

Banco Comercial Português, S.A.

Annual Report 2024

VOLUME 2

Millennium
bcp



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SUMMARY OF INDICATORS

SUMMARY OF NON-FINANCIAL INDICATORS

	Unid.	2024	2023	2022	Var. % 24/23
CUSTOMERS					
Total of Customers	Thousands	7 880	7 450	7 203	5,8%
Number of active customers ⁽¹⁾	Thousands	6 977	6 701	6 478	4,1%
Interest paid on deposits and interbank funding	Million euros	1 184	882	422	34,2%
Claims registered ⁽²⁾	Number	268 622	223 172	201 828	20,4%
Claims resolved	Percentage	87,6%	93,9%	92,2%	6,3 p.p.
ACCESSIBILITIES					
Branches	Number	1 199	1 206	1 239	-0,6%
Activity in Portugal		398	399	407	-0,3%
International activity		801	807	832	-0,7%
Branches opened on Saturday		164	153	160	-3,9%
Branches with access conditions to people with reduced mobility		782	793	826	-1,4%
Internet	Users number	2 328 841	2 435 902	2 762 685	-4,4%
Call Center	Users number	565 035	659 605	479 265	-14,3%
Mobile banking	Users number	4 980 188	4 678 735	4 293 837	1,5%
ATM	Number	2 775	2 849	2 943	-2,6%
EMPLOYEES					
Portugal Employees	Number	6 203	6 242	6 252	-0,6%
International Employees	Number	9 461	9 446	9 495	0,2%
TOTAL	Number	15 664	15 688	15 747	-0,2%
LABOR INDICATORS ⁽³⁾					
Breakdown by professional category	Number				
Executive Committee		23	24	23	-4,2%
Senior Management		191	159	167	20,1%
Management		1 632	1 648	1 468	-1,0%
Commercial		8 647	8 842	9 147	-2,2%
Technicians		4 782	4 313	4 140	10,9%
Other		389	702	798	44,6%
Breakdown by age	Number				
<30		2 550	2 585	2 562	-1,4%
[30-50[		8 018	8 320	8 647	-3,6%
>=50		5 096	4 783	4 534	6,5%
Average age	Years	43	42	42	2,4%
Breakdown by contract type	Number				
Permanent		14 827	14 649	14 450	1,2%
Temporary		837	1 039	1 293	-19,4%
Trainees		500	449	148	11,4%
Employees with working hours reduction	Number	200	201	197	-0,5%
Disabled employees	Number	273	235	221	16,2%
Recruitment rate	Percentage	8,8%	9,7%	12,8%	-0,9 p.p.
Internal mobility rate	Percentage	16,3%	15,3%	14,7%	0,1 p.p.
Leaving rate	Percentage	9,3%	10,2%	13,7%	-0,9 p.p.
Free association ⁽⁴⁾	Percentage				
Employees under Collective Work Agreements		99,7%	99,7%	99,7%	0,0 p.p.
Union Syndicated Employees		74,4%	74,1%	74,0%	0,3 p.p.
Hygiene and safety at work (HSW)					
HSW visits	Number	213	203	182	4,9%
Injury rate	Index	1,89	1,95	1,85	-3,1%
Death victims	Number	0	0	0	
Absenteeism rate	Percentage	4,4%	4,6%	5,1%	-0,2 p.p.
Lowest company salary and minimum national salary	Ratio	1,2	1,3	1,2	-7,7%
ENVIRONMENT ⁽⁵⁾					
Greenhouse gas emissions Scope 1 + Scope 2 ⁽⁶⁾	tCO ₂ e	11 460	10 957	12 312	3,2%
Greenhouse gas emissions Scope 3 ⁽⁷⁾	tCO ₂ e	9 598 650	-	-	-
Electricity consumption ⁽⁸⁾	MWh	44 643	47 760	46 464	-8,1%
Production of waste	t	1 496	1 473	1 216	-1,8%
Water consumption	m ³	270 489	225 264	176 288	20,1%
SUPPLIERS					
Time of payment and time contractually agreed, in Portugal	Ratio	1	1	1	0,0%
Purchase from local suppliers	Percentage	89,8%	90,3%	90,5%	-0,5 p.p.
DONATIONS					
	Million euros	2,6	2,4	2,3	8,3%

(1) Active Customers: First cardholders 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.

(2) Includes a structural change effect in the complaints handling process at Bank Millennium Poland, aiming to improve the Customer experience and optimize immediate treatment.

(3) Information on the number of Employees (and not FTE's) for: Portugal, Mozambique and Poland.

(4) Value reflects the operations in which these regimes are applicable: Collective Bargaining Agreement - Portugal and Mozambique, Trade Union - Portugal and Mozambique.

(5) Extended reporting scope, in 2023, to integrate Millennium bim and, in 2024, to consider the entire Bank Millennium Group.

(6) Market-based scope 2 GHG emissions.

(7) Methodology for calculating scope 3 GHG emissions improved in 2024 and considers categories 1, 2, 3, 6, 13 and 15 (more information in E1-6 – Gross scope 1, 2, 3 GHG emissions and total GHG emissions).

(8) Electricity purchased from the electricity grid.

INTRODUCTION

Introduction

Since 2004, Banco Comercial Português (BCP) has published annual sustainability information in accordance with the Global Reporting Initiative (GRI), and from this report onwards it will do so using the European Sustainability Reporting Standards (ESRS) as its main reference.

Sustainability Report

In this, the 21st edition of the sustainability information report, the report takes on a new format, becoming part of Volume II of the BCP Group's Integrated Report, in line with the requirements established by Directive 2022/2464 - Corporate Sustainability Reporting Directive (CSRD). Now divided into two parts - "Sustainability Report" and "Other Sustainability Information" - it continues to guarantee a global and integrated vision of the BCP Group's performance in the Economic, Social and Environmental dimensions, but also the detail relating to each of its main operations, Portugal, Poland and Mozambique.

This document was drawn up in accordance with the applicable ESRS guidelines and, in the case of sector indicators, the GRI Standards guidelines, the respective financial sector supplement, and verified by an external entity in accordance with the principles defined by the International Standard on Assurance Engagements 3000.

In view of the scenario of non-transposition of the CSRD, the BCP Group continues to be covered by the framework established by Decree-Law 89/2017 of 28 July, regarding the mandatory annual disclosure of non-financial information and information on diversity by certain large companies, which transposes the Non-Financial Reporting Directive (NFRD) of the European Union (EU). Thus, Volume 2 of the 2024 Annual Report corresponds to the 2024 Non-Financial Statement of the BCP Group.

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, in particular 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 *Comissão de Mercado de Valores Mobiliários* (CMVM) (Portuguese stock market regulator) guidelines for non-financial reporting; (vi) European Commission (EU) Taxonomy; and (vii) UNEP FI Principles for Responsible Banking (PRB); are available for consultation in the report's annexes and on the Bank's institutional website, www.millenniumbcp.pt, Sustainability area.

The combined reporting perimeter of (i) **BCP's Integrated Report**, (ii) **Bank Millennium's Integrated Report**, (iii) **Millennium bim's Annual Report and Accounts**, (iv) **Millennium bcp Foundations' Annual Report and Accounts** and (v) **Bank Millennium**, includes, in its different dimensions, the disclosure of relevant information on the BCP Group's performance in matters of or with an impact on Sustainability and the 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:

- EU Directive 2014/95 on the disclosure by large companies and groups of non-financial information and information on diversity (NFRD - Non-Financial Reporting Directive), published in October 2014, which imposes the reporting of non-financial information on a number of organisations, namely information on social and environmental performance, transposed into Portuguese law by 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 directives and regulations relevant to the reporting of non-financial information by organisations that make up the financial sector would emanate;
- EU Regulation 2019/2088 on the 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 which came 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 “main adverse impacts” of these decisions on environmental and social criteria, and disclosure of financial products that promote “E” and/or “S” characteristics or have a sustainable objective. Also from 2023, the duty to report has included information on the entity and product, on the institutional 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 objectives into tangible 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: (i) Mitigation of climate change, (ii) Adaptation to climate change, (iii) Sustainable use and protection of water/marine resources, (iv) Transition to a circular economy, (v) Prevention and control of pollution and (vi) Protection and restoration of biodiversity and ecosystems. Financial entities must report alignment with the taxonomy as of 2024 (compared to fiscal year 2023), for the environmental objectives of Mitigation and Adaptation to Climate Change. One of the main indicators to be reported is the Green Asset Ratio (GAR), i.e. the proportion of assets that finance and invest in economic activities 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 objectives;
- Directive EU 2022/2464 on Corporate Sustainability Disclosure (CSRD), published in its final version in December 2023 by the European Commission, replaces Directive EU 2014/94 (NFRD), and which 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 (EU Regulation 2023/2772). The CSRD will require all large companies and listed SMEs to disclose how sustainability issues can affect them and the society/environment and also to disclose their share of “environmentally sustainable” economic activities under the Taxonomy Regulation;
- The Framework Law on Climate (Law no. 98/2021), published in December 2021, which, in its article 38, establishes that climate risk must be considered in corporate governance and incorporated into its decision-making processes and that information on identified climate risks must 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 strategy and the European Green Deal presented for the first time in December 2019 and aims to reduce the EU's greenhouse gas (GHG) emissions by 55% by 2030. In the context of this plan, Millennium bcp took part in the European Banking Authority's (EBA) climate stress test exercise, the main aim of which was to test the banks' progress in terms of data capabilities (and the comprehensiveness of the data available);

- Risk disclosure - Pillar 3 report, ESG risk disclosures - from June 2022, large institutions that have issued securities admitted to trading on a regulated market in any Member State, as defined in Article 4(1) of Directive EU 2014/65, must disclose information on ESG risks, including physical and transition risks, as defined in the report referred to in Article 98(8) of Directive EU 2013/36. To this end, the Bank discloses its market discipline on an annual and half-yearly basis in response to the reporting obligations laid down in the Taxonomy regulation;
- The EBA will launch the P3DH (Pillar 3 Data Hub) portal which will centralise the public disclosure of prudential information from institutions subject to these requirements, to be submitted from 30 June 2025. This portal promotes more efficient use of information by all interested parties and reinforces the EBA's role in promoting market discipline;
- Under the Markets in Financial Instruments Directive II (MiFID II), the Bank, as a Financial Intermediary, must, prior to making investments in financial products, services or instruments, ask the Customer to provide specific information in order to assess the Customer's investment profile and the suitability of the investment for that profile (based on Article 54(2) of Delegated Regulation EU 2017/565 on the assessment of suitability and the definition of sustainability preferences introduced in Article 2(7)).

In the future, it will also have to respond to other directives and regulations that will become part of the EU's regulatory agenda:

- The Corporate Sustainability Due Diligence Directive (CSDDD), approved in 2024, will require large companies to carry out assessments of environmental and social impacts throughout their value chain. The directive establishes the obligation for large companies to adopt and implement a transition plan for climate change mitigation in line with the Paris Agreement's 2050 climate neutrality objective, as well as with interim targets under the European Climate Law.
- The European Union Regulation on Artificial Intelligence (AI Act) is legislation that establishes harmonised rules for the development, marketing and use of AI systems in the European Union. After a legislative process, the regulation was approved and published as Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024, establishing harmonised rules on artificial intelligence. This regulation aims to ensure that AI systems are safe, transparent,

ethical and respect fundamental rights, while promoting innovation in the sector. The regulation will be phased in.

Developments in Non-Financial Reporting

The BCP Group's approach to sustainability is guided by the main trends in reporting and performance on environmental, social and governance issues at national and international level.

Therefore, in its Sustainability Master Plan (SMP), BCP Group includes several objectives that respond to the most recent trends in sustainable finance and non-financial reporting, such as joining the United Nations Principles for Responsible Banking (UNEP FI), meeting the targets set under the United Nations Sustainable Development Goals (SDGs), adapting to the new European Union (EU) guidelines on non-financial reporting, namely the Corporate Sustainability Reporting Directive (CSRD) (EU 2022/2464) and the European Sustainability Reporting Standards (ESRS) (Regulation EU 2023/2772), alignment with the Regulations aimed at "Establishing a framework to promote sustainable investment" Regulation EU 2020/852 (aka Taxonomy) or "Disclosure of sustainability-related information in the financial services sector" (Regulation EU 2019/2088, SFDR), and the definition of targets certified by the Science Based Targets initiative (SBTi) and aligned with the Paris Agreement is also being evaluated.

The Bank believes it has a role to play in fulfilling national and international commitments, recognising the importance of involving and aligning the financial sector in the transition to a sustainable and inclusive economic development model. In terms of climate change, the Bank is committed to the Paris Agreement and the goal of limiting the increase in average temperature to below 1.5°C. With regard to ethical and responsible leadership, we would like to highlight the BCP Group's commitment to the Global Compact Principles, defined by the United Nations, which have 10 Principles for action in the areas of Human Rights, Working Conditions, Environmental Protection and Anti-Corruption.

In terms of reporting guidelines, the Bank develops its Sustainability Report in accordance with the applicable ESRS guidelines and, in the case of sector indicators, the GRI Standards guidelines, and also publishes the SASB indicators, namely those associated with the financial sector. The recommendations of the TCFD are also followed, as well as the requirements of CMVM in Portugal. This report also includes the Human Rights report, in accordance with the UN Guiding Principles Framework.

