public transportation and instead walked, ran or biked. As a result, 71 tons of carbon dioxide were saved, a major contributor to the pollution of the Planet.

**PROTECTING THE PLANET TOGETHER**

In the eco-volunteering part of the campaign, 26 different eco-initiatives were carried out by teams of volunteers. In total, 163 volunteers took part in eco-volunteering, and the aid reached numerous beneficiaries, including: disabled youth, children from an orphanage, patients from a children’s hospice, children from various kindergartens and elementary schools, as well as nature parks, bees and hedgehogs.

The eco-initiatives required volunteers to be engaged in their work, be open to the local community, plan for the long-term impact of their activities, use raw and recycled materials and minimize purchases. The campaign created a perfect space for creative and, most importantly, charitable ideas. As a result, each of the initiatives was unique. Teams of volunteers approached the topic of protecting the Planet in different ways, which confirmed how broadly the concept can be understood.

**TWICE THE CELEBRATION: VOLUNTEER DAY**

5 December is International Volunteer Day. Its purpose is to recognize the work of volunteers around the world for their efforts, time and skills. Last year, the Bank Millennium Foundation celebrated the day with a webinar in partnership with WWF. It was an ideal opportunity for willing volunteers to learn a little more about the steps each of us can take every day to protect the environment. During the webinar, the attendees were able to talk about: the most effective actions to benefit nature, our ecological debt, as well as the eco-initiatives that have already been implemented.

**TWICE THE CELEBRATION: 33RD ANNIVERSARY OF THE FOUNDATION**

In December 2023, the Foundation had its 33rd anniversary, which offered another opportunity for celebration - on this occasion, together at the Bank’s Head Office in Warsaw. The Foundation began its activities on 10 December 1990.



For more information, see the Bank Millennium Foundation 2023 Report:

[https://www.bankmillennium.pl/documents/d/guest/fundacja\\_raport\\_2023\\_en?mv=1mv](https://www.bankmillennium.pl/documents/d/guest/fundacja_raport_2023_en?mv=1mv)



## Social Responsibility and Social Solidarity Initiatives in Portugal, Poland and Mozambique



Millennium volunteers and "Brigada do Mar" clean beach on the Portuguese coast (Portugal)



Bank Millennium volunteers visit kindergartens and promote financial literacy (Poland)



"Solidarity Christmas" supports needy populations with first necessity (Mozambique)



"Solidarity Christmas", in 2023, carries out support actions in 11 cities across the country (Mozambique)



Millennium volunteers at the Lisbon Food Bank (Portugal)



12th edition of the Banking Olympics promotes financial literacy (Mozambique)

**Social Responsibility and Social Solidarity Initiatives in Portugal, Poland and Mozambique**



Bank Millennium Foundation promotes nature protection with the involvement of Millennium Volunteers (Poland)



Bank Millennium Foundation in yet another joint effort to protect the environment (Poland)



Millennium volunteers and "Semear" promote the inclusion of people with special needs (Portugal)



16th edition of the Minibasketball Tournament of the Social Responsibility program "Mais Moçambique pra Mim" (Mozambique)



BCP recognized for 18 years of participation in the UN Global Compact (Portugal)



"Our People23': Save the Planet", has Millennium volunteers doing physical exercise to raise social donations (Poland)

# Environmental Responsibility

# Environmental Responsibility

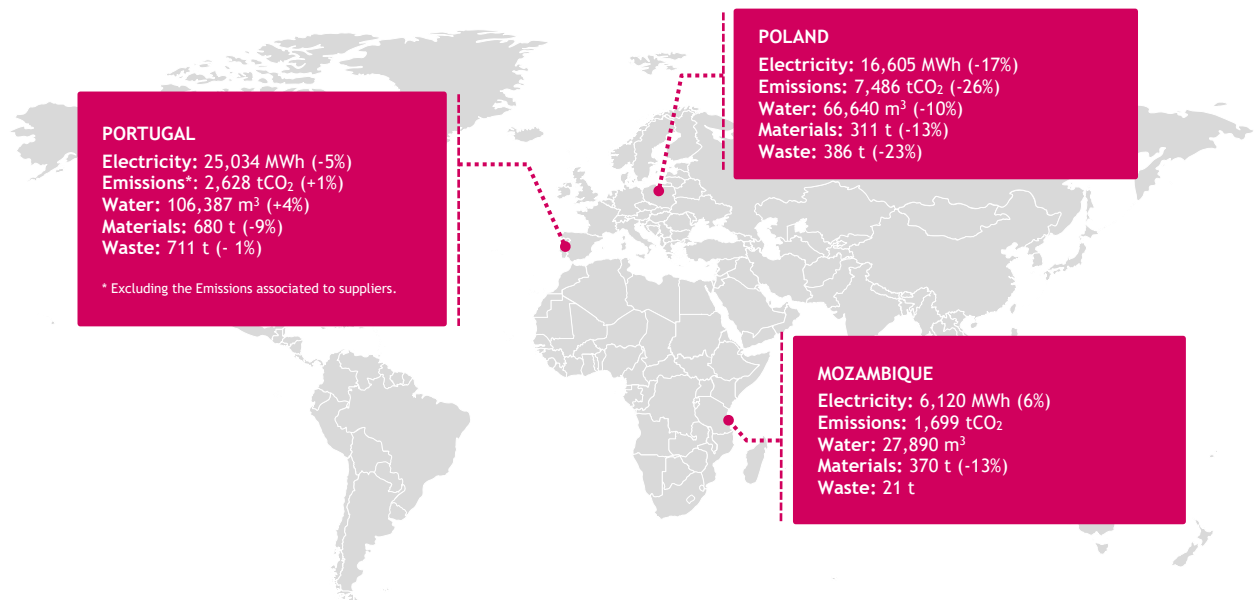
The impacts that arise from climate change and are felt at a global level, emphasize the importance of companies, governments and individuals acting in a concerted way to change habits and behaviours, which ensure greater environmental preservation and protection.

The Bank's activities necessarily result in several environmental impacts, including negative-ones. Recognizing this, Millennium bcp has implemented a strategy and an action plan, aligned with international frameworks, tools and indices, through which it seeks to minimize adverse impacts on the environment and enhance eco-efficiency in the management of its operations.



To reduce the negative impacts associated with its operations and portfolio, it invests in the provision of financial solutions and products that include an environmental responsibility aspect.

## Main highlights 2023



Caption: 2023, % evolution vs. 2022

## Bank's journey to improve environmental performance in Portugal

- 2016 ● — Implementation of the Program Go Paperless
- 2017 ● — The option to use/ purchase hybrid vehicles in the selection of the company's fleet is available.  
— Installation of a Photovoltaic Solar Energy Plant with around 1 MW capacity.
- 2019 ● — Replacement of traditional light bulbs for LED in all the Bank's buildings in TagusPark
- 2020 ● — Signing of the Mobility Pact for the City of Lisbon and Lisbon European Green Capital 2020 Commitment
- 2021 ● — Millennium bcp in the first ranking "Europe's Climate Leaders 2021" from FT  
— Use of electricity 100% green in the Bank's premises in Portugal  
— Conducting, in the Portuguese operation, universal training on Sustainability (5,815 Col.) and the Sustainability Course in the Financial Sector (3,565 Col.)

- 2022 • — Installation of a second photovoltaic plant at TagusPark with 1 MW of power
- 2023 • — Starting the process of installing micro photovoltaic plants in the different branches in Portugal

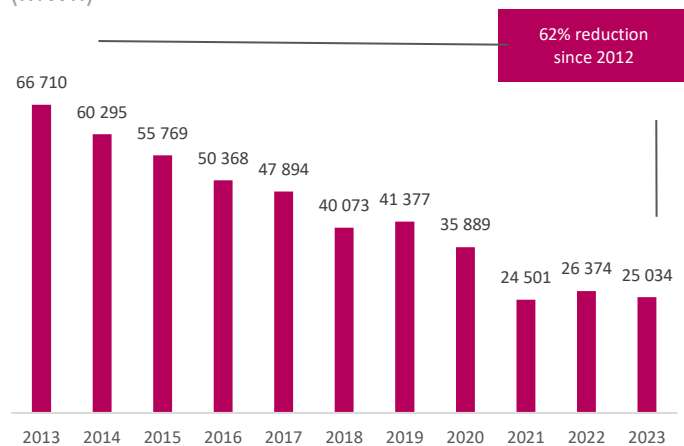
### The path of efficiency of Millennium bcp in Portugal

<b>Electricity</b> Goal 2023: +6 % ✓ Performance: -5% Target 2024: -3,5%	<b>Energy</b> Goal 2023: -11% Performance: +0.4% Target 2024: -5%	<b>Direct Energy</b> Goal 2023 <sup>1</sup> : -60% Performance: -9% Target 2024: -10%	<b>Indirect energy</b> Target 2023: +6% ✓ Performance: +4% Target 2024: -3,5%
<b>Water</b> Goal 2023 <sup>1</sup> : +2% Performance: +4% Target 2024: +2%	<b>Waste</b> Target 2023: 0% ✓ Performance: -1% Target 2024: 0%	<b>Materials</b> Target 2023: -5% ✓ Performance: -9% Target 2024: -7%	
<b>Emissions of CO<sub>2</sub>*</b> Goal 2023 <sup>3</sup> : -15% Performance: -1% Target 2024: -7% <small>* Excluding the Emissions associated to suppliers.</small>	<b>Direct Emissions</b> <small>scope 1</small> Target 2023: -15% Performance: -7% Target 2024: -10%	<b>Indirect Emissions</b> <small>scope 2 (market-based) and 3 (travels)</small> Target 2023: 0% Performance <sup>2</sup> : +78% Target 2024: +10%	

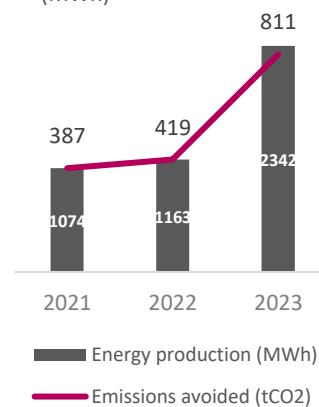
<sup>1</sup> The target defined for 2023 implied an increase in water consumption, since consumption in the first two months of 2022 was still reduced, as we are still in a pandemic period. The target was calculated based on pre-pandemic figures, thus assuming a reduction versus those figures.

<sup>2</sup> The increase recorded between 2022 and 2023 results from the lifting of restrictions on movement regarding mobility on duty, with a more relevant impact resulting from plane travels.

### Energy consumed\* (MWh)

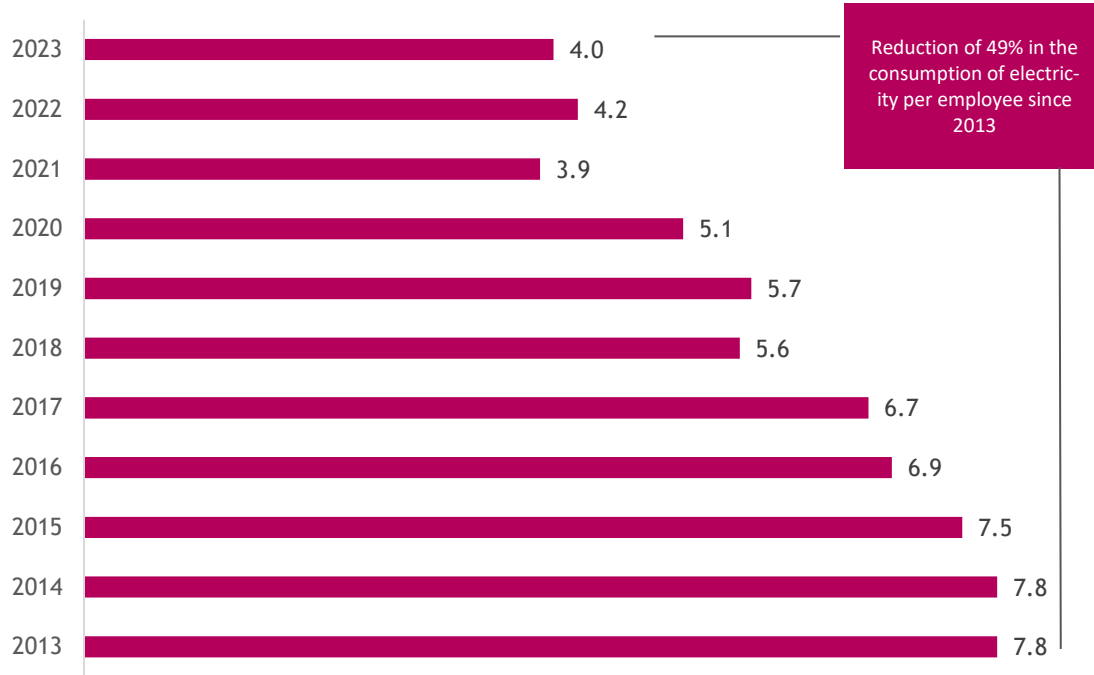


### ENERGY PRODUCED IN THE PHOTOVOLTAIC PANELS (MWh)




\*Refers to electricity consumption from the public grid.



### MWh per employee\*



\*Refers to electricity consumption from the public grid, by employee.

### Sustainable Development Objectives

SDG	Our objectives	Our contribution in 2023
	Contribute to limit global warming to 2°C.	<p><b>Promotion of decarbonisation in Group BCP</b></p> <p>Initiatives:</p> <ul style="list-style-type: none"> <li>In Portugal, two photovoltaic plants are in operation and the process of installing micro photovoltaic plants in its branches has begun.</li> <li>Gas boilers for heating and electric chillers for cooling were also replaced by heat pumps.</li> <li>In the different geographies, business travel has been minimized, and whenever possible, it is privileged to hold meetings and training in an online format.</li> </ul> <p>Results:</p> <ul style="list-style-type: none"> <li>In Portugal, 5,5% of the fleet is composed by electric or hybrid vehicles. An increase that contributes to reach the commitment of increasing the % of energy-efficient vehicles for the Bank's vehicle fleet in Portugal of 80% by 2030.</li> <li>In Poland, the Bank replaced 100% of the vehicles in its fleet with gasoline-powered hybrid models.</li> <li>The BCP Group reduced the total CO<sub>2</sub> emissions of operations (scope 1, 2 and 3 – Category 6) by 20% compared to 2022, considering the emissions associated with Portugal and Poland. In 2023, the reporting scope was extended to include Mozambique operations in scope 1 and 2.</li> </ul>
	Increase the percentage of renewable energy in total consumption of fuel.	<p><b>Consumption of renewable energies</b></p> <p>Results:</p> <ul style="list-style-type: none"> <li>In Portugal, all electricity consumed was 100% green, in a mix of energy produced by the TagusPark photovoltaic plant and energy purchased with a certificate of renewable origin, thus fulfilling the commitment to use 100% renewable electricity in all the Bank's facilities in Portugal.</li> <li>In Poland, from 2022 onwards, purchased electricity is 100% certified from renewable sources.</li> </ul>

SDG	Our objectives	Our contribution in 2023
	<p>Mobilise and increase the financial means for the conservation and respect for biodiversity and for eco-systems and for the promotion of a sustainable management of forests, including maintenance and re-forestation.</p>	<p><b>Financing of projects that contribute directly or indirectly to the conservation of biodiversity and ecosystems and to the sustainable management of forests</b></p> <p>Initiatives:</p> <ul style="list-style-type: none"> <li>• BCP finances several environmentally responsible projects, with direct and indirect contributions to the biodiversity conservation, in the areas of energy, forestry and agriculture, through Guarantee Lines with the European Investment Fund (EIF) and the European Investment Bank (EIB), under the EGF Community Programme – European Guarantee Fund; Capitalize More Line - SI Innovation; Credit Lines to support the Agricultural and Forestry Sector - IFAP Short Term, Fisheries Support; Biznesmax Warranty Program; Polish Green Economy Financing Facility; FECOP Calamities Credit Line, among other.</li> </ul>
	<p>Ensure the universal access to modern energy services and to accessible prices.</p>	<p><b>Financing of renewable energy infrastructure and equipment projects and others that contribute to/enhance the consumption of renewable energy</b></p> <p>Initiatives:</p> <ul style="list-style-type: none"> <li>• Sustainable Buildings Personal Loan - credit intended to finance the purchase of equipment to produce renewable energy or for the improvement of the energy efficiency of residential properties.</li> <li>• IFFRU 2020 Millennium Line – credit for the financing of investment projects to be developed by collective entities, public or private, aimed at urban rehabilitation and regeneration, enhancing improvements in the energy efficiency of buildings.</li> <li>• Millennium TFI Funds - funds in line with article 8 of the SFDR.</li> <li>• Participation in the Mój Elektryk Priority Program - guaranteeing co-payments from the National Fund for Environmental Protection and Water Management for the rental of electric vehicles.</li> </ul>

### Strategic Plan - Superação 24

Following the progress achieved in the 2018-21 period, the Millennium Strategic Plan for the 2021-2024 cycle consolidates the Bank's position in minimizing its environmental impacts and adds new elements consistent with the current context.

In this way, Millennium bcp incorporates in this Plan strategic priorities, which translate its commitment to sustainability, and a broad adaptation to the main trends in the financial sector, including the following objectives:

- Innovate in own products with green and social classification aimed at Individuals and Companies, risk appetite and funding structure influenced by the adoption of a green business model;
- Explore partnerships to increase the offer of ESG products, providing consultancy and advisory services to companies to support them in their transition process.
- Increase the origination of bonds linked to sustainability criteria and the issuance of ESG bonds;
- Establish a strong communication with internal and external Stakeholders, training all Employees and linking incentives with behaviours and results aligned with ESG criteria.

> 50%  
Reducing the level of exposure to coal and petroleum products in European operations

> 50%  
Green Project Finance

#1  
Origination of green bonds in Portugal

### 2023 Sustainability Master Plan - Environmental Action Plan

In its 2023 Sustainability Master Plan, the Bank includes the various lines of action through which it seeks to reduce its negative environmental impacts and enhance positive ones.

Size	Action Line
<p><b>Compliance with requirements related with environment</b></p>	<ul style="list-style-type: none"> <li>- Continue to implement the recommendations issued by the "Task Force on Climate-related Financial Disclosures" (TCFD).</li> <li>- Mandatory Taxonomy reporting in 2023 compared to 2022.</li> <li>- Prepare mandatory Taxonomy reporting for 2024, compared to 2023.</li> </ul>

Size	Action Line
<b>Risk management</b>	- Establish, carry out and document the process of assessing the materiality of the impact of C&E factors on the different risk typologies, in line with the expectations and recommendations of regulation and supervision. - Integrate the other environmental risks (i.e. other than climate) into the C&E materiality assessment and relevant processes.
<b>Policies and regulations on sustainable financing</b>	- Integrating climatic and environmental factors in collateral assessment. - Develop internal portfolio alignment exercise for relevant sectors in the Bank's activity.
<b>Climate change and energy transition</b>	- Promote the development of renewable energy through financing granted to the energy sector. - Preliminary study for the installation of a 3rd photovoltaic power station (Car Parking). - Accelerate the transition of the Bank's Car Fleet to energy efficient vehicles, with a mid-term review in 2025 flow and the goal of reaching 80% by 2030 (stock).
<b>Training and environmental awareness of the employees</b>	Promote individual awareness among employees for the adoption of environmentally responsible behaviour, through the creation and display of new environmental signs.

## Sustainable Operations

To monitor the eco-efficiency of its operations, the Bank regularly monitors various environmental performance indicators. This monitoring allows you to identify opportunities and improvement actions more quickly and efficiently.

As established in the Environmental Policy, updated in 2021 and adopted by all geographies and operations of the BCP Group, the Bank remains committed to the preservation of natural resources, through the rationalization of its consumption, namely energy, water and materials.

BCP Group	Units	2023		2022		2021	
		Values	Var. % 23/22 **	Values	Var. % 22/21	Values	Var. % 21/20
<b>Electricity – Public Grid</b>	MWh	<b>47 760 *</b>	<b>-10%</b>	<b>46 463.8</b>	<b>6.2%</b>	43 749.7	-22.8%
<b>Energy</b>							
Total	TJ	<b>314 *</b>	-12%	<b>313.4</b>	-12.7%	358.9	-12.9%
Direct	TJ	<b>82 *</b>	-4%	<b>68.5</b>	-36.5%	107.8	11.9%
Indirect	TJ	<b>232 *</b>	-14%	<b>243.4</b>	-3.1%	251.1	-20.5%
<b>Water</b>	m <sup>3</sup>	<b>201 017 *</b>	-2%	<b>176 287.8</b>	7.7%	163 746.8	-21.6%
<b>Waste produced</b>	t	<b>1 117 *</b>	-10%	<b>1 216.1</b>	-5.4%	1 284.9	54.8%
<b>Materials</b>							
Total	t	<b>1 360</b>	-11%	<b>1 531.5</b>	-2.9%	1 577.0	-9.0%
Cardboard/paper	t	<b>1 308</b>	-12%	<b>1 490.6</b>	-2.6%	1 531.1	-9.5%
Plastic	t	<b>52</b>	+27%	<b>40.8</b>	-11.1%	45.9	12.7%
<b>Emissions of CO<sub>2</sub></b>							
Total	tCO <sub>2</sub> eq	<b>11 813 *</b>	-20%	<b>12 709.8</b>	-67.0%	38 476.5	-22.0%
Direct Emissions***	tCO <sub>2</sub> eq	<b>5 502 *</b>	-5%	<b>4 543.0</b>	-34.1%	6 896.2	8.9%
Indirect Emissions****	tCO <sub>2</sub> eq	<b>6 611 *</b>	-29%	<b>8 166.7</b>	-74.1%	31 580.2	-26.5%

\* Inclusion of the operations in Mozambique within the scope of reporting.

\*\* For comparison purposes, data from Portugal and Poland were considered, in order to cover the reporting scope of the previous year, with the exception of the materials indicators, which already included Mozambique.

\*\*\* Scope 1 emissions.

\*\*\*\* Scope 2 and 3, Category 6 – Business Travel, emissions.



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**Main communication initiatives and awareness of sustainability**


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<p><b>Portugal</b></p>	<p>Millennium bcp frequently publishes content on the internal Portal, with good practices and general information and to foster the individual awareness of employees for the adoption of environmentally responsible behaviour, the Bank has posted environmental signage at its facilities. In addition, it carries out the daily treatment of the alarming of out-of-hours consumption in the branches and promotes the awareness of those responsible for it.</p> <p>In 2022, the total number of headcount Employees involved in the MiFID II Certification and Annual Renewal processes was 3,695, corresponding to 90,915 hours of training.</p> <p>Millennium bcp, in Portugal, and Bank Millennium, in Poland, are part of the Financial Times' "Europe's Climate Leaders 2023" ranking, which highlights the 500 European companies that have made the most progress in reducing greenhouse gas (GHG) emissions.</p>
<p><b>Poland</b></p>	<p>The Bank developed a campaign to encourage the adoption of the electronic statement, which resulted in a 16% reduction in paper statements sent to customers.</p> <p>As part of employee awareness campaigns, it promotes the use of reusable cups in the cafeteria of Bank Millennium's Headquarters</p> <p>The Bank's headquarters and some branches have been recognized for their environmental efficiency. The headquarters building in Warsaw has obtained the BREEAM certificate (Very Good level) for the use of energy-efficient lighting and the implementation of automatic systems to reduce energy and water consumption. The buildings in Wrocław and Gdańsk have received LEED Gold certification, which accredits them as modern, energy-efficient, and effective buildings.</p>
<p><b>Mozambique</b></p>	<p>Environmental topics were part of the ESG training given to Board members and to the first lines of relevant areas in Millennium bim's ESG process.</p> <p>It is also planned for 2024 to make the e-learning course on Sustainability, including environmental topics, available to all Millennium bim employees.</p> <p>The Bank was present at the inauguration of the "Wall of Biodiversity" as part of the Memorandum of Understanding between the Bank and the company Recycling &amp; Services (R&amp;S). This initiative, which aims to paint about 40 murals about Mozambican wildlife, marine and flora, as a means of raising awareness of the population for the fight against poaching and for the conservation of Biodiversity.</p> <p>The Bank also participated, at the invitation of the District Government of Gorongosa, in the 1st District Conference on Dissemination of Climate Resilience Potentialities and Investment Attraction for Environmental Conservation, expanding the panorama of debate around the contemporary solutions that the country sustains in the face of climate inclement weather.</p> <p>As the only Bank to operate in the Gorongosa district, Millennium bim contributes to the ecological integrity of physical and biological resources, as well as to the creation of opportunities for investment in sustainable areas that leverage the social and environmental values of the province and the country.</p>

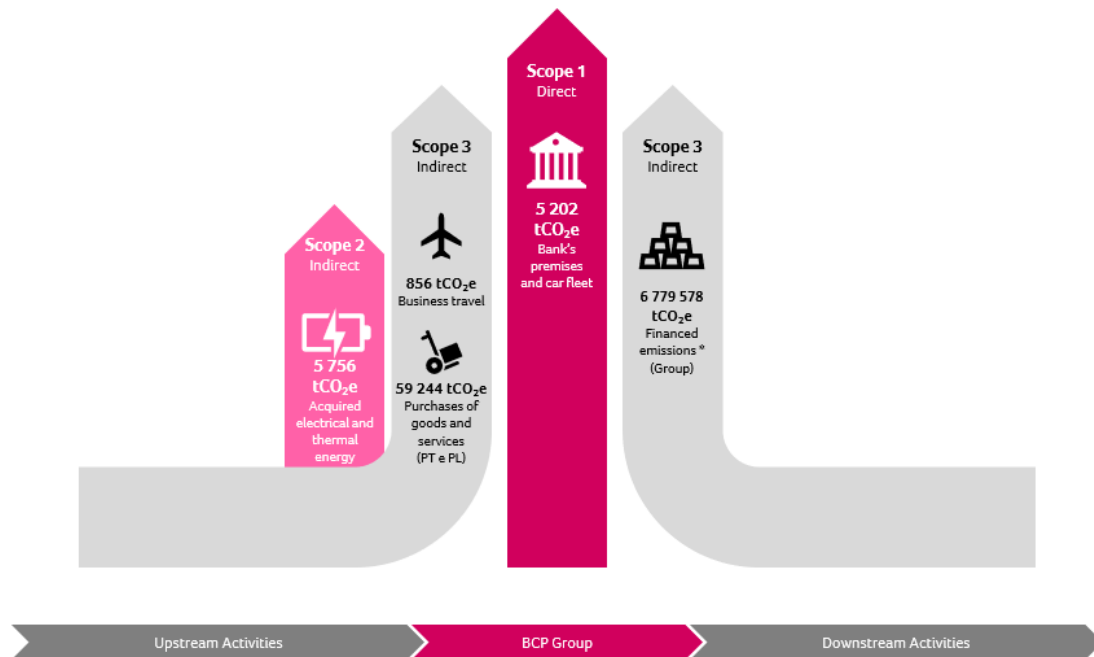
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**Group BCP carries out its initiatives so as to be able to comply with the goal of reaching carbon neutrality from the Bank's activity**

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## De-carbonisation

Group BCP carries out its initiatives to be able to comply with the goal of reaching carbon neutrality from the Bank's activity (direct emissions) until 2030. The effort to mitigate the carbon footprint has been intensified, namely through the reduction of emissions resulting from its activity.



\* According to Pilar 3 sectoral scope, which excludes sectors J, K and M –U.

In relation to the emission reduction targets set for Portugal (15% reduction in total emissions and direct emissions – scope 1) and a 0% change in indirect emissions (scope 2 - emissions associated with electricity consumption - and scope 3, category 6 - emissions associated with business travel), the Bank was unable to meet the targets set, with a 7% reduction in direct emissions and an 78% increase in indirect emissions, justified by the increase in missions because of the increase in air travel.

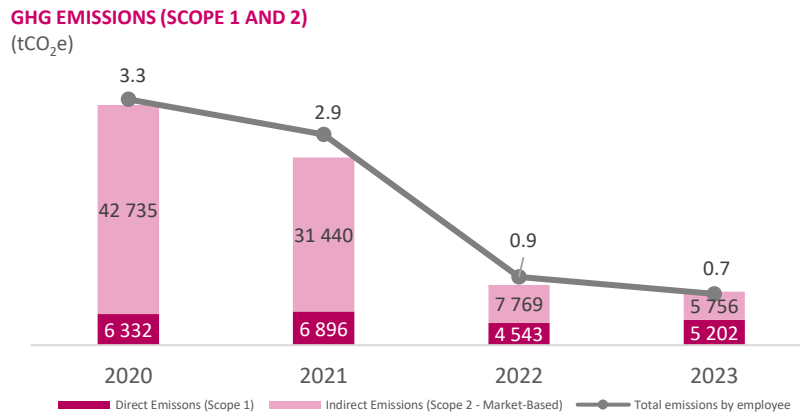
### Scope 1 and Scope 2

In 2023, the trend of reduction in scope 1 and 2 GHG (Greenhouse Gas) emissions associated with the BCP Group's activity continued, despite the inclusion of Mozambique in the calculation of emissions, with a reduction of 11% compared to the total emissions values of 2022. Scope 1 emissions represent emissions associated with the consumption of fuels and cooling gases and scope 2 emissions represent emissions associated with the consumption of electricity.

Regarding the scope 1 emissions of Group BCP, it recorded a 14% reduction versus the results achieved in the previous year. Regarding scope 2 emissions calculated on a market basis (*market-based*), there was a reduction of 26% compared to 2022, boosted by the reduction of the consumption of electricity for heat in Poland. In 2022, the Bank updated its calculation methodology, in line with the GHG Protocol, to include the reporting of location-based Scope 2 emissions, having recorded a total of 19,283 tCO<sub>2</sub>e in 2023 (25% less than the figures recorded in 2022).

In Portugal, there was a 7% reduction in scope 1 emissions, and a 40% reduction in scope 2 (location-based) emissions, continuing to report 0 tCO<sub>2</sub>e in market-based scope 2 emissions, since it purchases electricity 100% from renewable sources. There was a reduction of 2% in scope 1 emissions and a reduction of 33% in market-based scope 2 emissions in Poland. This was mainly due to a decrease in energy consumption for heat generation resulting from a decrease in the number of buildings, the optimization and modernization of the headquarters in Gdańsk, and the higher outdoor temperatures experienced during the colder season.

In relation to the overall performance of the BCP Group, there was also a 25% reduction in the value of tCO<sub>2</sub>e per employee (considering only scope 1, 2 and emissions), from 0.93 to 0.70.



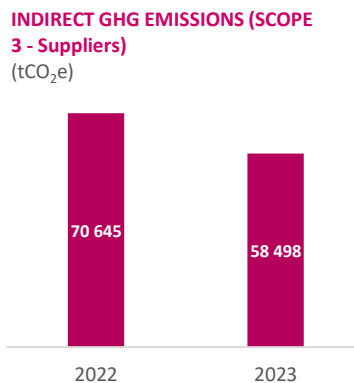
### Scope 3

Regarding Scope 3 emissions, there has been an improvement in the quality of the data used and the methodologies adopted, compared to previous years, and other categories have been considered, according to the GHG Protocol, upstream and downstream, namely category 1 – Purchase of goods and services, category 6 – Business travel and category 15 – Financed emissions.

In 2023, it has not yet been possible to extend all the calculated categories to all geographies, being a process of continuous improvement that the Bank recognizes as relevant and for which it is developing work.

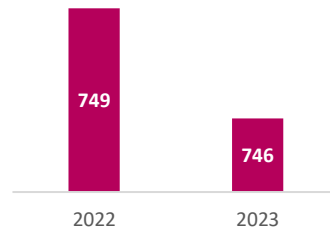
#### Category 1: Purchase of goods and services (amount)

Category 1 emissions are the sum of the Bank's suppliers' Scope 1, 2 and 3 emissions. In Portugal, in 2023, the scope of suppliers for which reported emissions data was collected (around 15% of turnover) was broadened and, in the estimated emissions, sources of information were used that provide more accurate data, and less based on sector estimates. Two different approaches were adopted to estimate emissions in this category: i) supplier-specific – an approach to which preference was given, whenever possible; and ii) spend-based, methodologies duly detailed in the chapter 'Methodological Notes'. Compared to the previous year, there was a 17% reduction in upstream Scope 3 emissions associated with suppliers.



In the same category, in Poland, emissions were calculated considering the following items: payment cards (units) - quantitative data provided by suppliers to calculate emissions resulting from the purchase of payment cards, taking into account the number of cards issued and destroyed; Office supplies (kg) - Purchased materials specified in units were considered: printed paper, envelopes, paper and paper rolls for operational needs, cardboard boxes, plastic materials (stretch films, box bags, etc.), packaging for disinfectants and batteries; and water (m3), water purchased in plastic packaging and drinking water from the water supply network were included.

**INDIRECT GHG EMISSIONS  
(SCOPE 3 - Suppliers)**  
(tCO<sub>2</sub>e)

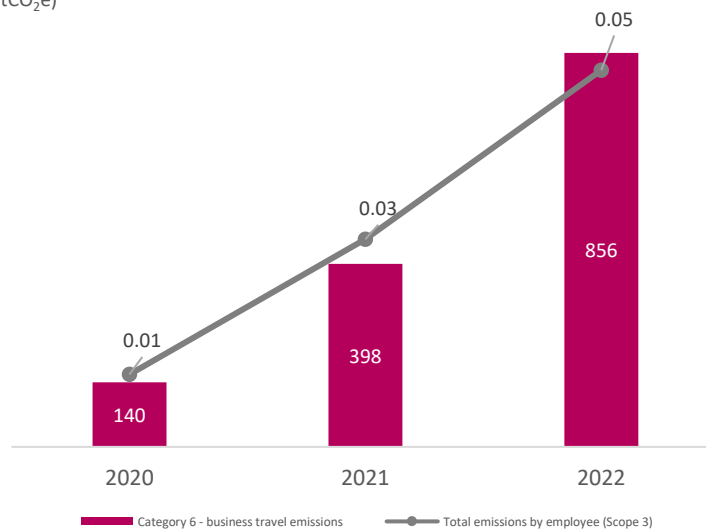


**Category 6: Work Travels (amount)**

In relation to the scope 3 emissions related with the mobility in service, there was an increase of more than 100% following the lifting of the institutional travel ban, which was implemented during the pandemic period, and the extension of the reporting scope to Mozambique. This increase thus reflects the return of work-related commuting activities.

Regarding the overall performance of the BCP Group, in this category, there was a 115% increase in the value of tCO<sub>2</sub>e per employee, from 0.03 to 0.05.

**INDIRECT GHG EMISSIONS (SCOPE 3 - Business Travel)**  
(tCO<sub>2</sub>e)



**Category 15: Financed emissions (downstream)**

In 2023, the Bank made significant progress, refining the methodology for calculating emissions under category 15, i.e. financed emissions - scope 1, 2 and 3 GHG emissions of counterparties financed by the BCP Group. To determine the Bank's financed emissions, the guidelines of the Partnership for Carbon Accounting Financials (PCAF) were considered, and priority was given to reported emissions by counterparties whenever available. Whenever this information was unavailable, estimates were produced based on the idiosyncratic features of the counterparties, as well as on their activity sector and country.

Main De-carbonisation Initiatives	
<b>Portugal</b>	<p>Implementation of photovoltaic panels in eight branches, with a direct impact on the amount of electricity purchased, and use of two photovoltaic plants with a production capacity of 1MWh each. The study for a third photovoltaic plant to be installed in the Taguspark Car Park was also authorized.</p> <p>BCP invests in the use of collaboration and productivity tools to reduce business travel, namely for meetings. Thus, in 2023, 401,175 meetings were held via MS Teams and Skype.</p>
<b>Poland</b>	<p>With the aim of transitioning to more sustainable mobility, the Bank replaced all gasoline cars in its fleet and rented cars with diesel engines with hybrid models running on gasoline. For business trips, low emission means of rail transport are privileged and limits have been set for the use of air transportation.</p> <p>With the same objective, Bank Millennium provides parking spaces for cyclists and toilet facilities, encouraging workers to use their bicycles as an alternative to public transport and cars.</p>
<b>Mozambique</b>	<p>Development and implementation of the green project at the Matola Municipality counter and at the head office building.</p> <p>To reduce the environmental impacts resulting from business travel, Millennium bim has also favoured MS Teams meetings over face-to-face ones. In addition, it has a bus that supports the transport of employees.</p>

### Energy efficiency

To reduce energy consumption and its consequent impacts, the Bank has been investing in renewable energies, with its operations in Portugal and Poland operating since 2022 with 100% of electricity coming from renewable sources.

**Reduction of 32% in the total consumption of energy in the last 5 years**

Electricity consumption (MWh)	2023
<b>Domestic: Portugal</b>	
Electricity originated in renewable sources	25 034
Electricity originated in non-renewable sources	0
<b>International Poland &amp; Mozambique<sup>14</sup></b>	
Electricity originated in renewable sources	21 501
Electricity originated in non-renewable sources	1 224

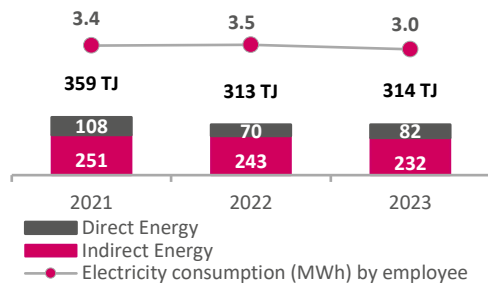
In 2023 there was a slightly reduction of about 1% in energy consumption, although the scope of the indicator has been extended to Mozambique, which reveals greater efficiency and responsibility in the consumption of this resource. In 2022, electricity consumption per employee was 3.04 MWh, having reduced, in 2023 to 2.04 MWh, a reduction which reflects the efforts that have been made.

Within the scope of the targets set by Portugal for energy, the targets for indirect energy consumption (which includes energy from renewable sources and electricity) were exceeded, with an increase of only 4%, when the target pointed to an increase of 6%, as it was the year in which the return to the office after the pandemic would have the most impact on consumption. In terms of direct energy consumption (which includes the consumption of fuels from non-renewable sources), the target was not met, with a reduction of 9% observed, far from the 60% planned reduction.

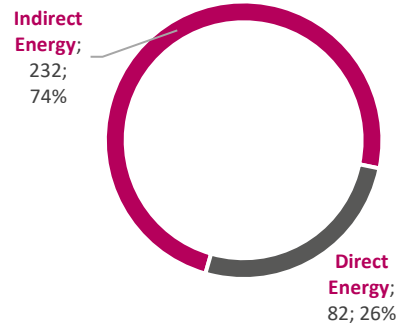
<sup>14</sup> Calculation of the percentage of renewable and non-renewable energy of the electricity consumed in Mozambique based on the information published in IRENA (International Renewable Energy Agency).

## BCP Group performance

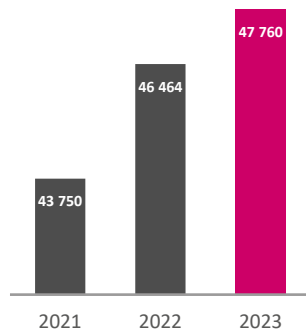
### TOTAL ENERGY CONSUMPTION - GRI 302-1 (TJ e MWh/employee)



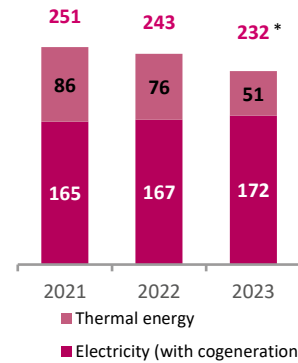
### DIRECT AND INDIRECT ENERGY CONSUMPTION IN 2023 (TJ and %)



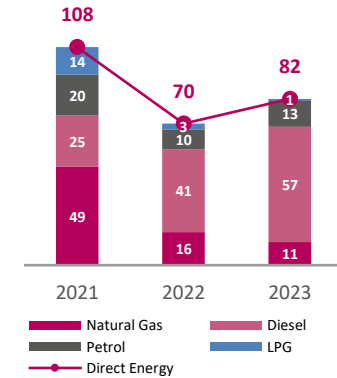
### ELECTRIC ENERGY CONSUMPTION (MWh)



### INDIRECT ENERGY CONSUMPTION (TJ)



### DIRECT ENERGY CONSUMPTION (TJ)



\* Includes 9 TJ of energy from renewable sources.

### Main energy efficiency initiatives

<b>Portugal</b>	Replacement of gas boilers for heating and electric chillers for cooling by heat pumps. This equipment, in addition to being more efficient, replaces the use of gas, which, being the energy acquired by BCP green, has a direct impact on CO <sub>2</sub> emissions.
<b>Poland</b>	<p>In 2023, to minimize electricity consumption at the Bank's headquarters, the operating times of various devices and equipment (e.g., the operating time of office lighting, the operating time of ventilation and air conditioning, and the temperature settings in individual areas) were reduced.</p> <p>Considering the difficulties experienced in the energy market throughout 2023, Bank Millennium has implemented additional measures to reduce electricity consumption, including the deactivation of light panels and advertising screens at its headquarters and branches, throughout the country, after business hours.</p> <p>In addition, the Bank continued to increase the number of branches with LED lighting. By the end of 2023, 186 branches had LED lighting.</p> <p>Some floors of the Bank's head office in Warsaw were also refurbished. In this context, occupancy sensors were installed in all bathrooms and pantries. The lighting system of the open space areas now includes, in addition to the occupancy sensors, luminous intensity sensors that adapt the lighting according to the existing natural light.</p>
<b>Mozambique</b>	Millennium bim has favoured the installation of LED lighting, in the event of a breakdown of existing systems.

## Management of resources - Water, Materials and Waste

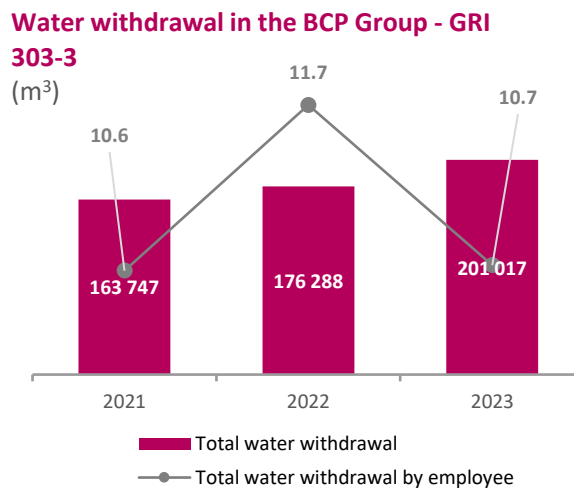
### WATER

The total water withdrawal/consumption in the BCP Group, used for human consumption on the bank's premises and for irrigation, has registered a downward trend, and during the years 2022 and 2023, there was an increase in water consumption, justified by the return of employees to the physical facilities and subsequent intensification of their use. Also contributing to this increase was the fact that, in 2023, the Bank extended the reporting scope of this indicator to its operations in Mozambique, reflecting its growing commitment to transparency and accountability.

**Reduction of 29% in the total consumption of water in the last 5 years**

Despite the aforementioned variations, the values, both in Portugal and Poland, remain below the pre-pandemic levels recorded in 2019. This reflects effective and efficient adaptation, as well as a growing awareness of the importance of conserving natural resources by employees. It should be noted that there was a reduction in water consumption per employee across the Group (from 11.7 to 10.7), reflecting not only an improvement from an efficiency point of view, but also a greater awareness of the responsible use of water.

In relation to the target set for Portugal regarding water abstraction (2% increase - supported by the idea that the return of employees to the office would have a negative impact on the consumption trend), this was not achieved, with an increase of 4% being recorded. Despite this increase, water consumption per employee in Portugal decreased from 12.93 to 11.78, like what was been observed at Group level.



### MATERIALS

Regarding the consumption of materials, BCP Group (Portugal, Poland, and Mozambique) achieving a 11% reduction in the consumption of the main, namely, cardboard, plastic and ink cartridges. Among these, paper and cardboard account for the largest share – 96% of the total materials consumed.

**Reduction of 36% in the total consumption of materials in the last 5 years**

	2021	2022	2023	Variation 23/22
<b>CONSUMPTION OF MATERIALS (tons)</b>	<b>1577.2</b>	<b>1531.7</b>	<b>1360.4</b>	<b>-11%</b>
- Paper & Cardboard	1531.1	1490.6	1308.5	-12%
- Plastic	45.9	40.8	51.8	27%
- Ink cartridges/Toners	0.2	0.2	0.2	-6%
<b>CONSUMPTION OF MATERIALS (Kg) PER EMPLOYEE</b>	<b>143.3</b>	<b>97.3</b>	<b>86.7</b>	<b>-8%</b>
- Paper & Cardboard per Employee	95.6	94.7	83.4	-12%
- Paper per Employee	44.9	44.9	30.5	-32%
- Plastic per Employee	2.9	2.6	3.3	27%
- Ink cartridges/Toners per Employee	0.0	0.0	0.0	-53%

There has been a downward trend in paper consumption, driven by the continuous digitalization of business processes and the semi-annual communication of consumption to all Divisions. Contributing to this trend is, for example, a decrease in local printing and the digitalisation of incoming processes, with operations being opened directly in the systems and applications, avoiding the physical circulation of documents.

**Main initiatives for reduction/ promote culture efficiency in materials consumption**

<p><b>Portugal</b></p>	<p>Currently implemented in Millennium Operations Centre, the <b>Kaizen Programme</b> is applied by 304 employees, distributed among 32 teams and 8 divisions. Its objective is to support the teams in the analysis and development of initiatives that promote the improvement of their processes, always based on a Lean methodology.</p> <p>In 2023, 191 improvement initiatives were implemented, 7% of which led to savings of around €10,737 in consumables (e.g.: paper, printing, internal mail stamps, internal and external envelopes, among others). For 2024, the focus on improving processes associated with a paperless philosophy, one of the main pillars of the Kaizen Program, will continue.</p> <p>Millennium bcp carries out initiatives to encourage the use of e-mail instead of physical mail, with the ultimate objective of reducing the amount of printing of customer documents. In 2023, 2.8 thousand customers had the subscription of documents in digital format, of which 47% are active customers on the website and mobile. This figure represents an annual growth of 7% in Customers who no longer receive paper statements and release notes.</p> <p>The Bank continues to invest in the dematerialization of its operations. The "GO Paperless" project, which incorporates solutions for the production and electronic signature of documents, in 2023 saved 8,948,706 B&amp;W prints, corresponding to a 16% decrease in prints made on branch equipment when compared to the same period in 2022 and which translates into an average monthly saving of 745,726 prints. Regarding colour printing, 810,632 were avoided, which corresponds to a reduction of 24%.</p> <p>In 2022, the first biodegradable plastic card, produced from cereals, which contains zero plastic and has zero impact on CO<sub>2</sub> levels, was launched in Portugal, the GO! Changer.</p>
<p><b>Poland</b></p>	<p>The centralization of the Bank Millennium Group's purchasing process in the organizational units of materials necessary for daily operations, supported by the REZA+ tool, through which the legitimacy of the purchase of each item is verified, contributes to a circumscription of materials purchased to what is strictly necessary. The permanent monitoring of budget execution and the definition of limits to reduce purchases also contribute significantly to the decrease of material consumption.</p> <p>In 2023, the decrease in paper consumption persisted at Bank Millennium, although there was a significant increase in the number of customers. This is largely due to the Bank's effort to reduce this consumption through digitization and process optimization, supported by an omnichannel approach, based on close cooperation between digital and traditional channels. In this context, the Bank also sought to limit the bulk and personal correspondence sent to customers, which resulted in a considerable reduction in the consumption of paper and envelopes.</p> <p>The need to issue plastic cards continues to decline as opposed to the growing popularity of payments using virtual cards, BLIK mobile payments and BLIK contactless payments via mobile app. Also contributing to this is the implementation of the temporary card blocking option, which avoids the need to issue a new card (when, for example, a customer loses his or her card and finds it in the meantime).</p>
<p><b>Mozambique</b></p>	<p>By December 2023, around 36% of M Customers (active) had subscribed to the services of digital statements and release notes, which contributes significantly to the reduction of paper used in these processes. In addition, the Bank favours the validation of digital documents, to the detriment of physical documents.</p>

**WASTE**

Regarding waste generation, in global terms, there was a reduction in waste generation in 2023, despite the extension of the scope of the indicator to Mozambique (as with the other environmental indicators).

Waste Produced, per destination (t)	2021	2022	2023
Total of waste re-used/recycled*	644.02	639.37	481.82
Waste for landfill	0.01	0.01	0.00
Other destinations*	640.88	576.71	635.64
<b>Total</b>	1284.91	1216.09	<b>1117.48</b>

\*Calculation based on the assumption that 38% of waste is recycled (INE, 2020).

In BCP Group, more important than the waste generated is the destination given to it, and, whenever possible, the necessary efforts are made to ensure its recycling or reuse.



In Portugal, there was a significant increase, justified, as previously mentioned, by the expansion of the scope of waste included in the calculation, as shown in the table below.

Waste produced in Portugal	2021	2022	2023	Variation 23/22
	Ton	Ton	Ton	%
<b>Total of waste produced</b>	<b>854.12</b>	<b>718.49</b>	<b>711.06</b>	<b>-1%</b>
<b>Total of waste re-used/recycled</b>	<b>324.56</b>	<b>272.96</b>	<b>270.20</b>	<b>-1%</b>
Paper	277.49	233.81	231.23	-1%
Card	45.99	38.75	38.33	-1%
Plastic	0.85	0.19	0.18	-4%
Ink cartridges/Toners	0.23	0.20	0.46	128%
<b>Total of waste in landfill</b>	<b>0.01</b>	<b>0.01</b>	<b>0.00</b>	<b>45%</b>
<b>Total waste incinerated with energy recovery</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>-</b>
<b>Total waste incinerated without energy recovery</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>-</b>
<b>Total of waste with unknown destination</b>	<b>529.55</b>	<b>445.53</b>	<b>440.85</b>	<b>-1%</b>
Paper	452.75	381.48	377.27	-1%
Card	75.04	63.23	62.53	-1%
Plastic	1.38	0.31	0.29	-4%
Ink cartridges/Toners	0.37	0.51	0.75	47%

#### Main initiatives for the reduction/management of waste

<b>Portugal</b>	<p>Millennium bcp, through the COM-Paperles initiative, has sought to reduce the circulation of physical documents, challenging suppliers to adhere to the digital sending of mail and through the digitization of the same physical documents upon arrival at the Bank.</p> <p>Digitalisation reduces the need for paper and paper transport, contributing to the reduction of the Bank's environmental impact, along with improvements in operational efficiency, such as the reduction of time associated with the processing of physical documents, the feasibility of handling information outside the office and real-time collaboration.</p> <p>In 2023, around 17,000 documents were scanned under these conditions.</p>
<b>Poland</b>	<p>The annual electronic waste collection campaign took place at Bank Millennium Head office and allowed employees to appropriately donate electronic equipment they no longer use.</p> <p>In addition to this campaign, there was also an annual collection of bottles and container caps collected at the head office and branches. The bottles and caps collected in 2023 by employees were donated to the Dom Rodzina Człowiek Association, which sells them as recyclable material. The value of this sale reverts to the assistance of needy people with disabilities, namely through the financing of the purchase of prostheses, meals for families, among others.</p> <p>In January 2023, the second phase of the process of clearing the premises of the Gdańsk Head office was carried out, resulting from the renovation carried out in 2022. The furniture suitable for use was displayed on a sales platform, accompanied by due dissemination on the Bank's internal channels. This furniture attracted the interest of employees and private buyers, who purchased almost 69% of the furniture planned for liquidation. A charity sale was also organized, with the purpose of raising funds for 7 different charitable organizations and foundations.</p> <p>This way, 83% of the equipment gained a second life, with only 17% being sent for recycling because it was worn or damaged.</p> <p>In 2023, 635 items of computer and computer equipment were given a second life. Of this number, 35 items were sold to Bank employees, 55 to external entities and 545 were donated to charities.</p>
<b>Mozambique</b>	<p>To reduce the production of plastic waste, a set of measures are being implemented to progressively purchase glass containers for board meeting rooms instead of plastic containers.</p>

### Offer of eco-friendly products and services

The financial sector, of which the Millennium Group is part, plays a key role in mobilizing and accelerating the transition to a greener economy. Accordingly, and in addition to the responsibility for minimizing the negative environmental impacts arising from its operations, the Bank (see chapter on Sustainable Operations) has sought to intensify the incorporation of ESG criteria, namely environmental performance criteria, in its offer.

Thus, with the purpose of mobilizing customers to opt for greener choices and more sustainable lifestyle habits, the Bank makes available in the various geographies in which it operates, a set of products and services that meet these considerations.

## Portugal

- **Green home loans** - product that requires compliance with energy classification requirements: acquisition or construction of properties with an A+, A or B energy classification; works on properties with an A+ and A classification or improvement of 2 more levels after the works.
- **Loans promoting electric mobility** - At a time when the relevance of rethinking new forms of mobility, more efficient, economic and, above all, more environmentally friendly, is reinforced, the Bank has prepared the "Green Leasing and ALD", a specific product that distinguishes vehicles: 100% electric (0% emissions) and hybrid cars with CO<sub>2</sub> emissions up to 50g/km
- **Sustainable Buildings Personal Loan** - product for the acquisition of equipment to produce renewable energies or for the improvement of the energy efficiency of residential properties.
- **Decarbonisation and Circular Economy Credit Line** - Protooled credit line to support projects for reducing energy consumption, of measures allowing the change from fossil to renewable energy sources or accelerating the process of transition to a circular economy.
- **Green Home Promotion Credit** - product aimed at the construction or rehabilitation of buildings, residential or otherwise, that obtain top ratings in the most prestigious building environmental certifications.
- **ESG/SRI investment funds** - funds that respect social and environmental aspects and are made available to customers in the various distribution channels.
- **Sustainability linked loans** - In 2023, Millennium bcp carried out 3 Sustainability Linked Loans Commercial Paper Operations/Programs in the global amount of 230 million euros, with sustainability indicators related to GHG emissions.

## Poland

Since 2021, with the launch of the EU's strategic green finance project, Bank Millennium has been providing product and process infrastructures to effectively support companies in the implementation of green investments and the energy transition.

- **Millennium TFI Funds** - One of the measures implemented as part of the Bank's strategy was the integration of ESG factors into asset selection processes in investment portfolios. Millennium TFI transformed three separate Sub-Funds within the Millennium Specialised Open-ended Investment Fund, in accordance with the requirements of Article 8 of the SFDR. These sub-funds promote environmental, social and corporate governance aspects (so-called light green products) by including them in the investment selection criteria and applying certain investment restrictions.
- **WWF Millennium MasterCard Credit card** – within the scope of the long-lasting partnership established by the Bank with the Foundation WWF Poland, this card, made 85% of recycled plastic, is the motto for the provision of financial support to the organization's statutory activities, focused on the protection of forest ecosystems. The cooperation implies, among other things, the issuance of the credit card WWF Millennium Mastercard. For each card issued, the Bank donates PLN 50 to the organisation.
- **Biznesmax Guarantee Programme (in cooperation with Bank Gospodarstwa Krajowego)** - the guarantee is used to secure loans granted to finance innovative projects in the SME sector, including environmentally efficient enterprises. Beneficiary clients may implement an investment project with at least one category, for example: electromobility, renewable energy sources covering photovoltaic installations, technologies to reduce energy consumption, technologies to produce alternative fuels, circular economy, installations to recover raw materials in production processes, etc.
- **Program Mój Elektryk implemented by Bank Ochrony Środowiska** – Millennium Leasing continued the implementation of Mój Elektryk, which guarantees co-payments from the National Fund for Environmental Protection and Water Management for renting electric vehicles and co-payments from the National Fund for Environmental Protection and Water Management for the upfront payment on electric vehicle lease contracts. The purpose of the programme is to reduce air pollution emissions by co-financing companies to reduce the consumption of fuel generators in transport. Co-financing is a support and incentive for the purchase/lease of zero-emission vehicles.
- **Green loans for photovoltaic projects:** financing for the construction of a photovoltaic installation or plant, in the self-consumption or mix regime.

Bank Millennium in Poland has been trying to significantly reduce its exposure to the coal industry, whose financing constraints are expressed in the Environmental Policy. For this reason, the portfolio of exposures to coal mining and directly ore-related industries is insignificant.

Mozambique

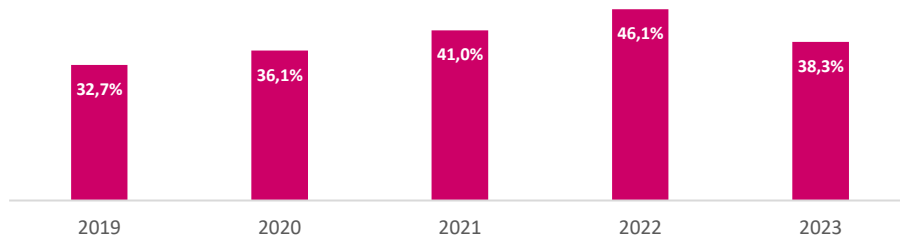
- **Smart IZI** – Mobile Banking application that covers all operations associated with the service - membership, registration, and use - in a functional and accessible way. Two new ones were made available in 2023: Salary credit and the management of the transactional limit of the Mobile Banking+ channel.

**Green Project Finance**

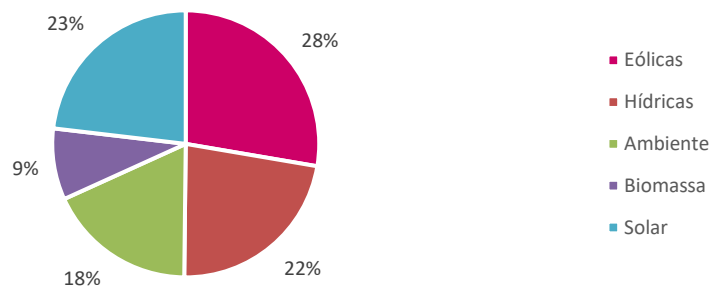
Millennium bcp has been seeking to increase its financing portfolio for environmentally sustainable projects and organizations. To this end, in 2021 it published the Principles of Responsible Financing which identify, among other things, the excluded projects and sectors/projects conditioned within the scope of the financing promoted by the Bank.<sup>15</sup> As can be seen, there has been an increase in the percentage of <sup>16</sup> 'green' financing in the total project finance portfolio, except for this year's results.

Within the scope of the activities financed, the following are included: Wind, Hydro, Biomass, Solar and other environmental issues, namely the financing of investments in urban waste collection and treatment plants, in drinking water distribution and wastewater treatment networks (ETAR), waste treatment plants, among others. As in previous years, the 'green' financing in wind energy is the most significant, representing 28% of the total number of projects.

“Green” financing at Millennium bcp



“Green” finance by type of investment



**Taxonomy of the European Union**

The European Union Taxonomy - Regulation (EU) 2020/852 - is a system that identifies economic activities that can be considered green or environmentally sustainable thereby translating the EU's climate and environmental objectives into criteria for investment in certain economic activities.

<sup>15</sup> The Bank's Sustainable Finance Policy, is available here: <https://investimentos.millenniumbcp.pt/en/Documents/MT0184-EN.pdf>

<sup>16</sup> Project finance operations whose purpose is aligned with Green Loan Principles were considered as 'green'.

On this basis of transparency and regulation, the European Commission adopted on 6 July of 2021 the Disclosures Delegated Act – Commission Delegated Regulation (EU) 2021/2178 (“Disclosures DA”), which sets out the information – content, methodology and presentation – to be disclosed by financial and non-financial companies regarding the proportion of environmentally sustainable economic activities of their business, investment or credit activities, in the form of key performance indicators (KPIs) and templates for different types of entities.

The Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 (Climate Delegated Act) supplements the EU Taxonomy Regulation, by establishing the criteria under which an economic activity can be considered environmentally sustainable, through the contribution for climate change mitigation or climate change adaptation objectives (the two initial environmental objectives).

The Disclosures and Climate Delegated Acts were later amended to incorporate the disclosure requirements stemming from the Commission Delegated Regulation of 9 March 2022 (Commission Delegated Regulation (EU) 2022/1214 – Complimentary Climate Delegated Act), which sets the criteria for specific gas and nuclear activities to help accelerate the shift from solid or liquid fossil fuels.

Finally, the Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023 (Environmental Delegated Act) supplemented the existing regulations, by establishing the criteria ruling the remaining (four) environmental objectives.

In this context, Millennium bcp discloses the applicable indicators and information pursuant to Article 10 of the Disclosures DA, following the Article 8 of the EU Taxonomy Regulation, including the Green Asset Ratio (GAR), which represents the proportion of assets in EU Taxonomy aligned activities over the total covered assets.

The complete set of required KPIs and templates is available in the appendix chapter 'European Union (EU) Taxonomy alignment table'.

### **The legal basis for the disclosures**

Pursuant to the Article 10 (5) of the Disclosures DA, from 1 January 2024, Millennium bcp is required to disclose the key performance indicators for financial undertakings (the Green Asset Ratio), including all relevant accompanying information, based on Annexes V, VI, XI and XII of that regulation (whereby points 1.2.3 and 1.2.4. Annex V shall apply from 1 January 2026). Similarly, the disclosures related to the specific gas and nuclear activities, resulting from the Complimentary Climate Delegated Act are also applicable from 1 January 2024 onwards.

On the other hand, under Article 10 (7) of the Disclosures DA, in the period from 1 January 2024 to 31 December 2025, Millennium bcp only discloses the percentage indicators of EU Taxonomy eligible and non-eligible activities (along with relevant qualitative information) – for the activities specified in the Environmental DA.

In this regard, Millennium bcp prepares and discloses the required qualitative and quantitative information, in accordance with the methodologies described in the following sections. Based on the applicable provisions, these disclosures comply with:

- Qualitative information referred to in the Annex XI of the Disclosures DA;
- Quantitative information referred to in the Annexes V and VI of the Disclosures DA, including the Annex XII introduced for the nuclear and specific gas activities by the Complimentary Climate DA. In particular:
  - Annex VI disclosures – includes the KPI templates: 0) summary of KPIs; 1) assets for the calculation of GAR (reported twice, based on turnover and on CAPEX); 2) GAR sector information (reported twice, based on turnover and on CAPEX); 3) GAR KPI stock (reported twice, based on turnover and on CAPEX); and 4) GAR KPI flow (reported twice, based on turnover and on CAPEX).
  - Annex XII disclosures – includes the quantitative and qualitative disclosures for the specific nuclear and gas activities.

### **The scope for the EU Taxonomy application**

Millennium bcp is required to publish the legal information on the EU Taxonomy, pursuant to the provisions of the Regulation (EU) 2020/852. The information is prepared on a consolidated basis, following the prudential consolidation perimeter.

These are the legal entities included in the prudential consolidated perimeter:

- Banco Comercial Português, S.A.;
- Banco ActivoBank, S.A.;
- Bank Millennium, S.A.;
- Banco Internacional de Moçambique, S.A..

All the relevant assets for each of the above entities were assessed in relation to the EU Taxonomy criteria. The environmental objectives establishing the basis for the assets' screening comprised the two first environmental objectives – Climate Change Mitigation (CCM) and Climate Change Adaptation (CCA) – defined by the Climate DA, and the additional objectives, whose criteria is laid down in the Environmental DA, totaling the following six environmental objectives:

- Climate change mitigation;
- Climate change adaptation;
- Sustainable use and protection of water and marine resources;
- Transition to a circular economy;
- Pollution prevention and control;
- Protection and restoration of biodiversity and ecosystems.

Resting on the recent European Commission clarifications – namely the FAQs published in the EC notice from 21 December 2023 – Banco Comercial Português, S.A. (or Millennium bcp) is complying with the mandatory disclosures – the information being reported is based on actual data collection, as prepared by the Bank's counterparties.

Given that the regulation has been only recently applicable, it was noted that counterparties associated to the relevant Taxonomy assets, are not yet reporting their eligibility or alignment with the additional (four) environmental objectives (Environmental DA) – for this reason, Millennium bcp is not disclosing eligibility nor alignment information for those same objectives.

To perform the screening of the EU Taxonomy criteria, the following relevant assets and portfolios are assessed, from the Group's balance sheet (on and off exposures), but part of the banking book:

- Loans and advances to non-financial corporations: these are credit-related activities consisting of funds that are directly disbursed to corporate companies. The funds are still outstanding, in full or in part, at the reporting date and are assessed based on their gross book-value. Independently of the contractual definitions or any collateral's characteristics, the whole portfolio was subject to the EU Taxonomy application process.
- Loans and advances to households: these are credit-related activities consisting of funds that are directly disbursed by the Group to natural persons. The funds are still outstanding, in full or in part, at the reporting date and are assessed based on their gross book-value. Only the loans related to residential mortgages and car-vehicle financing were subject to the EU Taxonomy application process.
- Investments in financial securities: these are debt (e.g., bonds, commercial paper) or equity (e.g., funds, stocks) instruments represented by financial securities held in the Group's banking book that are primarily maintained for liquidity management purposes. The relevant amounts for the EU Taxonomy application correspond to the effective book-value of these instruments.
- Local governments financing: these are credit-related activities consisting of funds that are directly disbursed to local sovereign (e.g., municipalities) entities. The funds are still outstanding, in full or in part, at the reporting date and are assessed based on their gross book-value. Independently of the contractual definitions or any collateral's characteristics, the whole portfolio was subject to the EU Taxonomy application process. In general a) the entities herein included are not required to disclose non-financial information (and no data is yet available following bilateral communications); and b) the existing contractual agreements are based on general purpose provisions, which resulted in the absence of amounts being reported for this specific segment.
- Non-current assets held for sale: the repossessed real estate assets (residential and commercial immovable properties), classified in this balance sheet item were subject to the EU Taxonomy application process, by the respective book-value as of the reporting date.
- Other banking book items: the guarantees given and the assets under management (AuM) were assessed for the purpose of the EU Taxonomy disclosures. The respective screening was performed following the nature of each item, in accordance with the definitions above presented.

The trading book is not yet subject to the disclosure requirements (as per the Disclosure DA Article 10, the quantitative disclosure requirements apply from 1 January 2026). Without prejudice, the current trading exposures mainly correspond to sovereign-debt instruments (none of each labelled with the EU Green Bond Standard). Therefore, this portfolio lacks any type of contribution for the Millennium bcp's alignment with the EU Taxonomy.

The assets or balance sheet items not above identified are not relevant for the EU Taxonomy application – they may be part of the KPIs denominator but do not directly contribute for any mandatory performance indicator.

#### **The screening process leading the EU Taxonomy application**

The screening process to determine to what extent the above defined portfolios and assets are environmentally sustainable follows a four-stages approach:

- **Stage 1 - eligibility:** the asset shall correspond to a relevant activity considered to potentially have a substantial contribution to one or more of the environmental objectives defined in the EU Taxonomy Regulation. Those activities are called 'taxonomy eligible' – i.e., they correspond to an activity that is covered by either the Climate and/or Environmental Delegated Acts;

If the asset corresponds to an eligible activity, further screening takes place to assess its alignment with the EU Taxonomy, for which the following criteria shall be met:

- **Stage 2 - alignment:** the asset should have a substantial contribution to any of the EU Taxonomy six environmental objectives;
- **Stage 3 - alignment:** the asset cannot significantly harm any of the other environmental objectives; and
- **Stage 4 - alignment:** minimum social safeguards are met.

In strict compliance with the provisions established by the Disclosures DA (and supplementary guidance provided in the EC December 2023 FAQs), the screening process is based on actual information disclosed by the counterparties (i.e., the EU Taxonomy KPIs applicable to non-financial undertakings) or collected through the Bank's processes (e.g., residential collateral management). Also, the way the screening is applied depends on the type of lending or investment purpose, in accordance with:

- General purpose lending or investing: the screening is based on the counterparties disclosures of the proportions of revenues (Turnover) and capital expenditures (CAPEX), respectively, resulting from or related to environmentally sustainable activities, published by the direct counterparty or respective consolidating company. Therefore, for this type of transactions, the screening is performed twice (i.e., both for CAPEX and Turnover).
- Use of proceeds lending or investing: the screening is based on the Group's own assessment of eligibility and alignment, based on the analysis performed to the activities being financed according to the respective technical screening criteria (described in the EU Taxonomy's delegated acts).

The screening process is performed by internal functions that are independent from the business lines and are led by the Sustainability Functions of each Group entity. In general, the process criteria are automated in the entities' systems being data kept and controlled in dedicated ESG-related platforms.

The external data used (i.e., disclosed by the companies) is captured through a data provider – whenever possible or needed, Millennium bcp has complemented such data with individual/ direct information collection from the companies' public disclosures.

### Main methodological assumptions and uncertainties

The regulatory framework is still evolving, impacting the institutions' interpretation on the requirements' application. This is also demonstrated by the recent European Commission notice, from 21 December 2023, which aimed at clarifying some requirements for the preparation of the EU Taxonomy disclosures by the financial undertakings.

Despite all the efforts the Group has been doing to collect the required information for the EU Taxonomy reporting, the data availability remains an operational challenge. Following the Article 8 of the Disclosures Delegated Act, the Group uses the most recent information published by the counterparties – for most of the counterparties the information was published with reference date of December 2022, which may cause fluctuations in the 2023 update. Also, the number of counterparties disclosing the required data is still limited, especially for Portugal and Poland where the economic activity and balance sheet exposures are mainly driven by Small and Medium Sized companies, not yet obliged to the non-financial reporting obligations. Adding to this limitation, the Group's business model is significantly based on retail lending which constitutes an additional challenge in the process of determining the volumes of sustainable assets.

Against this background, Millennium bcp considers the KPIs resulting from the EU Taxonomy application, of limited comparability across banking institutions.

In what relates to the household financing, the application of the Do No Significant Harm (DNSH) criteria, especially for the physical-risk assessment, was based on the Millennium bcp's internal risk management practices. The assessment performed is in line with the EU Taxonomy requirements, but the market data unavailability may lead to limitations in the accuracy of the results.

Considering the above, the following key assumptions were made in the screening process for household financing in Portugal:

- All the mortgage' loans granted for the acquisition or renovation of residential immovable properties are EU Taxonomy eligible, for the climate change mitigation objective;

- The technical screening criteria for the substantial contribution consider only the actual collected Energy performance Certificate (EPC), corresponding to the classes A and B;
- The DNSH screening was based on the internal risk management practices, allowing Millennium bcp to perform a location-specific assessment of physical risk factors. Therefore, only the properties that are not significantly exposed to physical risks' events (floods, heat stress, hurricanes & typhoons, sea level rise, water stress and wildfires) are deemed to verify the DNSH criteria.

In what relates to household financing Polish and Mozambican assets, due to insufficiencies of the information on the specific finality and the lack of actual EPC data, no eligibility or alignment is reported.

#### Summary of the main EU Taxonomy metrics

For 2023, Millennium bcp reports a mandatory eligibility ratio of 26,86%, based on the turnover ratio of the counterparties (26,98% based on the CAPEX). The 2023 figures include the households financing portfolios – following the methodological definitions above provided – and the exposure to NFRD companies, based on the actual information reported by those counterparties. The breakdown of the above information is provided in the appendix chapter 'European Union (EU) Taxonomy alignment table'.

The assets meeting the criteria assessed by the screening process are considered as EU Taxonomy aligned and part of the Group's Green Asset Ratio (GAR%) – as of 31 December 2023, the Group's GAR is 2,9% (based on the turnover KPI).

The largest contribution to the GAR% computation comes from households financing, which is the most relevant business segment for Millennium bcp. The exposure to counterparties in the NFRD scope – both through loans and advances and investment portfolio – is the second largest component of the GAR% aligned assets. If solely the exposures to NFRD companies were assessed as sustainable, the GAR% obtained would be 0,17%.

EU Taxonomy metrics – turnover based	Amount (mio EUR)	Eligible	Eligible%	Aligned	Aligned %
Loans and advances, debt, and equity securities	40 320	17 681	26,86	1 934	2,94
Financial corporations [a]	2 686	486	4,08	158	0,24
NFRD Non-financial corporations [b]	1 216	388	0,59	115	0,17
Households [c]	26 268	15 934	24,21	1 657	2,52
Local governments [d]	971	648	0,98	0	0
Repossessed assets [e]	226	226	0,34	3	~0
<b>Total assets in numerator and denominator<sup>17</sup></b>	<b>65 819</b>	<b>17 681</b>	<b>26,86</b>	<b>1 934</b>	<b>2,94</b>
Non-NFRD counterparties	19.666	---	---	---	---
Derivatives	41	---	---	---	---
Interbank loans	337	---	---	---	---
Cash and other assets	5 456	---	---	---	---
<b>Total assets in the denominator</b>	<b>65 819</b>	<b>---</b>	<b>---</b>	<b>---</b>	<b>---</b>
<b>Green Assets Ratio (GAR%)</b>					<b>2,9 %</b>

<sup>17</sup> Obtained by summing up a + b + c + d + e .

## Climate & Environmental materiality assessment

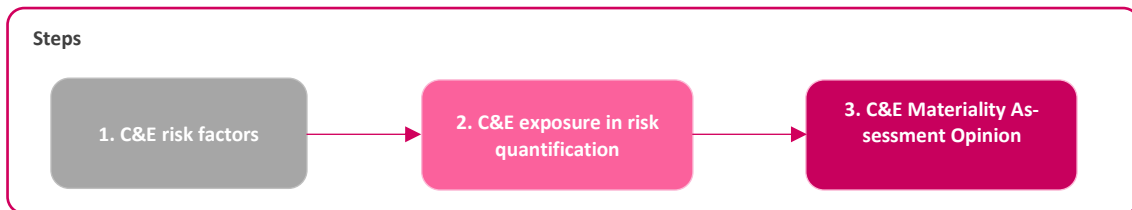
Identifying risks and assessing the materiality of climate and environmental (C&E) risk factors is an essential component of ESG risk management. The C&E Materiality Assessment exercise forms the basis for characterising the impact of C&E factors on the BCP Group's risk profile, informing regular risk management processes.

Understanding the potential impacts of climate change and environmental degradation on its activity, both directly and through its customers' businesses, will enable the Group to make informed decisions on how to manage and mitigate these risk factors, while at the same time allowing it to identify new opportunities arising from the transition to a low-carbon and environmentally sustainable economy.

In order to obtain an exhaustive assessment of the impacts of C&E risk factors, the C&E Materiality Assessment (MA) exercise was carried out:

- It is based on a substantially renewed methodology, geared towards better quantifying the impacts of C&E factors on the Group's balance sheet.
- It addresses transition, physical and nature-related risk factors;
- It produces an approach to quantifying exposure to risk;
- Adopts a forward-looking view of risk impacts, taking into account reference climate scenarios and extended time horizons;
- Covers all (i) three geographies fundamental to the Group's activity; (ii) relevant counterparty portfolios and segments, assets held (e.g. tangible) and reputation;
- It maps the impacts of C&E factors on traditional risk categories and assesses their materiality;

### Overview of the methodological approach





Following climate science, the use of different scenarios is particularly relevant to understanding the sensitivity of business strategy to different climatic and economic paths. The methodologies developed provide an assessment based on different perspectives of the evolution of C&E variables and the respective impacts on economic and financial factors.





The results reported here for the materiality assessment of the climate and environmental risks are the result of the following set of variables:

- **2030** as the target year/"central scenario", for all risk factors/types;
- Scenario **Net-Zero 2050** for forecasting transition risk results. This scenario is based on the assumption that global warming will be limited to 1.5°C due to the immediate introduction of ambitious climate policies and CO<sub>2</sub> removal technologies aimed at accelerating decarbonisation, resulting in high transition risks, in the short and medium term;
- **RCP 8.5** scenario for predicting physical risk outcomes. This is a purely geophysical scenario that predicts greater physical risk as a result of the assumption that emissions will continue to increase, accentuating global warming to critical levels that lead to serious and frequent physical risk events, responsible for causing damage to assets and interrupting production processes.

The following table summarises the methodologies applied to quantifying the impacts of C&E factors and the respective mapping of the Group's "traditional" risk categories.

C&E Risk Methodology	Risk Factor Mapping	Traditional Risk Category	Assessment Approach
 Climate related Transition risk Companies	Policy Technology	Credit Liquidity Market Real Estate Business	Sectoral approach that accounts for the expected impact of cost increases on the company's profit margin, considering the following risk factor components: i) carbon shock; ii) energy shock; and iii) capital expenditure shock (decarbonisation).
 Climate related Transition risks Individuals			Impact of: i) income stress; and ii) transition risk impacts on the financed asset. The methodology considers the clients' sector of employment as a sectoral risk.

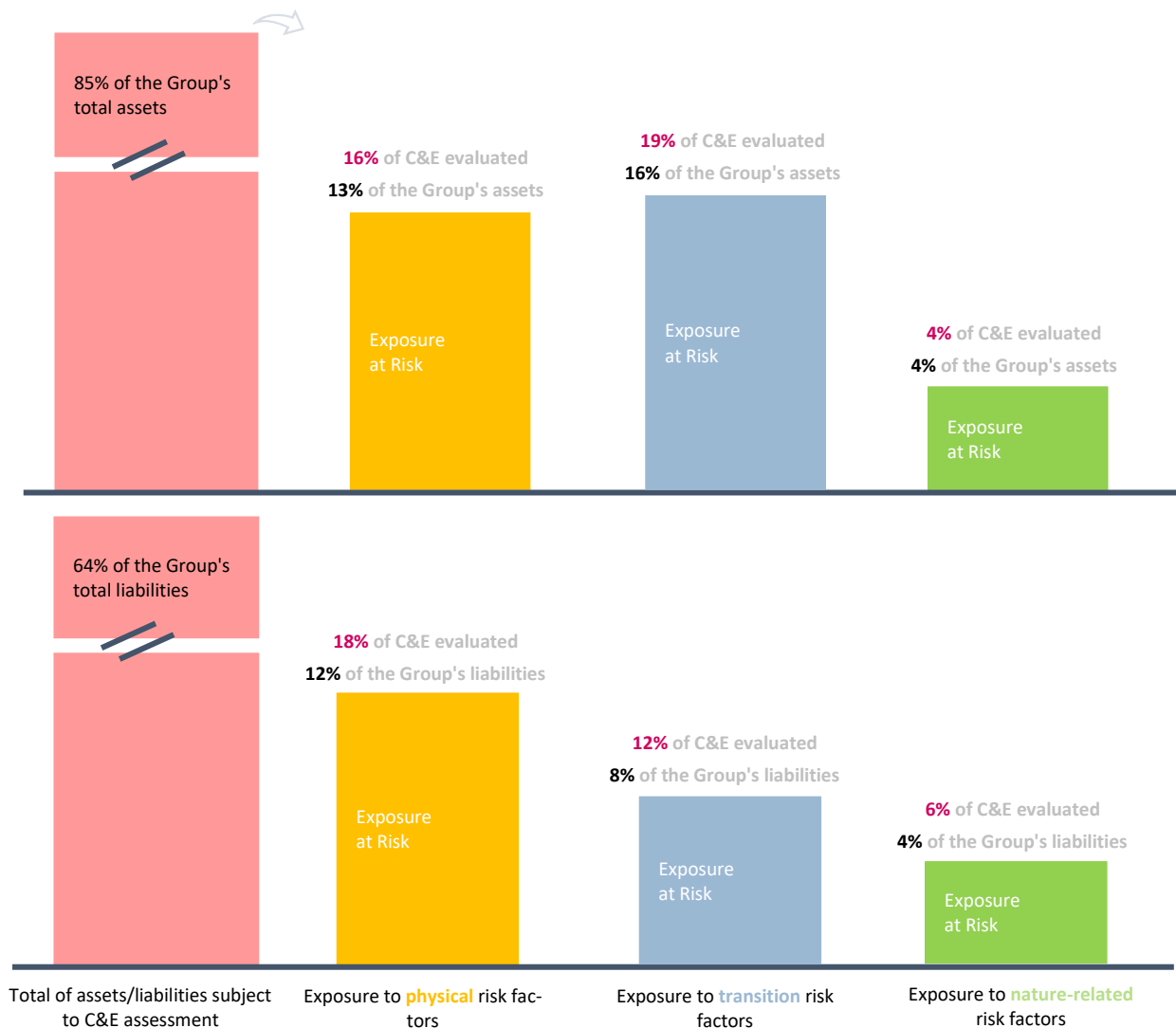


 <p>Climate related Transition risks Real estate</p>			<p>The transition to stricter energy efficiency standards can have a negative impact on the assessment and performance of less energy-efficient buildings. Therefore, the Energy Certificate (EC) of each building is considered: the lower the EC, the greater the risk associated with the building.</p>
 <p>Climate related Physical risk Companies</p>	<p>Severe Chronic</p>	<p>Credit Liquidity Market Real Estate Operations Business</p>	<p>Physical climate risks can affect business continuity by impacting an organisation's buildings, their equipment or causing any other disruption to activity related to the «assets» located in those buildings, namely staff facilities and any other services. The methodology uses Moody's tool, Climate on Demand, to estimate the level of risk of the following physical climate events: i) Floods; ii) Thermal stress; iii) Hurricanes and Typhoons; iv) Sea level rise; v) Water stress; and vi) Forest fires.</p>
 <p>Climate related Physical risk Own Buildings &amp; Activities</p>			
 <p>Risk related to nature Companies</p>	<p>Biodiversity Agroforestry Sys- tems Water</p>	<p>Credit Liquidity Market Operations Business</p>	<p>For each of the categories considered - biodiversity, agroforestry systems and water - a risk score is assigned based on two components: geographical location (taking into account distance to sensitive areas, the aridity index and distance to bodies of water); and sectoral impacts and sectoral dependencies on ecosystem services (using the EN-CORE classification tool and considering the dimensions of habitat integrity, provision of food and other goods, and water security).</p>

### Overview of the Assessment Results

The application of these methodologies has made it possible to measure the percentage of the Group's portfolios that is sensitive to C&E factors [i.e. exposure at risk, EaR] and to draw a conclusion on materiality for specific C&E risk factors: the greater the share of EaR, the greater the exposure to C&E risk factors.

These results are a view of the gross risk, before any mitigating effect (for example, they don't take into account insurance policies for the mortgage portfolio, nor corporate loans with public guarantees), which can significantly reduce the residual risk.



For the BCP Group, reputation is a category in itself. But since reputation can be affected by C&E factors, along with social and governance factors, it must also be addressed in the C&E materiality assessment. For this reason, the Group has developed its methodology for assessing the impact of C&E factors on reputational risk.

Reputational risks result from negative perceptions on the part of clients, counterparties, shareholders, investors, debtors, market analysts, other relevant parties or regulators, which can negatively affect a bank's ability to maintain existing business relationships or establish new ones and continued access to funding. The table below presents the relevant risk factors and briefly describes the methodology developed to assess reputational risk. The assessment did not identify any relevant problems or risk exposure.

Assessment approach of reputational risk

ESG risk factors	Risk Factor Mapping	Assessment Methodology
Reputation and greenwashing	Reputation - greenwashing; Reputation - stakeholders	Identify reputational risk factors through: <ul style="list-style-type: none"> <li>• Sample of counterparties classified by four different ESG ratings to assess ESG performance. The ratings were converted into a High-Medium-Low risk scale, with EaR corresponding to exposure to counterparties with at least two High ratings.</li> <li>• Sample of products (commercial and investment offers) based on a content analysis approach; three criteria were investigated for each product: a) relationship with the ESG concept; b) purpose of the offer; and c) description of the information required to access these products.</li> </ul>

# Task Force on Climate-related Financial Disclosures (TCFD)

BCP Group is committed to reporting relevant information to Stakeholders in the scope of its contribution to the fight against climate change. In this sense, the Bank seeks to align its reporting with the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD), as presented in this chapter.

## GOVERNANCE

To guarantee an effective management of environmental issues in the Bank (including climate change), the existence of a governance structure transversal to the organisation is ensured, capable of responding to environmental issues and ensuring a timely decision-making aligned with the strategy of BCP Group.