Regarding issues related to Sustainable Finance, the Bank monitors the evolution of the legal and regulatory context of the financial sector (namely the Acts 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 in these thematic areas.

In addition, the BCP Group has been ensuring an increasingly effective alignment between its offer, business processes and support operations with ESG issues, materialised in the integration of environmental and social aspects into the organisation's activities, from the governance model and risk management to the offer and management of internal activities.

2024 SUSTAINABILITY REPORT

Statement of non-financial information

General information

ESRS 2: General disclosures

Preparation basis

BP-1— General basis for preparing sustainability statements

This section, entitled “Sustainability Report”, is part of the BCP Group's Annual Report for the first time, containing the reporting of sustainability information within the framework of the Corporate Sustainability Reporting Directive (CSRD) and in accordance with the European Sustainability Reporting Standards (ESRS), which establish detailed requirements for the disclosure of sustainability-related information by companies.

The 2024 statements, which cover the period from 1 January 2024 to 31 December 2024, are presented on a consolidated basis in accordance with Article 48-I of Directive 2013/34/EU. They therefore cover the entire value chain of the BCP Group's, including the impacts, risks and opportunities (IRO) identified upstream, downstream and in their own operations, the policies and actions implemented to manage them and the metrics and targets that allow them to be properly monitored.

Within the BCP Group, the only subsidiary subject to the reporting obligation is Bank Millennium, since it is listed on the Warsaw Stock Exchange.

In preparing this document, information classified as sensitive or belonging to the Bank's intellectual property has been omitted, since it is not generally known or easily accessible in its entirety, in the specific configuration of its elements or in the interconnection between them, by individuals working in related areas. Furthermore, information with commercial value has also been omitted because it is confidential. Whenever this occurs, it is duly identified in the respective disclosures.

BP-2 – Disclosures in relation to specific circumstances

Time Horizons

The time horizons used in this Sustainability Report are defined in accordance with the requirements established by ESRS:

- Short-term - 1 year;
- Medium-term – 2 to 5 years;
- Long-term: more than de 5 years.

However, for ESG risk management, the long-term is defined as a period exceeding 10 years, allowing for a more comprehensive and strategic assessment of potential impacts and future trends.

Estimating the value chain, sources of estimates and uncertainty of results

BCP aims to disclose information with the highest possible accuracy and rigor, always using real data whenever available. However, in situations where such data is not accessible, estimates and assumptions are used as the basis for certain quantitative disclosures. In the case of the value chain, specific methodologies were applied to estimate relevant metrics, ensuring that the results adequately reflect the Bank's reality. The estimates and assumptions used are described in the sections "E1 Climate Change" and "Methodological Notes".

Changes in the preparation or presentation of information and Communication of errors in previous periods

Whenever possible, the quantitative data in this report is accompanied by comparative data from the previous year, ensuring greater context and transparency in the analysis of information. In this report, methodological changes were implemented in the calculation of GHG emissions, which are detailed in the sections “E1 Climate Change” and “Methodological Notes”.

Disclosures arising from local legislation or widely accepted positions on sustainability reporting

The BCP Group's Sustainability Reporting, which includes the Sustainability Report and the other sections of Volume II of this Annual Report, provides sustainability information aligned with the following frameworks:

- NFRD - Non-Financial Reporting Directive;
- UNGP – The United Nations Guiding Principles on Business and Human Rights;
- SFDR - Sustainable Finance Disclosure Regulation;
- GRI - Global Reporting Initiative;
- SASB - Sustainability Accounting Standards Board;

- ODS - Objetivos de Desenvolvimento Sustentável;
- TCFD - Task Force on Climate-related Financial Disclosures.

Incorporation by reference

When presenting the sustainability statement, the ESRS disclosure requirements incorporated by reference to other sections include:

ESRS Requirement	Remission
ESRS 2 GOV-1 – Role of administrative, management and supervisory bodies	Corporate Governance Report
ESRS 2 GOV-2 – Information provided and sustainability issues addressed by the company's management, management and supervisory bodies	SBM-1 – Strategy, business model and value chain
GOV-3 – Integrating sustainability performance into incentive schemes	Corporate Governance Report
SBM-1 – Strategy, business model and value chain	S1-6 – Characteristics of the company's salaried workers Strategic Plan 2025/2028 Report & Accounts
SBM-2 – Stakeholders' Interests and Viewpoints	GOV-1 – Role of administrative, management and supervisory bodies
S1 – Material impacts, risks and opportunities and their interaction with the strategy and business model	IRO-1 – Description of the process for identifying and assessing material impacts, risks and opportunities SBM-1 – Strategy, business model and value chain ESRS E1 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model
IRO-1 – Description of the process for identifying and assessing material impacts, risks and opportunities	Attachments
IRO-2 – ESRS disclosure requirements covered by the company's sustainability statement	Attachments
E1 - SBM-3 – Material impacts, risks and opportunities and their interaction with the strategy and business model	SBM-3 – Material impacts, risks and opportunities and their interaction with the strategy and business model IRO-1 – Description of the process for identifying and assessing material impacts, risks and opportunities E1-4 – Targets related to climate change mitigation and adaptation E1-1 – Transition plan for climate change mitigation).
E1-4 – Targets related to climate change mitigation and adaptation	E1-2 – Policies related to climate change mitigation), Methodological Note
E1-5 – Energy consumption and energy mix	E1-6 – Gross GHG emissions of scope 1, 2, 3 and total GHG emissions). Methodological Note
S1 - ESRS 2 SBM-2 – Interests and views of stakeholders	ESRS 2 SBM-2 – Interests and views of interested parties
S1 - ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	S1-6 – Characteristics of the company's salaried workers
S1-1 – Policies related to own workforce	IRO-1 – Description of the process for identifying and assessing material impacts, risks and opportunities S1-2 – Processes for engaging with workforce and worker representatives about impacts)
S1-4 – Taking action on material impacts on own workforce and approaches to managing material risks and pursuing material opportunities related to own workforce, as well as the effectiveness of these measures	Metrics and goals

S1-6 – Characteristics of the company's salaried workers	Methodological Notes
S1-7 – Characteristics of non-employees in the undertaking's own workforce	Methodological Notes
S1-12 – People with disabilities	Methodological Notes
S4 - ESRS 2 SBM-2 – Interests and views of stakeholders	ESRS 2 SBM-2 – Interests and views of interested parties
S4 - ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	IRO-1 – Description of the process for identifying and assessing material impacts, risks and opportunities
S4-2 – Processes for engaging with consumers and end-users about impacts	SBM-2 – Stakeholders' Interests and Viewpoints
S4-3 – Processes to remediate negative impacts and channels for consumers and end-users to express concerns	S4-1 – Policies relating to consumers and end-users
S4-4 – Adoption of measures on significant impacts on consumers and end-users, and approaches to manage material risks and pursue material opportunities related to consumers and end-users, and effectiveness of these actions	S4-1 – Policies relating to consumers and end-users
G1 - ESRS 2 GOV-1 – The role of administrative, supervisory and management bodies	Corporate Governance Report
S1-1 – Business Conduct Policies and Corporate Culture	IRO-1 – Description of the process for identifying and assessing material impacts, risks and opportunities S1-2 – Processes for engaging with workforce and worker representatives on impacts
G1-2 – Supplier relationship management	G1-6 – Payment practices
G1-3 – Prevention and detection of corruption and bribery	ESRS 2 GOV-1 – The role of administrative, supervisory and management bodies

Use of phase-in provisions

BCP has applied the transitional provision in accordance with Appendix C of ESRS 1:

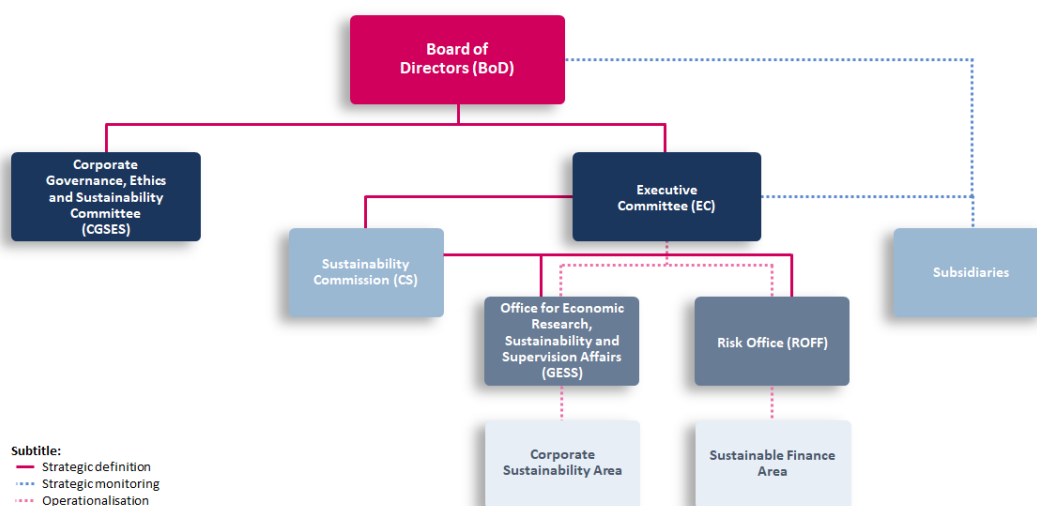
- ESRS 2 SBM-3 (no. 48 e)) – Financial effects
- E1-9 – Expected financial effects of material physics and transition risks, as well as potential climate-related opportunities.

Governance

GOV-1 – Role of the management and supervisory bodies

The BCP Group has a structured and transparent governance model that allows it to effectively manage its material impacts, risks and opportunities. This model guarantees a clear definition of the responsibilities of the management and supervisory bodies and their integration into the company's strategic and operational decision-making processes.

STRUCTURE OF THE SUSTAINABILITY GOVERNANCE MODEL



The BCP Group's governance model consists of a unitary Board of Directors (BoD), where supervisory and management responsibilities are exercised in an integrated manner. The BoD plays a central role in overseeing sustainability issues, regularly monitoring the Risk Appetite Statement (RAS) indicators and alerts defined in the Risk Identification Process (RIP), including climate risks. In addition, periodic materiality assessments of the IRO are carried out to ensure relevance, responsibilities, controls and strategic focus on ESG issues, as well as to establish the scope of the disclosures to be included in the perimeter of the Sustainability statement.

As far as the executive level is concerned, the Executive Committees of the entities that make up the BCP Group are responsible for managing Sustainability, both from an organisational point of view and in terms of their performance as a financing entity. These committees ensure that ESG principles are incorporated into the value proposition, the product and service offering and operational processes. Their work is supported by the Sustainability Commissions (SC), bodies that assess the integration of sustainability principles into decision-making processes, approve strategic initiatives and monitor the implementation and progress of the Sustainability Master Plan (SMP).

The Sustainability areas of the BCP Group Banks are responsible for proposing and implementing global and coherent sustainability and corporate social responsibility policies, which promote business development and risk management by incorporating environmental, social and corporate governance principles and enhance the growth of the institution's reputation and its ability to add social and environmental value and respond to the needs and expectations of Stakeholders. In addition, Millennium bcp's Sustainability Area (Office for Economic Research, Sustainability and Supervision Affairs) ensures that the BCP Group's practices comply with legal and regulatory requirements and with the expectations and recommendations of supervisory entities.

At the level of the Board of Directors (BoD), the Corporate Governance, Ethics and Sustainability Committee (CGESC), within the scope of the powers delegated by the BoD and in accordance with its Regulations, is 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, 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. The Risk Assessment Committee (RAC), within the scope of the powers delegated by the BoD and in accordance with its Regulations, is also responsible for monitoring the process of managing the material risks to which the Bank is subject, using appropriate indicators and metrics, including, among others, ESG risk factors, which include climate-related risks. The Regulations of the CGESC and the RAC, updated in November 2024, are available on the Bank's [website](#) (Institutional/Governance/Articles of Association and main Rules and Regulations).

On the reference date of this Report, the BoD was made up of 6 executive members and 10 non-executive members. On 10 January 2025, the Bank was notified of the European Central Bank's (ECB) non-objection to the election of the identified candidate and, on 22 January, director Esmeralda da Silva Santos Dourado was co-opted by the BoD to the position of non-executive (independent) member, thus increasing the ratio of independent directors on the Board. The characteristics and competences of the independent directors, who, on the date of approval of this report, represent 55 per cent of all non-executive directors, show that their autonomy is guaranteed.

The current composition of the Board of Directors for the term-of-office 2022-2025 has 6 elements of the least represented gender, which corresponds to a 35.29% of the total number of members, placing the percentage in the supervisory body in 33%.

Detailed information on the constitution of this and the other management and supervisory bodies, their duties and responsibilities, as well as the specialised knowledge and experience of their members in sustainability matters or in other areas relevant to the BCP Group's business model and geographical locations, can be found in the Corporate Governance Report¹.

GOV-2 – Information provided and sustainability issues addressed by the company's management and supervisory bodies

To ensure that material impacts, risks and opportunities are considered in the strategic management and decision-making processes, the Bank's management and supervisory bodies, including the relevant Commissions, are regularly briefed on IRO (Risks and Opportunities), the implementation of due diligence processes and the effectiveness of policies, actions, metrics and targets to address them. This monitoring takes place through a structured reporting and monitoring process involving different intervals and instruments.

During the reporting period, having carried out a thorough review of the dual materiality analysis, these bodies analysed all the impacts, risks and opportunities identified as material (more information in SBM-1 - Strategy, business model and value chain).

During 2024, the Bank continued its risk identification and assessment exercise with a focus on the ESG component, whose analysis process is made up of the most advanced practices available on the market - including scenarios (which ensure a prospective view of the expected impacts), as well as the transmission of ESG risks to traditional categories (and to the business) and the inclusion of all BCP Group exposures.

The results of the exercise are integrated into the Bank's day-to-day operations through the definition of actions for their 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 managing social and environmental risk factors are addressed in its Sustainability Master Plan (more information in SBM-1 - Strategy, business model and value chain), with guidelines and actions aimed at integrating risks into the business.

GOV-3 – Integration of sustainability performance into incentive schemes

The remuneration policy and incentive schemes for members of the company's management and supervisory bodies incorporate issues related to sustainability, including objectives associated with climate action and the reduction of GHG emissions (more information in the Corporate Governance Report²).

The incentive model provides for the annual value of the pool bonus attributed at Millennium bcp to be indexed to the degree of achievement of a set of Key Performance Indicators (KPIs), including a KPI specifically related to sustainability. Additionally, in the individual performance evaluation of the Chief Risk Officer (CRO), a KPI linked to sustainability issues is also taken into account. The other members of the management bodies perform supervisory duties and are therefore not covered by incentive or variable remuneration schemes.

¹ Chapters: "B. CORPORATE BODIES AND COMMITTEES"; "C. INTERNAL ORGANISATION"; "Annex I"; "Annex II"; and "Annex III".

² Chapter: "D. REMUNERATIONS".

In the specific case of the CRO, his/her evaluation includes the KPI “Compliance with the Sustainability Master Plan - Group”, with regard to the areas and topics under his/her responsibility. The applicable performance metrics are set out in the Remuneration Policy for Members of the Management and Supervisory Bodies (MMSB).

The proportion of variable remuneration depends on objectives related to sustainability. Therefore, the corporate KPIs used to calculate the maximum global amount of the Executive Committee's annual variable remuneration give a weight of 7.5% to sustainability criteria. In the specific case of the CRO, a weight of 10% is considered when calculating his/her annual variable remuneration.

As part of the company's culture and as defined in the Sustainability Master Plan, alignment with sustainability is one of the behaviours considered in the annual performance evaluation of employees. This behaviour is evaluated by both managers and other employees.

The performance evaluation of employees in management positions reporting to the Executive Committee also includes specific objectives related to sustainability, such as the KPI “Level of implementation of the Sustainability Master Plan”, a document reviewed annually, which includes, among other things, concrete actions and objectives related to climate change.

In the last quarter of 2024, the Incentive Matrix for different areas also included components related to the production of Sustainable Business Credit (Corporate Clients) and Mortgage Credit for properties with an energy rating of A or A+ (Individual Clients) in order to promote the growth of sustainable financing. The goal is to reach the upper quartile in the S&P Global CSA ranking and promote the growth of sustainable financing. To ensure these objectives are met, the Marketing Departments have developed processes for measuring and monitoring credit production and customer satisfaction, as well as implementing corrections or improvements whenever necessary.

Remuneration and incentive conditions are approved at the General Meeting of Shareholders, on a proposal from the Nominations and Remunerations Committee. Compliance with the Disclosure Requirement is in line with the remuneration report outlined in Articles 9-A and 9-B of Directive 2007/36/EC on the exercise of certain rights of shareholders in listed companies.

GOV-4 –Statement on the duty of due diligence

In order to ensure that negative impacts on people and the environment are identified, monitored and actively addressed in the development of its activity, the BCP Group has implemented a set of processes and control mechanisms which, in their different forms, aim to minimise or mitigate impacts and manage related risks. The table below identifies the sections of the sustainability statement that contain the main due diligence elements.

Essential Elements of Due Diligence	Sections of the Sustainability Statement
Integrate the due diligence duty into governance, strategy and the business model	ESRS 2 GOV-2 Page 18 ESRS 2 GOV-3 Page 18 ESRS 2 SBM-1 Page 21 ESRS 2 SBM-3 Page 28 - E1.SBM-3: Page 47 - S1.SBM-3: Page 60
Dialogue with affected stakeholders at all essential stages of due diligence	ESRS 2 GOV-2 Page 18 ESRS 2 SBM-2 Page 25 ESRS 2 IRO-1 Page 35 - E1.IRO-1 Page 35 - E2.IRO-1 Page 35 - E3.IRO-1 Page 35 - E4.IRO-1 Page 35 - E5.IRO-1 Page 35 ESRS 2 MDR-P - E1-2 Page 48 - S1-1 Page 61 - G1-1 Page 108
Identify and assess negative impacts	ESRS 2 IRO-1 Page 35 - E1.IRO-1 Page 35 - E2.IRO-1 Page 35 - E3.IRO-1 Page 35 - E4.IRO-1 Page 35 - E5.IRO-1 Page 35 ESRS 2 SBM-3 Page 28 - E1.SBM-3 Page 47 - S1.SBM-3 Page 60
Adopt measures to respond to these negative impacts	ESRS 2 MDR-A E1-1 - E1-3 Page 47 - Page 50 S1-1 - S1-4 Page 61 - Page 65 S4-1 - S4-4 Page 85 - Page 92 G1-1 - G1-3 Page 108 - Page 114
Monitor the effectiveness of these efforts and communicate	ESRS 2 MDR-T - E1-4 Page 54 - S1-5 Page 65 - S1-9 Page 68

GOV-5 – Risk management and internal controls of sustainability reporting

The BCP Group's Sustainability Report includes relevant qualitative and quantitative data on its entire value chain, collected and consolidated by the Bank's Sustainability area. It is then analysed and assessed by the EC. The Sustainability Report is then submitted to the CGESC, which issues an opinion on its compliance with the mandatory sustainability reporting standards to the BoD, the body that approves the proposed version and submits it to the GM for final approval.

In order to guarantee the proper collection and processing of data, providing a reliable view of the BCP Group's ESG performance, now aligned with ESRS requirements, the Bank has a specific internal standard - NP0469 - which describes the concrete principles and methods to be adopted for the purposes of collecting data and structuring the content of the sustainability report.

Both the dual materiality analysis process and the Sustainability Report are subject to an independent external verification process, Limited Assurance, in accordance with the principles defined by the International Standard on Assurance Engagements 3000, reinforcing the credibility of the report, compliance with regulatory requirements and transparency in the disclosure of information.

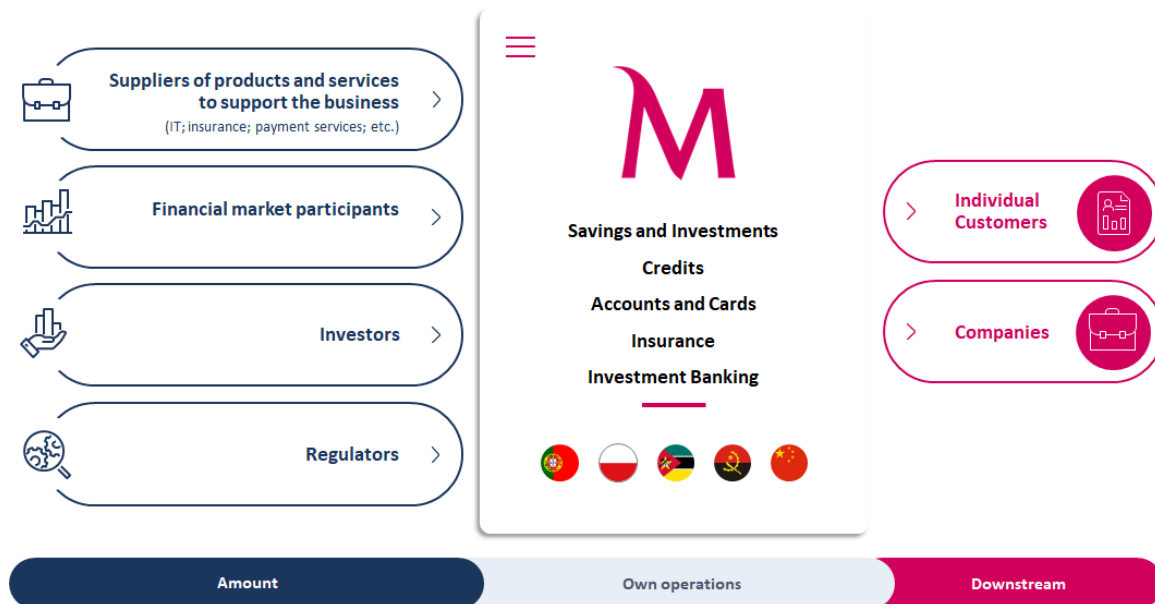
To date, the BCP Group has not identified any concrete risks related to the communication of sustainability information.

Strategy

SBM-1 – Strategy, business model and value chain

Banco Comercial Português, with its decision-making centre in Portugal, guides its operations with respect for people and institutions, a focus on the Customer, a vocation for excellence, trust, ethics and responsibility, and is a standout leader in various financial business areas and a benchmark institution in the markets where it operates.

BCP GROUP'S VALUE CHAIN



Under the Millennium brand, the BCP Group develops its financial and banking services activity in Portugal and abroad, and is present in several markets: Poland, Mozambique, Angola (through its stake in Banco Millennium Atlântico (BMA) and China (Macau). To this end, it has a total of 15,664 employees in its main geographies - Portugal, Poland and Mozambique - (more information in S1-6 - Characteristics of the company's employees). Its international presence is also ensured through representative offices and/or commercial protocols.

Activity in the Portuguese market is focused on retail and corporate banking, networks that are segmented in order to better serve Customers' needs and expectations, both through value propositions based on innovation, agility and efficiency for mass-market Customers and on targeted offers, management and customised service for Prestige, Business,

Corporate and Large Corporate Customers. In retail banking, it also includes ActivoBank, a bank aimed at Customers who use new information/communication technologies intensively and favour a banking relationship based on simplicity and innovative products and services.

Despite its efforts to promote responsible financing and investment (more information in the Strategic Plan 2025/2028), the Bank still maintains commercial relations with entities in the sectors of Fossil Fuels (Coal, Oil and Gas), the production of chemical products ³ and the cultivation and production of tobacco.

Sector	Associated revenue (€)
Fossil fuels (coal, oil and gas)	2.445.716,72
Production of chemical products	479.858,19 ⁴
Tobacco cultivation and production	263.933,45 ⁴

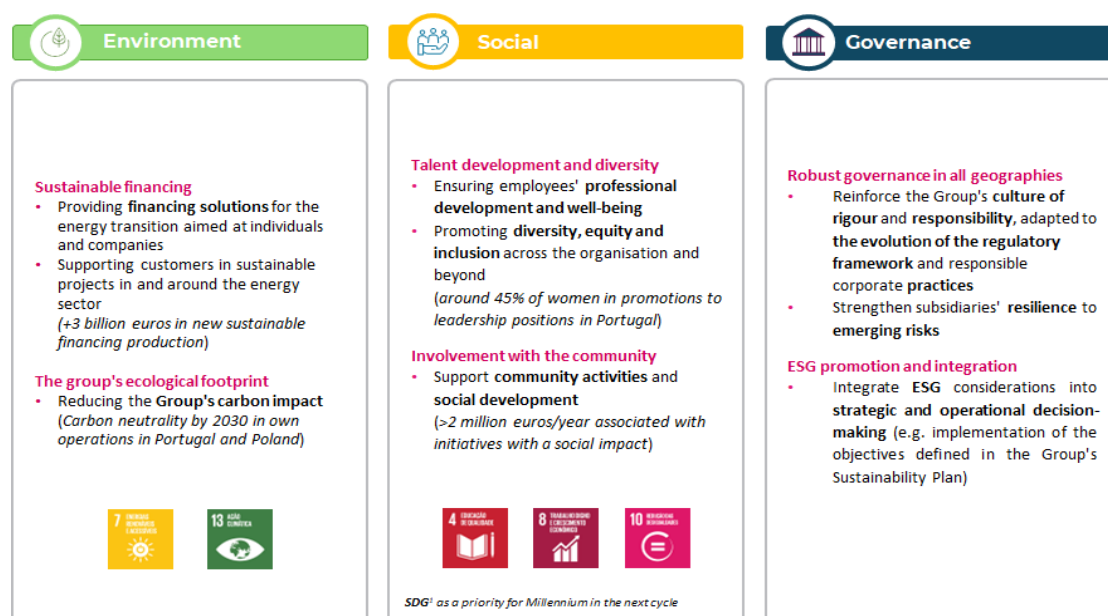
2025/2028 Strategic Plan

In the current cycle of the “Valorizar 28” Strategic Plan, Millennium bcp is seeking to innovate in commercial banking in order to grow and be a partner for the sustainability of companies, strengthening its position in segments with a greater competitive advantage, such as small and medium-sized companies, and modernising the model and offer to meet their main needs (e.g. supply chain financing, investment financing to support the climate transition).

The “Valorizar 28” plan is Millennium bcp's strategic framework for strengthening the bank's ability to fulfil the expectations of customers, employees and shareholders, after a period of structural effort to restore the financial sustainability of its business model (more information in the Annual Report and Financial Statements ⁵).