Ownership	Activities
<p><b>Board of Directors</b></p>	<p>Global responsibility for the BCP Group's ESG strategy, management and control framework in the Group, including the definition, approval and supervision of the effective implementation of the ESG strategy and its implementation agenda, being responsible for:</p> <ul style="list-style-type: none"> <li>• Approval of corporate Policies and Principles;</li> <li>• Approval of the Sustainability Report;</li> <li>• Monitoring of the implementation of the SMP through the progress report included in the Risk Appetite Statement;</li> <li>• Group risk disclosure for Pillar 3 purposes;</li> <li>• Approval of the Group's annual C&amp;E materiality assessment;</li> <li>• Approval of the exercises for aligning the emissions portfolio and setting targets;</li> <li>• Approval of the transition Plan.</li> </ul>
<p><b>Executive Committee</b></p>	<p>2.3 Approval of the SMP;</p> <p>3.3 Monitoring of the implementation of the SMP through the progress report included in the Risk Appetite Statement;</p> <p>4.3 Establish the ESG business strategy, including aspects from customer engagement to product development;</p> <p>5.3 Define the commercial and operational objectives to ensure the achievement of the Group's sustainability strategy;</p> <p>6.3 Implement the ESG organizational model;</p> <p>7.3 Define the approaches and methodologies to identify, assess and manage the relevant ESG risk factors;</p> <p>8.3 Lead the Group's communication plans and statements on ESG, including the definition of frameworks and respective commitments signed/to be signed by the Group.</p>
<p><b>Sustainability Committee</b> Chaired by the Chief Executive Office, Chief Risk Officer and heads of other Divisions</p>	<ul style="list-style-type: none"> <li>• Monitor the implementation of the SMP that includes ESG and climate change-related components.</li> </ul> <p>In addition, each local entity assists the local Executive Commission and the Sustainability Commission in defining local ESG regulations and procedures.</p>
<p><b>Risk Assessment Committee</b> Composed of the Chief Executive Officer, Chief Financial Officer, Chief Risk Officer and heads of other Divisions</p>	<ul style="list-style-type: none"> <li>• Define and supervise the overall risk management framework (including ESG risks);</li> <li>• Formally integrate the monitoring of ESG risks into the topics monitored by the Commission (<a href="#">Art. 7 – Competences, attributions and duties</a>);</li> <li>• Identify risks related to climate change and incorporate policies and procedures to ensure the continuity of the Bank's activity in the event of natural disasters.</li> </ul>
<p><b>Committee for Corporate Governance, Ethics and Sustainability (CGSES)</b></p>	<ul style="list-style-type: none"> <li>• Recommend the adoption by the Board of Directors (BoD) of policies in accordance with ethical, sustainability and corporate social responsibility principles and best practices;</li> <li>• Assist the BoD in assessing the progress of the Group's SMP and oversee compliance with national and international ESG, legal and regulatory requirements.</li> <li>• Issue opinions on annual corporate governance and sustainability reports.</li> </ul>

Ownership	Activities
<b>Sustainability Areas</b>	<ul style="list-style-type: none"> <li>• Implement, internally streamline and monitor the actions of the SMP, which include actions related to climate change, namely in the areas of improving energy efficiency and increasing the consumption of energy from renewable sources;</li> <li>• Provide support to the structuring of the offer with environmental criteria;</li> <li>• Provide support for climate and environmental risk management in compliance with applicable regulations, objectives, and targets.</li> </ul>

## STRATEGY

### Climate Risks and Opportunities

Climate change is a risk considered relevant for BCP, with the potential to impact the Bank in the short (up to 3 years), medium (3-8 years) and long term (9-18 years). In accordance with the classification recommended by the TCFD, and other relevant entities, the Group recognises the division of climate-related risks into physical risks and transition risks, defining them as follows:

- **Physical Risk:** refers to the direct and indirect impacts of climate change on the environment, and can be classified as:
  - i. **Severe:** when it is derived from extreme weather events that cause acute destruction to the environment, such as forest fires, floods, storms and heat waves, or
  - ii. **Chronic:** when it arises from progressive changes in climate and weather patterns, such as rising sea levels, water stress and changes in precipitation patterns.

All these risk factors can result in physical damage to assets, infrastructure, and communities, as well as disrupt supply chains, decrease levels of production and service delivery, and consequently decrease economic productivity.

- **Transition Risk:** refers to the risk of any negative financial impact that results, directly or indirectly, from the misalignment between the business model/strategy of the counterparties or invested assets and a low-carbon and environmentally sustainable economy. This transition may involve changes in energy systems, regulation, taxation, and investment patterns, which can disrupt established business models and cause significant financial losses in more vulnerable sectors or companies.

In the most recent climate-related and environmental (C&E) risk materiality analysis exercise, the Bank's approach was consistent with the factors defined by the TCFD, recognizing and analysing the following climate risk factors:

Risks			
Risk Category	Risk Factors	Description	Impact
Transition	Regulatory & Legal	<ul style="list-style-type: none"> <li>• Risk of introducing new regulation and amending existing regulations and policies with the aim of accelerating the decarbonisation process. For example, stricter energy efficiency requirements, introduction of carbon footprint tax mechanisms, policies that encourage the sustainable use of environmental resources, prohibition of the production of certain goods (e.g. combustion vehicles).</li> <li>• Risk that the level, speed or nature of decarbonisation-related policy uptake will change.</li> <li>• Increased settlement and litigation costs as a result of the failure to mitigate the impacts of climate change, the failure to adapt to climate change, and the failure to provide sufficient climate disclosures.</li> </ul>	Short- and medium-term
	Technological	<ul style="list-style-type: none"> <li>• Technological changes related to energy efficiency, low-carbon transport and increased use of non-fossil fuel sources.</li> <li>• Development of technologies with less impact on the climate and environment, leading to the obsolescence of existing technologies.</li> <li>• Business models of companies based on technologies that use energy sources that may become more expensive as a result of policy actions (e.g. through higher efficiency standards or the introduction of carbon taxes).</li> <li>• Replacing existing products and services with others with lower emissions.</li> <li>• Risk of unsuccessful investment in new technologies, including 'enabler' technologies that are not sufficient to support decarbonisation.</li> </ul>	Medium term
	Market	<ul style="list-style-type: none"> <li>• Changing customer behavioural patterns – increased demand for green/sustainable products and services.</li> <li>• Risk that financial institutions will avoid providing equity, debt or insurance financing due to a preference for customers with lower GHG emissions.</li> </ul>	Medium term

		<ul style="list-style-type: none"> <li>• Risk that Customers have partners (e.g. suppliers) that increase their carbon footprint.</li> </ul>	
	<b>Reputation</b>	<ul style="list-style-type: none"> <li>• Changing consumer preferences towards low-carbon and more sustainable alternatives.</li> <li>• Risk that the Bank's green and ESG products and practices will be identified as overly ambitious, or even false.</li> <li>• Increased stakeholder concern with ESG issues.</li> <li>• Risk that stakeholders (e.g., employees, suppliers, shareholders) will avoid investing in or working with a carbon-intensive and/or misaligned company.</li> </ul>	Short term
<b>Physical</b>	<b>Severe</b>	<p>Increased severity and frequency of extreme weather events, such as:</p> <ul style="list-style-type: none"> <li>• Floods</li> <li>• Heat Stress/ Heat Waves</li> <li>• Forest fires</li> <li>• Storms - Hurricanes and Typhoons</li> </ul>	Short term
	<b>Chronic</b>	<p>Progressive changes in climate, such as:</p> <ul style="list-style-type: none"> <li>• Hydraulic Stress</li> <li>• Sea level rise</li> </ul>	Long term
<b>Opportunities</b>			
<b>Resources Efficiency</b>		<p>Reduce operating costs by:</p> <ul style="list-style-type: none"> <li>• Use of more efficient modes of transport</li> <li>• Reduced water use and consumption</li> </ul>	Short term
<b>Energy Sources</b>		<ul style="list-style-type: none"> <li>• Reduce operating costs and exposure to rising prices of fossil fuel-derived energy sources, as well as exposure to rising carbon price in GHG emissions, through the use of low-carbon energy sources.</li> <li>• Benefits associated with the Bank's improved reputation for implementing renewable energy sources.</li> </ul>	Short term
<b>Products and Services</b>		<p>Improve competitive positioning to reflect changing customer and stakeholder preferences, resulting in improved reputation and potential increase in customers and revenue, through:</p> <ul style="list-style-type: none"> <li>• Development and sale of new green/sustainable services and products, including low-carbon products and services.</li> <li>• Financing projects with climate, environmental and/or social benefits.</li> </ul>	Short term
<b>Markets</b>		<ul style="list-style-type: none"> <li>• Increase revenues through access to new and emerging markets, such as markets associated with ESG investing.</li> <li>• Diversification of financial assets (e.g. green bonds)</li> </ul>	Medium term

Risk Category	Risk Factors	Transmission Channels and Financial Impacts	Risk and Opportunities Management
Transition	Regulatory & Legal	<p>Risk of non-compliance with stricter regulations under the European Union's Energy Performance of Buildings Directive, as a number of buildings owned by the Bank and in which it operates are covered by the Directive.</p> <p>Climate regulation impacting corporate customers and BCP's credit and financing portfolio may result in additional compliance costs. In addition, if a BCP customer fails to comply with the regulation and does not have the funds to pay the fines or penalties, BCP, as lender, may be held liable.</p> <p>The increase in fuel price in Portugal may represent an increase in operating costs related to transport, the bank's fleet and the heating of buildings.</p> <p>Risk of increased settlement and litigation costs as a result of the Bank's failure to mitigate and adapt to the impacts of climate change, as well as to provide climate disclosures.</p>	<p>BCP has been implementing energy efficiency measures, such as the installation of LED lighting, in all the geographies in which it operates, as well as the installation of photovoltaic panels in the Bank's buildings.</p> <p>The BCP Group commits its customers not to use credit funds for the actions included in the Environmental and Social Exclusion List of the EBRD (European Bank for Reconstruction and Development) and must hold all the necessary environmental licenses related to their activities.</p> <p>BCP is renewing its fleet, replacing them with more efficient vehicles with less environmental impact, and at Bank Millennium, in most of the fleet, the vehicles have been replaced by hybrid models.</p> <p>The Bank is committed to complying with the various legal requirements in the field of ESG issues and implementing the best available practices to identify and manage climate and environmental risks.</p> <p>Pursuant to the ECB's expectations, the Bank is developing a Group-wide Transition Plan that will set out the several measures to be taken by the Bank to minimise the transition risks to which it is exposed.</p> <p>In addition, the Bank has a sectoral policy that identifies the sectors that should be excluded from the Bank's financing, as well as the conditional and sensitive sectors to which financing restrictions should apply.</p>
	Technology	<p>Increased investment costs resulting from the development and adoption of new technologies with less impact on the climate and environment.</p> <p>Financial losses due to early obsolescence of existing assets/technologies.</p>	<p>Since 2016, BCP has been investing in phases in solutions with less environmental impact, namely: i) installation of LED lamps; (ii) installation of photovoltaic plants; (iii) replacement of combustion vehicles with hybrid or electric models; and (iv) purchase of green energy. In this way, the Bank has been gradually adapting to the needs and requirements of a low-carbon economy, reducing the risk of being left with obsolete assets and postponing the investment necessary to meet current and future requirements, which are increasingly demanding.</p>
	Market	<p>The Bank's Customers are increasingly seeking green products and services and the Bank's support for the financing of projects with environmental benefits (including benefits related to climate change mitigation and adaptation).</p> <p>At the same time, there is a market expectation that financial institutions will start to assess the ESG profile of Customers and give preference to those that present a better performance, namely those with lower levels of GHG emissions.</p>	<p>BCP is developing low-carbon products and services and has been financing several sustainable/green projects. For example, with the Decarbonisation and Circular Economy Line, and with special emphasis on applications to support the decarbonisation of industry, the Bank is supporting the financing of projects to reduce energy consumption or transition to a circular economy.</p> <p>The Bank is developing internal processes for the collection of ESG data that will impact risk rating and credit decision.</p> <p>In addition, the Bank has developed a Responsible Investment Charter that defines the concepts, general principles and guidelines to guide ESG investing and the management of associated risks at Group level.</p>
	Reputation	<p>BCP faces competitive risks posed by competitors and public opinion on the subject of climate change, which may occur in reputation risks if stakeholders understand that the Bank is not responding adequately to the management of climate-related risks.</p>	<p>BCP is committed to monitoring and implementing the best available ESG practices and to transparently disclosing the model for monitoring and managing climate-related financial risks.</p> <p>The Bank participates in recognized sustainability indexes, such as CDP, to improve its reputation in relation to climate change.</p>

Risk Category	Risk Factors	Transmission Channels and Financial Impacts	Risk and Opportunities Management
		If the Bank does not adopt measures to ensure good performance in matters of climate transition and sustainability or does not disclose them in the most appropriate way, it may be harmed by low ESG ratings.	<p>In 2021, BCP launched, and updates annually, the Responsible Finance Principles, which identify the sectors that should be excluded from the Bank's financing (e.g., oil and coal exploration and extraction), as well as the conditioned sectors and sensitive sectors (identified as 'at risk' in the C&amp;E materiality analysis), for which financing restrictions apply.</p> <p>To clarify which operations and products are considered 'green', and to define how new green businesses should be identified and monitored, BCP has developed an internal taxonomy – BCP's Green Taxonomy. Thus, the Bank ensures transparency in the approach and criteria used to manage and communicate goals related to ESG or green businesses.</p>
Physical	Severe	Extreme weather events can cause structural damage to the properties of the Bank's Customers and the infrastructure of the Bank itself and its employees.	To mitigate this risk, for example, BCP has a Business Continuity Plan and insurance coverage for assets in the event of natural disasters, to ensure stability and resilience in the event of incidents.
	Chronic	Higher temperatures can increase the demand for energy for cooling in BCP's branches and buildings, thus incurring higher operating costs.	To mitigate this risk, BCP is implementing energy efficiency measures in its buildings, namely the installation of photovoltaic panels.

**Impacts on BCP's Strategy and Business**

The BCP Group identifies, evaluates, controls and reports information on climate-driven risks and opportunities considering that the risk factors presented above are transmission channels that impact the 'traditional' risk categories, namely: credit, operational, liquidity, market, reputational and business. The most significant risk in the Bank's operations, and where transition and physical risks are most material, is in the credit risk category. Thus, actions in the Bank's loan portfolio are key to achieving the Bank's strategic objectives of financing the transition to a low-carbon and climate-resilient economy.

All risk factors recognised and analysed by the Group may result, directly or indirectly, in financial impacts for the Group, so it is essential that BCP adopts appropriate measures and changes its strategy and financial planning to manage the identified impacts in the most efficient way. The following table presents some of the potential financial impacts associated with each of the risk categories and factors identified by the Group, as well as examples of measures implemented by the Bank to manage these risks and opportunities.

In addition to the measures presented above, BCP continues to develop and plan other actions to better understand the exposure to risks related to climate change in its business, and to mitigate the respective impacts. In this regard, in 2023 the Bank: In this sense, in 2023 the Bank:

- Actively participated in the European Central Bank's (ECB) climate stress tests exercise, the aim of which is to assess banks' capacity in relation to climate risk and the industry's exposure to physical and transition risks;
- Has developed and continues to develop actions to align its risk management processes, activities and models with the ECB's expectations (according to the Thematic Review).
- Updated and developed new methodologies, more robust and aligned with the best available practices, to assess climate and environmental risks;
- Carried out the second exercise of assessing the materiality of climate and environmental risks, thus deepening the understanding of the impacts of these factors on the Group's activities;
- Developed and operationalised its internal capacity for climate stress tests;
- In line with the ECB's expectations, the Bank is developing a Group-wide Transition Plan;
- Has published an internal policy, 'Principles of ESG control and management' (GR0047), which provides all the concepts, principles, and guidelines necessary to manage ESG factors in the most diverse areas of the Group, namely: i) definition of the group's sectoral policies; ii) integration of ESG drivers into the credit decisioning framework; iii) methodology for stress-testing climate risk factors; iv) framework for ESG risk management.
- Has implemented and has planned to implement actions to bring BCP's actions closer to the ECB's expectations and the European Banking Authority's (EBA) guidelines on climate and environmental risks, in particular addressing the priorities identified in the context of the ECB's Thematic Review;
- Strengthened the process of in-depth and detailed assessment of the materiality of physical and transition risks in



- the risk typologies of BCP's risk taxonomy (e.g. credit risk, market risk, liquidity risk) and in its various portfolios (e.g. mortgage, retail, non-financial corporations);
- Continued to invest in the development of an IT platform that aggregates and integrates all ESG data, both internal and externally obtained (for example: obtained through customer engagement or via data providers), to respond to the varied business and reporting needs.

Given the risks and opportunities of climate change, BCP continues to adapt its business strategy to manage and mitigate the former, and to enhance the latter.

#### Climate and environmental change as a strategic priority

In line with the strategic priority given by the Bank to sustainability, and reflected in its Overcoming 24 Strategic Plan, BCP continues to adapt its business model to increase differentiation in the face of growing customer and other stakeholder expectations related to sustainability, while capturing related business opportunities and responding to regulatory requirements.

In this context, BCP remains committed to carbon neutrality by 2050, and has deepened its understanding of its environment, completing a thorough materiality assessment of physical and transitional risks in the economic activity sectors it supports and in the regions where it operates.

In addition, BCP continues to strengthen its offer of products and services adapted to customer needs, supporting them in the transition to a low carbon economy and capturing opportunities related to climate and environmental change, in alignment with the European Union Taxonomy.

## RISK MANAGEMENT

The BCP Group continuously monitors regulatory and supervisory requirements regarding ESG risk topics (including those related to climate-related risks and opportunities) and complies with relevant regulations as well as supervisory expectations.

The main process by which the Bank assesses the impact of climate-related risk factors on the Bank's risk profile is the materiality analysis of C&E factors. The exercise is carried out on an annual basis and makes it possible to: i) identify the proportion of the Bank's portfolios that are sensitive to climatic factors; ii) assess which climatic risks are material for the Group; iii) map the impacts determined in the "traditional" risk categories, according to the Bank's risk taxonomy; iv) identify opportunities for business improvement; and v) identify mitigation measures that should be adopted to reduce the Bank's exposure to these risks.

Following climate science, the use of different scenarios is particularly relevant to understand the sensitivity of business strategy to different climate and economic pathways. The methodologies developed within the scope of the C&E materiality analysis provide an assessment based on different perspectives of the evolution of C&E variables and their impacts on economic and financial factors.

The most recent materiality analysis carried out by the Bank took place at the end of 2023, with data referring to the year 2022, and integrated the **Net-Zero 2050** scenario for the prediction of transition risk outcomes and the **RCP 8.5** scenario for the prediction of physical risk outcomes. The risk factors analysed, the needs for improvement identified and the mitigation measures resulting from this analysis are partially presented above, under the 'Strategy' section. For more details on the assessment process, the integrated scenarios and the results obtained, please refer to the chapter 'Climate and Environmental materiality assessment'.

#### Management Model

The governance model for risks arising from ESG factors follows a structure based on three lines of defence which, under the leadership of the Board of Directors (and respective delegations on the Executive Committee), ensure its adequate assessment and management:

- The **first-line** functions comprise all the departments and business areas that interact with the Bank's customers, counterparties and suppliers, collect the information and data that support the assessment of their risk profiles (and of their respective operations) and structure the commercial solutions with characteristics associated to ESG factors and to the promotion of control of their impacts on the Bank's risk profile.
- In the **second line** of defence, the responsibility for risk control is assumed by the Risk Office and by the Com-

pliance Office. These functions ensure the procedures for the design, implementation of the policies/methodologies/ risk management models, which are paramount in keeping the risk profile of the Group in appropriate levels.

- The **third line** of defence is ensured by Internal Audit, which is responsible for independently reviewing the proper implementation and enforcement of the principles and processes related to ESG themes.

The Executive Committee is responsible for ensuring that ESG policies and strategies are followed, through the mobilization of resources and the execution of the necessary operational and business actions. The Sustainability Commission assists the Executive Committee in the integration of sustainability principles into decision-making and management processes and is responsible for evaluating and approving the initiatives of the Sustainability Master Plan, as well as changes and adaptations to the initiatives that are necessary for its implementation, and its monitoring.

The Board of Directors is responsible for the Group's ESG strategy, including defining, approving, and overseeing the effective implementation of the risk strategy and framework and its implementation agenda. Thus, the BoD is responsible for approving the following documents: i) ESG metrics defined in the Risk Appetite Statement; ii) Group Sustainability Master Plan; iii) Principles and policies related to sustainability and ESG themes; iv) Annual Sustainability Report; (v) risk disclosures for Pillar 3 purposes; (vi) portfolio alignment exercises and emissions targets; and (vii) the Transition Plan.

## METRICS AND TARGETS

As part of its environmental commitment, BCP has set targets to reduce carbon emissions, namely, to reduce scope 1 and scope 2 GHG emissions by 15% in 2023, compared to the previous year, for operations in Portugal. BCP in Portugal also has a target of decarbonising its vehicle fleet by 80% by 2030. Poland has made a commitment to replace all cars with hybrid or electric models by 2030.

BCP monitors metrics related to climate change, namely its GHG emissions (Scope 1, 2 and 3), and presents its performance and evolution in the Environmental Responsibility chapter. Scope 3 emissions for the year 2023 were calculated both upstream, associated with suppliers, and downstream, associated with the corporate loan portfolio. The methodologies for calculating these emissions have been improved compared to those of the previous year and are duly explained in the Report, in the chapter on Decarbonisation. In addition to the information referred to above, the Bank monitors other metrics related to climate change and reports them in the chapter on Environmental Responsibility.

Metrics and targets related to climate change are incorporated in BCP's remuneration policies: the variable remuneration of the Executive Committee (EC) and remaining employees is determined by several Key Performance Indicators (KPI), which include, in the case of the EC, the percentage of compliance with the SPM targets (which foresees actions aimed at reducing emissions). Additionally, the Chief Risk Officer (CRO) is assigned an individual KPI related to the fulfilment of the implementation plan for monitoring climate and environmental risks.

Assuming its role, as an organization and funding entity in facilitating the global transition to a low carbon economy, Millennium bcp recognises the need to reduce its own greenhouse gas emissions in own operations and also of those deriving from its credit/investment portfolio. In this context, in 2023, without prejudice to any reassessment of the decision if circumstances require or oblige it, the Bank formalized its adherence to the Science Based Targets initiative (SBTi), a global initiative that allows companies to set emission reduction targets in line with science and the level of decarbonization necessary to meet the goals of the Paris Agreement. The Bank is working on the development of alignment metrics as per Pillar 3 requirements.

# Highlighted: Renewable Power Production

### Renewable Energy Production

The energy efficiency and transition process and the reduction of GHG emissions attributable to Millennium bcp's operations, as an organization, are commitments made to our Stakeholders. It is in this context that, alongside the consumption of electricity from the public grid with a guarantee of 100% renewable production, the reinforcement of investment in the installation of its own sources of renewable energy production that contribute to improving the Bank's ecological footprint must be understood. To optimize costs and increase your energy autonomy.

This is how Millennium bcp, in Portugal, has already installed 2 photovoltaic plants in Taguspark, with 1 MWh of power/each - the second of which has been in operation since December 2022 -, and is now studying the creation of a third production unit.

The availability of the 2nd photovoltaic plant made it possible to double the production of electricity for self-consumption. These infrastructures now have an installed capacity that guarantees around 30% of the electricity consumption of the central service buildings located in Taguspark, having also avoided, in 2023, the emission of 811 t of CO<sub>2</sub>.

	2021	2022	2023
Production Centers	1,043 MWh	1,114 MWh	2,342 MWh
Consumption Taguspark Buildings (Grid + PV)	5,380 MWh	7,071 MWh	7,346 MWh
% self-consumption	19.4%	15.8%	31.9%
CO <sub>2</sub> emissions avoided	376 tCO <sub>2</sub>	401 tCO <sub>2</sub>	811 tCO <sub>2</sub>

In 2023, the process of installing micro photovoltaic plants in several branches also began, and three installations have already been completed - Charneca, Albufeira and Santarém - out of a total of eight planned.

The performance of these plants, depending on the number of photovoltaic panels that can be installed in each location, will determine a reduction in the energy bill of between 10% and 30% of the branch. It is estimated that these micro plants have the capacity to avoid CO<sub>2</sub> emissions in an amount ranging from 4 t to 10 t, which corresponds to the average CO<sub>2</sub> capture of 10 to 20 trees per branch.



In Poland, where all electricity supplied by the public grid is also entirely from renewable sources and with a zero contribution to the Greenhouse Gas Protocol's Scope 2 CO<sub>2</sub> emissions (indirect GHG emissions from the consumption of energy, including electricity, used in the company's activities), Bank Millennium launched in January 2023 its first photovoltaic plant for the production of electricity for self-consumption, installed on the roof of the headquarters building in Gdansk, a unit capable of meeting more than 20% of local electricity consumption needs.

In Mozambique, at Millennium bim, the pilot phase of the "green" project is being developed and implemented, both in the Matola Municipality branch and in the Maputo headquarters building, with a completion date scheduled for 2024.



2<sup>nd</sup> photovoltaic plant - central services in Taguspark (Portugal)



Photovoltaic plant - central services in Gdansk (Poland)

# ACTIVOBANK

## ACTIVOBANK

The ActivoBank, within the context of the BCP Group's Sustainability strategy and policies, has been developing a holistic approach that includes processes and operations, the offer of solutions, products and services, and its positioning and purpose within the framework of corporate social responsibility and financial literacy.

The ActivoBank was the first paperless bank in Portugal, reflecting the priority given, since its inception, to sustainability themes and issues.

Hence, in 2023, the Bank's position in supporting the community was maintained and strengthened, with the allocation of funds for investments in areas of social and/or environmental action, with emphasis on the protection of the Oceans and the fight against Cyberbullying.

Also in products and services, the offer in the area of sustainability was expanded, especially in the areas of credit, investments and cards/transactions.

All the information is available on the Bank's institutional website, allowing for the integrated monitoring of the various initiatives in the field of sustainability (Our blue is also green | Would you agree to join the change?) and where, through the PROATIVO seal, the various aspects of the offer and activity with an impact on sustainability are signposted.

Click here to see the aggregator page of ActivoBank for Sustainability: <https://www.activobank.pt/sustentabilidade>

### Sustainability Initiatives

#### Social benefit of products and services by line of business

The ActivoBank maintained its strategy of valuing and encouraging more sustainable choices, charging differentiated interest rates on products that address environmental issues such as Credit + Energy, EcoActivo and Electric Cars.

The Training Credit remained in the Bank's offer, with conditions adjusted to the financing of technical specialization courses, bachelor's, postgraduate, master's, doctorate, Erasmus, exchange, executive masters and executive education, in Portugal and abroad.

In June, the ActivoBank launched Crédito Saúde (Health Credit), and made this product available in its offer by financing expenses of this nature with differentiated conditions.

The ActivoBank's Investment Fund Offer includes products classified as articles 8 and 9 of the Sustainable Finance Disclosure Regulation (SFDR) that promote or have as their main focus environmental or social objectives (please see section "SFDR", in the chapter "Introduction").

#### Environmental benefit of products and services by line of business

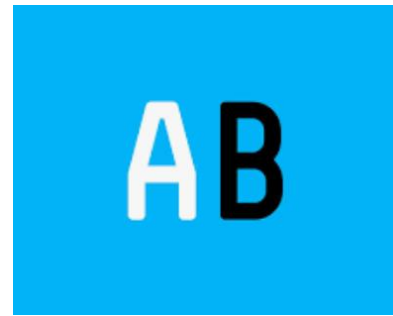
The year 2023 is marked by the availability on ActivoBank's website and App of the entire offer of Term Deposit and Savings products, which translated into around 95% of the amounts constituted through automatic channels.

This challenge of launching "digital journeys" was also extended to other financial products, namely with the launch of Easy Invest, an automated investment in Open Linked Units, and Public Subscription Operations.

As for the most current day-to-day movements, to provide a new account opening option to the Customer without going to the Active Points, the Digital Mobile Key Account Opening was launched.

In 2023, 3,494 AB Plans were contracted, using the digital contracting process, thus avoiding the printing and sending of documents.

Also in 2023, Customers became able to make overlimit SEPA Transfers (including immediate and urgent ones) through Digital Channels (website and App). With this development, the circuit that existed until then was changed, that is, there is now a new method of authentication of the operation that allows transfers with an amount higher than the maximum per



Customer defined daily by the Bank.

The integration of the authorized payments feature in the ActivoBank App also allowed Customers to automatically authorize subscriptions or regular purchases with just one "click".

This new possibility has brought several advantages to the Customer, of which the following stand out:

- the customer does not need to authorise payments individually, avoiding multiple "clicks";
- allows having an aggregated view of all subscriptions in the ActivoBank App - improving the user experience in terms of expense control;
- receive notices, such as those regarding subscription renewals;
- be able to establish and/or edit the limits, and their timeframe, to be debited.

The Bank also launched the digital cards. These ActivoBank Cards are a replica of the physical Cards, and are immediately available in the App and can be used right after being contracted, with obvious advantages, such as:

- consult the Card's data, namely the CVV;
- manage the intended transactions;
- make online payments and transfers (only Debit Cards allow you to make payments and transfers, Credit and Prepaid Cards only allow you to make payments);
- use MB Way, for example, to make withdrawals, since it is automatically associated, and also create MB NET Cards;
- associate with Apple, Android, SwatchPAY, Fitbit, and Garmin devices.

Also in the Cards, since the end of 2023, we have integrated the envelopes for sending physical AB Gold Credit Cards in kraft paper.

Preferential financial conditions were made available for the credit purchase of more efficient windows/doors, through partnerships aimed at improving the energy efficiency of homes.

The domiciliation and the contracting of the salary advance were made available in the App, in a fully digital process, facilitating the request of Customers.

#### Launching of ESG products and/or Services

The availability of the digital contracting of the ECOActivo Credit in the App allowed simpler access to a product whose purpose is to support Customers in choices aimed at improving the energy efficiency of their homes and environmentally friendly mobility.

Customers with a domiciled salary have access to sustainable mobility products under advantageous conditions, available in a showcase of articles - checklist.

In Investments, considering the Sustainable Finance Disclosure Regulation (SFDR), we have 73% of our portfolio of Investment Funds classified as articles 8 and 9, with an increase compared to last year (55% in the number of subscribed Funds), which allows us to guarantee and provide Clients with a very comprehensive offer of Funds that promote environmental and/or social sustainability or whose investment objective is exclusively sustainable.

#### Initiatives to improve the financial literacy of the community

Within the scope of Financial Literacy, we ensured a set of contents, which were made available in ActivoBank's digital communication channels - Facebook, Youtube, Instagram, LinkedIn and TikTok. These contents were produced and disseminated as conferences, podcasts or informative videos and images.

A partnership was also established with Observador, in which financial literacy content on Investments for branded content publications was worked on.

Due to the scope of the platforms used, this content is available to Customers and non-Customers.



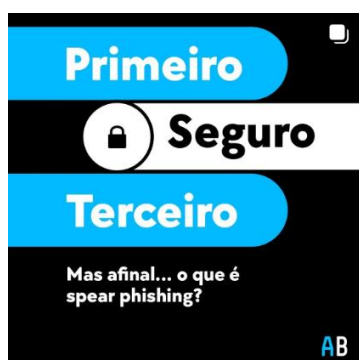


### Contas-poupança ou Depósitos a Prazo: qual a melhor solução?

Entre depósitos a prazo e contas-poupança, as diferenças parecem ser mínimas, mas na verdade são significativas. Descubra:he porquê e ainda indicamos as melhores soluções para começar a poupar já.



In relation to digital literacy, we ensured a set of contents - informative videos and images - which were made available in ActivoBank's digital communication channels - Instagram and LinkedIn.



### Involvement with the local community

During 2023, ActivoBank developed 12 social solidarity actions through its monthly item "Dar Créditos", associating a Project or Social Cause that was supported with an amount of up to 2,000 euros per month.

The amount donated was determined through a Solidarity Campaign, which consists of raising funds associated with the subscription/contracting of ActivoBank products or services. In addition to the monetary contribution, visibility was also given throughout the year on ActivoBank's digital media – Instagram page –, on the website and in the App to each Institution and a few months later a visit and interview was made to understand how this donation was used, which is very relevant, since it allows to promote the importance of these institutions to the community and raise new support, or volunteers.



Supported projects:

Month / Institution	On the Cause	Contribution
January - Participation of Diogo Matos in the Virtus Global Games	Diogo is a high-performance adapted swimming athlete since 2014/2015, who started his sporting career at the age of 15 in national and international competitions and has been an example of resilience and strength.	ActivoBank donated 1,935 euros to contribute to Diogo Matos' participation in the Virtus Global Games in Vichy, a very important milestone in his sporting career.
February - CASA	CASA's mission is to help those who are homeless, who are part of families at risk or families in need, through social solidarity actions, providing close contact, food, clothing and social reintegration services.	ActivoBank donated 2,000 euros to contribute to the new lodging centre for CASA in Lisbon.
March - Casa dos Rapazes	Casa dos Rapazes is a centennial Private Institution of Social Solidarity (IPSS) with a social response of a home for children and youth, which welcomes children and young boys between 6 and 18 years of age who had to leave their family environment for various reasons, which put them in danger.	ActivoBank has donated 2,000 euros so that Casa dos Rapazes can continue to provide social assistance to children and young people between 6 and 18 years old.
April - AFID	It is an IPSS, which is dedicated to initiatives of Rehabilitation, Education, Training and Socio-professional Integration of people with disabilities. It also develops a set of community support activities and proximity services in the fields of social assistance and solidarity, support for children and the elderly. Currently, it provides support to more than 1.500 individuals.	ActivoBank donated 1,038 euros to contribute to AFID's Rehabilitation, Education, Training and Socio-professional Integration initiatives.
May - Limites Invisíveis (Invisible Limits)	Since 2015, the Invisible Limits Project has been developing educational programs in nature with children from 3 to 10 years old, recognizing the benefits of this type of program, namely in terms of children's health and well-being, the development of socio-emotional, cognitive and motor skills and the change in sedentary behaviour patterns.	ActivoBank donated 2,000 euros to contribute to the educational programs of the Invisible Limits Project.
June - Pedalar sem idade (Cycling without age)	It was in Porto, in 2018, that this non-profit movement achieved the goal of joining the international Cycling Without Age movement, with the arrival of the first bicycle in Portugal. In partnership with the Bonfim Parish Council, they carry out urban tours, on electric bicycles, with the support of their team of volunteers (trishaw riders), who are dedicated to helping the elderly and people with reduced mobility in their communities.	ActivoBank donated 2,000 euros to help more seniors enjoy urban tours.
July - Liga Proteção da Natureza (Association for the Protection of Nature)	The LPN is a national Environmental Non-Governmental Organization (NGO), founded in 1948, being the oldest environmental protection association in the Iberian Peninsula. It is a non-profit association with Public Utility status, whose main objectives are the defence of the environment and contribute to the conservation of the natural heritage, the diversity of species and ecosystems.	ActivoBank donated 470 euros to contribute to the conservation of the Natural Heritage, the diversity of species and ecosystems.
August - Rosa Vida	Rosa Vida is a non-profit association that promotes the improvement of the quality of life of cancer patients.	ActivoBank donated 2,000 euros to Rosa Vida to help improve the quality of life of cancer patients.
September - APPACDM Porto	The APPACDM do Porto - Portuguese Association of Parents and Friends of the Mentally Handicapped Citizen is a non-profit association, of social solidarity and voluntary initiative of individuals, which supports people with developmental delay, intellectual disability or disability, of all ages. Its area of intervention extends to the entire city of Porto, where it was created in 1969.	ActivoBank donated 1,950 euros to contribute so that APPACDM Porto continues to support and empower People with Intellectual Disabilities or Disability to achieve a better quality of life.
October - Matiz	Matiz is an IPSS that aims to improve some aspects in the field of mental health care in the region of Trás-os-Montes, with a special focus on the municipality of Mirandela, aiming to facilitate access to it to the entire population, in an equitable way at all stages of life.	ActivoBank donated 2,000 euros to help with the purchase of a car so that Matiz can carry out home support actions.

November - SaMaNe	SaMaNe is an Association that works on issues of structural racism experienced by black and racialized mothers in Portugal during pregnancy, childbirth and post-partum and supports new mothers in matters of mental health and baby care.	ActivoBank donated 1,512 euros to help SaMaNe in its mission to support mothers during pregnancy, childbirth and postpartum.
December - CASA	CASA's mission is to help all those who are homeless.	ActivoBank donated 20,000 euros to support Casa in the distribution of about 4,000 meals.

In addition to the monthly support given to these social causes, during 2023 the Bank continued the support, which had begun in 2022, to the causes of Marine Reforestation and the fight against Cyberbullying. In the **Protection of the Oceans** with **Ocean Alive** and in the cause of combating **Cyberbullying** with **No Bully Portugal**.

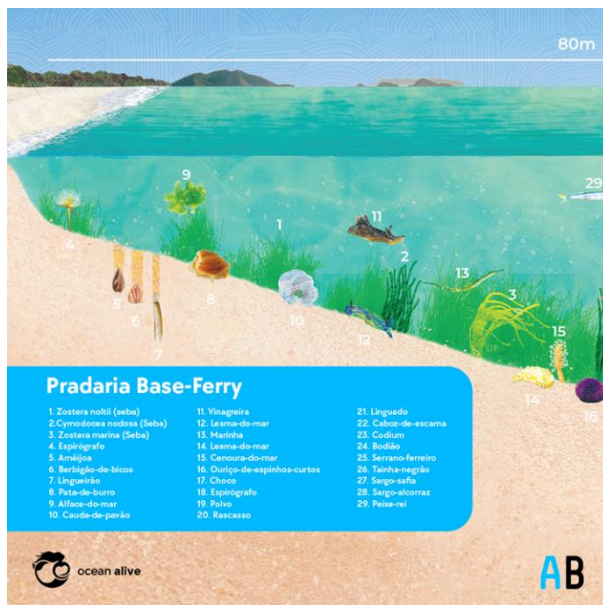
These partnerships are in line with the Bank's current support and Sponsorship policy, which is 100% focused on sustainability-related causes.

Protection of Seagrass Meadows and Partnership with Ocean Alive

Since Seagrass Meadows are marine ecosystems with a very important role on the Planet, as they are carbon sinks and habitat for several species of fish, crustaceans and bivalves, Activobank, aware of the vital importance of the Oceans and the active contribution to their preservation, has joined Ocean Alive, the first cooperative dedicated to the protection of Seagrass Meadows in Portugal.

This partnership with ActivoBank in the environmental area, which took place in 2022 and 2023, supported the preservation of the Ferry Base Seagrass Meadow, in Tróia, contributing to the achievement of two objectives: i) to create scientific knowledge to support prairie restoration actions; (ii) encourage good practices in vessel behaviour.

In the course of the various phases of the project, significant developments have been made that have made it possible to move from a meadow without a name, dimension and in which the state of conservation and biodiversity totally unknown, to the full knowledge of the Meadow Base Ferry.



During the project it was possible to map it, to make a survey of the biodiversity and of the areas that were degraded. After these surveys, a restoration plan was carried out that will be completed in March 2024 and will leave the entire area of the Seagrass Meadow in a good state of conservation.

In addition to the scientific work, there were also awareness-raising activities aimed at structuring navigation in the Meadow area. In 2023, two volunteering activities were carried out that allowed ActivoBank Customers and Employees to be involved in these actions to raise awareness among the local community about the importance of the Seagrass Meadows and the care to be taken in the preservation of these habitats.

The volunteering actions, which took place on the last weekend of July, totalled 12 hours of activity in the field, with the participation of about 16 volunteers. In total, 124 people and 33 boats participated.



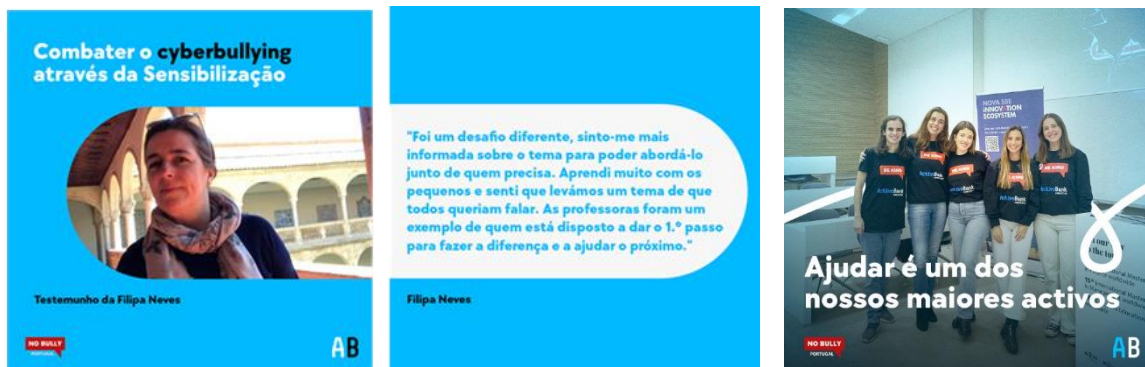
Also on social networks, several information about the Base Ferry Prairie Preservation project were disseminated, in order to spread information and raise awareness among as many people as possible:



Cyberbullying and No Bully Portugal

During 2023, one of the main actions of the partnership with **No Bully Portugal** (supported by the Bank in 2022/2023) was put into practice - the training of volunteers (ActivoBank Employees and University Students), so that they would be able to carry out training actions in Primary and Secondary Schools and Universities. Between March and May, weekly group preparation sessions were held, with the transfer of theoretical knowledge and practical group activities to promote the fight against Cyberbullyng.

After the training stage, five awareness-raising sessions were held (in the areas of Porto and Lisbon) at the Campanhã School, the Águas Santas Primary and Secondary School, the Passos Manuel Primary and Secondary School and the Universidade Nova of Lisbon.



### Prizes and awards

ActivoBank was elected Powerful Brand in the Online Banking category in Portugal for the second consecutive year.

This distinction is gaining more and more notoriety, despite being an award that is only two years old, as the sustainability of brands is also increasingly measured by the opinion and trust that consumers place in them.

The Powerful Brand award is based on a tool that, through Marktest's market studies, measures the value of brands, based on Key Performance Indicators (KPI), analysed in the dimensions of Innovation, Sustainability, Ethics and Brand Purpose, and ActivoBank stood out in all indicators in the Online Banking category.

It was also distinguished, for the fifth consecutive time, with the "Consumer's Choice" award, in the "Digital Banking" category, with a Satisfaction Score of 89.6% and a Recommendation Score of 89.4%. The independent evaluations, which are the result of consumer opinions, have once again highlighted the Bank's recognition among the public.

Security, transparency, ease of use, simplicity and interactivity, reduced rates/fees, trust in the brand, ease of opening an Account and completeness of the ActivoBank App were the most valued attributes. ActivoBank achieved the best score in all the satisfaction attributes evaluated.

In the second edition of the best Bank study, ActivoBank was once again the leader in 2023. ActivoBank secured 1st place in the following categories: Customer Satisfaction, Current Accounts and Personal Credit, which ensured an overall quality of 72%, the highest compared to the competition.

### Communication and Training

In the field of Ecology, in 2023 we joined photojournalist Daniel Rodrigues on his adventure to travel the African continent by electric bicycle.

This action aimed to raise awareness of Climate Change, demonstrating that if it is possible to cross Africa by bicycle, given the difficulties that are expected on this Continent, it is also possible for each of us to adopt more sustainable habits in our daily lives and exchange the usual means of transport for the electric bicycle.



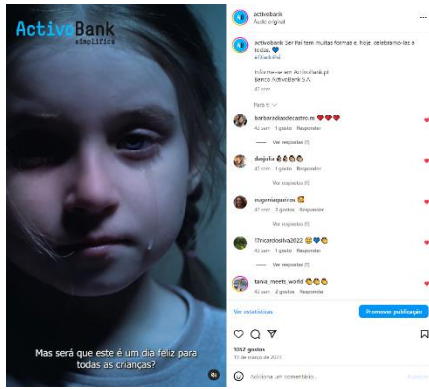
This action was associated with the ECOActivo Personal Credit product, in which one of the purposes is the acquisition of electric bicycles.

In the course of 2023, ActivoBank played an important role in Social Activism, marking anniversaries with its positioning regarding structuring causes for society:

- Publication on Social Networks to mark Women's Day and raise awareness of gender inequalities;



- Publication on Social Networks to mark Father's Day and to alert to different types of families;



- Publication of Women's Empowerment related to the approach of women to financial issues.



Creativism Contest

Creativism was born from ActivoBank's desire to get closer to the causes it defends through the artistic interpretation of young Portuguese talents. For that purpose, the Brand has launched, on its networks, a contest for the creation of sketches of murals on the themes of Ocean Protection, Women's Empowerment and combating Cyberbullying.