One of the main objectives of this plan is to reinforce the commitment to Sustainability - with the goal of positioning itself in the top quartile of the S&P Global CSA (Corporate Sustainability Assessment) rating - namely by promoting: (i) sustainable financing, particularly aimed at supporting the climate transition, (ii) employee well-being and diversity, including professional development, and (iii) a solid culture of rigour and responsibility.

Reinforcing the Group's ESG commitment



³ As established by Annex I, Division 20.2 of Regulation (EC) No 1893/2006.

⁴ Figures for the Portuguese operation.

⁵ Chapter: “Strategy”.

Recognising the importance of the ESG agenda now and in the near future, Millennium bcp remains committed to reinforcing, promoting and integrating ESG considerations into strategic and operational decision-making (e.g. implementation of the objectives defined in the Group's Sustainability Master Plan) and, additionally, to acting in accordance with regulatory expectations and evolving in the management of the different risk areas.

Sustainability Master Plan (SMP)

At BCP Group, the effort to manage sustainability issues is materialised in the commitments, targets and actions defined in the Sustainability Master Plan (SMP). The structuring of the lines of action and the identification of the actions that make up the SMP are the result of extensive reflection on the management of material issues, the resources available and the regulatory, economic and market framework.

Established for the first time in 2009 for the three-year period 2010/2012 (later extended to 2013), the Sustainability Master Plan is revised frequently - SMP 2014/2015 (extended to 2018); SMP 2019/2021; SMP 2022; SMP 2023; SMP 2024; and currently SMP 2025 - ensuring greater consistency and responsiveness to the context experienced at any given time.

The SMP 2024 was designed and developed at the level of the Group and its three main geographies, based on the results of the stakeholder consultation processes and thematic materiality analyses carried out in 2023, benchmarking exercises with the main peers, recommendations from supervisors, interpretation of suggestions from external analysts and the development of the legal and regulatory framework. This Plan has led to the implementation of a large number of initiatives and concrete actions along the following action lines:

Action Line	Size
a. Positive impact through a responsible and sustainable management	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. Positive impact through a sustainable offer	i. Responsible and Sustainable investment
	ii Development of ESG products
	iii. ESG risk management of the offer
c. Positive impact on environment	i. Climate change and energy transition
	ii. Reporting regulations and frameworks
	iii. Training and environmental awareness
d. Positive impact on people and communities	i. Training and development
	ii. Corporate volunteer Actions
	iii. Human Rights
	iv. Financial Literacy
	v. Partnerships for Sustainability
...	...

CONTINUING THE BCP GROUP'S EFFORTS TO MITIGATE/ELIMINATE NEGATIVE IMPACTS AND MAXIMISE POSITIVE ONES, THE SUSTAINABILITY MASTER PLAN APPROVED FOR 2025 FORESEES, LIKE THE ONE FOR 2024, A COMPONENT OF COMMON ACTIONS, TO WHICH ARE ADDED THE COMPONENTS OF LOCAL ACTIONS IN PORTUGAL, POLAND AND MOZAMBIQUE.

BCP GROUP: 2025 SUSTAINABILITY MASTER PLAN

 GOVERNANCE	 SOCIAL	 ENVIRONMENT
- Inclusion of ESG criteria in the value chain management; - Evolution of Sustainability report in accordance with CSRD/ESRS: 2024 Sustainability Report; - Sustainability report in accordance with CSRD/ESRS: 2025 Sustainability Report; - Sustainability Report – other report requirements; – Preparation, drafting and approval of the 2026 SMP; – Review and, if necessary, update and publication of Policies and Principles, in accordance with the regular review period every 2 years and guarantee that all material IRO (Impacts, Risks and Opportunities) have a management policy in place (ESRS 2 MDR-P); - ESG Organisational Model for HR monitoring.	– Preparation and execution of annual local action plans for corporate social responsibility and establishment of an articulation model at the Group level; – Monitoring of the human rights management and disclosure process, including identification of vulnerabilities and improvement actions.	- C&E materiality analysis: implementation of the annual update exercise; - C&E materiality analysis: integration of results in the Risk Identification Process and in the Risk Appetite Statement; – Monitoring and updating the target setting and portfolio alignment exercises in line with Pillar 3 and science-based requirements; – Implementation and monitoring of the Bank's Transition Plan (credit and investment portfolios); – ESG metrics: maintenance and updating of ESG metrics for relevant portfolios and business lines, both at the consolidated and subsidiary levels; - Preparation of the mandatory Taxonomy report in 2025, in reference to 2024. – Greater integration of C&E factors in the ICAAP and stress tests; – Implementation of the analysis report of the competitive business context and regulatory monitoring.

In addition to the initiatives transversal to the BCP Group, the 2025 SMP 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.



Transversal actions

Environment - 8

Social - 2

Governance - 7

Local actions

	 Environment	 Social	 Governance
	6	4	10
	6	11	9
	3	5	5

SBM-2 –Stakeholders' interests and points of view

The ability of the BCP Group 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 needs, expectations and ambitions into the strategic business approach.



BCP Group's stakeholders are divided into two main groups:

- stakeholders affected by the BCP Group: individuals or groups whose interests are or may be affected, positively or negatively, by the activities carried out and by the direct and/or indirect business relationships of the BCP Group along its value chain, and
- users of sustainability statements: users of financial and non-financial information for general and supervisory purposes (supervisors, investors, current and potential, lenders and other creditors, including asset managers, credit institutions, insurance companies), as well as other specific users of sustainability statements, including business partners, trade unions and social partners, civil society, Non-Governmental Organisations (NGOs), governments, analysts and academy.

The Bank has mechanisms for engaging with the different groups of stakeholders, through which elements that contribute significantly to the decision-making, continuous improvement and innovation processes are perceived. In addition, these processes are also important drivers for consolidating corporate reputation.

Stakeholders	Type of engagement	Frequency	Purpose and integration of results
Employees	Satisfaction surveys on organisational climate	Annual	To provide a safe and healthy, diverse and inclusive work environment that favours the well-being, development and professional fulfilment of each employee. To this end, in addition to complying with the labour legislation in force in the countries where it operates, the Bank establishes and updates its own mechanisms in each of these dimensions, which include, among others, policies, action plans and/or specific initiatives.
	Feedback and whistleblowing channels	No defined periodicity	
	Human Resources Commission	Monthly	
	Regular dialogue with the Workers' Committee (CT) and with the Unions	The dialogue with the CT is monthly and with the Unions is regular, depending on the topics to be dealt with throughout the year	
Customers	Customer "evaluation of experiences" surveys (and "mystery customer")	Daily (half-year)	To continuously improve the quality of service and customer satisfaction levels and, consequently, their loyalty and retention, by a deeper understanding of their needs and expectations. This purpose is materialised through the development of Customer service policies; the reinforcement of the training of employees who come into direct contact with customers; the implementation of innovation and continuous improvement measures, including the development of new products and services and the use of CRM (Customer Relationship Management) and Customer Intelligence tools; and the implementation of marketing and communication campaigns aimed at specific segments.
	Satisfaction surveys	No defined periodicity	
	Complaint processing and Client's Ombudsman	Daily	
	Customer service and other meetings (face-to-face and/or online) for negotiation and sale	Daily	
	Institutional meetings with customers (conferences, seminars, workshops, etc.)	No defined periodicity	
	Dialogue with Consumer Protection Associations	No defined periodicity	
Suppliers	Suppliers' relationship management procedures, including negotiation and contracting	Annual	Build stable partnerships and reduce/mitigate environmental, social and reputation risks related to the supply chain, ensuring the quality and timely delivery of products and services, as well as the practice of fair prices.
	Suppliers' evaluation surveys, including on sustainability requirements	No defined periodicity	
	Workshops with suppliers	No defined periodicity	

Shareholders	Communication and meetings with analysts (credit, equity and ESG)	Annual review, quarterly meetings before and after the results presentation and on a case-by-case basis when justified	Strengthen the corporate governance system and the Bank's strategy and business model, based on the expectations and requirements of shareholders and investors. Build a solid and long-term relationship with them, based on mutual trust and commitment to the company's success. At the same time, attract new investors, particularly institutional ones, and increase the value generated for shareholders and investors, providing relevant information for investment decisions and maximising the potential for share appreciation.
	Quarterly conference calls with analysts (credit and equity)/investors	No defined periodicity	
	Roadshows and conferences with investors	No defined periodicity	
	Events with Investors (e.g., Investor Days)	No defined periodicity	
	Annual General Meetings	Annual	
	Extraordinary General Meetings	No defined periodicity	
Communities	Meetings and other events within the scope of partnership/protocol relationships with NGOs and 3 rd sector entities	No defined periodicity	Create, maintain and strengthen close relationships with local communities, understanding and acting with a focus on their needs and the potential positive impacts to be generated on them.

Seeking to integrate the perception of its stakeholders regarding ESG issues, a consultation process with them is carried out regularly (every three years). The last exercise, carried out in 2022/2023, via online survey, to a representative sample of the main stakeholder groups, allowed us to understand their main needs and expectations regarding the organisation's performance in terms of sustainability and served as a basis for the validation of the materiality analysis exercise carried out in 2024.

The results of these Stakeholder consultation processes are analysed by the GESS - Corporate Sustainability Area, which is responsible for informing the Sustainability Commission, the Executive Committee and the Corporate Governance, Ethics and Sustainability Committee (CGSES), which, in alignment with the Executive Committee, informs the Board of Directors about them. (more information in GOV-1 – Role of the management and supervisory bodies).

SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model

In 2024, the BCP Group's double materiality analysis process was thoroughly revised, with the purpose of ensuring the best alignment with the principles established by the CSRD and the ESRS requirements (more information in IRO-1 – Description of the process of identification and assessment of material impacts, risks and opportunities), with regard to the identification of impacts, material risks and opportunities for the Bank, listed below.

IMPACTS

Issues	Sub-issues/ sub-sub-issues	Description	Positive/Negative	Location in the value chain	Real/Potential	Time horizon ¹
E1- Climate change	Adaptation to climate change	Financing projects and companies that promote adaptation to climate change, such as resilient infrastructure and renewable energy, allows the company to support the transition to a sustainable economy.	Positive	Downstream	Real	-
	Adaptation to climate change	Financing projects and companies that promote adaptation to climate change, such as resilient infrastructure and renewable energy, allows the company to support the transition to a sustainable economy.	Positive	Downstream	Real	-
	Energy	Financing projects aimed at improving energy efficiency, both in businesses and residential sectors, helps reduce overall energy consumption and carbon emissions. In addition, it contributes to the sustainability and competitiveness of the companies financed.	Positive	Downstream	Real	-
S1- Own workforce	Employment security	Lack of employment security, such as mass layoffs or precarious contracts, can affect employees' quality of life and mental health.	Negative	Own operations	Potential	Short Term
	Working hours	The implementation of fixed full-time working hours, employment programs and overtime management promotes stability and improves the quality of life of employees.	Positive	Own operations	Real	-
	Appropriate salaries	The application of salaries in accordance with appropriate benchmarks and subject to periodic reviews ensures the financial stability of employees.	Positive	Own operations	Real	-
	Freedom of association, the existence of company councils and the rights of employees' information, consultation and participation	Freedom of association, cooperation with trade unions and social dialogue with employees ensure the implementation of better working conditions, positively impacting the quality of life of employees.	Positive	Own operations	Real	-

¹ Time horizons: short term - one year; medium term - two to five years; long term - more than five years.

Issues	Sub-issues/ sub-sub-issues	Description	Positive/Ne- gative	Location in the value chain	Real/Poten- tial	Time horizon ¹
	Work-life balance	Developing and implementing programs that support employees can improve their quality of life.	Positive	Own operations	Potential	Short Term
	Health and Safety	Employees are exposed to potential physical attacks due to direct contact with retail customers and cash handling.	Negative	Own operations	Potential	Short Term
	Gender equality and equal pay for work of equal value	The implementation of fair salaries, in line with skills, competences, work experience and the role played, promotes gender equality and salary neutrality.	Positive	Own operations	Real	-
	Training and skills development	Providing actions and initiatives that promote the development of employees' skills contributes to their personal enrichment and professional growth.	Positive	Own operations	Real	-
	Diversity	Promotion of diversity through anti-discrimination awareness and diversity of recruitment practices.	Positive	Own operations	Real	-
	Diversity	Creating a diverse workforce fosters an inclusive work environment, increasing the well-being and prosperity of employees.	Positive	Own operations	Real	-
	Adequate housing	To facilitate access to adequate housing, namely by offering special home loan conditions, promotes the quality of life of employees, affecting their health, safety and well-being.	Positive	Own operations	Potential	Short Term
	Privacy	The lack of adequate information protection systems can lead to the loss/disclosure of data with negative consequences for the safety and integrity of employees.	Negative	Own operations	Potential	Short Term
	Privacy	Evolving cybersecurity threats and technologies can increase the potential for data breaches, compromising customers' personal identifiable information and negatively impacting their right to privacy and security.	Negative	Own operations	Potential	Short Term
	Privacy	The lack of adequate information protection systems can lead to the loss/disclosure of data with negative consequences for the safety and integrity of customers' data.	Negative	Downstream	Potential	Short Term
S4 - Consumers and final users	Privacy	Evolving cybersecurity threats and technologies can increase the potential for data breaches, compromising customers' personal	Negative	Downstream	Potential	Short Term

Issues	Sub-issues/ sub-sub-issues	Description	Positive/Negative	Location in the value chain	Real/Potential	Time horizon ¹
		identifiable information and negatively impacting their right to privacy.				
	Non discrimination	Products and services that respond to the needs of different groups of customers, regardless of age or income, promote the democratisation of access to banking services, contributing to the reduction of inequalities.	Positive	Downstream	Real	-
	Access to products and services	Contracting loans for educational purposes, particularly driven by rising tuition fees, can lead to a rapid increase in student debt and create significant economic and social externalities if loans default.	Negative	Downstream	Real	-
	Access to products and services	The provision of products and services for SMEs and entrepreneurs, such as micro-credit, can contribute to the growth of their businesses.	Positive	Downstream	Real	-
	Responsible business practices	Irresponsible business practices can lead to harmful decisions being made by customers.	Negative	Downstream	Potential	Short Term
	Responsible business practices	Remuneration structures and incentive policies that prioritise the sale of products or services can promote business practices that are not in the best interest of customers, such as irresponsible business practices.	Negative	Downstream	Potential	Short Term
G1- Business conduct	Managing supplier relationships, including payment practices	Hiring suppliers with insufficient and/or inadequate ethical practices can perpetuate behaviours that are harmful to people and the environment.	Negative	Upstream	Potential	Short Term
	Business Culture	Gaps in identifying and addressing intentional or accidental violations of the Code of Conduct (e.g., harassment) can cause significant harm to employees, suppliers, customers, or other stakeholders, such as discrimination or harassment.	Negative	Upstream, own operations and downstream	Potential	Short Term
	Corruption and bribery: incidents	The financing of criminal practices and terrorism contribute to a climate of crime and insecurity in society.	Negative	Own operations	Potential	Short Term

RISKS AND OPPORTUNITIES

Issues	Sub-issues/ sub-sub-issues	Description	Risk / Opportunity	Location in the value chain	Time horizon ²
E1- Climate change	Climate change mitigation	The transition to a low-carbon economy can have a significant impact on borrowers in energy-intensive or high CO ₂ -emissions sectors, leading to increased compliance costs, reduced solvency, restricted access to capital, decreased competitiveness or reputation damage (corporate banking segment). These consequences could ultimately increase credit risk and result in a decrease in turnover for the financial institution.	Risk	Downstream	Long Term
	Climate change mitigation	The gradual elimination of high-emission customers and Scope 3, Category 15 greenhouse gas (GHG) reduction targets can affect the bank's profitability and access to customers.	Risk	Downstream	Long Term
	Climate change mitigation	Measures to reduce GHG emissions from one's own operations can lead to financial savings and reputation gains.	Opportunity	Own operations	Short Term
	Energy	Investing in electricity generation from renewable sources, such as solar and wind, provides an opportunity to reduce dependence on fossil fuels and position the bank as a leader in the transition to a green economy.	Opportunity	Own operations	Short Term
S1- Own workforce	Employment security	Inadequate working conditions, such as long working hours, lack of adequate rest, or absence of ergonomic measures, can negatively affect employees' satisfaction and, consequently, their productivity.	Risk	Own operations	Short Term
	Social dialogue	Opportunities for dialogue and feedback can support employees' career development, increasing satisfaction and retention.	Opportunity	Own operations	Short Term
	Collective negotiation, including the rate of employees covered by collective agreements	Collective negotiation allows the establishment of agreements that promote employment stability through the creation of clear rules on remuneration, benefits, and other conditions, contributing positively to the organisational climate and, consequently, to the motivation and productivity of employees.	Opportunity	Own operations	Short Term
	Work-life balance	The provision of conditions that promote work-life balance tends to promote the well-being of employees and, consequently, their satisfaction and productivity.	Opportunity	Own operations	Short Term

² Time horizons: short term - one year; medium term - two to five years; long term - more than five years.

Issues	Sub-issues/ sub-sub-issues	Description	Risk / Opportunity	Location in the value chain	Time horizon ²
	Training and skills development	Investment in employee training and development contributes to the ability to attract and retain talent, thereby reducing recruitment and hiring costs.	Opportunity	Own operations	Short Term
	Diversity	Workforce diversity contributes positively to the organisational climate, increases the organisation's capacity for innovation, and, consequently, improves productivity.	Opportunity	Own operations	Medium term
	Appropriate salaries	Facilitating access to adequate housing, namely by offering special home loan conditions, contributes to talent retention and, consequently, reduces recruitment and hiring costs.	Opportunity	Own operations	Short Term
S4 - Consumers and final users	Access to information (quality)	The continuous scrutiny of financial institutions by regulators to ensure transparency and greater disclosure of information to customers can lead to increased financial losses and operational costs.	Risk	Downstream	Short Term
	Non discrimination	The creation of accessible digital tools, both in terms of usability and language, to ensure that all consumers, regardless of their financial education, can access and understand banking information, can represent an opportunity for business expansion.	Opportunity	Downstream	Short Term
G1- Business conduct	Business Culture	By adopting ethical business practices, the bank can build a strong reputation for integrity, which strengthens trust with customers, investors, and regulators.	Opportunity	Upstream, own operations and downstream	Short Term

Issues	Sub-issues/ sub-sub-issues	Description	Risk / Opportunity	Location in the value chain	Time horizon ²
	Managing supplier relationships, including payment practices	Delays in payments to suppliers can damage the bank's relationship with them, leading to disruptions in the provision of essential services, such as technological infrastructure or security.	Risk	Upstream	Short Term
	Prevention and detection, including training	The establishment of robust internal controls gives banking institutions a greater ability to prevent incidents of corruption, bribery or other related offences, which could otherwise result in financial losses and reduced revenues.	Opportunity	Own operations	Short Term
	Corruption and bribery: incidents	Incidents of corruption and bribery can have a significant impact on a bank's reputation. Trust is one of the most valuable assets for a financial institution, and any association with bribery or corruption can lead to the loss of customers, investors, and partners.	Risk	Own operations	Short Term

The definition of strategic priorities and the development of the BCP Group's business model take into account the impacts (including those related to human rights), risks and material opportunities identified (more information in SBM-1 – Strategy, business model and value chain). However, the Bank has not established a process for quantifying the current and expected financial effects of material risks and opportunities or for analyzing resilience to them.

Nevertheless, additional information on the resilience of the strategy to climate change is disclosed in ESRS E1 SBM-3 – Material impacts, risks and opportunities and their interaction with the strategy and business model.

With regard to the impacts related to employees in the own workforce, all those who may be affected by them (essentially employees) are taken into account in this Report. These impacts can be generalized, systemic or even related to specific incidents.

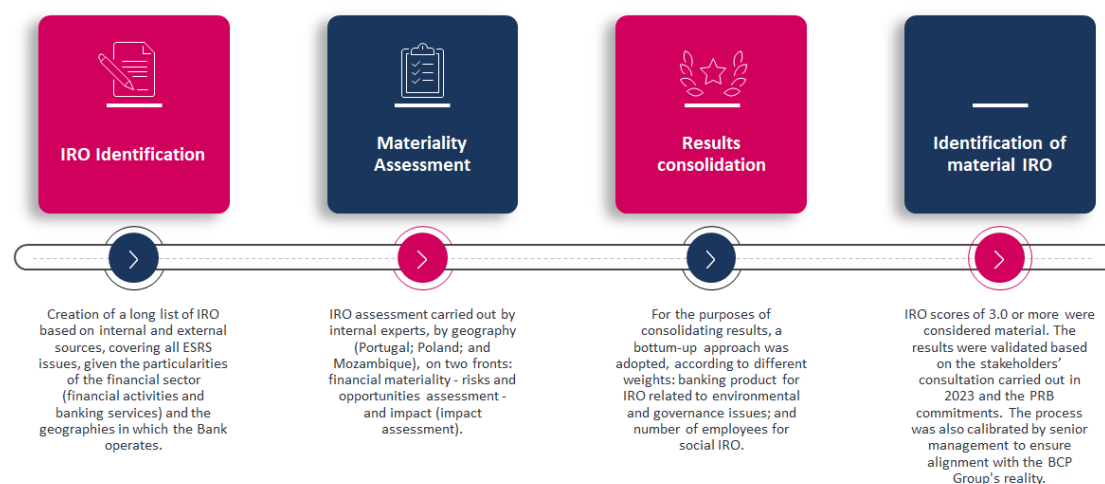
The mechanisms and procedures adopted by the BCP Group to manage material IRO are duly detailed in the following chapters, in accordance with the requirements of the ESRS thematic standards and, where relevant, using additional disclosures specific to the Bank and/or aligned with other benchmarks and commitments.

Management of impacts, risks and opportunities

IRO-1 – Description of the process for identifying and assessing material impacts, risks and opportunities¹

DOUBLE MATERIALITY ANALYSIS

The process of identifying and assessing material impacts, risks and opportunities - double materiality analysis - was conducted according to a structured approach, which covers not only issues related to own operations, but also the entire value chain, according to the following steps:



For the company's own operations, aspects such as resource consumption, GHG emissions and labour practices were assessed. In the value chain, the criteria include suppliers, partners and customers, considering, for example, labour practices and products and services quality.

This analysis focused on identifying relevant areas, analysing specific activities such as operations with high resource intensity or significant emissions, business relationships in the value chain likely to non-compliance with environmental or social standards, and geographies with weaker regulatory frameworks or greater exposure to climate risks.

¹ Includes the IRO-1 disclosure requirements for ESRS thematic standards E1, E2, E3, E4 and E5. The process of identifying and assessing the impacts, risks and opportunities related to pollution, water and marine resources, biodiversity and ecosystems and the use of resources and the circular economy followed the methodologies and assumptions described in 'Dual Materiality Analysis'.

Based on the impacts identified, which were subsequently completed, risks and opportunities associated with the operations and the relationships established with stakeholders were identified and assessed.

Impact assessment criteria

For the purpose of assessing the impacts, the product was considered between its severity (scale, scope and irreparability – in the case of negative impacts) and its probability (in the case of potential impacts).

Scale	Scope	Irreparability	Probability
5 = Very high	5 = Global	5 = Irreparable	1 = Very high
4 = High	4 = Disseminated	4 = Very difficult to remedy	0.8 = High
3 = Medium/Average	3 = Medium	3 = Difficult to remedy	0.6 = Medium/Average
2 = Low	2 = Limited	2 = Possible to remedy	0.4 = Low
1 = Very low	1 = Minimum	1 = Easy to remedy	0.2 = Very low
0 = Not applicable	0 = Not applicable	0 = Not applicable	

In the case of negative impacts on human rights (in this case, the severity score prevailing over the probability score), the company's upstream and downstream operations, products, services and business relationships were covered.

Risk and opportunity assessment criteria

The assessment of risks and opportunities results from an average between the magnitude of the financial effects and the probability of their occurrence.

Magnitude	Likelihood
5 = Very high	5 = Very high
4 = High	4 = High
3 = Moderate	3 = Medium
2 = Low	2 = Low
1 = Minimum	1 = Very low
0 = Non-existent	

The materiality analysis process, in particular the assessment of IRO, is based on the perception of the Bank's key interlocutors, with a deep knowledge of its reality, internal mechanisms, market challenges and legal and/or regulatory duties. It is also based on the results of other internal procedures and analyses that focus on the same matters, namely the ESG risk management procedure, including the materiality analysis of climate and environmental risk factors and the analysis of risks related to human rights.

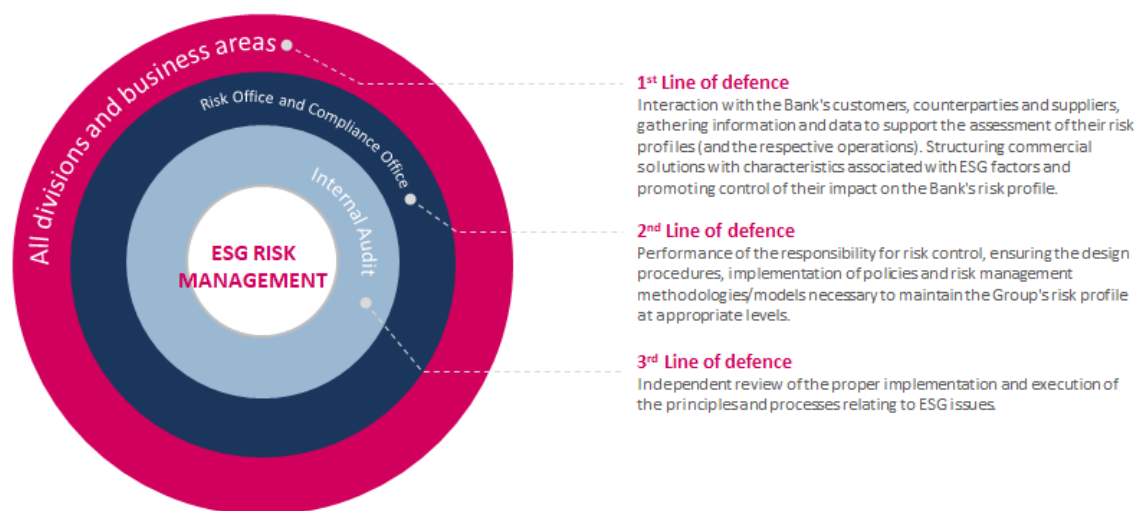
RISK MANAGEMENT – INTEGRATION OF ESG RISK FACTORS

This section should be read in addition to the information provided in the "Risk Management" section of volume 1 of the "2024 Annual Report".

The management of ESG risk factors is integrated into the company's operational practices, ensuring that sustainability aspects are assessed alongside traditional risks.