The winners were the sketches by the artistic duo C'marie and Egrito and the graphic designer Joana Fatela, the sketches portrayed the themes of Women's Empowerment and Protection of the Oceans, respectively.



# ESG bonds



# ESG Bonds

## Allocation and Impact Report



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# 1. Green, Social and Sustainability Bond *Framework*

Since 2021, Banco Comercial Português, S.A. (“BCP”, “Millennium bcp” or “Bank”) has established its [Framework](#) for issuing ESG Bonds, which represents an important and crucial tool in the integration of sustainability into its products and financial services, with a view to redirecting funds to finance a more sustainable society.

The Framework is aligned with the four principles defined by the International Capital Markets Association (“ICMA”) for ESG bond issuance as presented below and relies on relevant eligibility criteria for loans to be financed or refinanced in the Green and Social categories using the proceeds of the executed bond issues. The Framework also aims to contribute to the achievement of the United Nations Sustainable Development Goals (“SDGs”).

Millennium bcp’s Framework has the objective to ensure transparency and quality of the issuance of BCP’s ESG Bonds. It has been designed in accordance with the four core components of the Green Bond Principles (2018), Social Bond Principles (2020) and Sustainability Bond Guidelines (2018) published by the ICMA<sup>18</sup> (“ICMA Principles”):

1. Use of Proceeds;
2. Process for Project Evaluation and Selection;
3. Management of Proceeds;
4. Reporting.

Through the issuance of ESG Bonds, the Bank can access to one of the most important segments of the capital markets and make possible to significantly reinforce its commitments and efforts in relation to sustainability. In fact, this is an important tool to further integrate ESG matters within the Bank’s commercial offer of financial products and services, envisaging the financing of a more sustainable society as a whole. The Framework allows Millennium bcp to issue Green, Social and/or Sustainability Bonds under different instruments (from Additional Tier I to senior preferred debt, also including covered bonds and asset-backed notes).

The Framework follows market’s best practices and was validated through a Second-Party Opinion (“SPO”), issued by Sustainalytics, B.V.. According to the SPO, the Framework is robust and able to make a positive impact and follows the ICMA Principles.

As a result, the defined eligibility criteria and the expected impacts that should lead to important and positive environmental and social effects, within the scope of the various sustainable development objectives pursued by the United Nations, namely the SDG 2, 3, 4, 6, 7, 8, 9, 10, 11 and 12.



As part of the Framework update, Millennium bcp undertakes to publicly disclose, on an annual basis, until maturity of the exposures financed by the funds resulting from each ESG Bonds issuance:

- An Allocation Report that specifies:
  - o How funds raised through ESG Bond issuances were applied;
  - o Show the total amount of ESG Bonds issued;
  - o Show the amount of proceeds allocated to each portfolio by eligible category;
  - o Total amount of unallocated proceeds;
  - o The percentage of proceeds aligned with the Substantial Contribution Criteria of the European Taxonomy;

<sup>18</sup> ICMA’s <https://www.icmagroup.org/green-social-and-sustainability-bonds/>

- Any other information that the Bank considers relevant.  
In relation to this report, an external verification of the allocation process will be carried out, in order to validate compliance with the principles established in the Framework;
- The Impact Report should specify and quantify the environmental and/or social benefits of the ESG Bonds. The Report must include, subject to the availability of information, an estimate of results and impact indicators, as provided for in the Framework.

The proceeds of any ESG Bonds issued by Millennium bcp will be allocated exclusively to the Eligible Assets, in accordance with the Framework, defined in the list of Eligible Green or Social Categories, aligned to the ICMA Principles.

## 2. Millennium bcp - Inaugural ESG Bond Issuance

### 2.1. Transaction's features

In October 2021, Millennium bcp carried out its inaugural issue of ESG Bonds, through the issuance of senior preferred bonds with Social label, which was the first transaction, exclusively of this category, executed by a Portuguese bank. Below are listed its main features:

<b>Issuer:</b>	Banco Comercial Português, S.A.
<b>ISIN:</b>	PTBCPEOM0069
<b>Issue Ratings (31 dezembro 2023):</b>	Baa2 (Moody's) BBB- (Fitch) /BBB (DBRS)
<b>Amount:</b>	€ 500M
<b>Issue Date:</b>	7 October 2021
<b>Maturity Date:</b>	7 April 2028
<b>Call Option Date:</b>	7 April 2027 subject to the prior approval of the Relevant Authority
<b>Coupon:</b>	1,75% p.a., until Call Option Date, then E3m Euribor + 2,00%
<b>Use of Proceeds:</b>	An amount equivalent to the net proceeds of the Notes was used to refinance Eligible Social Assets as defined in the Framework.

For the future, and subject to prevailing market conditions, the Bank intends to continue to integrate the issuance of ESG Bonds into its Funding Plan in the capital market, namely with regard to the issuance of Senior Preferred debt.

### 2.2. Use of Proceeds

The Bank issues an annual report on the use of proceeds the ESG Bonds issued.

#### 2.2.1 Allocation Report

During the pandemic crisis, the Bank developed several initiatives with emphasis to:



- a €4,7B in support lines to families and businesses;
- maintaining full activity even during lockdowns;
- providing essential financial services, while ensuring safety of its Employees and Clients;
- support measures to Portugal's public health system;
- food aid and safety supplies to institutions;
- anticipation of invoice payment to suppliers; and
- joining national initiative to support culture.

Millennium bcp fully allocated the proceeds from its inaugural issue of ESG Social Bonds, in the amount of €500M, to refinance part -higher than the amount issued, in order to accommodate the natural and early amortizations of the Bonds - of its portfolio of loans granted, and partially guaranteed by the State, to support the economy during the pandemic Covid-19 ("Covid-19 Lines").

As of December 31, 2023, the portfolio consists of a total outstanding of around €904M and an average maturity of 2.4 years<sup>19</sup>.

In the selection process, sectors such as nuclear, mining, alcohol, tobacco, gambling and those dedicated to fossil fuels were excluded.

ESG Bond Issuance	ISIN	Amount
6,5nc5.5 Social Senior Preferred Notes	PTBCPEOM0069	500.000.000 €
<b>Total ESG Bonds Issued</b>		<b>500.000.000 €</b>

Eligible Social Category	31 dec 2023	
<b>COVID-19 RECOVERY</b>	<b>Number of Loans</b>	12.942
Supported SDGs	<b>Amount of Refinanced Loans</b>	903.899.100 €
 <b>3</b> GOOD HEALTH AND WELL-BEING	<b>Average Amount</b>	69.842 €
 <b>8</b> DECENT WORK AND ECONOMIC GROWTH	<b>Average Maturity</b>	2,4
<b>Total Amount of Refinanced Loans</b>		<b>903.899.100 €</b>

Allocation	Amount
<b>Total Social Bonds Allocated</b>	<b>500.000.000 €</b>
<b>Total Unallocated Bonds Amount</b>	<b>0 €</b>

<sup>19</sup> Average Maturity is calculated as the remaining term to maturity, weighted by the outstanding amount of the loan.

## 2.2.2 External Verification of the Allocation Report



### **Independent Limited Assurance Report**

*(Free translation from the original in Portuguese. In the event of discrepancies, the Portuguese language version prevails)*

To the Board of Directors

#### **Introduction**

We were engaged by the Board of Directors of Banco Comercial Português, S.A. ("Millennium bcp" or "Bank") to perform a limited assurance engagement on the information identified below in the section "Responsibilities of the auditor", regarding the allocation of the funds resulting from the ESG bonds issuance in the year ended on the 31<sup>st</sup> of December 2023, included in the Report "Social Bonds Report - Allocation and Impact Report" ("Allocation and Impact Report"), which is part of the 2023 Sustainability Report, prepared by the Bank for the purpose of disclosing the investments made within the scope of ESG bonds, issued by Millennium bcp.

#### **Responsibilities of the Board of Directors**

It is the responsibility of the Board of Directors to prepare the information regarding the allocation of the funds resulting from the ESG bonds issuance, identified below in the section "Responsibilities of the auditor", disclosed in the Allocation and Impact Report according to the guidelines for annual reporting defined by the Bank in the Green, Social and Sustainability Bond Framework ("ESG Framework"), and the selection of the funding projects according to the categories defined in the ESG Framework and with the instructions and criteria disclosed in the Allocation and Impact Report, as well as the maintenance of an appropriate system of internal control to enable the adequately preparation of the mentioned information.

#### **Responsibilities of the auditor**

Our responsibility is to issue a limited assurance report, which is professional and independent, based on the procedures performed and specified in the paragraph below.

Our work was conducted in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised) "Assurance engagements other than audits or reviews of historical financial information", issued by the *International Auditing and Assurance Standards Board of the International Federation of Accountants* and we have fulfilled other technical standards and recommendations issued by the Institute of Statutory Auditors. These standards require that we plan and perform our work to obtain limited assurance about whether the information regarding the allocation of the funds resulting from the ESG bonds issuance (only the component indicated in chapter 2.2.1 "Allocation Report" of the Allocation and Impact Report) is free from material misstatement and whether the funding allocation criteria defined in the ESG Framework were applied.

For this purpose the above mentioned work included:

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#### **PricewaterhouseCoopers & Associados – Sociedade de Revisores Oficiais de Contas, Lda.**

Sede: Palácio Sottomayor, Rua Sousa Martins, 1 - 3<sup>a</sup>, 1069-316 Lisboa, Portugal  
 Receção: Palácio Sottomayor, Avenida Fontes Pereira de Melo, nº16, 1050-121 Lisboa, Portugal  
 Tel: +351 213 599 000, Fax: +351 213 599 999, www.pwc.pt  
 Matriculada na CRC sob o NIPC 506 628 752, Capital Social Euros 314.000  
 Insrita na lista das Sociedades de Revisores Oficiais de Contas sob o nº 183 e na CMVM sob o nº 20161485

PricewaterhouseCoopers & Associados – Sociedade de Revisores Oficiais de Contas, Lda. pertence à rede de entidades que são membros da PricewaterhouseCoopers International Limited, cada uma das quais é uma entidade legal autónoma e independente.

- (i) Meeting with the Management and employees of the various Bank departments involved in the preparation of the Allocation Report, in order to understand the characteristics of the financing projects considered, the internal management procedures and systems in force, the data/information collection process and the established control environment;
- (ii) Verify the application of certain eligibility criteria for the financing projects described in the ESG Framework, regarding the Eligible Green and Social Categories, specifically, the NACE code activity and its classification as SMEs;
- (iii) Analyze the procedures, criteria and systems used to obtain the information and data presented in the Allocation Report;
- (iv) Carry out, on a random sample basis, substantive tests with the goal of verifying the information related to the indicators included in the Allocation Report and its compliance with the criteria defined in the ESG Framework. Verify also that the indicators were properly compiled from data provided based on Millennium bcp information sources; and
- (v) Verify that the disclosed information complies with the reporting requirements established in the ESG Framework.

The procedures performed were more limited than those used in an engagement to obtain reasonable assurance and, therefore, less assurance was obtained than in a reasonable assurance engagement.

We believe that the procedures performed provide an acceptable basis for our conclusion.

#### **Quality control and independence**

We apply the International Standard on Quality Management Standard 1 (ISQM 1), which requires that we design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA Code) and of the ethics code of the Institute of Statutory Auditors.

#### **Conclusion**

Based on the work performed, nothing has come to our attention that causes us to believe that the information regarding the allocation of the funds resulting from the ESG bonds issuance for the year ended on the 31<sup>st</sup> of December 2023, in the Allocation Report component of the Allocation and Impact Report, integrated in Millennium bcp's 2023 Sustainability Report was not prepared, in all material respects, in accordance with the guidelines for annual reporting defined by the Bank in the ESG Framework and, the selection of financing projects, in accordance with the categories defined in the ESG Framework and with the instructions and criteria disclosed in the Allocation and Impact Report.

**Restriction on use**

This report is issued solely for information and use of the Board of Directors of Millennium bcp for the purpose of communicating the information regarding the allocation of the funds resulting from the ESG bonds issuance by the Bank, in the Allocation and Impact Report, integrated in the 2023 Sustainability Report of Millennium bcp, and should not be used for any other purpose. We will not assume any responsibility to third parties other than Millennium bcp for our work and the conclusions expressed in this report, which will be attached to the Allocation and Impact Report.

March 25, 2024

PricewaterhouseCoopers & Associados  
- Sociedade de Revisores Oficiais de Contas, Lda.  
Represented by:

António Joaquim Brochado Correia, ROC nº 1076  
Registered with the Portuguese Securities Market Commission under nº 20160688

**(This is a translation, not to be signed)**



## 2.3 Impact

Annually, in accordance with the Framework, BCP issues a report on the environmental and/or social benefits of assets financed or refinanced by the issuance of ESG Bonds. Subject to data availability, this report should provide an aggregate estimate of impacts through the indicators defined in the Framework.

### 2.3.1 Impact Report

- **€904 mio** of financing under “Covid-19 lines”.
- More than **12.800 companies** supported.
- Over **215.000 jobs** impacted<sup>20</sup>.

As of December 31, 2023, the portfolio allocated to the issuance of ESG-Social Bonds includes a very diversified base of more than 12.800 Millennium bcp customers affected by the pandemic crisis, mostly micro and small and medium-sized companies. There is a natural concentration in the Lisbon and Porto regions and in the manufacturing and wholesale and retail trade sectors.

We conclude that this financial support was crucial for the Portuguese economy and for the business sector, since, in a difficult time, it contributed decisively to the beneficiary companies having the liquidity to maintain their activity, consequently preserving jobs.

Eligible Social Category	Reference Date 31 dec 2023
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#### COVID-19 RECOVERY

**Volume of Loans Granted** 500.000.000 €

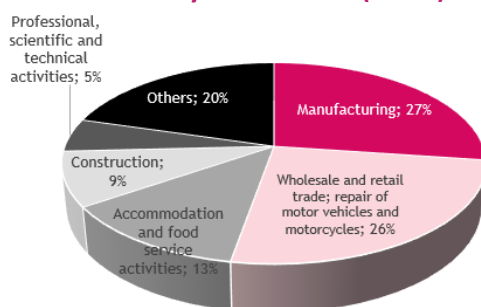
Supported SDGs



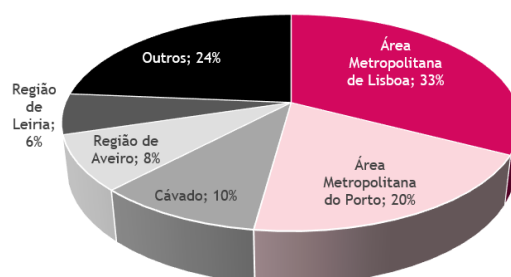
**Number of Clients Supported** 12.860

**Number of Jobs Impacted** 215.207

#### Industry Distribution (NACE)



#### Geographic Distribution (Nuts III)



<sup>20</sup> Number of jobs corresponds to the number of workers reported by each client. For those few cases where there was no information reported, it was assumed to be 1.

# Sustainability Indexes

## Recognition - Sustainability Indexes

Material issue:

BANK'S REPUTATION

In 2023, the BCP Group was listed in several Sustainability indexes.

In order to promote transparency in the communication with our *Stakeholders*, monitor the evolution of the Sustainability performance, identifying opportunities for improvement, and communicate the evaluation carried out by recognised external entities, we respond to various specialised indices.

As a result of the evaluation carried out by the analyst Standard Ethics, Brupo BCP is part of the "European Banks Index", having also been part of the "Europe's Climate Leaders 2023" ranking of the Financial Times and Statista, in Portugal and Poland, as one of the European companies with the greatest progress in reducing GHG emissions. It is also part, among the 26 "STOXX Indices" of which it is a member, the "EURO STOXX Banks ESG-X", the "STOXX Europe 600 Banks ESG-X", the "EURO STOXX Total Market ESG-X" and the "STOXX Developed Markets Total Market ESG-X".

In Portugal, in 2023, Global Finance magazine once again distinguished Millennium bcp as the "Best Bank for Sustainable Finance".

In its most recent assessments, the analyst Sustainalytics assigns a score of 19.7 (Low Risk) to BCP Group's ESG performance, ISS a rating of "C-", while MCSI rates it with a rating of "A" and S&P's CSA with a rating of 56%, which corresponds to a percentile of 89 in the financial/peer group sector. Ethifinance (formerly Gaia Rating) gives it a rating of 70%, LSEG (formerly Refinitiv) 74% and Vigeo Eiris an overall rating of 46% (which reaches 88% in assessing the quality and scope of reporting practices).

In Poland, Bank Millennium was once again included in the Warsaw Stock Exchange's "WIG-ESG" index, in recognition of its work in the environmental, social, economic and corporate governance dimensions.

In the 2023 edition of the CDP - Carbon Disclosure Project, the BCP Group remained, as in 2021 and 2022, in the "Management" band, with a "B" rating, after having been in the "Leadership" band in 2020 and obtained an "A-" rating.

The BCP Group is also for CDP, based on the "Supplier Engagement Rating" (SER), in this case in the 2022 edition, one of the leaders in involvement with Suppliers in Sustainability matters, having integrated, in 2023, the "Supplier Engagement Rating Leaderboard" ranking. This distinction highlights the companies that have made the most progress in engaging their supply chain.

BCP Group, in 2023, was included for the fourth consecutive time in the Bloomberg Gender-Equality Index, reaching its best global score to date with a *score* of 85.34%, above the 80.76% in 2022, 78.11% in 2021 and 77.79% in 2020, remaining in the group of companies that worldwide stand out in the implementation of gender equality, diversity and inclusion practices and policies.

Index/analyst	2023		2022
MSCI (*)	A	=	A
CSA S&P (formerly DJSI)	56%	↓	62%
Carbon Disclosure Project (Climate)	B	=	B
Carbon Disclosure Project (SER)	B	↓	A
Bloomberg Gender-Equality Index	85.3%	↑	80.7%
Vigeo Eiris	46% (88% disclosure)	=	46% (88% disclosure)
Ethifinance (formerly Gaia Rating)	70%	=	70%
LSEG (formerly Refinitiv)	74%	↓	78%
Sustainalytics	19.7	↑	21.6
ISS ESG	C-	↑	D+



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# Methodological Notes

## Environmental Indicators

### GRI 301-1

The figures presented in 2023 include the operations in Portugal, Poland and Mozambique.

- Consumption of paper and cardboard – Total estimated based on the purchase of these materials and numbers in stock records. The weight of the paper units was found using standard paper measurements issued by the ISO 216 standard.
- Plastic consumption - Total estimated based on the purchase of these materials and numbers in stock records. The calculation of the amount of plastic used in bank cards was based on the number of cards issued for Customers and on the standard weight of a card.
- Consumption of ink and toner cartridges – Total estimated based on the purchase of these materials. In Portugal, the values reported include ink and toner cartridges used by the Bank through Xerox.

### GRI 302-1

The figures presented in 2023 include the operations in Portugal, Poland and Mozambique.

- Consumption of natural gas and liquid fuels – Total estimated based on the purchase of these fuels. The LHV (Lower Heating Value) of the fuels used to compute energy is based on the Global Reporting Initiative, available at [www.globalreporting.org](http://www.globalreporting.org), and APA (Portuguese agency for the environment), available at [www.apambiente.pt](http://www.apambiente.pt).
- Consumption of electricity – Total estimated based on the electricity bills.

The conversion factors used were the following:

Energy - Fuel (source: GRI)		
	Lower Heating Value (LHV)	Density
Natural Gas	0.048 GJ/m <sup>3</sup>	-
LPG	47.30 GJ/ton	0.520 ton/m <sup>3</sup>
Diesel	43.00 GJ/ton	0.840 ton/m <sup>3</sup>
Petrol	44.30 GJ/ton	0.750 ton/m <sup>3</sup>
Litres - M <sup>3</sup>	1000 Litre = 1m <sup>3</sup>	-
Litres - TJ	(litres/1000)*43.00*0.840	Diesel
Litres - TJ	(litres/1000)*44.30*0.745	Petrol
Litres - TJ	(litres/1000*47.30*0.520	LPG
M <sup>3</sup> -Tj	((m <sup>3</sup> )*0.048)/1000	Natural Gas
Electricity		
<b>1 kWh</b>	3.60 MJ/kWh	

### GRI 303-3

The figures presented include the operations in Portugal, Poland and Mozambique. The total withdrawal of water in Portugal is calculated based on the assessment of the costs with water, using to estimate the water consumption in m<sup>3</sup> the pre-defined average cost per unit of 4.93€/m<sup>3</sup>, updated in 2023 to 5.08€/m<sup>3</sup>.

**GRI 305-1 to 305-3**

The figures presented include the operations in Portugal, Poland and Mozambique. The emission factors used were the following:

	Fator – 2020	Fator – 2021	Fator – 2022	Fator – 2023
<b>Portugal</b>				
Energy and Total Heat - Without disaggregation (CO <sub>2</sub> / kWh)	0.19237 kgCO <sub>2</sub> /kWh Source: Total – EDP Comercial	0.00000 kgCO <sub>2</sub> /kWh Source: Total – EDP Comercial	0.00000 kgCO <sub>2</sub> /kWh Source: Total – EDP Comercial	0.0000 kgCO <sub>2</sub> /kWh Source: Total – EDP Comercial
Location-based	-	-	0.137 kgCO <sub>2</sub> /kWh Source: <a href="#">APREN</a>	0.137 kgCO <sub>2</sub> /kWh Source: <a href="#">APREN</a>
<b>Poland</b>				
Heat (CO <sub>2</sub> / kWh)	0.6402 kgCO <sub>2</sub> /kwh	0.6402 kgCO <sub>2</sub> /kwh	0.6402 kgCO <sub>2</sub> /kwh	0.6402 kgCO <sub>2</sub> /kwh
<b>Mozambique</b>				
Energy and Total Heat - Without disaggregation (CO <sub>2</sub> / kWh)	-	-	-	0.096 kgCO <sub>2</sub> / kWh Source: ADEME
Location-based:	-	-	-	0.096 KgCO <sub>2</sub> / kW Source: ADEME

For more information on the emission factors used to calculate emissions associated with Polish operations, see the [ESG report of Bank Millennium and the Bank Millennium Group for 2023](#).

Emission factors - Fuel (source: [GHG Protocol](#))

<b>Petrol</b>	CO <sub>2</sub>	69310.6 Kg/TJ
	CH <sub>4</sub>	25.0 Kg/TJ
	N <sub>2</sub> O	8.0 Kg/TJ
<b>Diesel</b>	CO <sub>2</sub>	74110.6 Kg/TJ
	CH <sub>4</sub>	3.9 Kg/TJ
	N <sub>2</sub> O	3.9 Kg/TJ
<b>LPG</b>	CO <sub>2</sub>	63105.1 Kg/TJ
	CH <sub>4</sub>	62.0 Kg/TJ
	N <sub>2</sub> O	0.2 Kg/TJ
<b>Natural Gas</b>	CO <sub>2</sub>	56105.1 Kg/TJ
	CH <sub>4</sub>	1.2 Kg/TJ
	N <sub>2</sub> O	2.3 Kg/TJ

**Emission Factors – Travels**

Emission Source	Unit	Source	Emission Factor 2022 CO <sub>2</sub> e	Emission Factor 2022 CO <sub>2</sub> ; AR4=AR5	Emission Factor 2022 CH <sub>4</sub> ; AR5	Emission Factor 2022 N <sub>2</sub> O; AR5
WTT Petrol	L	DEFRA 2022, Folha WTT - Fuels -> Liquid Fuels -> Petrol (average biofuel blend)	0.61328	0.61328	-	-
WTT Diesel	L	DEFRA 2022, Folha WTT - Fuels -> Liquid Fuels -> Diesel (average biofuel blend)	0.60986	0.60986	-	-
WTT LPG	L	DEFRA 2022, Folha WTT - Fuels -> Gaseous Fuels -> LPG	0.18383	0.18383	-	-
Bus travel	passenger.km	DEFRA 2022, Folha Business travel-land -> Bus -> Coach	0.027271401	0.02678	0.000011200	0.000480201
Taxi travel	km	DEFRA 2022, Folha Business travel-land -> Taxi -> Regular Taxi (km)	0.208056449	0.20638	0.000004637	0.001671812
Air travel	passenger.km	DEFRA 2022, Folha Business travel-air -> International -> Average Passenger -> With RF	0.183520428	0.1827	0.000011200	0.000809228
Rail travel	passenger.km	DEFRA 2022, Folha Business travel-land -> Rail -> National Rail	0.035462964	0.0351	0.000078400	0.000284564
Private car	km	DEFRA 2022, Folha Business travel-land -> Car -> Average Car -> unknown	0.170568588	0.1694	0.000190400	0.000978188

## Emissions – Suppliers

In comparison to the previous year, there was a substantial improvement in the quality of data regarding suppliers' emissions. Not only is the scope of suppliers significantly expanded (around 15% of the billing to the bank) for which reported emissions data were retrieved, but also, in estimated emissions, the sources of information provide more accurate data, and are less reliant on sectoral estimates.

Two approaches were developed to assess BCP's Scope 3 emissions: i) supplier-specific; and ii) spend-based. The former was established as the preferred approach, whereas the latter was only taken into consideration when not enough data was available to apply the first one. Both methodologies are briefly described below.

The supplier-specific approach covers close to 80% of the billing to the bank, and almost half of the suppliers, while the spend-based approach, the most conservative one, accounts for the remaining 20% of the billing to the bank.

### Supplier-specific

Supplier's emissions imputed to the Bank (upstream scope 3 emissions) were calculated taking into consideration the suppliers' reported or estimated emissions (scope 1, 2 and 3) along with the billing to the Bank (VAT, measured in €), and the suppliers' total production (revenues in €). Real emissions (i.e., emissions in companies' own reports) were used when available. Otherwise, emissions were estimated using Moody's data sources. For each Bank's supplier (i), the imputed emissions to the Bank are calculated as follows:

$$\text{Upstream scope 3 Emissions} = (\text{Scope } 1_i + \text{Scope } 2_i + \text{Scope } 3_i) \times \frac{\text{Billing to the Bank}}{\text{Total Revenues}_i}$$

### Spend-based

Whenever data was not available to apply the supplier-specific approach, the spend-based method was used.

For this method, ADEME sectoral emissions factors, attributed to each supplier according to its activity sector, along with the billing to the Bank were considered. For each Bank's supplier (i), the imputed emissions to the Bank are calculated as follows:

$$\text{Upstream scope 3 Emissions} = \text{Billing to the Bank} \times \text{Sectoral emission factor}_i$$



# External Auditor's Report



### **Independent Limited Assurance Report**

*(Free translation from the original in Portuguese. In the event of discrepancies, the Portuguese language version prevails)*

To the Board of Directors

#### **Introduction**

We were engaged by the Board of Directors of Banco Comercial Português, S.A. ("Millennium bcp" or "Company") to perform a limited assurance engagement on the sustainability information identified below in the section "Responsibility of the auditor", included in the Sustainability Report 2023, for the year ended in December 31, 2023, prepared by the Company for the purpose of communicating its annual sustainability performance.

#### **Responsibilities of the Board of Directors**

It is the responsibility of the Board of Directors to prepare the sustainability information identified below in the section "Responsibility of the auditor", included in the Sustainability Report 2023, in accordance with the sustainability reporting guidelines "Global Reporting Initiative" ("GRI"), GRI Standards version, and with the instructions and criteria disclosed in the Sustainability Report 2023, as well as for the maintenance of an appropriate internal control system that enables the adequately preparation of the mentioned information.

#### **Responsibilities of the auditor**

Our responsibility is to issue a limited assurance report, which is professional and independent, based on the procedures performed and specified in the paragraph below.

Our work was conducted in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised) "Assurance engagements other than audits or reviews of historical financial information", issued by the *International Auditing and Assurance Standards Board of the International Federation of Accountants* and we have fulfilled other technical standards and recommendations issued by the Institute of Statutory Auditors. These standards require that we plan and perform our work to obtain limited assurance about whether the sustainability information (GRI Standards indicators), included in the Sustainability Report 2023, is free from material misstatement.

Our limited assurance engagement also consisted in carrying out procedures with the objective of obtaining a limited level of assurance as to whether the Company applied, in the sustainability information included in the Sustainability Report 2023, the GRI Standards guidelines.

For this purpose the above mentioned work included:

- (i) Inquiries to management and senior officials responsible for areas under analysis, with the purpose of understanding how the information system is structured and their awareness of issues included in the report;

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**PricewaterhouseCoopers & Associados – Sociedade de Revisores Oficiais de Contas, Lda.**

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 Recepção: Palácio Sottomayor, Avenida Fontes Pereira de Melo, nº16, 1050-121 Lisboa, Portugal

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Matriculada na CRC sob o NIPC 506 628 752, Capital Social Euros 314.000

Inscrita na lista das Sociedades de Revisores Oficiais de Contas sob o nº 183 e na CMVM sob o nº 20161485

PricewaterhouseCoopers & Associados – Sociedade de Revisores Oficiais de Contas, Lda. pertence à rede de entidades que são membros de PricewaterhouseCoopers International Limited, cada uma das quais é uma entidade legal autónoma e independente.

- (ii) Identification of the existence of internal management procedures leading to the implementation of economic, environmental and social policies;
- (iii) Testing, on a sampling basis, the efficiency of processes and systems in place for collection, consolidation, validation and reporting of the performance information previously mentioned, through calculations and validation of reported data;
- (iv) Confirmation that operational units follow the instructions on collection, consolidation, validation and reporting of performance information;
- (v) Execution of substantive procedures, on a sampling basis, in order to collect evidence of the reported information;
- (vi) Comparison of financial and economic data included in the sustainability information with the audited by the external auditor, in the scope of the legal review of Company's financial statements for the year ended in December 31, 2023;
- (vii) Verification that the sustainability information included in the Report complies with the requirements of GRI Guidelines, GRI Standards version.

The procedures performed were more limited than those used in an engagement to obtain reasonable assurance and, therefore, less assurance was obtained than in a reasonable assurance engagement.

We believe that the procedures performed provide an acceptable basis for our conclusion.

#### **Quality control and independence**

We apply the International Standard on Quality Management 1 (ISQM1), which requires that we design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We have complied with the independence and other ethical requirements of the *International Code of Ethics for Professional Accountants* (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA Code) and of the ethics code of the Institute of Statutory Auditors.

#### **Conclusion**

Based on the work performed, nothing has come to our attention that causes us to believe that the sustainability information identified above in the section "Responsibility of the auditor", included in the Sustainability Report 2023, for the year ended in December 31, 2023, was not prepared, in all material respects, in accordance with GRI Standards requirements and with the instructions and criteria disclosed in the Report and that Millennium bcp has not applied, in the sustainability information included in the Sustainability Report 2023, the GRI Standards guidelines.

**Restriction on use**

This report is issued solely for information and use of the Board of Directors of the Company for the purpose of communicating the sustainability information in the Sustainability Report 2023 and should not be used for any other purpose. We will not assume any responsibility to third parties other than Millennium bcp by our work and the conclusions expressed in this report, which will be attached to the Company's Sustainability Report 2023.

March 25, 2024

PricewaterhouseCoopers & Associados  
- Sociedade de Revisores Oficiais de Contas, Lda.  
Represented by:

António Joaquim Brochado Correia, ROC nº 1076  
Registered with the Portuguese Securities Market Commission under nº 20160688

**(This is a translation, not to be signed)**

# Annexes

# GRI table - Global Reporting Initiative

Information sources:  
AR – 2023 Annual Report  
SR – 2023 Sustainability Report

<b>Declaration of use</b>	Banco Comercial Português S.A. reported in accordance with the GRI Standards for the period from 1 January 2023 to 31 December 2023.
<b>GRI 1 used</b>	GRI 1: Foundation 2021
<b>Applicable sector standard</b>	At the Report’s publication date no sector standard applicable to the Bank was available.

## General standard contents

**Note:** Whenever requirements from the indicators are omitted this is indicated in the table in the column 'Content, page or link'.

GRI STANDARDS		Content, page or link	UNGC Principles
<b>ORGANISATION AND REPORTING PRACTICES</b>			
2-1	Organization details	SR 23   Economic and Governance Responsibility SR 23   Terms and Conditions	
2-2	Entities included in the organization's sustainability report	AR23   Regulatory information > Consolidated financial statements	
2-3	Reporting period, frequency and contact point	SR 23   Introduction > Sustainability Report SR 23   Terms and Conditions	
2-4	Reformulations of information	SR 23   Introduction > Sustainability Report	
2-5	External Verification	SR 23   External Auditors’ Report Corporate Governance Report > Section V - External Auditor	
<b>ACTIVITIES AND WORKERS</b>			
2-6	Activities, value chain and other business relationships	SR 23   Summary of Indicators SR 23   Economic and Governance Accountability > Products and Services SR 23   Economic and Governance Accountability > Suppliers SR 23   Introduction > Sustainability Report SR 23   Methodology Note	
2-7	Employees	SR 23   Summary of Indicators SR 23   Economic Responsibility and of Governance > Employees	
2-8	Workers who are not employees	In 2023, the Group employed 2,943 outsourced workers and trainees.	
<b>GOVERNANCE</b>			
2-9	Governance structure and its composition	Governance structure and its composition > Section II - Part B. Corporate bodies and Committees	
2-10	Appointment and selection for the highest governance body	Corporate Governance Report > Item 16 and 17.1	
2-11	Chairperson of the highest governance body	Corporate Governance Report > Items 4 and 5 and Item 17	
2-12	Role played by the highest governance body	Corporate Governance Report > Items 15, 17, 18 and 21-Board of Directors	

GRI STANDARDS	Content, page or link	UNGC Principles
2-13 Delegation of impact responsibility	<p>The management of impacts in sustainability is carried out by the Executive Committee within the scope of the Bank's day-to-day management. Its monitoring is carried out by the Committee for Corporate Governance, Ethics and Sustainability and by the Committee for Risk Assessment, in the area of monitoring climate and environmental risk management.</p> <p>With the objective of promoting a better articulation of current management decisions, involving the top management of the units integrated in each of the Business Areas, regarding Sustainability issues, the Executive Committee appointed a Sustainability Commission whose mission is to define and monitor initiatives that will ensure the execution of the Sustainability Master Plan (SMP), in its strategic axes (<i>Environmental, Social and Governance</i>), in accordance with the guidelines of the Plan approved by Board of Directors. This Commission needs a minimum quorum for decision of at least two executive directors.</p>	
2-14 Role played by the highest governance body in Sustainability Reporting	SR 23   Introduction > Governance Model	
2-15 Conflicts of interest	<p>The Bank has a Code of Conduct of the BCP Group that imperatively establishes that the members of the management and supervisory bodies, as well as the employees, must avoid any situation susceptible of giving rise to conflicts of interest with their functions, so that they can act with full independence of mind, impartiality and exemption and that the members of the management and supervisory bodies cannot intervene in the appreciation and decision of operations, or contracts for the acquisition or provision of services related with companies or persons in relation to which there is the risk of occurrence of conflicts of interest.</p> <p>Additionally, the Bank also has a Policy for the Prevention and Management of Conflicts of Interest (Group Code GR0038), which defines the fundamental principles and processes adopted for the identification and management of conflicts of interest occurring within the Group. GR0038 also formalises the governance principles applicable to the provision of investment and ancillary services and activities identified.</p> <p>The Bank's Articles of Association establish that the Board of Directors appoints a specialised Committee, called the Committee for Corporate Governance, Ethics and Sustainability, to which it attributes, among others, the power to assess the systems for identification and resolution of conflicts of interests. The Audit Committee also has powers related to the management of conflicts of interest, within the scope of which it issues a prior opinion to the Board of Directors on the evaluation of transactions with related parties, validating that they are carried out under market conditions and ensuring that there are no conflicts of interest. The Regulation of the Board of Directors states in article 6 that directors, while in the exercise of their functions, have the duty to avoid situations that may give rise to conflicts of interest.</p>	
2-16 Communication of critical concerns	<p>III. Economic and Governance Responsibility &gt; Ethics and Professional Conduct</p> <p>Critical concerns are reported to the Committee for Corporate Governance, Ethics and Sustainability, which has the powers delegated to it by the Board of Directors (as presented in the item 27 c) of the Corporate Governance Report).</p>	
2-17 Collective knowledge of the highest governance body	SR 23   Introduction > Governance Model	
2-18 Performance assessment of the highest governance body	Corporate Governance Report	
2-19 Remuneration Policies	Corporate Governance Report > Section III - Part D. Remunerations	
2-20 Process for determining remuneration	Corporate Governance Report > Section III - Part D. Remunerations	
2-21 Annual total remuneration ratio	<p>Portugal:</p> <p>The net annual total remuneration ratio recorded in 2023 was 21.</p> <p>The ratio between the percentage increase in the net annual total remuneration of the highest paid individual in the organisation and the median of the percentage increase in the total annual net remuneration of all employees (excluding the highest paid) recorded was 4.94.</p> <p>Notes: (i) The ratios presented above were calculated based on the fixed and variable amounts paid, net of taxes and mandatory contributions applicable, to the organization's</p>	

GRI STANDARDS	Content, page or link	UNGC Principles												
	<p>highest paid individual and to all employees of the organization; (ii) the total annual remuneration of the organization's highest paid individual does not include amounts not attributable to the 2023 financial year.</p> <p>Poland: The annual total remuneration ratio recorded in 2023 was 40. The ratio between the percentage increase in the annual total remuneration of the highest paid individual in the organisation and the median of the percentage increase in the annual total remuneration of all employees (excluding the highest paid individual) recorded was 1.42.</p> <p>Mozambique: The annual total remuneration ratio recorded in 2023 was 66. The ratio between the percentage increase in the annual total remuneration of the highest paid individual in the organisation and the average percentage increase in the annual total remuneration of all employees (excluding the highest paid individual) recorded was 2.32.</p>													
<b>STRATEGY, POLICIES AND PRACTICES</b>														
2-22	Declaration on sustainable development strategy SR 23   Joint Message from the Chairman of the Board of Directors and the Chairman of the Executive Committee													
2-23	Policies SR 23   Introduction > Governance Model Information regarding Policies and Commitments is available on the corporate website <a href="https://ind.millenniumbcp.pt/en/Institucional/governacao/Pages/normas_regulamentos.aspx">https://ind.millenniumbcp.pt/en/Institucional/governacao/Pages/normas_regulamentos.aspx</a>													
2-24	Incorporation of Policies Information regarding Policies and Commitments and how these are incorporated in the Bank is available on the corporate website: : <a href="https://ind.millenniumbcp.pt/en/Institucional/governacao/Pages/normas_regulamentos.aspx">https://ind.millenniumbcp.pt/en/Institucional/governacao/Pages/normas_regulamentos.aspx</a>													
2-25	Processes to remedy negative impacts SR 23   Introduction > ESG Risk Management													
2-26	Mechanisms for advice and raising concerns SR 23   Introduction > Ethics and Professional Conduct													
2-27	Compliance with laws and regulations <table border="1" data-bbox="528 1272 1206 1603"> <tr> <td>Total no. of significant cases of non-compliance with laws and regulations</td> <td>10</td> </tr> <tr> <td>No. of significant cases of non-compliance with laws and regulations for which fines were applied</td> <td>1</td> </tr> <tr> <td>No. of significant cases of non-compliance with laws and regulations in which non-monetary sanctions were applied</td> <td>10</td> </tr> <tr> <td>Monetary value of fines imposed in significant cases of non-compliance with laws and regulations</td> <td>538,500</td> </tr> <tr> <td>Monetary value of fines that occurred in the reporting period</td> <td>538,500</td> </tr> <tr> <td>Monetary value of fines that were paid in the reporting period</td> <td>0</td> </tr> </table>	Total no. of significant cases of non-compliance with laws and regulations	10	No. of significant cases of non-compliance with laws and regulations for which fines were applied	1	No. of significant cases of non-compliance with laws and regulations in which non-monetary sanctions were applied	10	Monetary value of fines imposed in significant cases of non-compliance with laws and regulations	538,500	Monetary value of fines that occurred in the reporting period	538,500	Monetary value of fines that were paid in the reporting period	0	
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Monetary value of fines that occurred in the reporting period	538,500													
Monetary value of fines that were paid in the reporting period	0													
2-28	Participation in Associations Information on the Associations to which the Bank belongs is available on the corporate website: <a href="https://ind.millenniumbcp.pt/en/Institucional/sustentabilidade/Pages/comunid_externa.aspx">https://ind.millenniumbcp.pt/en/Institucional/sustentabilidade/Pages/comunid_externa.aspx</a>													
<b>STAKEHOLDER ENGAGEMENT</b>														
2-29	Stakeholder engagement approach <a href="https://www.millenniumbcp.pt/en">https://www.millenniumbcp.pt/en</a> Institutional > Sustainability > Stakeholders management Approach to Sustainability   Relation with Stakeholders													
2-30	Collective negotiation agreements SR 23   Summary of Indicators													
<b>MATERIAL ISSUES</b>														
3-1	Process of defining material issues SR 23   Approach to Sustainability   Relation with Stakeholders > Stakeholders Involvement and materiality Analysis													



GRI STANDARDS	Content, page or link	UNGC Principles
3-2	List of material issues SR 23   Approach to Sustainability   Relation with Stakeholders > Stakeholders Involvement and materiality Analysis	
3-3	Management of material issues: Cybersecurity, privacy and information protection SR 23   Economic and Governance Accountability > Information Security SR 23   Economic Responsibility and of Governance > Protection and security, privacy of data	
3-3	Management of material issues: Innovation and digitalisation SR 23   Economic and Governance Accountability > Innovation	
3-3	Management of material issues: Ethics, conduct and compliance SR 23   Economic and Governance Responsibility > Ethics and Professional Conduct	
3-3	Management of material issues: Prevention of corruption and money laundering SR 23   Economic Responsibility and of Governance > Ethics and Professional Conduct	
3-3	Management of material issues: Transparency of the information provided to customers about products and services SR 23   Economic and Governance Responsibility > Products and Services	
3-3	Management of material issues: Sustainability Governance SR 23   Introduction > Governance Model	
3-3	Management of material issues: Resilience of the business model SR 23   Value Creation SR 23   Relation with Stakeholders > SMP - Sustainability Master Plan 2023	
3-3	Management of material issues: Risk management SR 23   Introduction > Management of ESG risks	
3-3	Management of material issues: Satisfaction and customer experience SR 23   Economic and Governance Responsibility > Quality Services	
3-3	Management of material issues: Management of the brand and reputation SR 23   Table of Contents and Sustainability Recognitions	
3-3	Management of material issues: Economic performance AR 23	
3-3	Management of material issues: Attracting, developing and retaining talent SR 23   Economic Responsibility and of Governance > Employees	
<b>CATEGORY: ECONOMIC</b>		
<b>ECONOMIC PERFORMANCE</b>		
201-1	Direct economic value generated and distributed AR23   Information on the BCP Group > Principal Indicators AR23   Financial Information > Results and Balance Sheet > Analysis	
201-2	Financial implications, risks and opportunities SR 23   Environmental Responsibility > Task Force on Climate-related Financial Disclosures (TCFD) <a href="https://www.cdp.net">https://www.cdp.net</a> > Search responses > Banco Comercial Português SA	

GRI STANDARDS	Content, page or link	UNGC Principles																				
	due to climate change																					
201-3	Benefit plans defined by the organisation AR 23																					
<b>MARKET PRESENCE</b>																						
202-1	Ratio between the lowest wage and the local minimum wage, by gender, in the Important operational units SR 23   Summary of Indicators	6																				
202-2	Proportion of employees hired locally																					
	<table border="1"> <thead> <tr> <th></th> <th>Men</th> <th>Women</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>No. of employees hired locally</td> <td>6,958</td> <td>8,665</td> <td>15,623</td> </tr> <tr> <td>% of employees hired locally</td> <td>99,4%</td> <td>99,7%</td> <td>99,6%</td> </tr> <tr> <td>No. of employees of the BoD, EC and Senior Management hired locally</td> <td>131</td> <td>40</td> <td>171</td> </tr> <tr> <td>% of employees of the BoD, EC and Senior Management hired locally</td> <td>91.6%</td> <td>100%</td> <td>93.4%</td> </tr> </tbody> </table>		Men	Women	Total	No. of employees hired locally	6,958	8,665	15,623	% of employees hired locally	99,4%	99,7%	99,6%	No. of employees of the BoD, EC and Senior Management hired locally	131	40	171	% of employees of the BoD, EC and Senior Management hired locally	91.6%	100%	93.4%	
	Men	Women	Total																			
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<b>INDIRECT ECONOMIC IMPACTS</b>																						
203-1	Development and impact of investments in infrastructure and services offered SR 23   Social Responsibility > Share and Participate SR 23   Social Responsibility > Financial Literacy SR 23   Social Responsibility > Foundations Group BCP																					
203-2	Significant indirect economic impacts, including the extent of impacts SR 22   Social Responsibility > Share and Participate SR 23   Social Responsibility > Financial Literacy SR 23   Social Responsibility > Foundations Group BCP																					
<b>PURCHASING PRACTICES</b>																						
204-1	Proportion of expenses with local suppliers in important operational units SR 23   Summary of Indicators SR 23   Economic Responsibility and of Governance > Suppliers																					
<b>ANTI-CORRUPTION</b>																						
205-2	Percentage of employees trained in the anti-corruption policies and practices of the organisation SR 23   Economic and Governance Accountability > Employees > Training	10																				
205-3	Actions taken in response to corruption cases SR 23   Economic Responsibility and of Governance > Ethics and Professional Conduct There were no cases of corruption in 2023	10																				
<b>TAXES</b>																						
207-1	Tax approach SR 23   Economic and Governance Accountability > Tax Policy																					
207-2	Governance, Tax risk control and management SR 23   Economic Responsibility and of Governance > Fiscal Policy																					
207-3	Stakeholder engagement and managing their concerns on tax SR 23   Economic Responsibility and of Governance > Fiscal Policy																					

GRI STANDARDS	Content, page or link	UNGC Principles
207-4	Report by geography SR 23   Economic Responsibility and of Governance > Fiscal Policy	
<b>CATEGORY: ENVIRONMENTAL</b>		
<b>MATERIALS</b>		
301-1	Materials consumption SR 23   Environmental Responsibility > Sustainable Operations	7, 8
<b>ENERGY</b>		
302-1	Energy Consumption within the organization SR 23   Environmental Responsibility > Energy Efficiency	7, 8
302-3	Energetic intensity SR 23   Environmental Responsibility > Energy Efficiency	8
302-4	Reduction of energy consumption SR 23   Environmental Responsibility > Energy Efficiency	8, 9
<b>WATER AND EFFLUENTS</b>		
303-1	Interactions with water as a shared resource A significant portion of the water consumed in the BCP is associated with human use. In addition to this, it is also used for irrigation in the facilities. In 2023, all the water for irrigation of the green spaces in Taguspark came from the borehole. The Group is concerned about reducing its environmental impact, which includes reducing water consumption in all geographies where it operates. BCP does not identify in its direct operation areas of water stress relevant to this report. SR 23   Environmental Responsibility > Sustainable Operations	
303-2	Management of impacts related to water discharge The management of effluents in the Bank is carried out by third parties, and most of the liquid effluents produced by the Group are rejected into public wastewater networks, and are subsequently subject to treatment and quality monitoring by the responsible entities. SR 23   Environmental Responsibility > Sustainable Operations	
303-3	Water withdrawal SR 23   Environmental Responsibility > Sustainable Operations	7, 8
<b>BIODIVERSITY</b>		
304-11	Operational facilities (owned, leased or managed) in areas surrounding protected areas and areas of high biodiversity value outside protected areas The Bank's operations do not have a significant direct impact on biodiversity, protected or restored habitats, which justifies the irrelevance of this indicator.	8
304-2	Significant impacts of activities, products and services on biodiversity The Bank's operations do not have a significant direct impact on biodiversity, protected or restored habitats, which justifies the irrelevance of this indicator.	8
304-3	Protected or restored habitats The Bank's operations do not have a significant direct impact on biodiversity, protected or restored habitats, which justifies the irrelevance of this indicator.	8
<b>EMISSIONS</b>		
305-1	GGE direct emissions (Scope 1) SR 23   Environmental Responsibility > Sustainable Operations	7, 8
305-2	GGE indirect emissions (Scope 2) SR 23   Environmental Responsibility > Sustainable Operations	7, 8
305-3	Other GGE indirect emissions (Scope 3) SR 23   Environmental Responsibility > Sustainable Operations	7, 8
305-4	Intensity of GGE emissions SR 23   Environmental Responsibility > Sustainable Operations	8
305-5	Reduction of GGE emissions SR 23   Environmental Responsibility > Sustainable Operations	8, 9
<b>WASTE</b>		

GRI STANDARDS	Content, page or link	UNGC Principles
306-1	Waste generation and significant impacts related to waste Waste production at BCP is mostly associated with office waste (paper, cardboard and plastic). The Group is concerned about reducing its environmental impact, which includes reducing waste production in all geographies where it operates. SR 23   Environmental Responsibility > Sustainable Operations	
306-2	Management of significant impacts related to waste SR 23   Environmental Responsibility > Sustainable Operations	
306-3	Generated waste SR 23   Environmental Responsibility > Sustainable Operations	8

**CATEGORY: SOCIAL**

**WORK**

SR 23 | Economic and Governance Accountability > Employees > Evolution of the workforce

401-1	New hirings and turnover	<table border="1"> <thead> <tr> <th>2023 Recruitment</th> <th>Men</th> <th>Women</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>&lt;30</td> <td>403</td> <td>608</td> <td>1011</td> </tr> <tr> <td>[30-50[</td> <td>197</td> <td>282</td> <td>479</td> </tr> <tr> <td>&gt;=50</td> <td>17</td> <td>17</td> <td>34</td> </tr> <tr> <td><b>Total</b></td> <td><b>617</b></td> <td><b>907</b></td> <td><b>1 524</b></td> </tr> </tbody> </table>	2023 Recruitment	Men	Women	Total	<30	403	608	1011	[30-50[	197	282	479	>=50	17	17	34	<b>Total</b>	<b>617</b>	<b>907</b>	<b>1 524</b>	6
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401-2	Benefits for full-time employees that are not provided to temporary or part-time employees SR 23   Social Responsibility > Employee Benefits The benefits identified in the Reports are granted to the Bank's employees (full-time or part-time) but are not extended to interns or outsourcers.	6
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401-3	Parental leave	<table border="1"> <thead> <tr> <th>BCP Group</th> <th>Men</th> <th>Women</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Employees that were entitled to parental leave</td> <td>133</td> <td>621</td> <td>754</td> </tr> <tr> <td>Employees that took parental leave</td> <td>69</td> <td>443</td> <td>512</td> </tr> <tr> <td>Employees that returned to work</td> <td>67</td> <td>416</td> <td>483</td> </tr> <tr> <td>Employees that returned to work after parental leave ended that were still employed 12 months after their return</td> <td>58</td> <td>358</td> <td>416</td> </tr> <tr> <td>Employees who returned to work after parental leave in the previous reporting period</td> <td>61</td> <td>432</td> <td>493</td> </tr> <tr> <td>Return rate - % of employees who returned to work after parental leave</td> <td>97.1%</td> <td>93.9%</td> <td>94.3%</td> </tr> <tr> <td>Retention rate - % employees who remained at the Bank after parental leave</td> <td>95.1%</td> <td>82.9%</td> <td>84.4%</td> </tr> </tbody> </table>	BCP Group	Men	Women	Total	Employees that were entitled to parental leave	133	621	754	Employees that took parental leave	69	443	512	Employees that returned to work	67	416	483	Employees that returned to work after parental leave ended that were still employed 12 months after their return	58	358	416	Employees who returned to work after parental leave in the previous reporting period	61	432	493	Return rate - % of employees who returned to work after parental leave	97.1%	93.9%	94.3%	Retention rate - % employees who remained at the Bank after parental leave	95.1%	82.9%	84.4%	6
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**LABOR/MANAGEMENT RELATIONS**

GRI STANDARDS	Content, page or link	UNGC Principles
402-1 Minimum notice periods regarding operational changes	Minimum number of days in advance to notify employees of structural/operational changes: 30 days.	6

**OCCUPATIONAL HEALTH AND SAFETY**

403-1 Occupational health and safety management system	<p>Millennium bcp has published regulations establishing the general principles relating to the prevention of professional risks, protection of the safety, hygiene and physical and mental health of Employees, regardless of the type of contractual relationship, whatever the facilities and workplaces where they carry out their activity, and information, consultation, participation and training in this field, without prejudice to the legal rules applicable in this field. These rules are available for consultation on the Bank's internal portal.</p> <p>The Occupational Health and Safety Management System was implemented in response to the specific legislation in this area (Law No. 102/2009 of 10 September, amended by Law 3/2014 of 28 January, with updates introduced by Decree-Law No. 88/2015 of 28 May, Law No. 146/2015 of 9 September and Law No. 28/2016 of 23 August) but its scope, particularly in health, goes beyond the limits determined by law.</p> <p>The Bank's Occupational Health and Safety Policy is updated regularly, and in 2022 incorporated elements that reflect the reality of the Bank in Portugal and the applicable legal and regulatory context, as well as good voluntary implementation practices.</p>	
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403-2 Identification of dangerousness, risk assessment and investigation of incidents	<p>With a view to ensuring adequate health surveillance of Employees, Millennium bcp carries out, according to each case, admission exams, periodic exams differentiated according to gender and age group - up to the age of 50 the periodicity is every two years and annual after that age - occasional and complementary exams, as well as activities to promote health at work, keeping organized the clinical records and other information elements relative to the health of each Employee. Following the check-up, a consultation is made with the Occupational Health Doctor where all information is provided on the Employee's state of health and the necessary recommendations are made.</p> <p>In the area of safety, risk assessment audits are carried out, whose reports are forwarded to the Procurement and Logistics Division, which after analysis issues recommendations to the areas whose intervention is justified to resolve the recommendations made.</p> <p>All Employees are made aware of the importance of looking after their own safety and health and that of others who may be affected by their actions or omissions at work, and of the need to immediately inform their employer of any work situation that presents a serious and immediate danger to safety or health, as well as any defect in the protection systems.</p> <p>Periodically, drills are carried out to identify improvements to be introduced in emergency procedures and also audits to buildings. In 2023, were carried out 4 drills and 6 Audits. A significant reinforcement of the initiative plan is planned for 2024.</p> <p>The Regulation in force determines that in the event of serious, immediate danger that cannot be avoided, Employees have the right to leave their workstation or a dangerous area and cannot be harmed by this fact and assumes the commitment that no action will be taken against anyone who reveals a concern about matters related to health and safety at work or by reporting an accident.</p> <p>The Information and dissemination on the procedures and contacts to be used in situations of danger or emergency can be found on the Internal Portal, not only in the Physical Security Department, which has direct responsibility for these issues, but also in Human Resources department. The process of reporting risk or accident situations can be triggered directly by the employee or by the hierarchy, and the reporting process is different depending on the circumstances.</p> <p>In the case of accidents at work, and according to the information available in the Human Resources area, there is a dedicated line, available 24 hours a day. Situations that are identified as accidents at work are reported to the insurance company, which investigates the circumstances underlying their origin and takes the appropriate action. Whenever the Bank has reports of occurrences that justify its intervention, the necessary measures are taken to mitigate situations that have some level of risk associated with them.</p>	
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GRI STANDARDS	Content, page or link	UNGC Principles
	<p>We periodically invite all employees and trainees to take specific training on the issue of safety and hygiene at work, with regular monitoring of the degree of completion. This training includes modules such as: Accidents at work; Ergonomics; Emergency situations; Sign-posting; Injuries and First Aid. This training, which is compulsory, is made available to all new employees and trainees immediately after they join the company.</p> <hr/> <p>In addition to the occupational medicine doctors referred to above, there is a team of curative medicine doctors and nurses available every day at the Bank's premises in Taguspark and a doctor and a nurse at the Bank's premises in Porto. The coordination of this team is made by the physician performing the functions of Chief Medical Officer, who reports to the Human Resources Division.</p> <p>Since 2020, the Bank has 12 AED (Automatic External Defibrillation) devices distributed throughout all central buildings, with six employees having been trained per device, with the aim of enabling them to use a defibrillator, duly integrated in an AED Programme licensed by the INEM.</p> <p>The themes of occupational health and well-being are considered, at any moment, bearing in mind the importance of providing a set of services able to help employees achieving a better balance between the professional life and the personal one. In this area, the bank provides:</p> <p>Curative Medicine Services – the medical and nursing actions comprised within these services are provided, free of charge, to all Employees. The bank also provides services of collection of samples for laboratory examination.</p> <p>Nutrition and Psychology Appointments – Appointments also available due to the significant role that the same may play in the health and well-being of the Employees, in the extent that a personalised food plan is prescribed through strategies adjusted to the lifestyle of each employee, allowing him/her to change and adopt healthy habits in a gradual manner. The Psychology appointments allow for the appropriate monitoring of Employees on mental health issues, through the detection and follow-up of cases with this type of pathology.</p> <p>Health Promotion Campaigns and Healthy Living Habits - a series of initiatives are carried out to inform and raise awareness among Employees of the importance of adopting healthy living habits in their daily lives.</p> <p>There is a Physiotherapy Centre in Taguspark, with an agreement signed with SAMS and with Médis. Social Support and Benefits – by means of the definition of a policy of social benefits and support, detailed on the internal website of the Human Resources, the Bank has been seeking to foster support to the balancing of work-family, support to education and incentive to mobility.</p> <p>Information and dissemination on the procedures and contacts to be used in situations of danger or emergency can be found on the Internal Portal, not only in the area of the Physical Security Department, which has direct responsibility for these issues, but also in the area of Human Resources. The process of reporting risk or accident situations can be triggered directly by the employee or by the hierarchy, and the reporting process is different depending on the circumstances.</p> <p>In the case of accidents at work, and according to the information available in the Human Resources area, there is a dedicated line, available 24 hours a day. Situations that are identified as accidents at work are reported to the insurance company, which investigates the circumstances underlying their origin and takes the appropriate action. Whenever the Bank has reports of occurrences that justify its intervention, the necessary measures are taken to mitigate situations that have some level of risk associated with them.</p> <p>We periodically invite all employees and trainees to take specific training on the subject of safety and hygiene at work, with regular monitoring of the degree of completion. This training includes modules such as: Accidents at work; Ergonomics; Emergency situations; Sign-posting; Injuries and First Aid. This training, which is compulsory, is made available to all new employees and trainees immediately after they join the company.</p>	
403-3	<p>Occupational health services</p>	
403-4	<p>Worker participation, consultation and communication to workers</p>	

23 SR | Social Responsibility > Employee Benefits > Health and Safety

GRI STANDARDS	Content, page or link	UNGC Principles												
403-5 Training of workers in occupational health and safety at work	<p>Training related to health, hygiene and safety at work, which is carried out periodically and mandatorily for all employees, in 2023 covered 311 employees, totaling 466.5 hours.</p> <p>The decrease in the number of participants/hours compared to 2022 is due to the fact that, last year, e-learning with updated content was made available to all employees, while in 2023 only new employees or returnees from prolonged absence were invited to take the course.</p>													
403-6 Worker health promotion	<p>Employees are called for check-ups in accordance with the rules established and already mentioned. Following the check-up, they are subsequently called for the occupational health consultation. All other consultations, curative medicine, psychology, nutrition, as well as clinical analyses, are booked on the initiative of the Employee through contact with the Bank's medical services. Physiotherapy sections are booked through direct contact with the service provider.</p> <p>Clinical information is recorded in an autonomous application, with restricted access, in order to guarantee the confidentiality of all data.</p> <p>The increasingly frequent publication on the internal portal of news about health care, diet and healthy living habits reflects the intention to encourage the dissemination of information aimed at promoting a healthier lifestyle with positive effects on physical, emotional and social well-being, with repercussions on the balance between professional and personal life.</p>													
403-7 Prevention and mitigation of health and safety impacts directly linked with business relationships	<p>The Bank has organised an occupational health and safety service that is responsible for drafting and updating the Occupational Health and Safety Plan, which includes the internal emergency plan, the specific plans for fire fighting, evacuation of premises and first aid, the occupational risk prevention plan, the development of health promotion activities and health surveillance examinations.</p> <p>The external entity that supports the Bank in conducting audits of workplaces ensures the identification of any anomaly that needs to be corrected in the reports it draws up.</p>													
403-9 Work accidents	<p>SR 23   Summary of Indicators 23 SR   Social Responsibility &gt; Employee Benefits &gt; Health and Safety</p> <p>In 2023 there were 56 accidents at work, one of which had serious consequences (sick leave of more than 6 months). Total hours worked were 28,691,168.</p>													
<b>TRAINING AND EDUCATION</b>														
404-1 Average hours of training per year per employee by employee category	SR 23   Economic and Governance Accountability > Employees > Training	6												
404-2 Competence management and lifelong learning programmes	SR 23   Economic and Governance Accountability > Employees > Training													
404-3 Percentage of employees receiving regular performance and career development reviews.	<p>SR 23   Economic and Governance Accountability &gt; Employees &gt; Assess and recognize</p> <table border="1" data-bbox="520 1615 1217 1787"> <thead> <tr> <th data-bbox="520 1615 836 1675">Employees evaluated in 2023</th> <th data-bbox="836 1615 948 1675">Men</th> <th data-bbox="948 1615 1082 1675">Women</th> <th data-bbox="1082 1615 1217 1675">Total</th> </tr> </thead> <tbody> <tr> <td data-bbox="520 1675 836 1727">Employees evaluated in the year</td> <td data-bbox="836 1675 948 1727">6,055</td> <td data-bbox="948 1675 1082 1727">7,791</td> <td data-bbox="1082 1675 1217 1727">14,446</td> </tr> <tr> <td data-bbox="520 1727 836 1787">% Employees evaluated in the year</td> <td data-bbox="836 1727 948 1787">95.1%</td> <td data-bbox="948 1727 1082 1787">89,7%</td> <td data-bbox="1082 1727 1217 1787">92,1%</td> </tr> </tbody> </table>	Employees evaluated in 2023	Men	Women	Total	Employees evaluated in the year	6,055	7,791	14,446	% Employees evaluated in the year	95.1%	89,7%	92,1%	6
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<b>DIVERSITY AND EQUAL OPPORTUNITIES</b>														

GRI STANDARDS	Content, page or link	UNGC Principles
405-1	<p>Composition of the corporate bodies of the company and list of employees by category, according to gender, age group, minorities and other diversity indicators.</p> <p>SR 23   Summary of Indicators SR 23   Economic and Governance Accountability &gt; Employees</p> <p>Additionally, BCP identifies and reports its employees with disabilities. In 2023, in Portugal, the Bank had 171 disabled people (82 men and 89 women) and in Poland 64 disabled people (23 men and 41 women).</p>	6

SR 23 | Economic Responsibility and of Governance >Employees

	Portugal		Poland		Mozambique		
	Base Salary (W/M)	Total remuneration (W/M)	Base Salary (W/M)	Total remuneration (W/M)	Base Salary (W/M)	Total remuneration (W/M)	
405-2	Ratio of total remuneration between men and women by employee category.						6
Senior Management	1.0	0.9	0.9	0.9	0.6	0.6	
Management	1.0	1.0	0.8	0.8	0.7	0.6	
Commercials	0.9	0.8	0.9	0.9	0.9	0.9	
Technicians	0.9	0.9	0.7	0.7	0.9	0.9	
Other	0.9	0.9	0.9	0.8	1.2	1.1	

**NON DISCRIMINATION**

406-1	Discrimination cases and actions taken	In 2023 there was no record of any reported case of discrimination.	6
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**FREEDOM OF ASSOCIATION AND NEGOTIATION**

407-1	Operations and suppliers identified as being at risk of violation of the right to freedom of association and collective negotiation, and actions taken	<p>SR 23   Economic Responsibility and of Governance &gt; Suppliers</p> <p>In 2023, no case was identified</p> <p>No cases were identified in 2023</p>	3
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**CHILD LABOUR**

408-1	Operations and suppliers identified with a risk of child labour, and actions taken	<p>SR 23   Economic Responsibility and of Governance &gt; Suppliers</p> <p>In 2023, no case was identified</p> <p>No cases were identified in 2023</p>	5
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**HUMAN RIGHTS ASSESSMENT**



GRI STANDARDS	Content, page or link	UNGC Principles	
	Operations subject to human rights assessments SR 23   Social Responsibility > Human Rights		
<b>LOCAL COMMUNITIES</b>			
413-1	Operations with programmes for involvement of local communities SR 23   Social Responsibility > Share and Participate SR 23   Social Responsibility > Financial Literacy SR 23   Social Responsibility > Foundations Group bcp	1	
FS13	Access in sparsely populated or economically disadvantaged areas SR 23   Summary of Indicators SR 23   Economic and Governance Responsibility		
FS14	Initiatives to improve access to financial services for disadvantaged people SR 23   Summary of Indicators SR 23   Economic and Governance Responsibility		
FS15	Policies for the fair design and sale of financial products and services SR 23   Economic and Governance Responsibility > Ethics and Professional Conduct > Policies for the fair design and sale of financial products and services		
<b>PUBLIC POLICIES</b>			
415-1	Political Contributions No contributions are made to political parties as required by law. SR 23   Economic Responsibility and of Governance > Ethics and Professional Conduct		
<b>PRODUCT AND SERVICE LABELLING</b>			
417-1	Information on products and services required by regulations, and the percentage of significant products and services subject to such requirements SR 23   Economic Responsibility and of Governance > Ethics and Professional Conduct		
<b>CUSTOMER PRIVACY</b>			
418-1	Complaints regarding breaches of customer privacy and losses of customer data	Complaints received from external parties and substantiated by the organisation	39*
		Complaints from regulatory agencies	0
		Total no. of substantiated complaints regarding breaches of customer privacy	39
		Total no. of customer data leaks, thefts or losses that have been identified	28
*two of which attributed to Ativobank ** one of which attributed to Ativobank			
<b>COMPLIANCE</b>			
	Amounts of significant fines and total number of non-monetary sanctions for non-compliance SR 23   Economic and Governance Responsibility > Ethics and Professional Conduct > Internal Audit		

GRI STANDARDS	Content, page or link	UNGC Principles
	with laws and regulations	
<b>SECTOR SUPPLEMENT</b>		
<b>PRODUCT PORTFOLIO - MATERIAL ASPECT</b>		
FS6	Percentage of specific business lines/ specific business segment, in total volume, by region and size	AR23 AR   Accounts and notes to consolidated accounts < Note 52 Consolidated Balance Sheet and Income Statement Indicators by Geographical and Operating Segments
FS7	(Monetary) volume of products and services with social benefit, by business line	SR 23   Economic and Governance Accountability > Products and Services SR 23   Environmental Accountability > Eco-friendly products and services offer
FS8	(Monetary) volume of products and services with environmental benefit, by business line	SR 23   Economic and Governance Accountability > Products and Services SR 23   Environmental Accountability > Eco-friendly products and services offer
<b>AUDIT</b>		
FS10	Percentage and number of companies included in the portfolio with which it has interacted regarding social and environmental aspects	SR 23   Economic and Governance Accountability > Products and Services SR 23   Environmental Accountability > Eco-friendly products and services offer
FS11	Percentage of assets subject to environmental and social assessment	SR 23   Economic and Governance Accountability > Products and Services SR 23   Environmental Accountability > Eco-friendly products and services offer

*GRI- Global Reporting Initiative*

**Table SASB - Sustainability Accounting Standards Board**

SASB – Commercial Banks	Category / measure unit	Content and location of the information	Scope																																	
<b>DATA SECURITY</b>																																				
FN-CB-230a.1	(1) Number of data violation, (2) percentage that involved personal identification information (PII), (3) number of affected account holders	<p>Number, Percentage (%)</p> <p>Number of data violation: 28 (one of which may be attributed to Ativobank)</p> <p>Percentage that involved personal identification information: 74%*</p> <p>Number of affected account holders: 145 (one of which may be attributed to Ativobank)</p> <p>*Cases involving direct personal identification data were considered; Situations involving personal data, considered indirect identifiers, are excluded, as it is understood that they do not represent a risk of identification of the affected subjects, since there is no access by third parties to additional information necessary to allow the identification of these subjects.</p>	Portugal																																	
FN-CB-230a.2	Description of the approach to identify and handle data safety risks	<p>n/a</p> <p>The regulatory context applicable to Portugal and Poland in terms of data security is similar, as both countries are covered by the rules emanating from the General Data Protection Regulation (GDPR). In addition to the GDPR, applicable to the geographies of Portugal and Poland, the Electronic Transactions Law, approved in 2017, which provides legal provision for the protection of personal data in Mozambique, also stands out.</p> <p>More information on the Bank’s Information Security policies and procedures can be found in the 2023 Sustainability Report, <b>Information Safety Chapter</b>.</p>																																		
<b>FINANCIAL INCLUSION AND CAPACITATION</b>																																				
FN-CB-240a.1	(1) Number and (2) amount of pending loans qualified for programs conceived to promote the development of small companies and the Community	<p>Number, Currency</p> <p>Millennium bcp supported in 2023 2,736 projects for the development of small businesses and communities (1), with a total credit of approximately 522,239 thousands euros (2).</p> <table border="1"> <thead> <tr> <th>Projects</th> <th>No. of projects</th> <th>Amount (thousand €)</th> </tr> </thead> <tbody> <tr> <td>Lines to support Entrepreneurship (Microinvest and Investe+)</td> <td>61</td> <td>1 483</td> </tr> <tr> <td>Decarbonization and Circular Economy</td> <td>14</td> <td>4 045</td> </tr> <tr> <td>EIB Lines</td> <td>30</td> <td>48 439</td> </tr> <tr> <td>ADN Lines</td> <td>35</td> <td>9 005</td> </tr> <tr> <td>Credit Lines with IFAP (IFAP Short-term and IFAP ML term)</td> <td>131</td> <td>11 139</td> </tr> <tr> <td>Lines to Finance Tourism</td> <td>39</td> <td>21 018</td> </tr> <tr> <td>FEI Lines</td> <td>1 474</td> <td>310 502</td> </tr> <tr> <td>IFFRU</td> <td>32</td> <td>34 893</td> </tr> <tr> <td>Green car (Leasing and ALD)</td> <td>912</td> <td>43 737</td> </tr> <tr> <td>Other (OSI, Madeira, Azores, SI Inovação, REC Green)</td> <td>8</td> <td>37 978</td> </tr> </tbody> </table> <p>More information on the number and amount of loans to businesses with social and environmental benefits can be found in the 2023 Sustainability Report, <b>Chapter of Products and Services (Social and Environmental)</b>.</p>	Projects	No. of projects	Amount (thousand €)	Lines to support Entrepreneurship (Microinvest and Investe+)	61	1 483	Decarbonization and Circular Economy	14	4 045	EIB Lines	30	48 439	ADN Lines	35	9 005	Credit Lines with IFAP (IFAP Short-term and IFAP ML term)	131	11 139	Lines to Finance Tourism	39	21 018	FEI Lines	1 474	310 502	IFFRU	32	34 893	Green car (Leasing and ALD)	912	43 737	Other (OSI, Madeira, Azores, SI Inovação, REC Green)	8	37 978	Portugal
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SASB – Commercial Banks		Category / measure unit	Content and location of the information	Scope
FN-CB-240a.2	(1) Number and (2) amount of <i>past-due</i> and <i>nonaccrual</i> loans qualified for programs to promote the development of small companies and of the community	Number, Currency	Information on <i>past-due</i> and <i>nonaccrual</i> loans is reported in the 2023 Annual Report 2, <b>Chapter Earnings and Balance Sheet - Credit to Clients</b>	
FN-CB-240a.3	Number of current accounts without costs supplied to clients previously without a bank or accessing only some basic banking services	Number	<p>Within the scope of the inclusion of individual Clients (resident and non-resident) with low incomes in the financial system, the Bank was one of the banking institutions that voluntarily provided the current account – Minimum Banking Services–, without associated costs, this account can be used with a debit card and through online banking. In 2023, 5,669 accounts were opened, presently accruing to 26,705 accounts.</p> <p>In Portugal, within the scope of Entities that incorporate the social sector, Millennium bcp keeps available the Non-Profit Association Account, a current account with special conditions that does not require an opening minimum deposit and has no maintenance and overdraft fees. 318 accounts with these features were opened in 2023, corresponding to a total of 5,332 accounts in the Bank's portfolio.</p> <p>More information on the Bank's Social Inclusion offer can be found in the 2023 Sustainability Report, <b>Social Inclusion Chapter</b>.</p>	Portugal
FN-CB-240a.4	Number of participants in financial education initiatives for clients without a bank or having only access to some basic banking services	Number	<p>In 2023, Millennium bcp impacted more than 3.800 people through its initiatives for the promotion of financial literacy.</p> <p>More information on the number and amount of loans to small businesses and with social and environmental benefits can be found in the Sustainability Report 2023, <b>Chapter Products and Services</b>.</p>	BCP Group
<b>INCORPORATION OF ENVIRONMENTAL, SOCIAL AND GOVERNMENT FACTORS IN THE CREDIT ANALYSIS</b>				
FN-CB-410a.1	Exposure of commercial and industrial credit per sector	Currency	Information on loans and credits to clients, per sector is reported in the 2023 Annual Report 2, <b>Chapter Earnings and Balance Sheet - Credit to Clients</b>	BCP Group
FN-CB-410a.2	Description of the approach to incorporate environmental, social and governance factors in (ESG) the credit analysis	n/a	<p>The BCP Group offers a complete and broad range of financial products and services, and continues, under the development of its business lines, responsible for offering an increasing number of products and services which incorporate social principles and respect for the environment and nature. The access to these products implies an assessment of the credit operation in the ESG component. BCP Group is also aware that the implementation of social and environmental criteria and standards in the commercial offer is reflected in more efficient risk management, reputation on greater value and higher quality of the products and services offered to customers, meeting the needs and ambitions of a market increasingly related with sustainability. In that sense, the Portuguese operation introduced an ESG matrix in the internal risk classification for larger companies.</p> <p>More information on the approach for the incorporation of ESG risks in the credit analysis can be found in the Market Discipline Report 2023, <b>Chapter Environmental and Social Risks</b> and in the Sustainability Report 2023, <b>Chapter TCFD</b>.</p>	Portugal
<b>BUSINESS ETHICS</b>				

SASB – Commercial Banks		Category / measure unit	Content and location of the information	Scope
FN-CB-510a.1	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, antitrust, anticompetitive behaviour, market manipulation, malpractice or other laws or regulations of the financial sector	Currency	Information on legal and internal procedures associated with fraud, trading with privileged information, anti-trust, anti-competitive behaviour, market manipulation, malpractice can be found in the 2023 Sustainability Report, <b>Internal Audit Chapter</b> .	Portugal
FN-CB-510a.2	Description of the whistleblowing policies and procedures	n/a	<p>In Portugal, a Communication of Irregularities Policy (Whistleblowing) is implemented, regulated by a specific Service Order.</p> <p>In Poland and Mozambique, in accordance with the recommendations issued by the Bank in Portugal, equivalent policies were adopted, adjusted to the reality of the respective countries.</p> <p>More information on the Policy for the Communication of Irregularities of the Bank is available here: <a href="#">Institutional/Governance/Articles of Association and main rules and regulations of the Bank/Policy for the Communication of Irregularities</a></p>	BCP Group
<b>MANAGEMENT OF SYSTEMIC RISK</b>				
FN-CB-550a.1	Notation of the <i>Global Systemically Important Bank</i> (G-SIB), per category	<i>Basis points</i> (bps)	<p>The BCP Group and the banks part of it are not considered Global Systemically Important Bank (G-SIB).</p> <p>More information on the G-SIB (2023) available here: <a href="#">Financial Stability Board (FSB) - 2023 List of Global Systemically Important Banks (G-SIBs)</a></p>	BCP Group
FN-CB-550a.2	Description of approach for incorporating mandatory and voluntary stress test results into capital adequacy planning, long-term corporate strategy and other business activities	n/a	<p>The ICAAP is a key process within the framework of the BCP Group's risk management function and is developed under an internal governance model that guarantees the involvement of the Board of Directors (the body responsible for approving results) and its Risk Assessment Committee (CAvR), the EC and the Group's top management, in its various stages.</p> <p>The results of the ICAAP allow the management bodies to test whether the Bank is adequately capitalized in view of the risks arising from its current activity, as well as in relation to the risks inherent in the projections of the balance sheet and results of the strategic plan and budget, in order to ensure the sustainability of the Group in the medium term, with respect for the risk limits defined in the RAS (Risk Appetite Statement) approved by the Board of Directors.</p> <p>For this purpose, the ICAAP starts from a prospective view of the impacts of the materialization of the various risks on the Group's capital (capital requirements), considering the respective scale or dimension, complexity, frequency, probability of occurrence and materiality, having as a background the projected developments for the Group's activity in a medium-term timeframe (3 years). Impacts are estimated under different scenarios, including stress scenarios with a severely penalizing evolution of macroeconomic indicators. Through this process, it is possible to test the Group's resilience, verifying that capital levels are adequate to cover the risks to which its activities may be subject. For this purpose, the different risks are modelled or incorporated into the framework of the Group's stress test methodology.</p> <p>More information on incorporating stress test results into capital adequacy planning, long-term corporate strategy and other business activities can be found at the 2023 Annual Report, <b>Chapter Pensions Fund Risks</b> and in the 2023 Sustainability Report, <b>Chapter TCFD</b>.</p>	BCP Group
<b>ACTIVITY METRICS</b>				

SASB – Commercial Banks	Category / measure unit	Content and location of the information	Scope
FN- CB- 000.A	(1) Number and (2) value of the current and savings accounts per segment: (a) individual and (b) small companies	Information on Customer Funds can be found in the Annual Report 2023 <b>Chapter Customer Funds</b> .	BCP Group
FN- CB- 000.B	(1) Number and (2) value of the loans per segment: (a) individual, (b) small companies and (c) companies (mortgage loans as well as revolving credit loans, should be excluded from the disclosure scope).	Information on Customer Funds can be found in the Annual Report 2023, in <b>Chapter Credit to Clients</b> .	BCP Group

## Table UNGP - UN Guiding Principles Reporting Framework

### PART A: GOVERNANCE OF RESPECT FOR HUMAN RIGHTS

#### A1

##### Policy of Commitment

What does the company say publicly about its commitment to respect human rights?

A1.1 In what way has been public commitment developed?

A1.2 From whom are the human rights approached in the public commitment?

A1.3 In what way is the public commitment disseminated?

The BCP Group assumes its commitment to the promotion of Human Rights through the Human Rights Policy, published in 2014 and revised several times, as a result of internal reflection process and evaluation of good practices, namely in 2023

Since 2005, it is also a member of the UN Global Compact, which includes Human Rights in its principles, and is also a subscriber to other initiatives that promote the adoption of best practices in this matter (see the Human Rights chapter).

The various commitments to Human Rights cover mainly, but not exclusively, all those who work at the Bank, including employees, as well as suppliers and business partners, customers and the local communities, namely through the development of partnerships and initiatives that contribute to the promotion of human rights

#### A2

##### Incorporating respect for human rights

How does the company show how important it is to implement its commitment to human rights?

A2.1 How is the daily responsibility for the performance of human rights organized within the company and why?

A2.2 What kind of human rights issues are discussed by top management and the Board, and why?

A2.3 How are employees and service providers made aware of how respect for human rights should be considered in their decisions and actions?

A2.4 How does the company make clear in its commercial relations the importance it attaches to respect for human rights?

A2.5 What lessons has the company learned during the reporting period on how to achieve respect for human rights and what has changed as a result of that learning?

The Committee for Corporate Governance, Ethics and Sustainability (that depends from the Board of Directors) and the Commission for Human Resources and for Sustainability (that depend from the Executive Committee) are the governance bodies responsible for following-up the themes related with the protection and promotion of Human Rights.

With regard to raising awareness of the importance of the topic among the various stakeholders: i) internal training is promoted and content related to the topic is disseminated, aimed at employees and ii) the Guiding Principles of Sustainability are applied to suppliers.

In 2021, a self-assessment was carried out whose purpose was to identify, in the main geographies of the BCP Group (PT, PL and MZ), which areas related to Human Rights can benefit from incremental processes of evolution (see chapter Human Rights). In 2022, the self-assessment process was concluded and improvement plans, developed following the process, were implemented in the various countries.

### PART B: DEFINE THE SCOPE OF REPORTING

#### B1.

##### Declaration of Relevant Themes

State the main human rights issues associated with the company's activities and business relationships during the reporting period.

The BCP Group, within the scope of its Human Rights Policy, establishes its commitment to the following themes:

- Prohibition of forced labour, child labour and human trafficking;
- Non-discrimination and prohibition of harassment;
- Freedom of association and of collective bargaining;
- Remuneration;
- Relations with interested parties (employees and shareholders clients, suppliers and partners and the community).

#### B2.

##### Identification of Relevant Themes

Describe how key human rights issues were determined, including any input from stakeholders.

The Policy of Human Rights establishes a set of themes deemed more relevant (see reply B1. Declaration of Relevant Topics), on which the self-assessment process carried out in 2021 and concluded in 2022 also focused. These themes were identified based on the main national and international references and regulations, such as the Universal Declaration of Human Rights or the Ruggie Framework and based on the best practices in the market.

#### B3.

The information on Human Rights reported relates to the three countries where Group BCP operates: Portugal / Poland

**Choice of local geographies**

If the report on key human rights topics focuses on specific geographies, explain how this choice was made.

/ Mozambique Whenever such does not happen, such fact is duly identified.

**B4.**

**Severe additional impacts**

Identify any serious human rights impacts that occurred or were still being addressed during the reporting period, but which are outside the relevant human rights topics, and explain how they were addressed.

Through the various mechanisms implemented, or through other means, no severe impacts on Human Rights arising from the activity of the BCP Group were identified.

**PART C: MANAGEMENT OF RELEVANT THEMES ON HUMAN RIGHTS**

**C1. Specific Policies**

Does the company have any specific policy that addresses its most relevant human rights issues? If yes, which one/which are they?

The BCP Group has a Human Rights Policy that establishes the approach to the most relevant topics and that covers a wide range of stakeholders, duly identified in the document.

C1.1 How does the company convey the relevance and meaning of such policies to those who must implement them?

This document is available on the Bank's website and on the company Intranet.

**C2. Involvement of Stakeholders**

What is the company's approach to stakeholder engagement with respect to each of its relevant human rights themes?

Millennium bcp seeks to actively involve its stakeholders in the development of its activity, including issues related to Human Rights.

C2.1 How are identified the stakeholders whose involvement in each relevant human rights themes the company should promote, when and how to do it?

In addition to the current involvement practices (see chapter Approach to Sustainability), all issues identified through the various existing mechanisms for this purpose are subject to analysis and subsequent implementation of improvements, whenever this proves to be necessary and capable of adding value.

C2.2 During the reporting period, which stakeholders whose involvement in relation to each relevant human rights issue did the company promote and why?

C2.3 During the reporting period, how did stakeholder views influence the company's understanding of each relevant issue and/or what is its approach to addressing it?

**C3. Assessment of Impacts**

How does the company identify changes in each relevant human rights issue over time?

Millennium bcp guarantees the analysis and follow-up of all issues related to Human Rights identified through the specific and confidential internal communication channel. In addition, all situations detected by or communicated to the internal audit function are also evaluated. Are also considered the situations identified through the Client Ombudsman.

C3.1 During the reporting period, were there any notable trends or patterns in impacts related to a relevant issue, and if so, what were they?

The self-assessment process conducted during 2021 and completed in 2022 also represents a potential source of information for identifying changes in issues related to Human Rights.

C3.2 During the reporting period, did any serious impacts related to a relevant issue occur and, if so, what were they?

In 2023, no significant changes or serious impacts related to Human Rights were identified.

**C4. Include findings and implement actions**

How does the company integrate its findings on each relevant human rights issue into its decision-making process and actions?

As mentioned in item C2. Involvement of Stakeholders, all issues identified by stakeholders are subject to analysis and originate actions for improvement and development of solutions/resolution of identified problems, if applicable.

C4.1 How can the parts of the company whose decisions and actions may affect the management of relevant issues be involved in finding and implementing solutions?

In 2023, the implementation of improvement actions in the geographies continued, based on the results of the self-assessment.

C4.2 When tensions arise between preventing or mitigating impacts related to a relevant issue and other business objectives, how are they handled?

C4.3 During the reporting period, what measures did the company implement to prevent or mitigate potential impacts related to each relevant issue?



**C5.**  
**Follow-up performance**

How does the company know if its efforts regarding each relevant human rights issue are effectively in practice?

C5.1 What specific examples from the reporting period illustrate whether each relevant issue is being managed effectively?

Millennium bcp has a wide range of Corporate Policies, available for public consultation on the website, which establish a set of base guidelines and expected conduct for groups of Stakeholders and on different matters, which include the subject of Human Rights.

In addition, and through its Guiding Principles for Suppliers, Millennium ensures that suppliers follow a set of Guidelines also related to Human Rights, and compliance with them can be verified by answering questionnaires or visiting places where the activity is carried out.

**C6.**  
**Remediation**

How does the company offer effective solutions to people who, through their actions and decisions, are harmed in terms of relevant human rights issues?

C6.1 How can the company receive complaints or concerns related to each relevant theme?

C6.2 How does the company know if people feel able and empowered to raise complaints or concerns?

C6.3 How does the company process complaints and evaluate the effectiveness of the results?

C6.4 During the reporting period, what were the trends and patterns of complaints or concerns and related results in relation to each relevant issue and what lessons learned?

C6.5 During the reporting period, did the company provide or facilitate the remediation of any actual impacts related to a material issue, and if so, what are typical or significant examples?

The Bank encourages the reporting of actual or potential situations of violation of Human Rights (see the Human Rights chapter) through i) the specific and confidential internal communication channel for reporting violations established in the Code of Conduct and other internal regulations and ii) the Client Ombudsman. Situations that are reported through other channels are also analysed and, whenever necessary, trigger improvement actions.