Throughout 2024, the Bank continued to strengthen its exercise of identifying and assessing C&E risk factors. To this end, it reviewed existing methodologies and incorporated a set of improvements to i) meet supervisory expectations; and ii) align the exercise with best practices that gradually become available in the market, including incorporating forward-looking scenarios to assess the expected impacts. In addition, it ensured the transmission of ESG risk drivers to the traditional risk categories and to the business 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 assessment of these risk factors is analysed in different time horizons, namely: short (1 year), medium (2-5 years) and long-term (>10 years).

Climate and environmental risk analysis

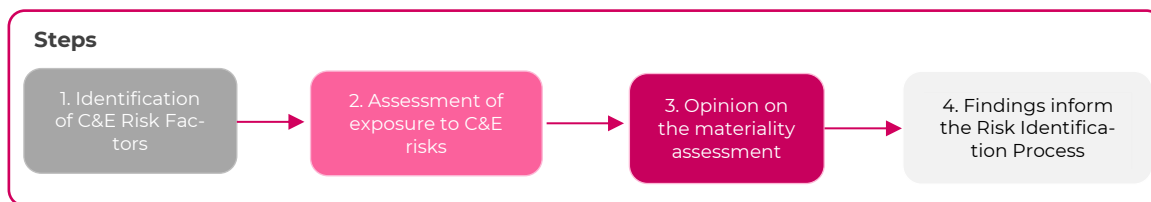
Risk identification and materiality assessment of climate-related and environmental (C&E) risk factors is an essential component of ESG risk management. The C&E Materiality Assessment exercise is the foundation for characterising the impact of C&E factors on the BCP Group's risk profile, feeding into regular risk management processes.

Understanding the potential impacts of climate change and environmental degradation on its business, both directly and through its customers' activities, allows the Group to make informed decisions about the management and mitigation of these potential risk factors, while facilitating the identification of new opportunities arising from the transition to a low-carbon and environmentally sustainable economy.

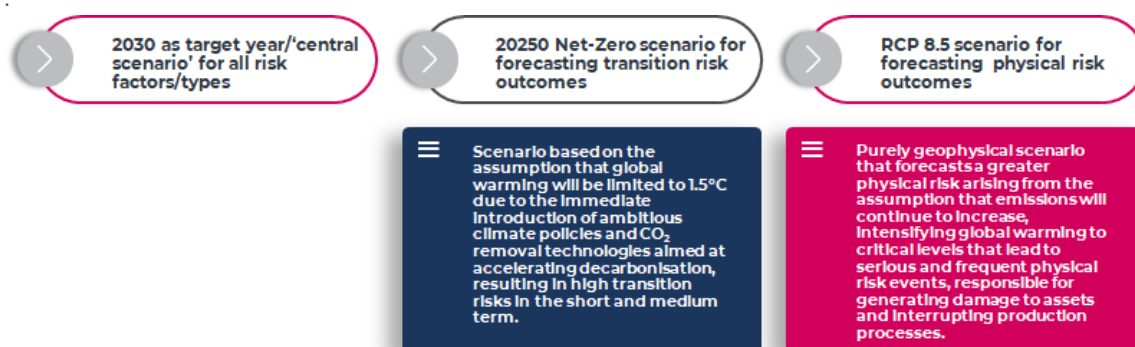
In order to obtain a comprehensive assessment of the impacts of C&E risk factors, the Materiality Assessment exercise of climate and environmental risk factors:

1. Reflects the nature, size and complexity of the BCP Group's portfolios and business lines;
2. Is based on methodologies aimed at quantifying the potential impacts of C&E factors on the Group's balance sheet;
3. Analyses the materiality of ESG risks (transition and physical climate and environmental risks) at the level of the BCP Group's traditional risk categories (namely, credit risk, market risk, liquidity risk, operational risk, reputation risk, concentration risk, real estate risk and business risk);
4. Adopts a forward-looking view of risk impacts, based on baseline climate scenarios and extended time horizons;
5. Produces an approach to quantifying risk exposure;
6. Considers the continuous improvement of data coverage and accuracy, (i) taking into account the three main geographies in which the Group operates; (ii) covering the most relevant portfolios and lines of business; (iii) identifying and classifying green operations accordingly; (iv) mapping the holding companies and adjusting their sectoral classifications according to the most relevant economic sector of these groups.

Overview of the methodological approach



The methodology adopted by the BCP Group is based on different scenarios, providing an assessment based on different perspectives of the evolution of C&E variables and their impacts on economic and financial factors, which allows the sensitivity of the business strategy to different climatic and economic paths.



The materiality analysis is done considering several time horizons and the following scenarios:



Following the classification recommended by Task Force on Climate-Related Financial Disclosures (TCFD) and other relevant entities, the Group recognizes the division of climate risks into physical and transition risks, defining them as follows:

Physical risks arise from the effects of climate and environmental changes caused by climate change. They can be categorised as:

- **Acute:** Resulting from extreme weather events that cause acute environmental destruction (e.g., floods, heat-waves, wildfires, hurricanes, and typhoons).
- **Chronic:** Emerging from progressive changes in climate and weather patterns (e.g., heat stress, water stress, sea level rise and an increase in global average temperature).

These risk factors can lead to physical damage to assets, infrastructure, and communities, as well as disrupt value chains, reduce production and service delivery levels, and ultimately decrease economic productivity.

Transition risks relate to any negative financial impact stemming, directly or indirectly, from the misalignment between counterparties' or invested assets' business models/strategies and a low-carbon and environmentally sustainable economy. These include:

- Climate and environment-related policy and regulatory changes, arising from new regulations or amendments to existing policies aimed at accelerating decarbonization (e.g., stricter energy efficiency requirements, carbon footprint taxation mechanisms, and policies promoting sustainable resource use).
- Technological changes that introduce lower-impact technologies, making existing ones obsolete or less competitive.
- Market sentiment / behaviour changes, resulting from shifts in consumer and investors preferences shift toward more sustainable products and services, making it harder to attract and retain customers, employees, business partners, and investors.

The following table provides a summary of the methodologies applied to quantify the impacts of Climate & Environmental (C&E) drivers and their respective mapping to BCP Group's traditional risk categories.

C&E Risk Methodology	Risk Factor Mapping	Risk Category Traditional	Assessment Approach
 Climate-related Transition risk Companies	Policy Technology	Credit Concentration Liquidity Market Real Estate Business Operational Reputation	Sectoral approach that assesses transition potential impact on a company's profit margin, taking into account the following components of the economic shock: i) carbon shock; ii) energy shock; and iii) capital expenditure shock.
 Climate-related Transition risk Individuals			The methodology assesses the potential impact of transition risk drivers on individual's incomes, considering their employment sector.
 Climate-related Transition risk Real estate			The transition to stricter energy efficiency standards can have a negative impact on the assessment and performance of less energy-efficient buildings. Thus, the Energy Certificate (EC) of each building is considered: the worse the CE classification, the greater the risk associated with the building.
 Climate-related Physical risk Companies & Individuals	Acute Chronic	Credit Concentration Liquidity Market Real Estate Business Operational Reputation	Climate physical risks can affect businesses and individuals, depending on the location of their assets. The Bank's own buildings, as well as its employees, may also be affected, resulting in a disruption of its activities. The methodology assesses the potential impacts of acute and chronic physical events on companies' assets, individual clients, and the BCP Group through Moody's Climate on Demand tool, which estimates the risk level of the following climate physical events for a given location: i) Floods; ii) Heat stress; iii) Hurricanes and Typhoons; iv) Rise in sea level; v) Water Stress; and vi) Forest Fires.
 Climate-related Physical risk Buildings & Activities			
 Nature-related risk Companies Buildings & Activities	Biodiversity Agroforestry Water Air	Credit Concentration Liquidity Market Real Estate Business Operational Reputation	For each of the categories considered – biodiversity, agroforestry systems, water and air – the methodology assigns a risk score based on two components: i) geographic location and; ii) impacts and dependencies associated with the sector of activity, using the ENCORE classification tool. It is applicable to companies, the BCP Group itself, and real estate assets.

Overview of Assessment Results

The application of the methodological approach described made it possible to assess the percentage of exposure sensitive to C&E factors (i.e., exposure at risk (EaR)), mapped in BCP's 'traditional risk categories' and to prepare a conclusion on the risks' materiality.

The updated results of the C&E materiality assessment were in line with those of the previous year. The risk category most potentially exposed to C&E risk factors is credit risk. In addition, operational risk (in terms of the impact of physical and nature-related risks, considering the number of employees in high-risk locations) and business risk (associated with transition risk and physical risk) were also material, although to a lesser extent compared to the credit risk category.

Human rights risk analysis

The BCP Group, either through voluntary national and international initiatives, such as the UN Global Compact or the UN Guiding Principles Reporting Framework (more information in Annexes²), or through its internal rules and regulations, assumes an effective commitment to respect for human rights.

As this is a transversal principle to all areas of action, activities, operations and geographies of the BCP Group, the Bank's risk management process covers issues related to Human Rights, namely in Operational Risk, in the categories of Employee Relationships, Occupational Health and Safety Issues, Discrimination against employees, Customer Relationships, products/services Design, regulatory, legal and tax Duties and Outsourcing.

Human Rights Self-Assessment

To identify the main Human Rights issues and risks in its value chain, the BCP Group carries out, biannually, a Human Rights Self-Assessment process in the geographies in which the Group operates - Portugal, Poland and Mozambique - which covers five fundamental areas:



The analysis carried out in 2024 resulted in the identification of some opportunities for improvement for which a concrete action plan will be defined and implemented in 2025. Even so, it should be noted that in this self-assessment no risk situation with potential appreciable impact was identified.

In addition, the Bank's risk management process covers issues related to Human Rights, namely Operational Risk, in the categories of Employee Relationships, Occupational Health and Safety Issues, Discrimination against Employees, Customer Relationships, product/service Design, regulatory, legal and tax Duties and Outsourcing.

ESG Risk Management Process Control

The Bank's Audit Directorate conducts audit actions across all subsidiaries, defining their scope based on the most relevant topics and risks for the Group. These audits typically involve joint teams of auditors from both the Bank's central structures and its subsidiaries.

In 2024, the audits focused particularly on:

- The implementation of developments in ESG risk management policies and procedures in Poland.
- Certification of the implementation of recommendations from the 2023 ECB inspection, which focused on climate and environmental risks.

² Chapters: "GRI Table - Global Reporting Initiative" and "UNGP Table - UN Guiding Principles Reporting Framework".

- Certification of policy and procedural developments related to ESG risk management within the BCP Group.
- Review of the materiality assessment process for climate and environmental risks at the Bank.

The 2025 Audit Plan includes continued monitoring and certification of the implementation of recommendations issued by the ECB.

IRO-2 - Disclosure requirements contained in ESRS covered by the company's sustainability statement

This Report complies with the Disclosure Requirements stipulated by the ESRS, as presented in the table of contents in the Annexes section. In the same section, a list of all data points deriving from other EU legislation has also been included.

The process of dual materiality analysis allowed us to conclude that the issues ESRS E2 Pollution; ESRS E3 Water and Marine Resources; ESRS E4 Biodiversity and ecosystems; ESRS E5 Resource use and circular economy; ESRS S2 Employees in the value chain; ESRS S3 Affected Communities; do not present IRO materially relevant to the BCP Group and its Stakeholders. Consequently, the ESRS disclosure requirements for these documents are not included in this document.

The materiality of the information on impacts, risks and opportunities to be disclosed has been assessed according to a combination of qualitative factors, incorporating the limits and criteria described in section 3.2 Material issues and materiality of information of the ESRS 1 standard.

Environmental Information

Disclosures under Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)

European Union Taxonomy

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. The objective is to direct investments toward sectors that contribute to climate change mitigation and environmental preservation, thus supporting the pursuit of the goals of the Paris Agreement and the European Green Deal.

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).

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 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. The regulation has been in force since January 1, 2024.

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, in accordance with templates for financial institutions, is available in the appendix chapter “European Union (EU) Taxonomy alignment tables (UE)”.

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.

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, totalling the following six environmental objectives:

1. Climate Change Mitigation;
2. Climate Change Adaptation;
3. Sustainable use and protection of water and marine resources;
4. Transition to a circular economy;
5. Pollution prevention and control;
6. Protection and restoration of biodiversity and ecosystems.

Resting on European Commission clarifications – namely the FAQs published in the EC notice from 21 December 2023 – 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.

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), that are 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 individuals. 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.

O processo de triagem que conduz o pedido da Taxonomia da EU

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 information disclosed by the counterparties or their consolidating entities regarding the proportions of revenues (Turnover) and capital expenditures (CAPEX), respectively, resulting from or related to environmentally sustainable activities. For this type of transactions, the screening is performed for both CAPEX and Turnover.
- **Use of proceeds lending or investing:** the screening is performed by the Group on the eligibility and alignment of the finance activities 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 registered 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 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, information with reference date of December 2023, which may cause fluctuations in future 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 covered by 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.

In this context, Millennium bcp considers the KPIs resulting from the EU Taxonomy application, of limited comparability across banking institutions.

Regarding household financing, the application of the Do No Significant Harm (DNSH) criteria, especially for the physical-risk assessment, was based on 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+, 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.