In 2023, there were no complaints or concerns expressed by any group of stakeholders in terms of Human Rights.

**Table regarding the alignment with the recommendations from the TCFD - Task Force on Climate-Related Financial Disclosures**

Pillar	Recommendations	Sources of Reference
<p><b>Governance</b> How we manage the climate-related risks and opportunities and opportunities</p>	<p>a) Describe Management's oversight of climate-related risks and opportunities. b) Describe management's role in assessing and managing climate-related risks and opportunities.</p>	<ul style="list-style-type: none"> <li>• 2023 Sustainability Report &gt; Environmental Responsibility &gt; TCFD</li> <li>• CDP Climate Change 2023- C1 Governance</li> <li>• 2023 Annual Report &gt; Risk Management</li> </ul>
<p><b>Strategy</b> How we manage the current and potential impacts of climate-related risks and opportunities</p>	<p>a) Describe the climate-related risks and opportunities identified by the Organization for the short, medium and long term. b) Describe the impact of climate-related risks and opportunities on the Organization's business, strategy and financial planning. c) Describe the resilience of the organization's strategy, considering the different climate-related scenarios, including the 2°C or lower scenario.</p>	<ul style="list-style-type: none"> <li>• 2023 Sustainability Report &gt; Environmental Responsibility &gt; 2023 Sustainability Master Plan - Environmental Action Plan</li> <li>• 2023 Sustainability Report &gt; Environmental Responsibility &gt; Sustainable Operations</li> <li>• 2023 Sustainability Report &gt; Environmental Responsibility &gt; TCFD</li> <li>• CDP Climate Change 2023- C2 Risk and Opportunities, C3 Business Strategy</li> </ul>
<p><b>Risks and opportunities</b> How we identify, assess and manage the climate-related risks and opportunities</p>	<p>a) Describe the organization's process for identifying and assessing climate-related risks. a) Describe the organization's process to manage climate-related risks. c) Describe how the Organization's climate-related risk identification, assessment and management processes are integrated into overall risk management.</p>	<ul style="list-style-type: none"> <li>• 2023 Sustainability Report &gt; Environmental Responsibility &gt; TCFD</li> <li>• CDP Climate Change 2023- C2 Risk and Opportunities, C3 Business Strategy</li> </ul>
<p><b>Metrics and targets</b> How we assess and manage the climate-related risks and opportunities</p>	<p>a) Disclose the metrics used by the organization to assess climate-related risks and opportunities, in line with the risk management strategy and process. b) Disclose GHG emissions (scopes 1, 2 and 3) and the associated risks. c) Describe the objectives used by the organization to manage climate-related risks and opportunities and assess its performance against the objectives.</p>	<ul style="list-style-type: none"> <li>• 2023 Sustainability Report &gt; Environmental Responsibility &gt; Sustainable Operations</li> <li>• 2023 Sustainability Report &gt; Environmental Responsibility &gt; TCFD</li> <li>• CDP Climate Change 2023- C4 Targets and Performance, C6 Emissions data</li> </ul>

## Alignment with the CMVM model of report for the disclosure of non-financial information

Requirement	Chapter/section	Pages	
<b>Part I - Information on the Policies adopted</b>			
<b>A - Introduction</b>	Description of the Company's general policy regarding sustainability issues, with an indication of any changes to the previously approved	SR 23   Introduction > Sustainability Policy SR 23   Approach to Sustainability   Relation with Stakeholders   Relation with <i>Stakeholders</i> > Sustainability Master Plan (SMP) 2022	
	Description of the methodology and the reasons for its adoption in reporting non-financial information, as well as any changes that may have occurred in relation to previous years and the reasons that motivated them.	SR 23   Introduction > Sustainability Policy SR 23   Relation with <i>Stakeholders</i> > SMP - Sustainability Master Plan 2023	
<b>B – Corporate Model</b>	General description of the business model and form of organization of the Company/Group, indicating the main business areas and markets in which it operates (if possible, using organization charts, graphics or functional tables).	SR 23   Creation of Value	
		SR 23   Introduction > Governance Model	
		AR 23   Business Model	
<b>C - Main Risk Factors</b>	1. Identification of the main risks associated with the subject matter of the report and arising from the Company's activities, products, services or commercial relationships, including, where applicable and whenever possible, supply chains and outsourcing.	SR 23   Introduction > Management of ESG risks SR 23   Economic Responsibility and of Governance > Employees SR 23   Social Responsibility > Human Rights SR 23   Environmental Responsibility > TCFD	
	2. Indication of the way those risks are identified and managed by the company.	SR 23   Introduction > Management of ESG risks SR 23   Economic Responsibility and of Governance > Ethics and Professional Conduct > Internal Audit	
	1. Explanation on the internal functional distribution regarding competences, including the corporate bodies, commissions, committees, or divisions responsible for the identification/management /monitoring of the risks.	SR 23   Introduction > Management of ESG risks SR 23   Economic Responsibility and of Governance > Ethics and Professional Conduct > Internal Audit SR 23   Environmental Responsibility > TCFD	
	2. Express indication of the new risks identified by the company versus what was reported in previous years and well as of the risks that stopped being risks.	SR 23   Introduction > Management of ESG risks SR 23   Economic Responsibility and of Governance > Employees SR 23   Social Responsibility > Human Rights SR 23   Environmental Responsibility > TCFD	
	3. Indication and brief description of the main opportunities that are identified by the Company in the context of the themes object of reporting.	SR 23   Introduction > Strategic Plan 2021/2024 SR 23   Environmental Responsibility > TCFD	
<b>D - Implemented Policies</b>			
<b>i. ENVIRONMENTAL POLICIES</b>	1. Description of the Company's strategic objectives and the main actions to be taken to achieve them.	SR 23   Environmental Responsibility	
	2. Description of the main performance indicators defined.	SR 23   Environmental Responsibility	
	3. Indication versus the previous year, of the degree of fulfilment of those objectives, at least by reference to: i. Sustainable use of resources ii. Pollution and climate changes	SR 23   Environmental Responsibility > Sustainable Operations	

Requirement	Chapter/section	Pages
iii. Circular Economy and waste management iv. Protection of biodiversity		

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Requirement	Chapter/section	Pages
<b>Part I - Information on the Policies adopted</b>		
<b>ii. SOCIAL AND POLITICAL POLICIES</b>	1. Description of the Company's strategic objectives and the main actions to be taken to achieve them.	SR 23   Social Responsibility > Sharing and participate SR 23   Social Responsibility > Financial Literacy SR 23   Social Responsibility > Foundations Group BCP SR 23   Economic Responsibility and of Governance > Suppliers SR 23   Economic Responsibility and of Governance > Products and services
	2. Description of the main performance indicators defined.	SR 23   Introduction > Sustainable Finance Disclosures (SFDR) SR 23   Approach to Sustainability   Relation with Stakeholders SR 23   Economic Responsibility and of Governance > Fiscal Policy
<b>iii. EMPLOYEES AND GENDER EQUALITY AND NON DISCRIMINATION</b>	3. Indication versus the previous year, of the degree of fulfilment of those objectives, at least by reference to: i. Commitments of the company towards the Community ii. Outsourcing and suppliers iii. Consumers iv. Responsible investment v. <i>Stakeholders</i> vi. Fiscal Information	i. SR 23   Social Responsibility > Sharing and participate i. SR 23   Social Responsibility > Financial Literacy i. SR 23   Social Responsibility > Foundations Group BCP ii. SR 23   Economic Responsibility and of Governance > Suppliers iii. SR 23   Economic Responsibility and of Governance > Products and services iv. SR 23   Economic Responsibility and of Governance > Products and services iv. SR 23   Introduction > Sustainable Finance Disclosures (SFDR) v. SR 23   Approach to Sustainability   Relation with Stakeholders vi. SR 23   Economic Responsibility and of Governance > Fiscal Policy
	1. Description of the Company's strategic objectives and the main actions to be taken to achieve them.	SR 23   Economic Responsibility and of Governance > Employees
<b>IV. HUMAN RIGHTS</b>	2. Description of the main performance indicators defined.	SR 23   Economic Responsibility and of Governance > Employees
	3. Indication versus the previous year, of the degree of fulfilment of those objectives, at least by reference to: i. Office: ii. Work organization iii. Health and Safety iv. Social Relations v. Training vi. Equality	i. SR 23   Economic Responsibility and of Governance > Employees ii. SR 23   Social Responsibility > Foundations Group BCP iii. SR 23   Social Responsibility > Benefits for Employees > Health and Safety iv. SR 23   Summary of Indicators SR 23   Economic Responsibility and of Governance > Employees > Training vi. SR 23   Economic Responsibility and of Governance > Employees
1. Description of the Company's strategic objectives and the main actions to be taken to achieve them.	SR 23   Social Responsibility > Human Rights	

	2. Description of the main defined performance indicators.	SR 23   Social Responsibility > Human Rights	
	3. Indication versus the previous year, of the degree of fulfilment of those objectives, at least by reference to: i. Due diligence procedures ii. Measures for the Prevention of Risks iii. Legal proceedings for violation of human rights	SR 23   Social Responsibility > Human Rights SR 23   Table UNGP- UN Guiding Principles Reporting Framework	


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Requirement	Chapter/section	Pages
<b>Part I - Information on the Policies adopted</b>		
<b>V. FIGHT AGAINST CORRUPTION AND BRIBERY ATTEMPTS</b>	1. Prevention of Corruption	SR 23   Economic Responsibility and of Governance > Ethics and Professional Conduct
	2. Prevention of money laundering (for issuing companies subject to this regime)	SR 23   Economic Responsibility and of Governance > Ethics and Professional Conduct
	3. Codes of Ethics	SR 23   Economic Responsibility and of Governance > Ethics and Professional Conduct
	4. Management of Conflicts of Interest	SR 23   Economic Responsibility and of Governance > Ethics and Professional Conduct > Conflicts of Interest Policies
<b>Part II- Information on Standards/Guidelines followed</b>		
<b>1. IDENTIFICATION OF STANDARDS/GUIDELINES FOLLOWED IN THE REPORTING OF NON-FINANCIAL INFORMATION</b>	23 SR   Introduction > Sustainability Report SR 23   Introduction > Evolution of the Non-Financial Reporting	
<b>2. IDENTIFICATION OF THE SCOPE AND METHODOLOGY TO CALCULATE THE INDICATORS</b>	SR 23   Introduction > Sustainability Report SR 23   Methodology Note	

## Table of alignment with PRB - Principles for Responsible Banking

In June 2022, Banco Comercial Português, S.A. joined the [United Nations Environment Programme - Finance Initiative \(UNEP-Fi\)](#) and subscribed the [Principles for Responsible Banking \(PRB\)](#). For the 2023 fiscal year, BCP Group reports its first mandatory self-assessment template against the 6 Principles for Responsible Banking: 1. Alignment; 2. Impact and Target Setting; 3. Clients and Customers; 4. Stakeholders; 5. Governance and Culture; 6. Transparency and Accountability.

<b>Principle 1: Alignment</b>	
	<p>We will align our business strategy to be consistent with and contribute to individuals’ needs and society’s goals, as expressed in the Sustainable Development Goals (SDG), the Paris Climate Agreement and relevant national and regional frameworks.</p>
<b>Business model</b>	
<p>Describe (high-level) your bank’s business model, including the main customer segments served, types of products and services provided, the main sectors and types of activities across the main geographies in which your bank operates or provides products and services. Please also quantify the information by disclosing e.g. the distribution of your bank’s portfolio (%) in terms of geographies, segments (i.e. by balance sheet and/or off-balance sheet) or by disclosing the number of customers and clients served.</p>	
<p><b>Response</b></p> <p>The BCP Group’s decision center is in Portugal, but it is also present in the following markets: Poland, Mozambique and China (Macau). In Angola and France (through its shareholder position in Banco Millennium Atlântico and in Banque BCP), BCP Group holds financial participations that consolidates using the asset consolidation method. In Portugal, it operates with the brand Millennium bcp - with the legal name of Banco Comercial Português, S.A. (BCP) - and it is currently the largest Portuguese private sector bank. The Group operates and acts with respect for people and institutions, focusing on the clients, pursuing a mission of excellence, trust, ethics, sustainability and responsibility. All its banking operations develop their activity under the Millennium brand and its international presence is ensured through representation offices and/or commercial protocols.</p> <p>The BCP Group conducts its banking activities and financial services in Portugal and abroad, with special focus on Retail Banking, Corporate Banking and Private Banking business. The Group offers a vast range of financial products and services: current accounts, payment systems, savings and investment products, private banking, asset management, investment banking and loans - including mortgage loans and personal loans - commercial banking, leasing, factoring and insurance, among others.</p> <p><b>BCP Group in Portugal</b></p> <p>In Portugal, Millennium bcp has 2.7 million clients and it is focused on the retail and companies’ markets, providing services to its customers in a segmented manner. The Bank makes products available to customers through its network of branches and digital platforms, offering a wide range of products and services.</p> <p><b>BCP Group in Poland</b></p> <p>In Poland, Bank Millennium also serves about 2.8 million clients and has a well distributed network of branches and strong digital platforms, all supported by a modern multi-channel infrastructure, on a reference service quality, with high brand recognition.</p> <p><b>BCP Group in Mozambique</b></p> <p>In Mozambique, the BCP Group operates through Millennium bim, a universal bank that has about 1.2 million clients. Millennium bim is the reference bank in this country, being associated with innovation, strong penetration in terms of electronic banking and capacity to attract new customers, as well as being a reference in terms of profitability and capitalization.</p> <p><b>BCP Group in Macau</b></p> <p>The activity of the existing branch in Macau was expanded in 2010, through the attribution of a full license (onshore), and counts with 2 thousand and 600 Clients.</p> <p>In 2023, the BCP Group reported that credit to individuals represented 61.3% of the total amount of its loans (mortgage loans were 80.4% and personal loans were 19.6%), while credit to companies was 38.7% of the total amount of the portfolio (including activities in all geographies). For Portugal, these values were 54.6% (89.0% mortgage loans and 11.0% personal loans) and 45.4%, respectively. The main sectors in Millennium bcp’s lending portfolio are: Wholesale business (3.69%), Real estate activities (3.65%), Retail Business (3.13%), Construction (2.71%), Financial intermediation (2.65%), Machinery, equipment and basic metallurgical (2.50%) and Restaurants and hotels (2.50%).</p>	<p><b>Links and references</b></p> <p><a href="#">2023 BCP Annual Report</a>  <a href="#">Millennium bcp Website</a></p>

<p>Strategy alignment</p> <p><b>Does your corporate strategy identify and reflect sustainability as strategic priority/ies for your bank?</b></p> <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Please describe how your bank has aligned and/or is planning to align its strategy to be consistent with the Sustainable Development Goals (SDGs), the Paris Climate Agreement, and relevant national and regional frameworks.</p> <p><b>Does your bank also reference any of the following frameworks or sustainability regulatory reporting requirements in its strategic priorities or policies to implement these?</b></p> <p><input checked="" type="checkbox"/> UN Guiding Principles on Business and Human Rights</p> <p><input checked="" type="checkbox"/> International Labour Organization fundamental conventions</p> <p><input checked="" type="checkbox"/> UN Global Compact</p> <p><input type="checkbox"/> UN Declaration on the Rights of Indigenous Peoples</p> <p><input checked="" type="checkbox"/> Any applicable regulatory reporting requirements on environmental risk assessments, e.g. on climate risk - please specify which ones: Taxonomy eligibility and alignment, EBA Pillar 3</p> <p><input type="checkbox"/> Any applicable regulatory reporting requirements on social risk assessments, e.g. on modern slavery - please specify which ones: -----</p> <p><input type="checkbox"/> None of the above</p>	
<p>Response</p> <p>BCP Group defines sustainability as a strategic priority in its business model, strategic plan and in its Sustainability Master Plan (SMP), which defines the bank’s sustainability strategy. The Bank is committed to promoting a culture of environmental, social and economic responsibility, namely to fight climate change, the preservation of natural resources, biodiversity and the environment and social inequalities, together with the strategic goals of digital and technological innovation.</p> <p>Millennium bcp’s intervention is structured through three major axes: Environment - implementation of measures fostering a fair and inclusive transition to a decarbonized economic development model, including the incorporation of the environmental aspect into the bank's risk models; Social - involvement with both, the external and internal communities, to create shared value; Corporate governance - integration of sustainability principles into the Bank's decision-making processes. Therefore, as an integral part of its business model, Millennium bcp takes on the commitment to create social value by developing actions to – and with – the various stakeholder groups, with the goal of, directly and indirectly, contribute to the economic and social development of the countries in which it operates.</p> <p>The Bank includes Sustainability as one of the vectors of the “Excelling 24” Strategic Plan: Millennium bcp is sustainability-driven, meaning that it is adapting its business model to increase positive differentiation towards the community’s and its clients’ rising expectations on sustainability, while capturing associated business opportunities and addressing regulatory demands.</p> <p>In the wake of the subscription, in 2005, of the United Nations Global Compact Principles, BCP Group also committed to support its 10 Principles establishing a set of values in what concerns Human Rights, Labour Conditions, Environment, Ethics and Anti-Corruption.</p> <p>BCP Group is committed to align its activities with the Paris Climate Agreement and the objective of limiting the increase in average temperature to below 1.5°C. The Bank has signed BCSD Portugal’s manifest “Towards COP27”, which recognizes the importance of decarbonizing economic development models and complying with the Paris Agreement. The Bank has also signed, in 2019, the “Letter of Commitment for Sustainable Financing” promoted by the Portuguese Government and, in 2020, the “Lisbon European Green Capital Commitment”, both national initiatives promoting sustainability goals. In 2023, the BCP Group signed the Science Based Targets initiative (SBTi) Commitment Letter, assuming the commitment to drive sustainable growth by setting science-based emissions reduction targets.</p> <p>Furthermore, the Bank acknowledges the importance of the Sustainable Development Goals (SDGs) of the United Nations. Considering that the pursuit of these 17 objectives implies a joint effort of states and private entities, namely companies, the Bank assumes the commitment to work actively towards a sustainable, socially inclusive and environmentally responsible development in all territories where it operates.</p> <p>At this stage, Millennium bcp has identified the following SDGs as priorities for the implementation of the 2030 Agenda for Sustainable Development: (i) SDG 4 - Quality education, (ii) SDG 7 - Affordable and clean energy, (iii) SDG 8 - Decent work and economic growth, (iv) SDG 10 - Reduced inequalities and (v) SDG 13 - Climate action.</p>	<p>Links and references</p> <p><a href="#">2023 BCP Annual Report</a></p> <p><a href="#">2023 BCP Sustainability Report</a></p> <p><a href="#">Millennium bcp Environmental Policy</a></p> <p><a href="#">Millennium bcp Corporate Policies and Principles</a></p>

## Principle 2: Impact and Target Setting



We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products and services. To this end, we will set and publish targets to the areas where we can have the most significant impacts.

### 2.1 Impact Analysis (Key Step 1)

Show that your bank has performed an impact analysis of its portfolio/s to identify its most significant impact areas and determine priority areas for target-setting. The impact analysis shall be updated regularly<sup>1</sup> and fulfil the following requirements/elements (a-d)<sup>2</sup>:

a) **Scope:** What is the scope of your bank's impact analysis? Please describe which parts of the bank's core business areas, products/services across the main geographies that the bank operates in (as described under 1.1) have been considered in the impact analysis. Please also describe which areas have not yet been included, and why.

<p><b>Response</b></p> <p>BCP Group has conducted an impact analysis of its Portuguese portfolio, which represents more than half of the Group's total business. The analysis includes the core business segments of Millennium bcp: its Retail, Business, Corporate and Investment portfolios.</p> <p>The Bank used UNEP FI's Impact Analysis tool to perform the impact assessment. The Context Module was filled in for Portugal and allowed an understanding of the country's reality and main need areas. The Consumer Banking Identification Module was filled in with data from the Bank's Retail portfolio and the Institutional Banking Identification Module was filled in twice, separately, once for the Business and Corporate portfolios and another for the Investment portfolio of Millennium bcp. The results of each module were analyzed and overlaid to assess the priority impact areas/topics for the Bank.</p> <p>The remaining portion of BCP's geographies are not yet assessed due to a lack of available data to perform a detailed analysis. The BCP Group plans to expand its impact analysis to include all countries where it is active and disclose this information in the future.</p>	<p>Links and references</p>
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b) **Portfolio composition:** Has your bank considered the composition of its portfolio (in %) in the analysis? Please provide proportional composition of your portfolio globally and per geographical scope

- i) by sectors & industries<sup>3</sup> for business, corporate and investment banking portfolios (i.e. sector exposure or industry breakdown in %), and/or
- ii) by products & services and by types of customers for consumer and retail banking portfolios.

If your bank has taken another approach to determine the bank's scale of exposure, please elaborate, to show how you have considered where the bank's core business/major activities lie in terms of industries or sectors.

<p><b>Response</b></p> <p>The portfolio analysis performed by Millennium bcp included its Retail banking and its Institutional banking portfolios, which together represent 90.1% of the Bank's total portfolio in Portugal, and are distributed according to the following table (in net operating revenue):</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #e1f5fe;">Business segment</th> <th style="background-color: #e1f5fe;">Portugal</th> </tr> </thead> <tbody> <tr> <td style="background-color: #e1f5fe;">Retail Banking</td> <td style="text-align: center;">62.8%</td> </tr> <tr> <td style="background-color: #e1f5fe;">Institutional Banking</td> <td style="text-align: center;">27.3%</td> </tr> <tr> <td style="background-color: #e1f5fe;">Business Banking</td> <td style="text-align: center;">63.0%</td> </tr> <tr> <td style="background-color: #e1f5fe;">Corporate Banking</td> <td style="text-align: center;">5.5%</td> </tr> <tr> <td style="background-color: #e1f5fe;">Investment Banking</td> <td style="text-align: center;">31.5%</td> </tr> </tbody> </table>	Business segment	Portugal	Retail Banking	62.8%	Institutional Banking	27.3%	Business Banking	63.0%	Corporate Banking	5.5%	Investment Banking	31.5%	<p>Links and references</p>
Business segment	Portugal												
Retail Banking	62.8%												
Institutional Banking	27.3%												
Business Banking	63.0%												
Corporate Banking	5.5%												
Investment Banking	31.5%												

<sup>1</sup> That means that where the initial impact analysis has been carried out in a previous period, the information should be updated accordingly, the scope expanded as well as the quality of the impact analysis improved over time.

<sup>2</sup> Further guidance can be found in the [Interactive Guidance on impact analysis and target setting](#).

<sup>3</sup> 'Key sectors' relative to different impact areas, i.e. those sectors whose positive and negative impacts are particularly strong, are particularly relevant here.



Composition of Millennium bcp's retail portfolio:

Products & services	Total % of portfolio based on amounts	Total % of portfolio based on number of customers
Current accounts	35.3%	40.7%
Savings	27.8%	11.2%
Credit	36.9%	48.1%
Credit cards	1.6%	58.8%
Consumer loans & overdraft	8.4%	17.3%
Home loans /mortgages	87.4%	7.5%
Vehicle related loans	0.5%	0.4%
Others	2.1%	16.0%

The Business & Corporate banking portfolio of Millennium bcp includes the loans the bank has to SMEs, corporates and multinationals. The analysis included 96.2% of total business & corporate portfolio due the limit of 50 sectors imposed by the UNEP FI's Impact Analysis tool. The sectoral breakdown is as follows:

Sector	% outstanding amount
Manufacturing	18.5%
Wholesale and Retail Trade	16.1%
Real Estate Activities	10.9%
Financial and Insurance Activities	9.1%
Accommodation and Food Service Activities	8.8%
Construction	7.5%
Professional, Scientific and Technical Activities	7.4%
Transportation and Storage	4.2%
Electricity, Gas, Steam and Air Conditioning Supply	2.8%
Agriculture, Forestry and Fishing	2.3%
Aministrative and Support Service Activities	2.1%
Human Health and Social Work Activities	1.9%
Arts, Entertainment and Recreation	1.3%
Water Supply; Sewage, Waste Management and Remediation Activities	1.1%
Information and Communication	0.8%
Education	0.8%
Other Service Activities	0.3%
Mining and Quarrying	0.3%

For the investment banking portfolio of Millennium bcp, the analysis included only the Bank's investments in Portugal, specifically in Non-Financial Corporations, Financial Institutions and Sovereigns. The last one represents 68% of this portfolio. Subsequently, the portfolio was analysed using UNEP FI's Impact Analysis tool that, since it was limited to a maximum of 50 NACE sectors, covered 98.2% of the defined portfolio. The sectoral breakdown is as follows:

Sector	% outstanding amount
Public Administration and Defense; Compulsory Social Security	67.9%
Professional, Scientific and Technical Activities	10.0%
Financial and Insurance Activities	9.5%

Manufacturing	4.4%	
Electricity, Gas, Steam and Air Conditioning Supply	3.0%	
Transportation and Storage	0.6%	
Real Estate Activities	0.6%	
Mining and Quarrying	0.5%	
Wholesale and Retail Trade	0.5%	
Water Supply, Sewerage, Waste Management and Remediation activities	0.5%	
Construction	0.4%	
Aministrative and Support Service Activities	0.2%	
Arts, Entertainment and Recreation	0.1%	

c) **Context:** What are the main challenges and priorities related to sustainable development in the main countries/regions in which your bank and/or your clients operate?<sup>4</sup> Please describe how these have been considered, including what stakeholders you have engaged to help inform this element of the impact analysis.

This step aims to put your bank’s portfolio impacts into the context of society’s needs.

Response	Links and references
<p>Millennium bcp used the third version of UNEP FI’s Impact Analysis Tool to assess the main challenges and priorities related to sustainability in Portugal, the main geography of the Bank’s activities. The Context Module was automatically filled in for Portugal and from its results the Bank can observe that the main need areas, and respective topics are (based on information from the statistical datasets):</p> <ul style="list-style-type: none"> <li>• Availability, accessibility, affordability, quality of resources &amp; services - Water, Housing and Healthcare &amp; Sanitation;</li> <li>• Infrastructure;</li> <li>• Climate stability;</li> <li>• Biodiversity &amp; Healthy ecosystems - Waterbodies and Habitat;</li> <li>• Circularity - Resource intensity and Waste.</li> </ul> <p>Adding to these results, the Bank considered the findings of its materiality matrix and complementary exercises involving its stakeholders, which allowed for a more contextualized view of the exercise outcomes (for more information refer to Principle 4: Stakeholders).</p>	

Based on these first 3 elements of an impact analysis, what positive and negative impact areas has your bank identified? Which (at least two) significant impact areas did you prioritize to pursue your target setting strategy (see 2.2)<sup>5</sup>? Please disclose.

Response	Links and references
<p>Millennium bcp filled in the UNEP FI’s Impact Analysis Tool modules as mentioned above, and reached the following results:</p> <p>Retail portfolio - the main potential key impact areas for this portfolio are:</p> <ul style="list-style-type: none"> <li>• (i) Availability, accessibility, affordability, quality of resources &amp; services - potential positive and negative impacts;</li> <li>• (i) Socio-economic convergence - potential positive impact;</li> <li>• (i) Climate stability and (ii) Circularity - potential negative impact areas.</li> </ul> <p>Business &amp; Corporate porfolios - the main potential key impact areas for the sectorial analysis of these portfolios are:</p> <ul style="list-style-type: none"> <li>• (i) Health &amp; Safety, (ii) Availability, accessibility, affordability, quality of resources &amp; services, (iii) Livelihood, (iv) Equality &amp; Justice, (v) Strong institutions, Peace &amp; Stability, (vi) Climate stability, (vii) Biodiversity &amp; Healthy ecosystems and (viii) Circularity - potential positive and negative impacts;</li> </ul>	

<sup>4</sup> Global priorities might alternatively be considered for banks with highly diversified and international portfolios.

<sup>5</sup> To prioritize the areas of most significant impact, a qualitative overlay to the quantitative analysis as described in a), b) and c) will be important, e.g. through stakeholder engagement and further geographic contextualisation.

<ul style="list-style-type: none"> <li>• (i) Healthy economies and (ii) Socio-economic convergence - potential positive impact areas;</li> <li>• (i) Integrity &amp; Security of person - potential negative impact area.</li> </ul> <p>Investment portfolio - the main potential key impact areas for the sectorial analysis of this portfolio are:</p> <ul style="list-style-type: none"> <li>• (i) Integrity &amp; Security of person, (ii) Health &amp; Safety, (iii) Availability, accessibility, affordability, quality of resources &amp; services, (iv) Livelihood, (v) Equality &amp; Justice, (vi) Strong institutions, Peace &amp; Stability, (vii) Climate stability, (viii) Biodiversity &amp; Healthy ecosystems and (ix) Circularity - potential positive and negative impact areas;</li> <li>• (i) Healthy economies, (ii) Infrastructure and (iii) Socio-economic convergence - potential positive impact areas.</li> </ul> <p>These areas of environmental, social and economic positive and negative potential impacts were assessed by the Bank, as well as each correspondent potential impact topic. The results from each portfolio were compared and then overlaid with the results from the Context Module (main need areas for Portugal), as well as interpreted in the context of the Bank's activities and main strategies.</p> <p>The main result of this analysis was the identification of the three main impact topics for Millennium bcp: Climate Stability, Resource Intensity and Housing.</p>	
<p>d) For these (min. two prioritized impact areas): Performance measurement: Has your bank identified which sectors &amp; industries as well as types of customers financed or invested in are causing the strongest actual positive or negative impacts? Please describe how you assessed the performance of these, using appropriate indicators related to significant impact areas that apply to your bank's context.</p> <p>In determining priority areas for target-setting among its areas of most significant impact, you should consider the bank's current performance levels, i.e. qualitative and/or quantitative indicators and/or proxies of the social, economic and environmental impacts resulting from the bank's activities and provision of products and services. If you have identified climate and/or financial health&amp;inclusion as your most significant impact areas, please also refer to the applicable indicators in the Annex.</p> <p>If your bank has taken another approach to assess the intensity of impact resulting from the bank's activities and provision of products and services, please describe this.</p> <p>The outcome of this step will then also provide the baseline (incl. indicators) you can use for setting targets in two areas of most significant impact.</p>	
<p><b>Response</b></p> <p>Millennium bcp has assessed its performance regarding all the potential impact areas of its portfolios, while keeping its focus on the three main impact topics prioritized by the Bank.</p> <p><b>Climate Stability</b></p> <p>Climate Stability has been a topic of attention for the Bank for years now, and it is one of the main focuses of the Bank's sustainability strategy. BCP is committed to the Paris Agreement and the objective of limiting the increase in average temperature to below 1.5°C. It is also committed to achieve carbon neutrality by 2030, for its direct emissions. The results from Millennium bcp's exercise using the Impact Analysis Tool and a thorough analysis of its financed and invested sectors indicate that:</p> <ul style="list-style-type: none"> <li>• The sectors that have the most potential negative impacts this topic are "Real estate activities" and "Construction of buildings".</li> <li>• The sectors that have the most potential positive impacts on this topic are "Regulation of and contribution to more efficient operation of businesses" and "Electricity, gas, steam and air conditioning supply".</li> </ul> <p>Millennium bcp's sustainability framework already includes a deep analysis of the Bank's performance in several climate-related indicators. In 2023, the Bank reduced its GHG operational emissions by 7%, for its Portuguese activities. In Portugal, 100% of the electricity consumed comes from renewable sources, 10.5% of the fleet is already electric or hybrid and this number is expected to rise in the next years. In 2022, Millennium bcp built its second photovoltaic plant in Portugal and in 2023 had approved the project to start building the third one.</p> <p>The Bank has also established a Green, Social and Sustainability Bond Framework. Regarding the sectors it finances, Millennium bcp has a list of projects and sectors excluded from or with conditioned access to credit due to their environmental impacts (e.g., coal energy production).</p> <p><b>Resource Intensity</b></p> <p>Regarding the impact topic "Resource Intensity", the results from the Impact Analysis Tool reveal that:</p> <ul style="list-style-type: none"> <li>• The sectors that have the most potential negative impacts this topic are also "Real estate activities" and "Construction of buildings".</li> <li>• The sectors that have the most potential positive impacts on this topic are "Regulation of and contribution to more efficient operation of businesses" and "Retail trade, except of motor vehicles and motorcycles".</li> </ul> <p>The dematerialization of operations has been one of the main priorities of the Bank in the past years. Millennium bcp monitors the levels of resource use of its own activities and has a list of projects and sectors excluded from credit for not complying with environmental requirements (e.g., coal mining, oil exploration and companies and</p>	<p><b>Links and references</b></p> <p><a href="#">2023 BCP Sustainability Report</a></p> <p><a href="#">Principles of Responsible Financing</a></p> <p><a href="#">ESG Bonds Framework</a></p>

<p>activities related to wood extraction and commercialization derived from protected areas in native tropical forests).</p> <p>Regarding the Bank's own operations, there has been a reduction of printing, as well as of water and materials' consumption. In the last five years, the Bank reduced the water consumption from its own operations by 42% and reduced the use of materials by 44% (-45% use of cardboard/paper and -64% use of ink cartridges and toners). The Bank has also eliminated the use of single-use plastics.</p> <p><b>Housing</b></p> <p>Housing is a topic of significant concern for the Bank, as it is associated with the most relevant share of the credit it provides to consumers. Millennium bcp's portfolio impact analysis' results show that "Home loans /mortgages" is a product with key positive impact in the topic "Housing" and represents 87% of Millennium bcp's Retail Banking credit. From this value, 17% is associated with houses that have an energy classification of A+, A or B. Millennium bcp offers special credit conditions to housing with energy classification of A+, A and B..</p> <p>The Bank has launched housing related consumer loans to promote the energy efficiency of properties, as well as a green real estate promotion product.</p> <p>The Bank adopted, in the name of transparency in its relationship with customers, the voluntary code of conduct adopted by European Consumer Associations about on time information to be provided in the context of mortgage credit contracts.</p> <p>In social terms, the Bank also provides special conditions of mortgage loans to its employees.</p>	
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**Self-assessment summary:**

**Which of the following components of impact analysis has your bank completed, in order to identify the areas in which your bank has its most significant (potential) positive and negative impacts?<sup>6</sup>**

Scope:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No
Portfolio composition:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No
Context:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No
Performance measurement:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No

**Which most significant impact areas have you identified for your bank, as a result of the impact analysis?**  
*Climate Stability, Resource Intensity and Housing*

**How recent is the data used for and disclosed in the impact analysis?**

Up to 6 months prior to publication

Up to 12 months prior to publication

Up to 18 months prior to publication

Longer than 18 months prior to publication

Open text field to describe potential challenges, aspects not covered by the above etc.: (optional)

<sup>6</sup> You can respond "Yes" to a question if you have completed one of the described steps, e.g. the initial impact analysis has been carried out, a pilot has been conducted.

## 2.2 Target Setting (Key Step 2)

Show that your bank has set and published a minimum of two targets which address at least two different areas of most significant impact that you identified in your impact analysis.

The targets<sup>1</sup> have to be Specific, Measurable (qualitative or quantitative), Achievable, Relevant and Time-bound (SMART). Please disclose the following elements of target setting (a-d), for each target separately:

- a) **Alignment:** which international, regional or national policy frameworks to align your bank’s portfolio with<sup>2</sup> have you identified as relevant? Show that the selected indicators and targets are linked to and drive alignment with and greater contribution to appropriate Sustainable Development Goals, the goals of the Paris Agreement, and other relevant international, national or regional frameworks.

You can build upon the context items under 2.1.

Response	Links and references
<p>Millennium bcp subscribed two documents “Guidelines to accelerate sustainable finance in Portugal” and “Engagement Letter for the Sustainable Funding in Portugal”, issued within the scope of the “Think tank on Sustainable Finance in Portugal”, promoted by the Ministries of Environment, Finances and Economy in the context of the Portuguese “Route to Carbon Neutrality” in 2050. The Bank also subscribed the “Lisbon European Green Capital Commitment”, promoted by CML (Lisbon City Council), as a commitment to promote climate action and sustainability, to meet the targets set by the Paris Agreement and accelerate the path to carbon neutrality.</p> <p>In 2022, and within the framework of the initiatives promoted by BCSD Portugal, Millennium bcp subscribed the manifesto “Towards COP27” recognizing the importance of this conference for the global dialogue on the decarbonisation of development models and for compliance with the Paris Agreement on climate, signing also the manifesto “For an Agreement at COP15”, noting in this case the urgency of adopting a Global Biodiversity Strategy to stop the loss of biodiversity by 2030 and promote the recovery of natural ecosystems.</p> <p>The sustainability-related targets already established by the Bank are in alignment with these frameworks and commitments, as well as with the Sustainable Development Goals (SDG) associated with each impact topic: SDG 13 - Climate Action (Climate Stability), SDG 12 - Responsible Consumption and Production (Resource Intensity) and SDG 11 - Sustainable Cities and Communities (Housing).</p>	

- b) **Baseline:** Have you determined a baseline for selected indicators and assessed the current level of alignment? Please disclose the indicators used as well as the year of the baseline.

You can build upon the performance measurement undertaken in 2.1 to determine the baseline for your target.

A package of indicators has been developed for climate change mitigation and financial health & inclusion to guide and support banks in their target setting and implementation journey. The overview of indicators can be found in the Annex of this template.

If your bank has prioritized climate mitigation and/or financial health & inclusion as (one of) your most significant impact areas, it is strongly recommended to report on the indicators in the Annex, using an overview table like below including the impact area, all relevant indicators and the corresponding indicator codes:

Impact area	Indicator code	Response
Climate change mitigation	...	
	...	
	...	

Impact area	Indicator code	Response
Financial health & inclusion	...	
	...	
	...	

In case you have identified other and/or additional indicators as relevant to determine the baseline and assess the level of alignment towards impact driven targets, please disclose these.

Response	Links and references
<p>Millennium bcp is currently working on the development of SMART targets for each of the three most significant impact topics chosen by the Bank and following UNEP FI’s guidelines on target setting.</p> <p>The current indicators being used to assess the Bank’s performance on these topics and respective baseline values are:</p> <p><b>Climate stability</b></p> <ul style="list-style-type: none"> <li>• GHG Emissions (Scope 1): 2,205 tCO<sub>2</sub>e (2023)</li> <li>• GHG Emissions (Scope 2): 0 tCO<sub>2</sub>e (2023)</li> <li>• Share of fleet that is hybrid/electric: 10.5% (2023)</li> </ul>	

<ul style="list-style-type: none"> <li>Green project finance: 38.3% (2023)</li> </ul>		
Impact area	Indicator code	Response
Climate change mitigation	A.1.1(Climate strategy)	Yes
	A.1.2 (Paris alignment target)	In progress. – The Bank is committed to the Paris Agreement and the objective of limiting the increase in average temperature to below 1.5°C. It is also committed to achieve carbon neutrality by 2030, for its direct emissions.
	A.1.5 (Business opportunities and financial products)	Yes. Examples of these products include: Green mortgage loans; Loans, leasing and renting promoting electric mobility; Renewable energy consumer loans; Decarbonisation and Circular Economy Credit Line; Green Real Estate Promotion Credit; ESG/SRI investment funds.
<p><b>Resource intensity</b></p> <ul style="list-style-type: none"> <li>Water consumption: 106,387 m3 (2023)</li> <li>Materials consumption: 680 t (2023)</li> </ul> <p><b>Housing</b></p> <ul style="list-style-type: none"> <li>Share of credit to houses with energy certifications of A+, A or B: 8.9% (2023)</li> </ul>		

<p>c) <b>SMART targets</b> (incl. key performance indicators (KPIs)<sup>3</sup>): Please disclose the targets for your first and your second area of most significant impact, if already in place (as well as further impact areas, if in place). Which KPIs are you using to monitor progress towards reaching the target? Please disclose.</p>	
<p>Response</p> <p>Millennium bcp is currently working on the development of SMART targets for each of the three most significant impact topics chosen by the Bank and following UNEP FI's guidelines on target setting. The current targets established by the Bank are:</p> <p><b>Climate stability</b></p> <ul style="list-style-type: none"> <li>Carbon neutrality of direct emissions by 2030 (Portugal);</li> <li>-</li> <li>Set alignment targets (Scope 1, 2 and 3) according to SBTi;</li> <li>Fleet with 80% hybrid/electric cars by 2030;</li> <li>&gt;50% reduction in exposure to coal and petroleum products;</li> <li>&gt;50% Green project finance;</li> <li>Increase of sustainability-linked bonds (SLBs) and ESG bond issuance.</li> </ul> <p><b>Resource intensity</b></p> <ul style="list-style-type: none"> <li>Implement solutions to enable the re-use of water;</li> <li>Limit increase in water consumption to 2% in 2024;</li> </ul>	<p>Links and references</p>

<sup>1</sup> Operational targets (relating to for example water consumption in office buildings, gender equality on the bank's management board or business-trip related greenhouse gas emissions) are not in scope of the PRB.

<sup>2</sup> Your bank should consider the main challenges and priorities in terms of sustainable development in your main country/ies of operation for the purpose of setting targets. These can be found in National Development Plans and strategies, international goals such as the SDGs or the Paris Climate Agreement, and regional frameworks. Aligning means there should be a clear link between the bank's targets and these frameworks and priorities, therefore showing how the target supports and drives contributions to the national and global goals.

<sup>3</sup> Key Performance Indicators are chosen indicators by the bank for the purpose of monitoring progress towards targets.

<ul style="list-style-type: none"> <li>Decrease materials consumption by 7% in 2024.</li> </ul> <p><b>Housing</b></p> <ul style="list-style-type: none"> <li>Align the requirements for housing credit with the EU’s Energy Performance of Buildings Directive, by introducing minimum standards based on the energy performance of new and existing buildings and promoting renovations for energy efficiency improvement.</li> </ul>	
<p>d) <b>Action plan:</b> which actions including milestones have you defined to meet the set targets? Please describe.</p> <p>Please also show that your bank has analysed and acknowledged significant (potential) indirect impacts of the set targets within the impact area or on other impact areas and that it has set out relevant actions to avoid, mitigate, or compensate potential negative impacts.</p>	
<p><b>Response</b></p> <p>Millennium bcp has developed a Sustainability Master Plan which defines, aligned with the strategy, the actions and initiatives to achieve its environmental, social and governance goals and targets. Within the scope of those goals, the Bank aims to rationalize and improve its consumption profile, namely energy, water and materials, mainly based on a logic of dematerializing processes and preserving natural resources.</p> <p>Millennium bcp in 2024 will begin the construction, approved in 2023, of its third solar power plant. As an effort to reduce Scope 1 emissions, the Bank promotes a bus transport service between Tagus and Lisbon, as well as a hybrid way of working (option to work from home some days of the week) to reduce emissions from transportation. Practices such as the reduction of local printing and the digitalisation of incoming processes, with operations being opened directly in the systems and applications, contribute to a decrease of materials consumption.</p> <p>The Bank also plans to continue increasing the offer of mortgage loans that promote sustainable living standards.</p> <p>Within the scope of Millennium bcp’s lending portfolio, the Bank seeks to increase the percentage of funding for environmentally sustainable projects and organisations, having published in 2021 the Principles for Responsible Financing that identify, among other aspects, the excluded projects and sectors/projects constrained in the scope of the financing policy promoted by the Bank. Included in the scope of financed sustainable activities are Wind, Hydro, Solar and Biomass, as well as the financing of investments in urban waste collection and treatment plants, in drinking water distribution and wastewater treatment networks (ETAR, in Portuguese), waste treatment plants, among others.</p>	<p><b>Links and references</b></p> <p><a href="#">Principles of Responsible Financing</a></p>

Self-assessment summary			
Which of the following components of target setting in line with the PRB requirements has your bank completed or is currently in a process of assessing for your...			
	First area of most significant impact: <b>Climate Stability</b>	Second area of most significant impact: <b>Resource Intensity</b>	Third area of impact: <b>Housing</b>
Alignment	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No
Baseline	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No
SMART targets	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No
Action plan	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No

### 2.3 Target implementation and monitoring (Key Step 2)

**For each target separately:**

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

Report on your bank's progress since the last report towards achieving each of the set targets and the impact your progress resulted in, using the indicators and KPIs to monitor progress you have defined under 2.2.