Summary of the main EU Taxonomy metrics

For 2024, Millennium bcp reports a mandatory eligibility ratio of 26.83%, based on the turnover ratio of the counterparties (27.12% based on the CAPEX). The 2024 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 section “European Union (EU) Taxonomy alignment tables (UE)”.

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 2024, the Group's GAR is 3.8%.

The largest exposure being considered on the GAR% computation is derived from households financing, which is the most relevant business segment for Millennium bcp. The exposure to NFRD – 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 0.20%.

EU Taxonomy metrics – turnover based	Amount (M€)	Eligible (M€)	Eligible (%)	Aligned (M€)	Aligned (%)
Loans and advances, debt, and equity securities	42 708	18 612	26.83	2 617	3.77
Financial corporations [a]	3 616	703	1.01	196	0.28
Non-financial corporations NFRD [b]	1 369	716	1.03	141	0.20
Households [c]	36 621	16 716	24.10	2 280	3.29
Local governments [d]	945	373	0.54	0	0
Reposessed assets [e]	156	104	0.15	1	0
Total assets in numerator and denominator ¹⁰	69 362	18 612	26.83	2 617	3.77
Non-NFRD counterparties	19 078	---	---	---	---
Derivatives	69	---	---	---	---
Interbank loans	251	---	---	---	---
Cash and other assets	7 256	---	---	---	---
Total assets in the denominator	105 519	---	---	---	---
Green Assets Ratio (GAR%)					3.8%

¹⁰ Obtained by summing up a + b + c + d + e

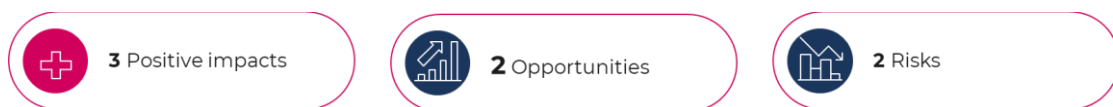
ESRS E1 - Climate Change

Strategy

E1-1 – Transition Plan for Climate Change Mitigation

The BCP Group transition plan for climate change mitigation is in the process of formalization, bringing together the decarbonization commitments already included under Pillar 3, the evolution of its own operations, and the objectives of the strategic plan, including a monitoring process, the definition of specific KPIs, and the preparation of disclosure reports.

SBM-3 – Material Impacts, Risks, and Opportunities and Their Interaction with Strategy and Business Model



The dual materiality analysis identified 7 material IROs for the Bank, related to climate change adaptation and mitigation and energy (more information in SBM-3 - Material impacts, risks and opportunities and their interaction with the strategy and business model). The material risks identified are classified as transitional climate risks, and they can have possible consequences for the Group arising from the growing regulatory and market pressure to mitigate negative impacts on the environment.

The BCP Group conducts annual assessments of the effects of climatic and environmental factors on its customers, suppliers and operations, in the short, medium and long term, which allows it to anticipate preventive and adaptive measures.

The process of analysing climate and environmental risks and the strategy's resilience to different scenarios is described in IRO-1 - Description of the process for identifying and assessing material impacts, risks and opportunities. Information is also provided on the respective results and those responsible for ESG risk management.

The results of the C&E Materiality Assessment exercise feed into the Bank's risk management processes, including: the Risk Identification Process (RIP); the definition of ESG metrics in the RAS; and the definition of key risk indicators for continuous monitoring. Based on the results obtained in the last financial year, the BCP Group is implementing various actions and strategies, such as:

- Adoption of the Principles for Responsible Finance, defining excluded sectors (sectors incompatible with the Bank's ESG commitments), conditional sectors (sectors that raise concerns about the Bank's commitments due to their impacts on the environment and society) and sensitive sectors (sectors identified as high risk and which should be subject to additional due diligence processes);
- Revision of the Loan Origination and Monitoring Framework, incorporating information on individual risks and Customers' ESG performance in order to influence the credit decision;
- Definition of GHG emission reduction targets for carbon-intensive sectors (more information in E1-4 - Targets related to climate change mitigation and adaptation);
- Development of a Transition Plan, establishing measures to fulfil the climate targets (more information in E1-1 - Transition plan for climate change mitigation).

These actions, developed under the Sustainability Master Plan, are in line with BCP's strategy of adapting its business model to the transition to a low-carbon and sustainable economy, guaranteeing the Bank's resilience in the face of climate change.

The following sections provide more detail on the BCP Group's strategic approach to the material IROs identified under climate change.

Management of impacts, risks and opportunities

E1-2 – Policies Related to Climate Change Adaptation and Mitigation

Environmental concerns are part of the BCP Group's agenda and corporate culture and are therefore a fundamental component of its strategy. To align its actions with this commitment, the Bank defines fundamental sustainability principles through its corporate policies, which support the management of material issues related to climate change mitigation and adaptation and energy efficiency. The policies and principles detailed below are available for consultation on the Bank's website. The policies are also available to employees via the intranet.

Supervision of compliance with the policies referred to below is ensured by the Board of Directors, supported by the Corporate Governance, Ethics and Sustainability Committee.



* It applies to all the Bank's operations, activities, products and services in Portugal. Its adoption by branches abroad is promoted, subject to the necessary adjustments arising from local legislation and regulatory framework.

Sustainability Policy

The BCP Group's Sustainability Policy establishes the principles and guidelines that guide the Bank in promoting sustainable and responsible practices. The policy defines, within the environmental pillar, a focus on the transition to a sustainable economic development model, where climate issues are integrated into the Bank's risk models and product and service offering, including the financing of green and energy-efficient projects, thus stimulating green growth and the fulfilment of environmental targets.

The policy is reviewed every 3 years and establishes the adoption and support of international initiatives, such as the United Nations Global Compact Principles, the *Carta de Princípios do BCSD Portugal* (BCSD Portugal Charter of Principles), the Charter of Commitment to Sustainable Financing, the *Pacto de Mobilidade Empresarial para a Cidade de Lisboa* (Business Mobility Pact for the City of Lisbon), the *Compromisso Lisboa Capital Verde Europa 2020* (Lisbon Green Capital Europe 2020 Commitment), among others.

Environmental Policy

Aware of the direct and indirect environmental impact of its activities and committed to preserving nature and mitigating and adapting to climate change, the BCP Group details in this policy the priorities aimed at minimising the Bank's

environmental footprint. These priorities include: eco-efficiency in environmental actions, whether through the efficient management of waste, energy, water and fuel, or through the introduction of green solutions; financial products with environmental characteristics and responsible financing through the identification of excluded or restricted sectors, with a view to reducing the emissions associated with the Bank's investment portfolio; and the promotion of environmental education for its employees, customers, suppliers and other stakeholders.

In terms of Environmental Policy, the Bank reinforces its commitment to international initiatives, such as the United Nations Sustainable Development Goals and the Paris Agreement on Climate Change, and to working groups, namely the APB Task Force on Sustainable Taxonomy, the APEE and ISO Technical Subcommittee on Sustainable Finance ISSO/TC 322, the Reflection Group for Sustainable Financing in Portugal, the *Conselho Empresarial para o Desenvolvimento Sustentável* of BCSD Portugal (Business Council for Sustainable Development), and the APB, EBF, BCSD Portugal and AEM Working Groups on Sustainable Finance.

Principles of Responsible Finance

The BCP Group recognises the existence of sectors and activities whose environmental and/or social impacts may not be in line with the Group's commitments to a more sustainable future. As such, the Bank has developed the Principles of Responsible Finance, a system for classifying sectors that aims to guide the Group's new business and investment approaches in this direction. The Group regularly assesses compliance with these Principles through performance indicators and publicly discloses the most relevant ones, including a list of excluded sectors (that is, those not aligned with the Bank's ESG commitments), providing greater transparency in its sustainability activities.

Principles of Responsible Investment

Responsible investment consists of avoiding and/or mitigating risks on ESG aspects and practices to protect the Group's financial sustainability. ESG is assessed from a dual materiality perspective, firstly by evaluating its influence on the risk-adjusted return on the Group's financial assets (risk management perspective) and secondly by evaluating the impact it has on the communities and the environment with which the Group and its subsidiaries relate (environmental sustainability perspective). The Principles of Responsible Investment define the fundamental guidelines for making investments, for assessing the issuer and counterparty, the procedures for monitoring the risk associated with investment portfolios and ESG investment instruments.

Sustainability Guidelines for Suppliers

These principles, which set out the essential guidelines for relations with suppliers, are applicable when contracting services from third parties. The BCP Group believes that the sustainable management of companies is an obligation towards society and the communities it serves, but also a factor of competitiveness, which is why it endeavours to incorporate and promote a corporate culture of responsible production and consumption in its value chain. The Sustainability Guiding Principles for Suppliers cover a range of topics, from ethical conduct, human and labour rights, health and safety and the environment, among others.

The Principles are in line with the United Nations Universal Declaration of Human Rights, the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, the Fundamental Principles and Rights at Work of the International Labour Organisation (ILO), the United Nations Global Compact and the *Carta de Princípios* of BCSD Portugal (BCSD Portugal Charter of Principles).

Corporate Volunteering Policy

The BCP Group's commitment and purpose is to pursue business models that create value by developing actions for and with the different stakeholder groups, with the aim of contributing to the economic, social, environmental and cultural development of the countries where it operates. It is in this context of proximity to the community that the Bank regularly promotes ecological or environmental literacy initiatives, such as planting trees or cleaning up coastal beaches (external community) or communication and information initiatives (internal community).

Climate Resilience and Operational Continuity Policy

Defines protocols for responding to extreme weather events, guaranteeing safety, damage minimisation and continuity of services. This policy is only applicable to operations in Mozambique, where extreme weather events are more frequent.

E1-3 – Actions and resources related to climate change policies

The Bank has demonstrated a solid commitment to sustainability, namely, to mitigating climate change, by implementing various initiatives and measures in its operations throughout the different countries where it operates. These actions aim not only to reduce GHG emissions, but also to promote energy efficiency and the use of renewable energy sources.

The BCP Group has adopted measures that guarantee the optimisation of energy consumption, the modernisation of infrastructures and the transition to a more sustainable and low-carbon business model. The Bank has also strengthened its commitment to adapting to climate change, according to the 2025-2028 Strategic Plan.

The move towards innovation in energy management, through measures such as the installation of photovoltaic plants on the Bank's premises, the widespread use of LED light bulbs and more efficient heating/cooling systems, the development of solutions that induce more environmentally sustainable behaviour on the part of employees, the commitment to collaborative business models where people and companies work together to reduce costs and increase efficiency (e.g. Energy Communities), the use of digital technologies and energy monitoring platforms, and the spread of a wide range of practices that optimise consumption, improve efficiency and resilience of energy systems and reduce GHG emissions.

Initiative	Monetary amount	Contribution to goals/targets	Reduction of GHG emissions (tCO ₂ e)	Status	Scope
Renewable energy					
Investment in the production of electrical energy from photovoltaic sources is essential.	CapEx: 2 photovoltaic plants in TagusPark (1.452.00€) + (144.940€) installing panels in 8 branches. Total 1.564.940€	In 2024, the two photovoltaic plants in operation produced 2.363 MWh, covering around 34% of the electricity consumption of the Bank's buildings in Taguspark and avoiding the emission of 435 tons of CO ₂ .	Since they came into operation, the two photovoltaic plants have avoided the emission of 1.404 tCO ₂ e. In addition, the photovoltaic panels installed in the branches of Charneca, Albufeira and Santarém have reduced the energy bill of these locations by more than 25%.	Completed	
Installation of photovoltaic systems	Headquarters CapEx: 704.099,84€; OpEx: 2.200€ MPETO CapEx: 72.521,92€; OpEx: 180,92€ Matola CapEx: 72.900,00€ OpEx: 180,92€	Energy consumption reduction: Headquarters: 26% MPETO: 42% Matola: 41,2%	Headquarters: 380,5875 tCO ₂ e/ano MPETO: 38,089 tCO ₂ e/ano Matola: 37,09 tCO ₂ e/ano	Headquarters: Ongoing MPETO e Matola: Completed	
Purchase of electricity from renewable sources with Renewable Energy Guarantee of Origin Certificates	-	100% of the electricity purchased from the public grid comes from renewable sources with the acquisition of Guarantees of Origin.	-	Completed	
Joining Energy Communities	-	In 2014, Millennium bcp partnered with Cleanwatts, EDP, and GreenVolt to integrate 229 branches, representing 60% of its total network, into Renewable Energy Communities, particularly in areas where these companies operate.	It is estimated that Energy Communities (CER) will avoid the emission of 1.765 tCO ₂ e/per year.	Ongoing	
Energy efficiency					

Initiative	Monetary amount	Contribution to goals/targets	Reduction of GHG emissions (tCO ₂ e)	Status	Scope
Lamp replacement	-	Around 14.000 lamps were replaced with LED lighting in the central buildings. The LED replacement process began in 2016 and was completed around three years ago in the branches.	Lighting consumption is reduced by half compared to fluorescent lighting, while the lifetime of the lamps is doubled.	Completed	
Energy efficiency of buildings	-	Reduction of energy consumption through BREEAM and LEED Gold certification. Replacement of 14.000 luminaires with LED, reducing lighting consumption by 54%.	-	Completed	
Energy savings in bank branches	-	Use LED panels, lighting control by clocks, and installation of timers for the A/C.	-	Completed	
Reduction in operating time of technical equipment	-	Adjustments to lighting, ventilation, and air conditioning operating times to minimize energy consumption.	-	Completed	
Implementation of presence sensors	-	Reduction of energy consumption and increase lifetime of the lamps.	-	Ongoing	
Replacement of fluorescent lamps with LED	-	Reduction of energy consumption and increase lifetime of the lamps.	-	Ongoing	
Service monitoring	-	A system has been implemented to monitor and manage electricity, water, and gas consumption in the buildings and in about 50% of the branches. This system helps to prevent energy waste by using specific alarms and measures that monitor energy efficiency in real time.	Significant reductions in consumption and improvements in energy efficiency.	Completed	
Consumables consumption management	-	Consumption audits, awareness campaigns for the rational use of energy in common areas and offices.	-	Completed	