**Or, in case of changes to implementation plans (relevant for 2nd and subsequent reports only):** describe the potential changes (changes to priority impact areas, changes to indicators, acceleration/review of targets, introduction of new milestones or revisions of action plans) and explain why those changes have become necessary.

**Response**

Millennium bcp has been gradually implementing the measures defined in its Sustainability Master Plan (SMP), as well as keeping track of its environmental, social and governance commitments. This constitutes the first mandatory report published by the BCP Group - after the voluntary one published in the Sustainability Report 2022 - and, as previously mentioned, the Bank is still working on the development of SMART targets for each of the three most significant impact topics, following UNEP FI's guidelines on target setting. Millennium bcp plans to disclose detailed information on these targets implementation and monitoring in following reports.

**Links and references**



## Principle 3: Clients and Customers



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

### 3.1 Client engagement

Does your bank have a policy or engagement process with clients and customers<sup>4</sup> in place to encourage sustainable practices?

Yes                       In progress                       No

Does your bank have a policy for sectors in which you have identified the highest (potential) negative impacts?

Yes                       In progress                       No

Describe how your bank has worked with and/or is planning to work with its clients and customers to encourage sustainable practices and enable sustainable economic activities<sup>5</sup>. It should include information on relevant policies, actions planned/implemented to support clients' transition, selected indicators on client engagement and, where possible, the impacts achieved.

This should be based on and in line with the impact analysis, target-setting and action plans put in place by the bank (see P2).

#### Response

The BCP Group places sustainability and ethical, inclusive and responsible business practices as cardinal points in the cartography of its values and corporate culture, focusing on its clients and working together with them to create lasting and consistent social value, while protecting the environment, the climate and biodiversity.

The Group's Code of Conduct is applicable to all of the Bank's business divisions and geographies, and it ensures that the Bank treats its clients and customers responsibly and with integrity at all times. BCP Group works to offer a quality service to customers, increasingly digital and with high levels of security. The Bank is also certified by laws and regulations like the MiFID II, which ensure that the Bank follows the required processes and control mechanisms and helps identify issues and action areas.

Every two years, the Bank performs a Stakeholder consultation process, which includes representative samples of its (i) Shareholders; (ii) Customers; (iii) Employees; (iv) Community; (v) Suppliers and (vi) Media. This exercise allows the Bank to understand its Customers' perception of the significance of the Bank's impacts, but also their main needs and expectations regarding the organisation's performance in terms of sustainability. This consultation contributes to the (re)definition of material issues for Millennium bcp, reflected in the Materiality Matrix and the Sustainability Master Plan. This Plan addresses the following customer-related dimensions and respective action lines:

- Service quality and Customer satisfaction: optimise satisfaction levels;
- Raising awareness and informing Customers on products and services: integrate aspects of sustainability of the proposed investments into communication with Customers;
- Offering inclusive and sustainable products: Reinforce the Sustainable/ESG products and services' offer that promotes the transition of the economy towards a sustainable model.

The BCP Group is constantly seeking to be near its Customers by means of diversified distribution channels to adequately respond to the contact needs between the Customer and the Bank. As part of its social commitment, the Bank promotes accessibility for people with special needs to its various contact channels.

BCP uses its different platforms to communicate with its Clients and Customers about sustainability-related topics, including its available Sustainable/ESG products.

#### Links and references

[Code of Conduct](#)

[Customer Charter](#)

[2023 BCP Sustainability Report](#)

[2023 BCP Annual Report](#)

<sup>4</sup> A client engagement process is a process of supporting clients towards transitioning their business models in line with sustainability goals by strategically accompanying them through a variety of customer relationship channels.

<sup>5</sup> Sustainable economic activities promote the transition to a low-carbon, more resource-efficient and sustainable economy.

### 3.2 Business opportunities

Describe what strategic business opportunities in relation to the increase of positive and the reduction of negative impacts your bank has identified and/or how you have worked on these in the reporting period. Provide information on existing products and services, information on sustainable products developed in terms of value (USD or local currency) and/or as a % of your portfolio, and which SDGs or impact areas you are striving to make a positive impact on (e.g. green mortgages – climate, social bonds – financial inclusion, etc.).

#### Response

The BCP Group offers a complete and broad range of financial products and services, and continues, under the development of its business lines, responsible for offering an increasing number of products and services which incorporate social principles and respect for the environment and nature. The Bank is also aware that the implementation of social and environmental criteria and standards in the commercial offer is reflected in more efficient risk management, reputation value and higher quality of the products and services offered to Customers, meeting the needs and ambitions of a market increasingly concerned with sustainability.

ActivoBank, held by Millennium bcp and part of BCP Group in Portugal, also has a financing strategy adjusted to the needs of its Customers, with adjusted pricing for loans based on choices that address environmental issues, thus seeking to encourage Customers to make more sustainable choices within their consumption projects.

Considering the role of banking as an accelerator of the green transformation of the economy, in addition to the Bank's actions within the scope of its operations, the consideration of Sustainability/ESG criteria, namely environmental performance criteria, has been intensified in the Bank's offer of products and services.

In the geographic areas in which it operates, products and services have been developed that consider environmental aspects or that are developed considering their environmental impact, and which aim to promote the adoption by Customers of more ecological choices, promoting more sustainable life habits. Providing financial solutions and products that show a concern for combating climate change and improving the quality of life is BCP Group's commitment to sustainability, promoting the necessary changes for the development of a fair, inclusive and decarbonized future.

#### BCP Group in Portugal

In 2021, Millennium bcp established its Green, Social and Sustainability Bond Framework, aiming to finance projects that lead to important and positive environmental and social effects, within the scope of the UN's SDGs 1, 4, 7, 8, 10 and 13. The Bank also provides the following products with ESG criteria: Green mortgage loans; Loans, leasing and renting promoting electric mobility; Renewable energy consumer loans; Decarbonisation and Circular Economy Credit Line; Green Real Estate Promotion Credit; ESG/SRI investment funds.

The Bank seeks to increase the prevalence of funding for environmentally sustainable projects and organisations, having published in 2021 the [Principles for Responsible Financing](#) that identify, among other aspects, the excluded projects and sectors/projects constrained in the scope of the financing promoted by the Bank. In 2023 the percentage of 'green' financing in the total project finance portfolio was 38.3%.

#### BCP Group in Mozambique

Millennium bim has developed Smart IZI, a totally digital service, in the form of a Mobile Banking application, through which individual Customers can obtain information and submit operations wherever and whenever they need (including subscription, registration and use). Last year, the Bank invested in improving the service provision in this channel, simplifying the channel's adherence flow and making available documents, such as current account statements and proof of debit and credit. By making these types of documents available in a totally digital way and free of charge, and along with IZI's other functionalities, the Bank has contributed to resource savings and a reduction of negative environmental impacts, while improving accessibility to the Bank's services.

#### BCP Group in Poland

Bank Millennium launched the strategic EU green finance project, under which it prepared product and process infrastructures to effectively support businesses in their sustainable development, implementation of green investments and energy transition. This contributed to projects such as: Millennium TFI Funds; WWF Millennium Mastercard credit card; Biznesmax Guarantee Programme; Mój Elektryk programme; Green loans for photovoltaic projects.

A few years ago, the Bank decided to significantly reduce its exposure to the coal industry and not to financ new projects, with these constraints expressed in the Environmental Policy.

#### Links and references

[2023 BCP Sustainability Report](#)

[2023 BCP Annual Report](#)

## Principle 4: Stakeholders



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

### 4.1 Stakeholder identification and consultation

Does your bank have a process to identify and regularly consult, engage, collaborate and partner with stakeholders (or stakeholder groups<sup>6</sup>) you have identified as relevant in relation to the impact analysis and target setting process?

Yes                       In progress                       No

Please describe which stakeholders (or groups/types of stakeholders) you have identified, consulted, engaged, collaborated or partnered with for the purpose of implementing the Principles and improving your bank's impacts. This should include a high-level overview of how your bank has identified relevant stakeholders, what issues were addressed/results achieved and how they fed into the action planning process.

#### Response

The BCP Group defines strategies and pursues dynamic policies adjusted to the new challenges imposed by the interested parties with which it relates, materializing a business model based on an ongoing and transparent dialogue enabling to interpret, understand and integrate the expectations of its Stakeholders.

Every two years, Millennium bcp performs a Stakeholder consultation. This process involves, through a representative sampling, the main interested parties, namely: (i) Shareholders; (ii) Customers; (iii) Employees; (iv) Community; (v) Suppliers and (vi) Media, in an exercise that allows to understand their perception of the significance of the Bank's impacts, but also their main needs and expectations regarding the organisation's performance in terms of sustainability. This consultation contributes to the (re)definition of material issues for the Bank, reflected in the Materiality Matrix and the Sustainability Master Plan.

Thematic materiality analysis is the regular process through which the Bank determines which issues are most relevant from the point of view of sustainability, guiding not only the information it disseminates on these aspects, but also the development of strategies and action plans. The Bank's 2022/2023 materiality analysis responds to the new regulatory guidelines, arising from the Corporate Sustainability Reporting Directive (CSRD), regarding double materiality.

This exercise resulted, among the 22 subjects under assessment, in a list of 12 material subjects, reviewed and approved by the Executive Committee of BCP to guide the development of plans and strategies with an impact on the Bank's future action. The 12 material subjects were:

- Cyber-security, privacy and information protection;
- Innovation and digitalization;
- Ethics, conduct and compliance;
- Anti-corruption and anti-money laundering;
- Transparency of the information provided to Customers on products and services;
- Sustainability Governance;
- Resilience of the business model;
- Risk management;
- Satisfaction and Customer experience;
- Brand management and reputation;
- Economic performance;
- Attracting, developing and retaining talent.

The identification and continuous monitoring of the subjects considered material - the most recent performed in 2022/2023 - has made it possible to identify the areas of action that should be recognised as a priority for the Bank in the field of Sustainability and has also made it possible to identify and characterise opportunities for improvement, making a strong contribution to adapting the Sustainability strategy to new realities, challenges and requirements.

#### Links and references

[2023 BCP Sustainability Report](#)

(Chapter: Relation with Stakeholders)

<sup>6</sup> Such as regulators, investors, governments, suppliers, customers and clients, academia, civil society institutions, communities, representatives of indigenous population and non-profit organizations

## Principle 5: Governance & Culture



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

### 5.1 Governance Structure for Implementation of the Principles

Does your bank have a governance system in place that incorporates the PRB?

- Yes
  In progress
  No

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

- which committee has responsibility over the sustainability strategy as well as targets approval and monitoring (including information about the highest level of governance the PRB is subjected to),
- details about the chair of the committee and the process and frequency for the board having oversight of PRB implementation (including remedial action in the event of targets or milestones not being achieved or unexpected negative impacts being detected), as well as
- remuneration practices linked to sustainability targets.

#### Response

Under the Sustainability Master Plan (SMP), BCP has been reviewing and improving its governance model for Sustainability and Responsible Business.

In this context, in 2020, it created the Sustainability Commission (SC), a body dependent on the Executive Committee (ExCo) and chaired by the Chief Executive Officer (CEO), which is responsible for assessing, following up and monitoring the implementation of the Bank's Sustainability strategy - which includes the economic, social, environmental and climate change dimensions - having, specifically, the following tasks:

- To advise the ExCo in the integration of Sustainability principles (Environmental, Social and Corporate Governance) in the Bank's decision-making and management processes;
- To analyse and approve the initiatives necessary for the implementation of actions aimed at materialising the strategic axes and lines of action of the SMP in force, as well as other amendments or adaptations necessary for the fulfilment of the targets defined;
- To supervise and monitor the progress of the approved initiatives, compliance with the respective deadlines and budgets and the evolution of the results achieved, as well as the main performance indicators of the SMP dimensions.

In 2022, within the scope of the Board of Directors (BoD) Committees, the new name and new regulations of the present Committee for Corporate Governance, Ethics and Sustainability (CCGES) were also approved, the body responsible for recommending the adoption by the BoD of policies in line with ethical and social responsibility principles and best practices in matters of corporate governance and sustainability, but also for monitoring the evolution of the SMP and the Corporate Social Responsibility Plan and issuing an opinion on the annual Corporate Governance and Sustainability reports. The Committee for Risk Assessment (CRA) also saw its powers and duties extended to include the monitoring of ESG risks, including climate risks.

In addition, in line with the objective of strengthening the governance model of the topics included in the Sustainability perimeter, the BoD also has competencies in the area of sustainability. Besides the competencies in matters of sustainability delegated to the CCGES and CRA, the Board of Directors is responsible for establishing an internal control system of, translated into a set of strategies, policies, processes, systems and procedures with the aim of ensuring the medium and long-term sustainability of the institution and the prudent exercise of its activity and ensuring that it is applied consistently in all the Bank's subsidiaries and branches, in Portugal or in international operations.

BCP's Remuneration Policy is reviewed annually by the Bank's management bodies and aims to make Employees and members of the management and supervisory bodies aware of the rules and principles underlying the Bank's remuneration management, thus promoting the transparency of remuneration policies with regard to the integration of sustainability risks.

For that purpose, it includes a set of rules of good governance, in the sense that it contemplates provisions aimed at ensuring an alignment of its senior executives and overall Employees with a sound and prudent management of the institution and that considers the interests of all its stakeholders, not promoting an incentive to risk-taking at levels higher than those defined by BCP, avoiding the creation, or contribution to the creation, of situations of conflict of interest and, through those rules and alignment, contributing to the ethical and sustainable development of the Company. These rules are detailed in the Remuneration Policies of the employees of BCP Group and of the members of the Management and Supervisory bodies.

In the case of the variable remuneration of the Executive Committee and the employees, one of the KPIs under consideration is the execution level of the Sustainability Master Plan (SMP).

#### Links and references

[2023 BCP Sustainability Report](#)

[2023 Corporate Governance Report](#)

[Remuneration Policies](#)

## 5.2 Promoting a culture of responsible banking

Describe the initiatives and measures of your bank to foster a culture of responsible banking among its employees (e.g., capacity building, e-learning, sustainability trainings for client-facing roles, inclusion in remuneration structures and performance management and leadership communication, amongst others).

### Response

BCP's Code of Conduct guarantees that the entities of the Group and the members of its Management and Supervisory bodies, as well as its employees, guide their actions on principles of respect for people's rights, of preservation of social and environmental sustainability and of culture and institutional values, committing themselves to behave in an upstanding and honest manner in all relations they establish among themselves, with customers, or any other person or entity with whom they relate. This Code of Conduct enshrines the main values and behaviour standards and corporate responsibility to be observed by all the companies part of the BCP Group and enumerates the preventive measures aimed at preventing discrimination and harassment in the workplace. The BCP Group has also in place an Anti-Corruption and Anti-Bribery Policy.

In 2021, in order to promote the bank's commitment to reinforce training in Sustainable Financing directed to its employees at the different levels of the organisation, Millennium bcp held an universal training on Sustainability in Portugal, which is now part of the courses given to new employees (5,815 employees in 2021, 509 in 2022 and 213 in 2023).

In 2022, and to ensure that the Board of Directors has sufficient knowledge to effectively manage sustainability issues, training was promoted on sustainability and co-sourcing, provided by the Internal Audit area. This training aimed to demonstrate how to integrate sustainability areas in the Bank's internal processes.

The development of the personal and professional competences of the employees is one of the Bank's priorities considering the need to ensure its ongoing alignment with the strategic goals defined by the organization. Seeking to promote excellence in the relations established with Customers, the Bank recognises the importance of ongoing training to ensure business sustainability and endeavours to provide its Employees with the tools necessary for the execution of their activities.

### Links and references

- [Code of Conduct](#)
- [Anti-corruption and Anti-bribery Policy \(v. 2023\)](#)

## 5.3 Policies and due diligence processes

Does your bank have policies in place that address environmental and social risks within your portfolio?<sup>7</sup> Please describe.

Please describe what due diligence processes your bank has installed to identify and manage environmental and social risks associated with your portfolio. This can include aspects such as identification of significant/salient risks, environmental and social risks mitigation and definition of action plans, monitoring and reporting on risks and any existing grievance mechanism, as well as the governance structures you have in place to oversee these risks.

### Response

BCP has an annual process to identify, assess and manage more than 60 types of risks. ESG risk drivers, which have acquired growing relevance within the scope of the Bank's activity - both due to the densification of the legal, regulatory and supervisory framework and requirements, and to the deepening of good practices in risk management - are part of this process.

The Risk Officer annually leads the risk identification and assessment process, with support from other Group divisions. The process consists of a self-assessment exercise of the risks impacts to the BCP Group and its subsidiaries through formal risk identification workshops and expert panel discussions, to provide an informed opinion on risk factors, probability and materiality to BCP Group's capital and liquidity position.

The risk management process has been adapted in a manner consistent with the strategic priority given by the Bank to ESG matters, which is reflected in its Strategic Plan "Excelling 24".

Additionally, the Bank developed its first climate and environmental materiality assessment, thus deepening the understanding of these factors' impacts on the Group's activities, and integrating it in the definition of actions and decision-making for its management and mitigation, and in the identification of business opportunities that emerge from the dynamics of transition to a low carbon economy.

BCP Group priorities and ambitions regarding social and environmental risks are also addressed in its Sustainability Master Plan 2023, in particular in the risk management dimension, with lines of action and measures very directly related to the approach to risks and their integration in the business, among which the following stand out:

### Links and references

- [2023 BCP Sustainability Report](#)
- [2023 Market Discipline Report](#)
- ["Excelling 24" Strategic Plan](#)

<sup>7</sup> Applicable examples of types of policies are: exclusion policies for certain sectors/activities; zero-deforestation policies; zero-tolerance policies; gender-related policies; social due diligence policies; stakeholder engagement policies; whistle-blower policies etc., or any applicable national guidelines related to social risks.

<ul style="list-style-type: none"> <li>• assess the impact of climate and environmental factors on the different risk typologies;</li> <li>• establish processes for monitoring the evolution of the climate and environmental risk factors;</li> <li>• develop a management and control framework for climate and environmental risk factors, including the definition of a governance model;</li> <li>• implement the capacity for climate stress tests.</li> </ul>	
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**Self-assessment summary:**

Does the CEO or other C-suite officers have regular oversight over the implementation of the Principles through the bank's governance system?

Yes  No

Does the governance system entail structures to oversee PRB implementation (e.g. incl. impact analysis and target setting, actions to achieve these targets and processes of remedial action in the event targets/milestones are not achieved or unexpected neg. impacts are detected)?

Yes  No

Does your bank have measures in place to promote a culture of sustainability among employees (as described in 5.2)?

Yes  In progress  No

## Principle 6: Transparency & Accountability



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

### 6.1 Assurance

Has this publicly disclosed information on your PRB commitments been assured by an independent assurer?

- Yes       Partially       No

If applicable, please include the link or description of the assurance statement.

**Response**

**Links and references**

### 6.2 Reporting on other frameworks

Does your bank disclose sustainability information in any of the listed below standards and frameworks?

- GRI
- SASB
- CDP
- IFRS Sustainability Disclosure Standards (to be published)
- TCFD
- Other: UNGP

**Response**

**Links and references**

### 6.3 Outlook

What are the next steps your bank will undertake in next 12 month-reporting period (particularly on impact analysis<sup>8</sup>, target setting<sup>9</sup> and governance structure for implementing the PRB)? Please describe briefly.

**Response**

Millennium bcp plans to continue the analysis of its portfolio, utilizing the Assessment Module of the UNEP FI's Impact Analysis Tool and setting targets for its three prioritized impact topics. The Bank will continue to work on improving and implementing its sustainability strategy and achieve the established sustainability targets, while continuing to focus on its alignment with the Paris Agreement, the UN's SDGs, and the Principles for Responsible Banking. The Bank is also currently working on its response to the new requirements arising from the CSRD.

**Links and references**

<sup>8</sup> For example outlining plans for increasing the scope by including areas that have not yet been covered, or planned steps in terms of portfolio composition, context and performance measurement

<sup>9</sup> For example outlining plans for baseline measurement, developing targets for (more) impact areas, setting interim targets, developing action plans etc.

## 6.4 Challenges

Here is a short section to find out about challenges your bank is possibly facing regarding the implementation of the Principles for Responsible Banking. Your feedback will be helpful to contextualise the collective progress of PRB signatory banks.

What challenges have you prioritized to address when implementing the Principles for Responsible Banking? Please choose what you consider the top three challenges your bank has prioritized to address in the last 12 months (optional question).

If desired, you can elaborate on challenges and how you are tackling these:

- |  |  |
|--|--|
| <input type="checkbox"/> Embedding PRB oversight into governance                               | <input type="checkbox"/> Customer engagement             |
| <input type="checkbox"/> Gaining or maintaining momentum in the bank                           | <input type="checkbox"/> Stakeholder engagement          |
| <input type="checkbox"/> Getting started: where to start and what to focus on in the beginning | <input checked="" type="checkbox"/> Data availability    |
| <input checked="" type="checkbox"/> Conducting an impact analysis                              | <input checked="" type="checkbox"/> Data quality         |
| <input type="checkbox"/> Assessing negative environmental and social impacts                   | <input type="checkbox"/> Access to resources             |
| <input type="checkbox"/> Choosing the right performance measurement methodology/ies            | <input type="checkbox"/> Reporting                       |
| <input type="checkbox"/> Setting targets   | <input type="checkbox"/> Assurance                       |
| <input type="checkbox"/> Other: ...  | <input type="checkbox"/> Prioritizing actions internally |

If desired, you can elaborate on challenges and how you are tackling these:



## Table of alignment with the CSRD (Corporate Sustainability Reporting Directive) and ESRS (European Sustainability Reporting Standards)

This exercise is the result of the analysis between the information presented in this Report and the requirements arising from the European Sustainability Reporting Standards (ESRS).

### CORRESPONDENCE TABLE BETWEEN THE MILLENNIUM BCP MATERIAL THEMES AND THE ESRS THEMES

BCP Material Issues	ESRS thematic	ESRS Sub theme
Attracting, developing and retaining talent	ESRS S1 Own workforce	Work Conditions
		Equal treatment and opportunities for all
Transparency of the information provided to customers about products and services	ESRS S4 Final consumers and users	Information-related impacts for consumers and/or end-users
Customer satisfaction and experience	ESRS S4 Final consumers and users	Information-related impacts for consumers and/or end-users
Ethics, conduct and compliance	ESRS G1 Business Conduct	Business Culture
		Protection of whistle-blowers
		Political context and lobbying activities
		Managing supplier relationships, including payment practices
Prevention of corruption and money laundering	ESRS G1 Business Conduct	Corruption and bribery
Cyber-security, privacy and information protection	No match	-
Innovation and digitalisation	No match	-
Sustainability Governance	No match	-
Resilience of the business model	No match	-
Risk management	No match	-
Management of the brand and reputation	No match	-
Economic performance	No match	-

### DISCLOSURE REQUIREMENTS

Disclosure requirements	Title	Contents, page or link
<b>1. GENERAL INFORMATION</b>		
<b>ESRS 2: GENERAL DISCLOSURE</b>		
<b>BASE OF PREPARATION</b>		
BP-1	General basis for the preparation of sustainability statements	23 SR   Introduction > Sustainability Report
		23 SR   Economic and Governance Responsibility
BP-2	Disclosures in relation to specific circumstances	AR23 AR   Regulatory information > Consolidated financial statements
		SR 23   Approach to Sustainability   Relation with Stakeholders > Materiality Analysis
BP-2	Disclosures in relation to specific circumstances	SR 23   Introduction > Sustainability Report
		SR 23   Methodological Note
<b>GOVERNANCE</b>		
GOV-1	The role played by the management and supervisory bodies;	Governance structure and its composition > Section II - Part B. Corporate bodies and Committees SR 23   Introduction > Governance Model SR 23   Summary of Indicators

GOV-2	Information provided and sustainability issues addressed by the company's management and supervisory bodies	SR 23   Introduction > Governance Model SR 23   GRI Table > GRI 2-13 SR 23   GRI Table > GRI 2-16 SR 23   GRI Table > GRI 2-24 III. Economic and Governance Responsibility > Ethics and Professional Conduct
GOV-3	Integration of sustainability performance into incentive schemes	Corporate Governance Report > Section III - Part D. Remunerations
GOV-4	Declaration on diligence duty	SR 23   Introduction > Governance Model
GOV-5	Risk management and internal controls for sustainability reporting	SR 23   Introduction > Governance Model

**STRATEGY**

SBM-1	Strategy, business model and value chain	SR 23   Creation of Value SR 23   Summary of Indicators SR 23   Economic and Governance Accountability > Products and Services SR 23   Economic Responsibility and of Governance > Suppliers SR 23   Economic Responsibility and of Governance > Employees
SBM-2	Stakeholder interests and views	SR 23   Introduction > Strategic Plan SR 23   Introduction > Governance Model SR 23   Approach to Sustainability   Relation with Stakeholders > Materiality Analysis
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	SR 23   Introduction > Management of ESG risks 23 SR   Approach to Sustainability   Relation with Stakeholders > Materiality Analysis RS 23   Environmental Responsibility > Climate & Environmental Materiality Assessment  SR 23   Environmental Responsibility > Task Force on Climate-related Financial Disclosures (TCFD)

**MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES**

IRO-1	Description of the processes for identifying and assessing material impacts, risks and opportunities	SR 23   Approach to Sustainability   Relation with Stakeholders > Materiality Analysis
IRO-2	Disclosure requirements contained in ESRS covered by the company's sustainability statement	SR 23   ESRS Table

**3. ENVIRONMENTAL INFORMATION**

**ESRS E1: CLIMATE CHANGES<sup>10</sup>**

**GOVERNANCE**

ESRS 2 GOV-3	Integration of sustainability performance into incentive schemes	Corporate Governance Report > Section III - Part D. Remunerations SR 23   Environmental Responsibility > Task Force on Climate-related Financial Disclosures (TCFD)
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<sup>10</sup> As it is a potentially material topic and on which the regulator has a special focus of monitoring, the BCP Group chooses to report information regarding Climate Change.

STRATEGY		
E1-1	Climate change mitigation transition plan	SR 23   Environmental Responsibility > De-carbonisation SR 23   Environmental Responsibility > Task Force on Climate-related Financial Disclosures (TCFD)
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	SR 23   Introduction > Strategic Plan 2021/2024 SR 23   Approach to Sustainability   Relation with Stakeholders > Materiality Analysis SR 23   Environmental Responsibility > Climate & Environmental Materiality Assessment SR 23   Environmental Responsibility > Task Force on Climate-related Financial Disclosures (TCFD)
MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES		
ESRS 2 IRO-1	Description to the processes for identifying and assessing material impacts, risks, and opportunities climate-related	SR 23   Introduction > Management of ESG risks SR 23   Approach to Sustainability   Relation with Stakeholders > Materiality Analysis SR 23   Environmental Responsibility > Climate Materiality Assessment 23 SR   Environmental Responsibility > Task Force on Climate-related Financial Disclosures (TCFD)
E1-2	Policies related to climate change mitigation and adaptation	SR 23   Introduction > Governance Model SR 23   Environmental Responsibility
E1-3	Actions and resources related to climate change policies	SR 23   Environmental Responsibility > Sustainable Operations SR 23   Environmental Responsibility > De-carbonisation 23 SR   Environmental Responsibility > Energy Efficiency SR 23   Environmental Responsibility > Task Force on Climate-related Financial Disclosures (TCFD)
METRICS AND TARGETS		
E1-4	Targets related to climate change mitigation and adaptation	23 SR   Approach to sustainability   Relation with Stakeholders > SMP - Sustainability Master Plan SR 23   Environmental Responsibility > Sustainable Operations SR 23   Environmental Responsibility > De-carbonisation SR 23   Environmental Responsibility > Energy Efficiency SR 23   Environmental Responsibility > Task Force on Climate-related Financial Disclosures (TCFD)
E1-5	Power consumption and energy combination	SR 23   Environmental Responsibility > Sustainable Operations SR 23   Environmental Responsibility > Energy Efficiency
E1-6	Gross Scope 1, 2, 3 GHG emissions and total GHG emissions	SR 23   Environmental Responsibility > Sustainable Operations SR 23   Environmental Responsibility > De-carbonisation
E1-7	GHG removal and GHG mitigation projects financed through carbon credits	Currently, the Bank does not have information to respond to the indicator.
E1-8	Internal carbon pricing	Currently, the Bank does not have information to respond to the indicator.
E1-9	Anticipated financial effects of material, physical and transition risks and potential climate-related opportunities	SR 23   Approach to Sustainability   Relation with Stakeholders > Materiality Analysis SR 23   Environmental Responsibility > Task Force on Climate-related Financial Disclosures (TCFD)

3. SOCIAL INFORMATION		
ESRS S1: OWN WORKFORCE		
STRATEGY		
ESRS 2 SBM-2	Stakeholder interests and views	SR 23   Introduction > Strategic Plan 2021/2024 SR 23   Approach to Sustainability   Relation with Stakeholders > Materiality Analysis SR 23   Social Responsibility > Employee Benefits
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	SR 23   Approach to Sustainability   Relation with Stakeholders > Materiality Analysis SR 23   Economic Responsibility and of <i>Governance</i> >Employees SR 23   Social Responsibility > Employee Benefits
MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES		
S1-1	Policies related with own workforce	SR 23   Introduction > Governance Model SR 23   Economic Responsibility and of <i>Governance</i> >Employees SR 23   Social Responsibility > Employee Benefits SR 23   Social Responsibility > Human Rights
S1-2	Processes for engaging with own workers and workers' representatives on impacts	SR 23   Approach to Sustainability   Relation with Stakeholders > Materiality Analysis SR 23   Economic Responsibility and of <i>Governance</i> >Employees SR 23   Social Responsibility > Employee Benefits
S1-3	Processes for remediating negative impacts and channels for workers to express concerns themselves	SR 23   Approach to Sustainability   Relation with Stakeholders SR 23   Economic Responsibility and of <i>Governance</i> >Employees SR 23   Social Responsibility > Employee Benefits SR 23   Social Responsibility > Human Rights
S1-4	Taking action on material impacts on own labour and approaches to mitigate material risks and look for material opportunities related to the labour itself, as well as the effectiveness of such measures	SR 23   Approach to Sustainability   Relation with Stakeholders SR 23   Economic Responsibility and of <i>Governance</i> >Employees SR 23   Social Responsibility > Employee Benefits SR 23   Social Responsibility > Human Rights
METRICS AND TARGETS		
S1-5	Targets related to the management of material negative impacts, the promotion of positive impacts, and the management of material risks and opportunities	SR 23   Summary of Indicators 23 SR   Approach to sustainability   Relation with <i>Stakeholders</i> > SMP - Sustainability Master Plan SR 23   Economic Responsibility and of <i>Governance</i> >Employees SR 23   Social Responsibility > Employee Benefits
S1-6	Features of the company's employees	SR 23   Summary of Indicators SR 23   Economic Responsibility and of <i>Governance</i> >Employees SR 23   GRI Table > GRI 401-1 SR 23   GRI Table > GRI 405-1
S1-7	Characteristics of self-employed persons in the company's own workforce	SR 23   GRI Table > GRI 2-8
S1-8	Coverage of collective bargaining and social dialogue	SR 23   Summary of Indicators
S1-9	Diversity metrics	SR 23   Summary of Indicators SR 23   Economic Responsibility and of <i>Governance</i> >Employees 23 SR   GRI Table > GRI 405-1

S1-10	Appropriate salaries	SR 23   Summary of Indicators
S1-12	Disabled persons	SR 23   Summary of Indicators SR 23   Economic Responsibility and of <i>Governance</i> > Employees SR 23   GRI Table > GRI 405-1
S1-13	Metrics on training actions and skills development	SR 23   Economic and <i>Governance</i> Accountability > Employees > Training SR 23   Economic and <i>Governance</i> Accountability > Employees > Assess and recognize SR 23   GRI Table > GRI 404-3
S1-15	Work-life balance metrics	SR 23   Social Responsibility > Employee Benefits
S1-16	Remuneration metrics (Pay disparity and total remuneration)	SR 23   Economic Responsibility and of Governance > Employees SR 23   GRI Table > GRI 2-21 SR 23   GRI Table > GRI 405-2

**ESRS S4: FINAL CONSUMERS AND USERS**

**STRATEGY**

ESRS 2 SBM-2	Stakeholder interests and views	SR 23   Introduction > Strategic Plan 2021/2024 SR 23   Approach to Sustainability   Relation with Stakeholders > Materiality Analysis SR 23   Economic and Governance Accountability > Quality Services
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	SR 23   Approach to sustainability   Relation with Stakeholders > SMP - Sustainability Master Plan SR 23   Economic and Governance Accountability > Products and Services SR 23   Economic and Governance Accountability > Quality Services

**MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES**

S4-1	Policies related with final consumers and users	SR 23   Introduction > Governance Model SR 23   Economic and <i>Governance</i> Accountability > Products and Services SR 23   Social Responsibility > Human Rights
S4-2	Processes for engaging with consumers and end-users on impacts	SR 23   Approach to Sustainability   Relation with Stakeholders > Materiality Analysis SR 23   Economic and Governance Accountability > Quality Services
S4-3	Processes for remediating negative impacts and channels for final consumers and users express concerns themselves	SR 23   Approach to Sustainability   Relation with Stakeholders > Materiality Analysis SR 23   Economic and <i>Governance</i> Accountability > Products and Services SR 23   Economic and <i>Governance</i> Accountability > Quality of Service SR 23   Social Responsibility > Human Rights
S4-4	Adoption of measures on material impacts and approaches to mitigate material risks and seek material opportunities related to consumers and end-users and effectiveness of such actions and approaches	SR 23   Introduction > Strategic Plan 2021/2024 SR 23   Approach to sustainability   Relation with Stakeholders > SMP - Sustainability Master Plan SR 23   Economic and <i>Governance</i> Accountability > Products and Services SR 23   Economic and <i>Governance</i> Accountability > Quality of Service

**METRICS AND TARGETS**

S4-5	Targets related to the management of material negative impacts, the promotion of positive impacts, and the management of material risks and opportunities	23 SR   Economic and <i>Governance</i> Accountability > Products and Services 23 SR   Economic and <i>Governance</i> Accountability > Quality of Service
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**4. INFORMATION ON GOVERNANCE**

**ESRS G1: BUSINESS CONDUCT**

GOVERNANCE		
ESRS 2 GOV-1	The role played by the management and supervisory bodies;	<p>Governance structure and its composition &gt; Section II - Part B. Corporate bodies and Committees</p> <p>SR 23   Introduction &gt; Governance Model</p> <p>SR 23   Economic Responsibility and of <i>Governance</i> &gt; Ethics and Professional Conduct</p>
MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES		
ESRS 2 IRO-1	Description of the processes for identifying and assessing material impacts, risks, and opportunities	<p>SR 23   Introduction &gt; Management of ESG risks</p> <p>SR 23   Approach to Sustainability   Relation with Stakeholders &gt; Materiality Analysis</p> <p>Governance structure and its composition &gt; Section II - Part B. Corporate bodies and Committees</p> <p>SR 23   Introduction &gt; Governance Model</p> <p>SR 23   Economic Responsibility and of <i>Governance</i> &gt; Ethics and Professional Conduct</p>
G1-1	Corporate Culture and Business Conduct Policies	<p>SR 23   Introduction &gt; Governance Model</p> <p>SR 23   Economic Responsibility and of <i>Governance</i> &gt; Ethics and Professional Conduct</p> <p>SR 23   Social Responsibility &gt; Human Rights</p>
G1-2	Management of relations with suppliers	SR 23   Economic Responsibility and of <i>Governance</i> > Suppliers
G1-3	Prevention and detection of corruption and bribery	SR 23   Economic Responsibility and of <i>Governance</i> > Ethics and Professional Conduct
METRICS AND TARGETS		
G1-4	Confirmed corruption or bribery incidents	<p>SR 23   Economic Responsibility and of <i>Governance</i> &gt; Ethics and Professional Conduct</p> <p>SR 23   GRI Table &gt; GRI 2-27</p>
G1-5	Political influence and lobbying activities	<p>SR 23   Economic Responsibility and of <i>Governance</i> &gt; Ethics and Professional Conduct</p> <p>SR 23   GRI Table &gt; GRI 415-1</p>
G1-6	Payment practices	SR 23   Economic Responsibility and of <i>Governance</i> > Suppliers
CYBER-SECURITY, PRIVACY AND INFORMATION PROTECTION		
GOVERNANCE		
-	-	<p>SR 23   Economic and Governance Accountability &gt; Information Security</p> <p>SR 23   Economic and Governance Accountability &gt; Protection and privacy of data</p>
STRATEGY		
-	Material impacts, risks and opportunities	<p>SR 23   Approach to Sustainability   Relation with Stakeholders &gt; Materiality Analysis</p> <p>SR 23   Economic and Governance Accountability &gt; Information Security</p> <p>SR 23   Economic and Governance Accountability &gt; Protection and privacy of data</p>
MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES		
-	Policies	<p>SR 23   Economic and Governance Responsibility &gt; Information Security</p> <p>SR 23   Economic and Governance Responsibility &gt; Protection and privacy of data</p>
-	Actions to manage the theme	<p>SR 23   Approach to Sustainability   Relation with Stakeholders</p> <p>SR 23   Economic and Governance Responsibility &gt; Information Security</p> <p>SR 23   Economic and Governance Responsibility &gt; Protection and privacy of data</p>
METRICS AND TARGETS		

-	Targets related to the management of material negative impacts, the promotion of positive impacts, and the management of material risks and opportunities	SR 23   Economic and Governance Responsibility > Information Security SR 23   Economic and Governance Responsibility > Protection and privacy of data
<b>INNOVATION AND DIGITALIZATION</b>		
<b>STRATEGY</b>		
-	Material impacts, risks and opportunities	SR 23   Approach to Sustainability   Relation with Stakeholders > Materiality Analysis SR 23   Economic and Governance Responsibility > Innovation
<b>MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES</b>		
-	Actions to manage the theme	SR 23   Approach to Sustainability   Relation with Stakeholders SR 23   Economic and Governance Responsibility > Innovation
<b>METRICS AND TARGETS</b>		
-	Targets related to the management of material negative impacts, the promotion of positive impacts, and the management of material risks and opportunities	SR 23   Economic and Governance Responsibility > Innovation
<b>SUSTAINABILITY GOVERNANCE</b>		
<b>STRATEGY</b>		
-	Material impacts, risks and opportunities	SR 23   Approach to Sustainability   Relation with Stakeholders > Materiality Analysis SR 23   Introduction > Governance Model
<b>MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES</b>		
-	Actions to manage the theme	SR 23   Approach to Sustainability   Relation with Stakeholders SR 23   Introduction > Governance Model
<b>METRICS AND TARGETS</b>		
-	Targets related to the management of material negative impacts, the promotion of positive impacts, and the management of material risks and opportunities	SR 23   Summary of Indicators SR 23   Introduction > Governance Model
<b>RESILIENCE OF THE BUSINESS MODEL</b>		
<b>MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES</b>		
-	Actions to manage the theme	SR 23   Creation of Value SR 23   Introduction > Strategic Plan 2021/2024 SR 23   Approach to Sustainability   Relation with Stakeholders
<b>METRICS AND TARGETS</b>		
-	Targets related to the management of material negative impacts, the promotion of positive impacts, and the management of material risks and opportunities	SR 23   Introduction > Strategic Plan 2021/2024
<b>RISK MANAGEMENT</b>		
<b>GOVERNANCE</b>		
-	-	SR 23   Introduction > Governance Model SR 23   Management of ESG risks
<b>STRATEGY</b>		
-	Policies	SR 23   Management of ESG risks
-	Material impacts, risks and opportunities	SR 23   Approach to Sustainability   Relation with Stakeholders > Materiality Analysis SR 23   Management of ESG risks
<b>MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES</b>		
-	Actions to manage the theme	SR 23   Management of ESG risks

		SR 23   Approach to Sustainability   Relation with Stakeholders
<b>METRICS AND TARGETS</b>		
-	Targets related to the management of material negative impacts, the promotion of positive impacts, and the management of material risks and opportunities	SR 23   Management of ESG risks
<b>MANAGEMENT OF THE BRAND AND REPUTATION</b>		
<b>STRATEGY</b>		
-	Material impacts, risks and opportunities	SR 23   Approach to Sustainability   Relation with Stakeholders > Materiality Analysis SR 23   Table of Contents and Sustainability Recognitions
<b>MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES</b>		
-	Actions to manage the theme	SR 23   Approach to Sustainability   Relation with Stakeholders SR 23   Table of Contents and Sustainability Recognitions
<b>METRICS AND TARGETS</b>		
-	Targets related to the management of material negative impacts, the promotion of positive impacts, and the management of material risks and opportunities	23 SR   Table of Contents and Sustainability Recognitions
<b>ECONOMIC PERFORMANCE</b>		
<b>STRATEGY</b>		
-	Material impacts, risks and opportunities	SR 23   Approach to Sustainability   Relation with Stakeholders > Materiality Analysis AR23   Information on the BCP Group > Principal Indicators AR23   Financial Information > Results and Balance Sheet > Profitability Analysis
<b>MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES</b>		
-	Actions to manage the theme	SR 23   Creation of Value SR 23   Introduction > Strategic Plan 2021/2024 SR 23   Approach to Sustainability   Relation with Stakeholders AR23   Information on the BCP Group > Principal Indicators AR23   Financial Information > Results and Balance Sheet > Profitability Analysis
<b>METRICS AND TARGETS</b>		
-	Targets related to the management of material negative impacts, the promotion of positive impacts, and the management of material risks and opportunities	AR23   Information on the BCP Group > Principal Indicators AR23   Financial Information > Results and Balance Sheet > Profitability Analysis



## Table of Commitments

COMMITMENTS AND PRINCIPLES ASSUMED BY MILLENNIUM BCP			
	Commitment	Objective in terms of time	Fulfilment / Reporting
LISBON Green Capital (2020)	Led lighting - Installation of LED lighting in all buildings (indoor and outdoor, if applicable).	Dec. 2025	85% (1)
	Solar Photovoltaic - Installation of photovoltaic solar energy production equipment in buildings with an adequate sun exposure and availability.	Dec. 2030	100% (2)
	Water re-use - Implementation of solutions for water re-use.	Dec. 2021	100%
	Single-use plastics - Eliminate the use of single-use plastics.	Dec. 2021	100%
	Awareness - Disclosure to the employees and/or associates of the Lisbon's objectives concerning environment and climate action.	Dec. 2020	100%
	Electric and/or hybrid vehicles - Increase the promotion of de-carbonisation in private vehicles and in operational fleets.	2025: 30% 2030: 80%	10.5% (electric and hybrid)
	Car Pool - have at the Employees' disposal a pool of cars that can be reserved and used as needed for business trips.	Dec. 2020	19.2% of the current fleet
Business Mobility Pact for the City of Lisbon (PMEL) (3) (2019)	Electric and/or hybrid vehicles - Increase the promotion of de-carbonisation in private vehicles and in operational fleets.	2025: 30% 2030: 80%	10.52% (electric and hybrid)
	Car Pool - have at the Employees' disposal a pool of cars that can be reserved and used as needed for business trips.	Dec. 2020	19.2% of the current fleet
Engagement Letter for the Sustainable Funding (Mn. of Environment, Finance and Economy) (2019)	Promote the debate on Sustainability and on the environmental, social and governance risks and opportunities at the level of the Board of Directors (BoDs), so that these risks and opportunities are considered in the definition of the respective strategies	2030	i. Reinforcement of the Commitment with Sustainability as per the 2024 Strategic Plan; ii. Review of the Governance Model on Sustainability themes.
	Promote training in Sustainable Financing addressed to employees in different levels of the organization, with a focus on the area of credit risk analysis, financial products, commercial and/or production.	2030	i. Ongoing Activity/ SR 2023: Chapter "Economic and Governance Accountability" Training Section"
	Follow-up the review of the criteria of SME Leader and SME Excellence, to gradually incorporate sustainability issues into these criteria and accept the possibility of creating a Green SME or a Sustainable SME category.	2030	Millennium bcp continues to monitor developments on the theme, particularly within the scope of the annual meeting held to review the PME Leader and PME Excellence criteria in which Banks and other partners participate.
	Promote a gradual integration of environmental, social and governance criteria in investment assessments.	2030	i. Continuous integration activity – In which an opinion is requested from the Sustainability Function in the New Product Approval Process and in the decision on financing and investment operations with relevance and/or impact on ESG matters. It is a process integrated into internal regulations relating to the management and control of ESG factors, which includes the Principles of Responsible Financing, a framework for these factors in credit origination and a responsible investment charter; ii. More information available on the SR 2023 - Chapter "Risks Management".
	Follow-up and participate in future works related with the Think tank on Sustainable Funding.	2030	i. Regular Participation in the meetings of the Work Group / SR 2023: Chapter "Introduction", Section "Partnerships", sub-section "Work Groups".
Women's Empowerment Principles (2020)	1. Establish a high-level corporate leadership for Gender Equality.	Ongoing	i. Plan for Gender Equality 2024; Being led by a woman - commitment "Superação 24"; iii. SR 2023: Chapter "Economic and Governance Accountability" Employees" Section
	2. Treat women and men fairly at work - respect and support Human Rights and non-discrimination.		i. Plan for Gender Equality 2024; Policy for Diversity and Equal Opportunities; Human Rights Policy; SR 2023: Chapter "Economic Responsibility and Governance", Section "Employees"; Chapter "Social Responsibility", Section "Human Rights"; Annex "UNGP - UN Guiding Principles Reporting Framework".
	3. Ensure health, safety and well-being for male and female employees.		i. Occupational Health and Safety Policy; Training in Occupational Health and Safety; iii. SR 2023: Table "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact".
	4. Promote education, training and professional development of women		i. Career development programs aimed at employees with the greatest potential and talent (Power On, Ingenius); ii. SR 2023: Chapter "Economic and Governance Accountability" Section "Training".
	5. Implement business development, supply chain and marketing practices that promote women's empowerment.		i. Process for the inclusion of ESG criteria in the selection of Suppliers; ii. Targeted campaigns/dedicated offering, female empowerment initiatives/conferences; iii. SR 2023: Chapter "Economic Responsibility and Governance", Sections "Employees", "Products and Services"; Chapter "Social Responsibility", Section "Benefits to Employees".
	6. Promote equality through community initiatives and advocacy.		i. Member of the <i>Steering Committee</i> of WEP Portugal; ii. Initiatives/conferences of female empowerment; iii. SR 2023: Chapter "Economic and Governance Accountability" Employees" Section
	7. Measure and publicly report the organization's progress in terms of gender equality.		i. Plan for Gender Equality 2024; SR 2023: Chapter "Economic and Governance Accountability" Employees" Section

Principles		Objective in terms of time	Fulfillment / Reporting
UN Global Compact (2005)	Human Rights	Ongoing	i. Human Rights Policy; Policy for Diversity and Equal Opportunities; iii. Self assessment Human Rights (bi-annual realization); iv. SR2023: Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "UNGP - UN Guiding Principles Reporting Framework".
	1. Companies must support and respect the protection of internationally proclaimed human rights.		i. Human Rights Policy; ii. Sustainability Guidelines for Suppliers; iii. SR2023: Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "UNGP - UN Guiding Principles Reporting Framework".
	Human Rights		i. Collective Labour Agreements; ii. Sustainability Guidelines for Suppliers; iii. SR 2023: Chapter "Economic Responsibility and Governance", Section "Employees", and Annex "UNGP - UN Guiding Principles Reporting Framework".
	2. Companies must ensure they are not complicit in human rights abuses.		i. Human Rights Policy; ii. Sustainability Guidelines for Suppliers; iii. SR2023: Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "UNGP - UN Guiding Principles Reporting Framework".
	Work		i. Human Rights Policy; ii. Sustainability Guidelines for Suppliers; iii. SR2023: Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "UNGP - UN Guiding Principles Reporting Framework".
	3. Companies must defend freedom of association and the effective recognition of the right to collective bargaining.		i. Human Rights Policy; ii. Sustainability Guidelines for Suppliers; iii. SR2023: Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "UNGP - UN Guiding Principles Reporting Framework".
	Work		i. Human Rights Policy; ii. Policy for Diversity and Equal Opportunities; iii. SR2023: Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "UNGP - UN Guiding Principles Reporting Framework".
	4. The elimination of all forms of forced and compulsory labour.		i. Human Rights Policy; ii. Sustainability Guidelines for Suppliers; iii. SR2023: Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "UNGP - UN Guiding Principles Reporting Framework".
	5. The effective abolition of child labour.		i. Human Rights Policy; ii. Policy for Diversity and Equal Opportunities; iii. SR2023: Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "UNGP - UN Guiding Principles Reporting Framework".
	6. The elimination of discrimination in relation to employment and occupation.		i. Environmental Policy; ii. Principles for a responsible financing: under conditions and excluded projects; iii. Sustainability Policy; iv. Inclusion of C&A risks in the financing process; v. SR 2023: Chapter "Environment".
Environment	i. Incentives for sustainable mobility, increase in social and/or environmental awareness actions among Employees, installation of 2 photovoltaic plants in Taguspark; environmental monitoring of a set of KPIs (as an Organization), inclusion of C&A risks in the financing process (as a Financing entity); ii. Environmental Policy; iii. Principles for a responsible financing: under conditions and excluded projects iv. Sustainability Policy; v. SR 2023: Chapter "Environment".		
7. Companies must support a preventative approach to environmental challenges.	i. Incentives for sustainable mobility, increase in social and/or environmental awareness actions among Employees, installation of 2 photovoltaic plants in Taguspark; environmental monitoring of a set of KPIs (as an Organization), inclusion of C&A risks in the financing process (as a Financing entity); ii. Environmental Policy; iii. Principles for a responsible financing: under conditions and excluded projects iv. Sustainability Policy; v. SR 2023: Chapter "Environment".		
Environment	i. Anti-Corruption and Anti-Bribery Policy; ii. Code of Conduct; iii. SR 2023: Chapter "Economic Responsibility and Governance", Section "Employees", Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "UNGP - UN Guiding Principles Reporting Framework".		
8. Companies should undertake initiatives to promote greater environmental responsibility.			
9. Companies must encourage the development and dissemination of environmentally friendly technologies.			
Anti-corruption			
10. Companies should work against corruption in all its forms, including extortion and bribery.			
Commitment		Objective in terms of time	Fulfillment / Reporting
UNEP-FI Principles for Responsible Banking (2022)	1. Aligning business strategy to be consistent with and contribute to the needs of individuals and the goals of society, as expressed in the Sustainable Development Goals, the Paris Climate Agreement and relevant national and regional frameworks.	Ongoing	SR 2023: Annex for "Principles for Responsible Banking"
	2. Continuously increase positive impacts while reducing negative impacts and managing risks to people and the environment resulting from their activities, products and services. To do this, they must define and publish goals where they can have the most significant impact.		SR 2023: Annex for "Principles for Responsible Banking"
	3. Work responsibly with their customers and users to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.		SR 2023: Annex for "Principles for Responsible Banking"
	4. Pro actively and responsibly consult, engage and partner with relevant stakeholders to achieve the company's goals.		SR 2023: Annex for "Principles for Responsible Banking"
	5. Implement commitments to these principles through effective governance and a responsible banking culture.		SR 2023: Annex for "Principles for Responsible Banking"
	6. Periodically analyse the individual and collective implementation of these principles and adopt a policy of transparency and responsibility in relation to their positive and negative impacts and their contribution to the company's objectives.		SR 2023: Annex for "Principles for Responsible Banking"

TCFD (2019)	Recommendations	Objective in terms of time	Fulfillment / Reporting
	Recommended climate-related financial disclosures: Governance, Strategy, Management, Metrics and objectives.	Ongoing	SR 2023: Annex "Task Force on Climate related Financial Disclosures"
CEO Guide to Human Rights - WBCSD (2019)	Recommendations	Objective in terms of time	Fulfillment / Reporting
	<b>Protect</b> 1. States have a duty to protect people against human rights abuses by third parties, including companies. They are expected to prevent, investigate, punish and address abuses through appropriate policies, legislation, regulation and adjudication.	Ongoing	SR 2023: Chapter "Social Responsibility", Section "Human Rights"; Annex "UNGP - UN Guiding Principles Reporting Framework"
	<b>Respect</b> 2. Companies have a responsibility to human rights. They must address adverse human rights impacts that may result from their own activities and business relationships.		SR 2023: Chapter "Social Responsibility", Section "Human Rights"; Annex "UNGP - UN Guiding Principles Reporting Framework"
	<b>Remedy</b> 3. Affected people must have access to remediation. States and companies have roles to play in ensuring access to remediation when negative impacts occur.		SR 2023: Chapter "Social Responsibility", Section "Human Rights"; Annex "UNGP - UN Guiding Principles Reporting Framework"
Charter of Principles from BCSD Portugal (2018)	Principles	Objective in terms of time	Fulfillment / Reporting
	<b>1. Ethics and Legal Compliance</b> 1.1 RESPECT in its actions the 10 Principles of the United Nations Global Compact, the Universal Declaration of Human Rights and the Fundamental Principles and Rights at Work of the International Labour Organization. 1.2 ACT in compliance with the laws and standards that regulate their activity at national and international level, adopting the principle of greater demands in the case of selection between national legislation and international standards. 1.3 COMPLY and promote compliance with good practices in terms of ethical conduct. 1.4 NOT TOLERATE, the participation, in a direct or indirect manner, in any corruption, fraud, money laundering, bribery or extortion. 1.5 RESPECT the rules of fair competition and provide reliable and transparent information to all partners. 1.6 DEFINE procedures to identify and approach conflicts of interest which may adversely affect the business relations. 1.7 RESPECT AND ENFORCE intellectual property rights. 1.8 PROTECT, and not use or make unauthorized third-party data available.	Ongoing	i. Corporate Principles and Policies; ii. Articles of Association and main rules and regulations; iii. SR 2023: Chapter "Economic Responsibility and Governance"; Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "SASB - Sustainability Accounting Standards Board".
	<b>2. Human Rights</b> 2.1 RESPECT and promote Human Rights. 2.2 DO NOT TOLERATE the violation of human rights, refusing any form of harassment, discrimination, coercion, abuse, violence or exploitation in their sphere of influence. 2.3 MAKE appropriate efforts to prevent the use of raw materials in their products that directly or indirectly finance practices that violate human rights.		i. Corporate Principles and Policies; ii. Articles of Association and main rules and regulations; iii. SR 2023: Chapter "Economic Responsibility and Governance"; Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "SASB - Sustainability Accounting Standards Board", UNGP - UN Guiding Principles Reporting Framework".
	<b>3. Labour Rights</b> 3.1 RESPECT labour rights and reject any form of forced or child labour. 3.2 SUPPORT the freedom of association and the recognition of the right to collective bargaining. 3.3 PROVIDE fair and equitable remuneration, ensuring payment of a decent salary and balance between professional, family and personal life. 3.4 PROMOTE equal opportunities and treatment in terms of employment and professional functions. 3.5 ENSURE conditions for a work environment free from discrimination, moral or sexual harassment, threats and physical or psychological aggression. 3.6 PROVIDE knowledge and training for their workers, and recognize and value the qualifications acquired to perform their duties.		i. Corporate Principles and Policies; ii. Articles of Association and main rules and regulations; iii. SR 2023: Chapter "Economic Responsibility and Governance"; Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "SASB - Sustainability Accounting Standards Board", UNGP - UN Guiding Principles Reporting Framework".
	<b>4. Prevention, Health and Safety</b> 4.1 IDENTIFY, CONTROL AND PREVENT risks and take the necessary preventive measures to avoid accidents and occupational diseases. 4.2 ENCOURAGE behaviours that promote the physical and psychological well-being and safety of its direct and indirect workers. 4.3 ENSURE means of protection and training in prevention, health and safety for workers.		i. Corporate Principles and Policies; ii. Articles of Association and main rules and regulations; iii. SR 2023: Chapter "Economic Responsibility and Governance"; Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "SASB - Sustainability Accounting Standards Board", UNGP - UN Guiding Principles Reporting Framework".
	<b>5. Environment</b> 5.1 PROMOTE the continuous improvement of processes, products and services, through the identification, monitoring and mitigation of environmental risks associated with its activities, aiming at reducing negative impacts on climate, air, water, soil, biodiversity, territory and communities. 5.2 REDUCE the consumption of natural resources and the generation of waste, maximizing process efficiency, reuse and recycling. 5.3 PROMOTE environmental responsibility, the use of innovative and clean technologies and engagement with stakeholders to adapt to global challenges		i. Corporate Principles and Policies; ii. Articles of Association and main rules and regulations; iii. SR 2023: Chapter "Economic Responsibility and Governance"; Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "SASB - Sustainability Accounting Standards Board", UNGP - UN Guiding Principles Reporting Framework".
	<b>6. Management</b> 6.1 Continuously IMPROVE management processes and practices, adopting measures to comply with the principles enshrined here. 6.2 ENCOURAGE the value chain to respect and promote principles equivalent to those in this Charter. 6.3 COMMUNICATE sustainability performance regularly and transparently, namely relevant information on economic, environmental, social, ethical and management performance. 6.4 ENCOURAGING the involvement with interested parties by listening and dialogue.		i. Corporate Principles and Policies; ii. Articles of Association and main rules and regulations; iii. SR 2023: Chapter "Economic Responsibility and Governance"; Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "SASB - Sustainability Accounting Standards Board", UNGP - UN Guiding Principles Reporting Framework".

(1) Inside the Branches, the light bulbs are replaced by LED whenever respective maintenance is necessary.  
 (2) Millennium bcp installed a second Photovoltaic Plant with 1MW of power in Taguspark, doubling its own energy production capacity.  
 (3) Common goals with Lisbon European Green Capital

## EUROPEAN UNION (EU) TAXONOMY TABLES

## 0. Summary of KPIs to be disclosed by credit institutions under Article 8 of the EU Taxonomy Regulation

Year 2023		Total environmentally sustainable assets (Million EUR)*	KPI turnover	KPI CAPEX	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
<i>Main KPI</i>	<i>Green asset ratio (GAR) st</i>	1 934	2,9%	3,0%	47,3%	29,9%	22,8%
<i>Additional KPIs</i>	<i>GAR (flow)</i>	694	1,0%	1,1%	0,7%	-1,9%	2,4%
	<i>Trading book</i>	n.a.	n.a.	n.a.			
	<i>Financial guarantees</i>	0	n.a.	n.a.			
	<i>Assets under manage</i>	6,7	1,0%	3,3%			
	<i>Fees and commissions in</i>	n.a.	n.a.	n.a.			

\* These values are based on the turnover KPI.











**2.1. GAR sector information based on turnover (only the sectors with eligible not-null exposures are presented)**

Breakdown by sector - NACE four digits (code and label)	Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)		Water and marine resources (WTR)		Circular economy (CE)		Pollution (PPC)		Biodiversity and Ecosystems (BIO)		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	[Gross] carrying amount Million EUR	Of which environmentally sustainable	[Gross] carrying amount Million EUR	Of which environmentally sustainable	[Gross] carrying amount Million EUR	Of which environmentally sustainable	[Gross] carrying amount Million EUR	Of which environmentally sustainable	[Gross] carrying amount Million EUR	Of which environmentally sustainable	[Gross] carrying amount Million EUR	Of which environmentally sustainable	[Gross] carrying amount Million EUR	Of which environmentally sustainable	[Gross] carrying amount Million EUR	Of which environmentally sustainable
22.22 Manufacture of plastic packing goods	0,8	0			0,8	0			0	0			0,8	0		
23.41 Manufacture of ceramic household and ornamental articles	1,6	0			1,6	0			0	0			1,6	0		
24.51 Casting of iron	0,0001	0			0,0001	0			0	0			0,0001	0		
27.51 Manufacture of electric domestic appliances	4,8	0			4,8	0			0	0			4,8	0		
29.32 Manufacture of other parts and accessories for motor vehicles	0,5	0			0,5	0			0	0			0,5	0		
30.20 Manufacture of railway locomotives and rolling stock	0,0004	0			0,0004	0			0	0			0,0004	0		
33.20 Installation of industrial machinery and equipment	0,7	0			0,7	0			0	0			0,7	0		
35.11 Production of electricity	116,7	12			116,7	0			0	0			116,7	12		
41.20 Construction of residential and non-residential buildings	1,8	0			1,8	0			0	0			1,8	0		
42.11 Construction of roads and motorways	50,6	0			50,6	0			0	0			50,6	0		
42.12 Construction of railways and underground railways	8,2	0			8,2	0			0	0			8,2	0		
42.13 Construction of bridges and tunnels	11,2	0			11,2	0			0	0			11,2	0		
42.99 Construction of other civil engineering projects n.e.c.	19,5	0			19,5	0			0	0			19,5	0		
43.21 Electrical installation	0,2	0			0,2	0			0	0			0,2	0		
45.11 Sale of cars and light motor vehicles	0,1	0			0,1	0			0	0			0,1	0		
46.76 Wholesale of other intermediate products	5,8	0,4			5,8	0			0	0			5,8	0,4		
49.10 Passenger rail transport, interurban	28,3	0			28,3	0			0	0			28,3	0		
49.20 Freight rail transport	11,7	0			11,7	0			0	0			11,7	0		
49.31 Urban and suburban passenger land transport	2,2	0			2,2	0			0	0			2,2	0		
50.20 Sea and coastal freight water transport	1,0	0			1,0	0			0	0			1	0		
52.21 Service activities incidental to land transportation	33,8	0			33,8	0			0	0			33,8	0		
52.29 Other transportation support activities	0,01	0			0,01	0			0	0			0,01	0		
53.10 Postal activities under universal service obligation	0,1	0,01			0,1	0			0	0			0,1	0,01		
61.30 Satellite telecommunications activities	8,6	0			8,6	0			0	0			8,6	0		
62.01 Computer programming activities	0,01	0			0,01	0			0	0			0,01	0		
62.02 Computer consultancy activities	5,7	0			5,7	0			0	0			5,7	0		
68.10 Buying and selling of own real estate	3,9	0			3,9	0			0	0			3,9	0		
70.10 Activities of head offices	641,9	113,8			641,9	0			0	0			641,9	113,8		
71.11 Architectural activities	0,0002	0			0,0002	0			0	0			0,0002	0		
77.39 Renting and leasing of other machinery, equipment and tangible goods	0,1	0			0,1	0			0	0			0,1	0		
80.20 Security systems service activities	0,3	0			0,3	0			0	0			0,3	0		
84.13 Regulation of and contribution to more efficient operation of business	10,6	0			10,6	0			0	0			10,6	0		
86.10 Hospital activities	0,2	0			0,2	0			0	0			0,2	0		

2.2. GAR sector information based on CapEx (only the sectors with eligible not-null exposures are presented)

Breakdown by sector - NACE four digits (code and label)	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
	Million EUR	Of which environmentally sustainable	Million EUR	Of which environmentally sustainable	Million EUR	Of which environmentally sustainable	Million EUR	Of which environmentally sustainable	Million EUR	Of which environmentally sustainable	Million EUR	Of which environmentally sustainable	Million EUR	Of which environmentally sustainable	Million EUR	Of which environmentally sustainable	Million EUR	Of which environmentally sustainable	Million EUR	Of which environmentally sustainable	Million EUR	Of which environmentally sustainable	Million EUR	Of which environmentally sustainable	Million EUR	Of which environmentally sustainable	Million EUR	Of which environmentally sustainable
22.22 Manufacture of plastic packing goods	0,8	0			0,8	0			0	0			0	0			0	0			0	0			0,8	0		
23.41 Manufacture of ceramic household and ornamental articles	1,6	0			1,6	0			0	0			0	0			0	0			0	0			1,6	0		
24.51 Casting of iron	0,0001	0			0,0001	0			0	0			0	0			0	0			0	0			0,0001	0		
27.51 Manufacture of electric domestic appliances	4,8	0			4,8	0			0	0			0	0			0	0			0	0			4,8	0		
28.32 Manufacture of other parts and accessories for motor vehicles	0,5	0			0,5	0			0	0			0	0			0	0			0	0			0,5	0		
30.20 Manufacture of railway locomotives and rolling stock	0,0004	0			0,0004	0			0	0			0	0			0	0			0	0			0,0004	0		
33.20 Installation of industrial machinery and equipment	0,7	0			0,7	0			0	0			0	0			0	0			0	0			0,7	0		
35.11 Production of electricity	116,7	1,2			116,7	0			0	0			0	0			0	0			0	0			116,7	1,2		
41.20 Construction of residential and non-residential buildings	1,8	0			1,8	0			0	0			0	0			0	0			0	0			1,8	0		
42.11 Construction of roads and motorways	50,6	0			50,6	0			0	0			0	0			0	0			0	0			50,6	0		
42.12 Construction of railways and underground railways	8,2	0			8,2	0			0	0			0	0			0	0			0	0			8,2	0		
42.13 Construction of bridges and tunnels	11,2	0			11,2	0			0	0			0	0			0	0			0	0			11,2	0		
42.99 Construction of other civil engineering projects n.e.c.	19,5	0			19,5	0			0	0			0	0			0	0			0	0			19,5	0		
43.21 Electrical installation	0,2	0			0,2	0			0	0			0	0			0	0			0	0			0,2	0		
45.11 Sale of cars and light motor vehicles	0,1	0			0,1	0			0	0			0	0			0	0			0	0			0,1	0		
46.76 Wholesale of other intermediate products	5,8	1,5			5,8	0			0	0			0	0			0	0			0	0			5,8	1,5		
49.10 Passenger rail transport, interurban	28,3	0			28,3	0			0	0			0	0			0	0			0	0			28,3	0		
49.20 Freight rail transport	11,7	0			11,7	0			0	0			0	0			0	0			0	0			11,7	0		
49.31 Urban and suburban passenger land transport	2,2	0			2,2	0			0	0			0	0			0	0			0	0			2,2	0		
50.20 Sea and coastal freight water transport	1,0	0			1,0	0			0	0			0	0			0	0			0	0			1	0		
52.21 Service activities incidental to land transportation	33,8	0			33,8	0			0	0			0	0			0	0			0	0			33,8	0		
52.29 Other transportation support activities	0,01	0			0,01	0			0	0			0	0			0	0			0	0			0,01	0		
53.10 Postal activities under universal service obligation	0,1	0,01			0,1	0			0	0			0	0			0	0			0	0			0,1	0,01		
61.30 Satellite telecommunications activities	8,6	0			8,6	0			0	0			0	0			0	0			0	0			8,6	0		
62.01 Computer programming activities	0,01	0			0,01	0			0	0			0	0			0	0			0	0			0,01	0		
62.02 Computer consultancy activities	5,7	0			5,7	0			0	0			0	0			0	0			0	0			5,7	0		
68.10 Buying and selling of own real estate	3,9	0			3,9	0			0	0			0	0			0	0			0	0			3,9	0		
70.10 Activities of head offices	641,9	141,9			641,9	0			0	0			0	0			0	0			0	0			641,9	141,9		
71.11 Architectural activities	0,0002	0			0,0002	0			0	0			0	0			0	0			0	0			0,0002	0		
77.39 Renting and leasing of other machinery, equipment and tangible goods n.e.c.	0,1	0			0,1	0			0	0			0	0			0	0			0	0			0,1	0		
80.20 Security systems service activities	0,3	0			0,3	0			0	0			0	0			0	0			0	0			0,3	0		
84.13 Regulation of and contribution to more efficient operation of businesses	10,6	0			10,6	0			0	0			0	0			0	0			0	0			10,6	0		
86.10 Hospital activities	0,2	0			0,2	0			0	0			0	0			0	0			0	0			0,2	0		

3.1. GAR KPI stock based on turnover

% (compared to total covered assets in the denominator)		31 December 2023																																	
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				Proportion of total assets covered					
		Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)													
		Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)													
Of which Use of Proceeds		Of which transitional	Of which enabling	Of which Use of Proceeds		Of which transitional	Of which enabling	Of which Use of Proceeds		Of which transitional	Of which enabling	Of which Use of Proceeds		Of which transitional	Of which enabling	Of which Use of Proceeds		Of which transitional	Of which enabling	Of which Use of Proceeds		Of which transitional	Of which enabling	Of which Use of Proceeds		Of which transitional	Of which enabling								
<b>GAR - Covered assets in both numerator and denominator</b>																																			
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	42%	5%	5%	0%	0%	2%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	44%	5%	5%	0%	0%	47%
2	<b>Financial undertakings</b>	18%	6%	6%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	18%	6%	6%	0%	0%	3%	
3	Credit institutions	17%	17%	17%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	17%	17%	17%	0%	0%	1%	
4	Loans and advances	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
5	Debt securities, including UoP	23%	23%	23%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	23%	23%	23%	0%	0%	1%	
6	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
7	Other financial corporations	18%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	18%	0%	0%	0%	0%	2%	
8	of which investment firms	29%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	29%	0%	0%	0%	0%	1%		
9	Loans and advances	6%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	6%	0%	0%	0%	0%	0%		
10	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
11	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
12	of which management companies	87%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	87%	0%	0%	0%	0%	0%	
13	Loans and advances	99%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	99%	0%	0%	0%	0%	0%		
14	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
15	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
16	of which insurance undertakings	32%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	32%	0%	0%	0%	0%	0%	
17	Loans and advances	32%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	32%	0%	0%	0%	0%	0%	
18	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
19	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
20	<b>Non-financial undertakings</b>	38%	12%	1%	0%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	38%	12%	1%	0%	0%	1%	
21	Loans and advances	50%	4%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	50%	4%	0%	0%	0%	1%	
22	Debt securities, including UoP	31%	17%	1%	0%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	31%	17%	1%	0%	0%	1%	
23	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
24	<b>Households</b>	45%	5%	5%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	45%	5%	5%	0%	0%	41%	
25	of which loans collateralised by residential immovable property	60%	6%	6%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	60%	6%	6%	0%	0%	31%	
26	of which building renovation loans	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
27	of which motor vehicle loans	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	
28	<b>Local governments financing</b>	0%	0%	0%	0%	0%	67%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	67%	0%	0%	0%	0%	1%	
29	Housing financing	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
30	Other local government financing	0%	0%	0%	0%	0%	67%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	67%	0%	0%	0%	0%	1%	
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	100%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	1%	0%	0%	0%	0%		
32	<b>Total GAR assets</b>	26%	3%	3%	0%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	27%	3%	3%	0%	0%	47%	

31 December 2022																																	
% (compared to total covered assets in the denominator)	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						Proportion of total assets covered
	Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)						Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)						
	Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)						Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)						
	Of which Use of Proceeds		Of which transitional		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which transitional		Of which enabling		
<b>GAR - Covered assets in both numerator and denominator</b>																																	
1	Loans and advances, debt securities and equity instruments not HFI eligible for GAR calculation	42%	3%	3%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	48%	
<b>Financial undertakings</b>																																	
2	Credit institutions	11%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	3%	
3	Loans and advances	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	
4	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
5	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
6	Other financial corporations	15%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	2%		
7	of which investment firms	19%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%		
8	Loans and advances	58%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
9	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	
10	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
11	of which management companies	96%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
12	Loans and advances	99%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
13	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
14	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
15	of which insurance undertakings	50%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
16	Loans and advances	50%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
17	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
18	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
19	<b>Non-financial undertakings</b>	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	
20	Loans and advances	2%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
21	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
22	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
23	<b>Households</b>	47%	4%	4%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	41%	
24	of which loans collateralised by residential immovable property	61%	5%	5%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	31%	
25	of which building renovation loans	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
26	of which motor vehicle loans	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
27	<b>Local governments financing</b>	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	
28	Housing financing	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
29	Other local government financing	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
30	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	100%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
31	<b>Total GAR assets</b>	25%	2%	2%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	48%	

3.2. GAR KPI stock based on CapEx

% (compared to total covered assets in the denominator)		31 December 2022																								Proportion of total assets covered			
		Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)			Circular economy (CE)			Pollution (PPC)			Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)									
		Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)									
		Proportion of total covered assets funding Taxonomy-aligned			Proportion of total covered assets funding Taxonomy-aligned			Proportion of total covered assets funding Taxonomy-aligned			Proportion of total covered assets funding Taxonomy-aligned			Proportion of total covered assets funding Taxonomy-aligned			Proportion of total covered assets funding Taxonomy-aligned			Proportion of total covered assets funding Taxonomy-aligned									
		Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	
<b>GAR - Covered assets in both numerator and denominator</b>																													
1	Loans and advances, debt securities and equity instruments not HTF eligible for GAR calculation	42%	3%	3%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	48%
2	<b>Financial undertakings</b>	11%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	3%
3	Credit institutions	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%
4	Loans and advances	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
5	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%
6	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
7	Other financial corporations	15%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	2%	
8	of which investment firms	19%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	
9	Loans and advances	58%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
10	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%
11	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
12	of which management companies	96%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
13	Loans and advances	99%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
14	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
15	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
16	of which insurance undertakings	50%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
17	Loans and advances	50%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
18	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
19	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
20	<b>Non-financial undertakings</b>	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%
21	Loans and advances	2%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%
22	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%
23	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
24	<b>Households</b>	47%	4%	4%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	4%
25	of which loans collateralised by residential immovable property	61%	5%	5%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	3%
26	of which building renovation loans	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
27	of which motor vehicle loans	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
28	<b>Local governments financing</b>	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%
29	Housing financing	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
30	Other local government financing	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	100%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
32	<b>Total GAR assets</b>	25%	2%	2%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	48%

% (compared to total covered assets in the denominator)		31 December 2022																														
		Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)			Circular economy (CE)			Pollution (PPC)			Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)												
		Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)												
		Proportion of total covered assets funding Taxonomy-aligned			Proportion of total covered assets funding Taxonomy-aligned			Proportion of total covered assets funding Taxonomy-aligned			Proportion of total covered assets funding Taxonomy-aligned			Proportion of total covered assets funding Taxonomy-aligned			Proportion of total covered assets funding Taxonomy-aligned			Proportion of total covered assets funding Taxonomy-aligned			Proportion of total covered assets funding Taxonomy-aligned			Proportion of total covered assets funding Taxonomy-aligned			Proportion of total assets covered			
		Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling		
<b>GAR - Covered assets in both numerator and denominator</b>																																
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	43%	3%	3%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	48%	
2	<b>Financial undertakings</b>	11%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	3%	
3	Credit institutions	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	
4	Loans and advances	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
5	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	
6	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
7	Other financial corporations	15%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	2%	
8	of which investment firms	19%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	
9	Loans and advances	58%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
10	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	
11	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
12	of which management companies	96%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
13	Loans and advances	99%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
14	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
15	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
16	of which insurance undertakings	50%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
17	Loans and advances	50%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
18	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
19	Equity instruments	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
20	<b>Non-financial undertakings</b>	25%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	
21	Loans and advances	39%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%
22	Debt securities, including UoP	10%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
23	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
24	<b>Households</b>	47%	4%	4%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
25	of which loans collateralised by residential immovable property	61%	5%	5%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
26	of which building renovation loans	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
27	of which motor vehicle loans	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
28	<b>Local governments financing</b>	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
29	Housing financing	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
30	Other local government financing	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
32	<b>Total GAR assets</b>	26%	2%	2%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%

4.1. GAR KPI flow based on turnover

% (compared to flow of total eligible assets)		31 December 2023																															
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)			Of which Use of Proceeds		Of which transitional		Of which enabling		Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)		Of which Use of Proceeds		Of which enabling		Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)		Of which Use of Proceeds		Of which enabling		Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)		Of which Use of Proceeds		Of which enabling		Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)			Of which Use of Proceeds	
<b>GAR - Covered assets in both numerator and denominator.</b>																																	
1	Loans and advances, debt securities and equity instruments not HIT eligible for GAR calculation																																
2	<b>Financial undertakings</b>																																
3	Credit institutions																																
4	Loans and advances																																
5	Debt securities, including UoP																																
6	Equity instruments																																
7	Other financial corporations																																
8	of which investment firms																																
9	Loans and advances																																
10	Debt securities, including UoP																																
11	Equity instruments																																
12	of which management companies																																
13	Loans and advances																																
14	Debt securities, including UoP																																
15	Equity instruments																																
16	of which insurance undertakings																																
17	Loans and advances																																
18	Debt securities, including UoP																																
19	Equity instruments																																
20	<b>Non-financial undertakings</b>																																
21	Loans and advances																																
22	Debt securities, including UoP																																
23	Equity instruments																																
24	<b>Households</b>																																
25	of which loans collateralised by residential immovable property																																
26	of which building renovation loans																																
27	of which motor vehicle loans																																
28	<b>Local governments financing</b>																																
29	Housing financing																																
30	Other local government financing																																
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>																																
32	<b>Total GAR assets</b>																																

4.2. GAR KPI flow based on CapEx

% (compared to flow of total eligible assets)		31 December 2023																													
		Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)			Circular economy (CE)			Pollution (PPC)			Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			Proportion of total new assets covered								
		Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)											
		Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)											
Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling						
<b>GAR - Covered assets in both numerator and denominator</b>																															
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation																														
2	1%	2%	1%	0%	0%	2%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	2%	2%	1%	0%	0%	0.69%
<b>Financial undertakings</b>																															
3	Credit institutions																														
4	Loans and advances																														
5	Debt securities, including UoP																														
6	Equity instruments																														
7	Other financial corporations																														
8	of which investment firms																														
9	Loans and advances																														
10	Debt securities, including UoP																														
11	Equity instruments																														
12	of which management companies																														
13	Loans and advances																														
14	Debt securities, including UoP																														
15	Equity instruments																														
16	of which insurance undertakings																														
17	Loans and advances																														
18	Debt securities, including UoP																														
19	Equity instruments																														
<b>Non-financial undertakings</b>																															
21	Loans and advances																														
22	Debt securities, including UoP																														
23	Equity instruments																														
24	Households																														
25	of which loans collateralised by residential immovable property																														
26	of which building renovation loans																														
27	of which motor vehicle loans																														
<b>Local governments financing</b>																															
29	Housing financing																														
30	Other local government financing																														
<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>																															
31																															
32	<b>Total GAR assets</b>																														



### 5.1. KPI off-balance sheet exposures based on turnover

% (compared to total eligible off-balance sheet assets)		31 December 2023																															
		Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)			Circular economy (CE)			Pollution (PPC)			Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)													
		Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)													
		Proportion of total covered assets funding Taxonomy-aligned sectors (Taxonomy-aligned)			Proportion of total covered assets funding Taxonomy-aligned sectors (Taxonomy-aligned)			Proportion of total covered assets funding Taxonomy-aligned sectors (Taxonomy-aligned)			Proportion of total covered assets funding Taxonomy-aligned sectors (Taxonomy-aligned)			Proportion of total covered assets funding Taxonomy-aligned sectors (Taxonomy-aligned)			Proportion of total covered assets funding Taxonomy-aligned sectors (Taxonomy-aligned)			Proportion of total covered assets funding Taxonomy-aligned sectors (Taxonomy-aligned)													
		Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling					
1	Financial guarantees (FinGuar KPI)	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%			
2	Assets under management (AUM KPI)	6,12%	0,91%	0,00%	0,00%	0,62%	0,09%	0,07%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	6,19%	1,00%	0,00%	0,00%	0,62%

### 5.2. KPI off-balance sheet exposures based on CapEx

% (compared to total eligible off-balance sheet assets)		31 December 2023																														
		Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)			Circular economy (CE)			Pollution (PPC)			Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)												
		Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)												
		Proportion of total covered assets funding Taxonomy-aligned sectors (Taxonomy-aligned)			Proportion of total covered assets funding Taxonomy-aligned sectors (Taxonomy-aligned)			Proportion of total covered assets funding Taxonomy-aligned sectors (Taxonomy-aligned)			Proportion of total covered assets funding Taxonomy-aligned sectors (Taxonomy-aligned)			Proportion of total covered assets funding Taxonomy-aligned sectors (Taxonomy-aligned)			Proportion of total covered assets funding Taxonomy-aligned sectors (Taxonomy-aligned)			Proportion of total covered assets funding Taxonomy-aligned sectors (Taxonomy-aligned)												
		Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	
1	Financial guarantees (FinGuar KPI)	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
2	Assets under management (AUM KPI)	7,13%	3,14%	0,00%	0,10%	2,28%	0,23%	0,19%	0,00%	0,02%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	7,35%	3,33%	0,00%	0,10%	2,30%

## 6. Disclosures according to Annex XII - Nuclear energy and fossil gas related activities

### 6.1. Nuclear energy and fossil gas activities

Nuclear energy related activities		
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	No
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No
Fossil gas related activities		
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	Yes
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	Yes
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	No

## 6.2. Aligned activities - Denominator

Row	Economic activities based on KPI Turnover	Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
	Million EUR						
1	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
2	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
3	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
4	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
5	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
6	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
7	<b>Amount and proportion of other Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	<b>1 934</b>	<b>100%</b>	<b>1 934</b>	<b>100%</b>	<b>0</b>	<b>0%</b>
8	<b>Total green asset ratio, Turnover</b>	<b>1 934</b>	<b>3%</b>	<b>1 934</b>	<b>3%</b>	<b>0</b>	<b>0%</b>

Row	Economic activities based on KPI CAPEX	Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
	Million EUR						
1	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
2	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
3	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
4	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
5	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
6	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
7	<b>Amount and proportion of other Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	<b>1 963</b>	<b>0%</b>	<b>1 963</b>	<b>0%</b>	<b>0</b>	<b>0%</b>
8	<b>Total green asset ratio, CAPEX</b>	<b>1 963</b>	<b>3%</b>	<b>1 963</b>	<b>3%</b>	<b>0</b>	<b>0%</b>

6.3. Aligned activities – Numerator

Row	Economic activities based on KPI Turnover	Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
	Million EUR	Amount	%	Amount	%	Amount	%
1	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
2	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
3	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
4	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
5	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
6	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
7	<b>Amount and proportion of other Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	<b>1 934</b>	<b>100%</b>	<b>1 934</b>	<b>100%</b>	<b>0</b>	<b>0%</b>
8	<b>Total amount and proportion of Taxonomy-aligned economic activities in the numerator of the total green asset ratio based on turnover</b>	<b>1 934</b>	<b>100%</b>	<b>1 934</b>	<b>100%</b>	<b>0</b>	<b>0%</b>

Row	Economic activities based on KPI CapEx	Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
	Million EUR	Amount	%	Amount	%	Amount	%
1	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
2	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
3	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
4	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
5	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
6	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0%	0	0%	0	0%
7	Amount and proportion of other Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	1 963	100%	1 963	100%	0	0%
8	<b>Total amount and proportion of Taxonomy-aligned economic activities in the numerator of the total green asset ratio based on turnover</b>	<b>1 963</b>	<b>100%</b>	<b>1 963</b>	<b>100%</b>	<b>0</b>	<b>0%</b>

### 6.4. Eligible but not aligned activities

Row	Economic activities based on KPI Turnover	Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
Million EUR							
1	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
2	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
3	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
4	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0%	3	0%	0	0%
5	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
6	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
7	<b>Amount and proportion of other Taxonomy-eligible but not Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	<b>15 744</b>	<b>100%</b>	<b>15 087</b>	<b>0%</b>	<b>657</b>	<b>100%</b>
8	<b>Total amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activities in the denominator of the eligible ratio based on turnover</b>	<b>15 747</b>	<b>89%</b>	<b>15 090</b>	<b>85%</b>	<b>657</b>	<b>0%</b>

Row	Economic activities based on KPI Capex	Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
Million EUR							
1	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
2	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
3	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
4	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
5	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
6	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
7	<b>Amount and proportion of other Taxonomy-eligible but not Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	<b>15 798</b>	<b>100%</b>	<b>15 141</b>	<b>100%</b>	<b>657</b>	<b>100%</b>
8	<b>Total amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activities in the denominator of the eligible ratio based on turnover</b>	<b>15 798</b>	<b>89%</b>	<b>15 141</b>	<b>11%</b>	<b>657</b>	<b>4%</b>

## 6.5. Non-eligible activities

Row	Economic activities based on KPI Turnover	Amount	%
	Million EUR		
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	25	0%
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
7	<b>Amount and proportion of other Taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	48 113	100%
8	<b>Total amount and proportion of Taxonomy-non-eligible economic activities in the denominator of the applicable KPI (non-eligible ratio turnover)</b>	48 138	73%

Row	Economic activities based on KPI Capex	Amount	%
	Million EUR		
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	25,3	0%
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
7	<b>Amount and proportion of other Taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	48 033	100%
8	<b>Total amount and proportion of Taxonomy-non-eligible economic activities in the denominator of the applicable KPI (non-eligible ratio turnover)</b>	48 058	0,73

**Sustainability Report 2023**

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Banco Comercial Português, S.A.,  
Company open to public investment

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under the Single Registration and  
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[GRI 2-3]

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All mentions in this document to the application of any ruling mean the version currently in effect.

This report was made in accordance with the GRI Standards: Core option.

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