Initiative	Monetary amount	Contribution to goals/targets	Reduction of GHG emissions (tCO ₂ e)	Status	Scope
Heat pumps	CapEx: 1,256,000	The replacement of natural gas boilers and electric chillers with heat pumps resulted in a reduction in the consumption of natural gas, which has a greater environmental footprint compared to the "green" electricity consumed at the Bank, and greater efficiency of heat pumps in electricity consumption.	Significant reduction in gas consumption and related emissions.	Completed	
Other initiatives					
Target Setting	-	Aligned with the Group's short-term emissions reduction goal.	Fossil fuels: 1.6 kgCO ₂ e/GJ Automotive: 5.9 gCO ₂ e/km Aviation: 7.4 gCO ₂ e/km Maritime transport: 0.5 gCO ₂ e/km Cement: 0.08 tCO ₂ e/t Steel: 0.03 tCO ₂ e/t Aluminum: 0.03 tCO ₂ e/t Chemicals: 0.6 kgCO ₂ e/GJ Expected greenhouse gas emission reductions considering the carbon intensity of eight portfolios in 2023 and the Bank's targets set for these same portfolios/sectors for 2026.	Completed	
Infrastructure and Support for ESG Goals	-	Encouraging the use of bicycles and public transport, creating infrastructure for cyclists and changing rooms.	-	Completed	
Hybrid Vehicles	-	Progressive reduction of fleet emissions by replacing combustion vehicles with hybrid or electric vehicles.	-	Completed	
Limiting Business Travel	-	Replacing air travel with rail travel and adopting videoconferencing.	-	Completed	

Responsible financing

In particular, with regard to financing, the Bank integrates the Principles of Responsible Financing into the processes of assessing customers, granting credit and project finance, taking into account the environmental and social risks associated with the sectors of activity of the operations, as well as ESG performance.

Project exclusions and sectoral limitations are defined to ensure that activities are aligned with the commitment to preserve the environment, promote sustainable development, combat climate change and preserve biodiversity. Excluded activities include, for example, the production or trade of illegal products, coal mining, coal-based energy production, unlicensed wild-life trade or endangered species trade, among others (for more detail, please refer to the Responsible Financing Policy).

In addition, the BCP makes support and funding conditional on projects with certain characteristics or in sectors of activity with greater potential for environmental and social impact, requiring the demonstration of adequate safeguards and protection of environmental and social issues. Examples include companies and activities related to tobacco production, hazardous materials or substances subject to specific regulation.

Metrics and targets

E1-4 – Targets related to climate change mitigation and adaptation

Recognising its role as an organisation and financier of the global transition to a low-carbon economy, and in order to comply with the principles established in the aforementioned Policies (more information in E1-2 - Policies related to climate change mitigation), the BCP Group recognises the need to reduce GHG emissions in its own operations and those attributable to the credit/investment portfolio. Thus, it maintains its commitment to sustainability, aiming to achieve carbon neutrality at the level of its operations (direct emissions) by 2030 and neutrality of its credit and investment portfolio by 2050.

However, considering the evolution of regulatory requirements, it was identified that there was a need to strengthen the foundations and quantify the interim targets, which will be done through the Climate Transition Plan and whose development is scheduled for 2025.

Specifically with regard to reducing scope 3 emissions at the level of financed emissions (category 15), the Bank has set the following interim targets for the year 2026¹, in line with Pillar 3 requirements, for eight carbon-intensive activities:

Sector		Base Year	Reference value	Target year	Target value
1	Energy	2023	141.00 gCO ₂ /kWh	2026	141.00 gCO ₂ /kWh
2	Combustion of fossil fuels	2023	67.00 kgCO ₂ /GJ	2026	65.40 kgCO ₂ /GJ
3	Automobile	2023	125.00 gCO ₂ /km	2026	119.10 gCO ₂ /km
4	Aviation	2023	131.00 gCO ₂ /km	2026	123.60 gCO ₂ /km
5	Shipping	2023	7.00 gCO ₂ /km	2026	6.50 gCO ₂ /km
6	Cement	2023	0.70 tCO ₂ /t	2026	0.62 tCO ₂ /t
7.1	Steel	2023	1.40 tCO ₂ /t	2026	1.37 tCO ₂ /t
7.2	Aluminium	2023	2.15 tCO ₂ /t	2026	2.12 tCO ₂ /t
8	Chemical products	2023	28.50 kgCO ₂ /GJ	2026	27.90 kgCO ₂ /GJ

These targets were structured based on the International Energy Agency (IEA) Net Zero by 2050 scenario, presenting a scientific foundation compatible with the 1.5°C ambition (more information in the Methodological Note). The presented targets have not been validated by SBTi².

¹ The Scope 3, Category 15 targets for 2030 have not yet been formalized.

² The Bank formalised its commitment to this initiative in 2023 and is now in the process of re-evaluating the decision, considering the context evolution and its specificities and requirements.

Although the BCP Group has already established the decarbonisation targets presented above, it is still in the process of defining and implementing the measures needed to achieve these goals, as well as others that are expected to be defined later. Alongside this, and in addition to the Climate Transition Plan, other initiatives are also underway which are also expected to have an impact on financed emissions, such as: i) the new assessment of the performance of investment portfolios (a process which takes place annually), which analyses the intensities of portfolios and the distance from Pillar 3 reporting targets; ii) the integration of ESG factors into the credit granting and monitoring process; and iii) the development of frameworks to promote “green” banking and investment products.

E1-5 – Energy consumption and energy mix

The Bank's concern to mitigate its impact on the environment and society takes into account not only its own operations, but also its value chain. To this end, for several years it has been implementing a multitude of initiatives aimed at reducing its energy consumption and carbon footprint (more information in E1-3 - Actions and resources related to climate change policies).

The purchase of 100% renewable energy in all its facilities is one of these measures, already implemented in Portugal and Poland since 2022. The electricity consumed by Millennium bcp comes from its photovoltaic plants in Taguspark, as well as from electricity from the public grid certified as being of renewable origin, thus guaranteeing the goal of using only green energy in all its facilities in Portugal. Similarly, Poland consumes mostly renewable electricity from the grid certified with Guarantees of Origin, since 2022, and also has solar panels on the building in Gdańsk. In line with the Group's strategy, this year, Mozambique also began installing photovoltaic plants in three facilities, two of which are already in operation, thus consuming renewable electricity generated at its facilities and grid electricity from fossil fuels.

In 2024, there was a 4% increase in renewable energy produced by the Bank for self-consumption (2 456 MWh) and a decrease of almost 4% in the consumption of electricity and heat purchased/acquired from renewable sources (40 030 MWh). Fossil energy consumption (43 706 MWh) remained practically constant, with a slight increase of 1%, although Portugal reduced this consumption more sharply (13%), as a result of the replacement of fossil fuel-powered cars with electric/hybrid vehicles and the replacement of natural gas absorption chillers with more efficient electric heat pumps.

Regarding the energy consumed by the Group (86 192 MWh), a reduction, of 1%, was observed again this year, as a result of the well-balanced combination of consumption rationalization measures and the use of energy from renewable sources.

Total energy consumption (MWh)	2022 ³	2023 ⁴	2024 ⁵
Fossil energy consumption	39 822	43 249	43 706
Fuels from renewable sources	-	0,02	-
Electricity and heat purchased or acquired from renewable sources	46 464	41 640	40 030
Renewable energy generated by the organisation	1 163	2 362	2 456
Renewable energy consumption	47 627	44 002	42 486
Total energy consumption	87 448	87 250	86 192

Globally, around 49% of the Bank's energy mix is derived from renewable sources and the rest from fossil sources, as in the previous year. When analysing this indicator, it is important to consider that, as mentioned above, in 2024, as a result of the energy efficiency measures implemented, there was an effective reduction in electricity consumption from the grid, which in

³ In 2022, the figures are not included in the Millennium bim (more information in Methodological Notes).

⁴ The value of electricity consumed in 2023 has been updated (more information in Methodological Notes).

⁵ In 2024, the activity of the Bank Millennium Group was considered (more information in Methodological Notes).

Portugal and Poland is reflected in a reduction in energy from renewable sources, greater than the reduction seen in energy consumption from fossil sources.

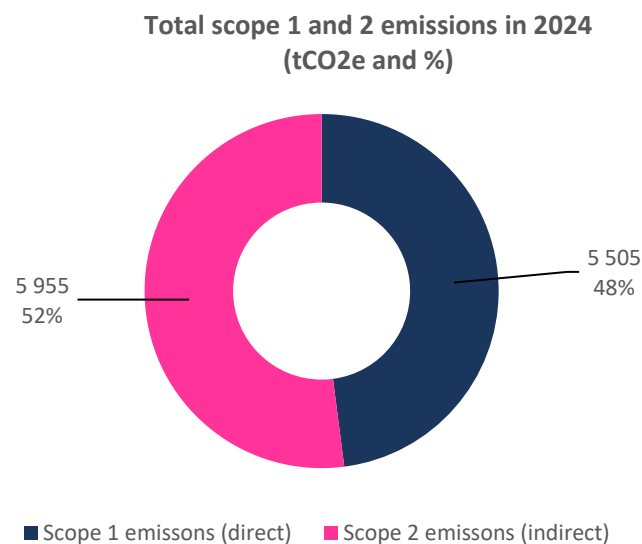
In Portugal, almost 77% of the energy consumed was from renewable sources, with the majority coming from the grid. In Poland, around 40% of the energy mix is derived from renewable sources. Meanwhile, Mozambique, introduced renewable energy into its energy mix this year, therefore its impact is still limited, with an expected increase in the over the next few years.

Total energy consumption corresponds to the activities owned or controlled by the Group and complies with the same organisational limits applied when calculating scope 1 and 2 emissions (more information in E1-6 - Gross GHG emissions scope 1, 2, 3 and total GHG emissions).

The methodologies and assumptions used to collect and consolidate the quantitative information are duly reported in the Methodological Notes section.

E1-6 – Gross scope 1, 2, 3 GHG emissions and total GHG emissions

In 2024, the Bank recorded a slight increase in Scope 1 and 2 emissions (around 5%) due to activities in Mozambique and the expansion of the reporting scope this year in response to ESRS standards requirements. Scope 3 emissions, however, make up the majority of the Group's footprint.



GHG emissions were determined for each geography (Portugal, Poland and Mozambique), following the GHG Protocol methodology and considering the entities under which it has operational control, maintaining the scope covered by the financial statements. The Bank intends to strengthen its methodology for calculating its carbon footprint to ensure better alignment with ESRS reporting requirements in the coming years.

Scope 1 emissions are associated with direct emissions derived from the use of fuels, in stationary and mobile sources, and refrigeration gases. In 2024, there was a 6% increase in Scope 1 GHG emissions (5 505 tCO₂e) due to the reasons mentioned above. However, Portugal reduced its emissions by more than 15%, mainly in stationary combustion emissions.

Scope 1 (tCO ₂ e)	2022 ⁶	2023	2024
Stationary combustion emissions	931	647	871
Mobile combustion emissions	3 612	4 525	4 595
Fugitive emissions	-	30	39
Scope 1 gross emissions	4 543	5 202	5 505
Biogenic CO ₂ emissions	-	-	126

Scope 2 market-based indirect GHG emissions, related to electricity and heat consumption⁷, recorded a slight increase this year (3%), reaching 5 955 tCO₂e, although Mozambique reduced these emissions by 5%. In Portugal, as only renewable energy is consumed, it continues to report 0 tCO₂e in market-based Scope 2 emissions. Poland, on the other hand, registers Scope 2 emissions mainly due to heat generation, with a slight increase of less than 1%.

In terms of scope 2 location-based emissions (16 496 tCO₂e), the reduction of 14% is due not only to the decrease in the Bank's energy consumption in the various geographies, but also to the reduction in specific emission factors, namely in the electricity-producing sector in Portugal, which saw an increase in renewable production in 2024.

Scope 2 (tCO ₂ e)	2022 ¹¹	2023	2024
Scope 2 location-based gross emissions	25 606	19 283	16 496
Scope 2 market-based gross issuance	7 769	5 756	5 955

Over the past years, the Bank has been enhancing the calculation of its emissions. This year, improvements were made primarily to the methodology for calculating Scope 3 GHG emissions - the Bank reviewed the methodologies used to ensure full alignment with the GHG Protocol. Compared to the previous reporting year, emissions were determined for categories 2, 3, and 13, in addition to categories 1, 6, and 15, which had been reported in previous years. At the same time, for the calculation of category 1, it was also possible to include more products and services in the emissions calculation, and the calculation of categories 6 and 15 was improved. Due to these methodological improvements, there is a sharp increase in Scope 3 GHG emissions to 9 598 650 tCO₂e, making comparisons with previous years not applicable.

Scope 3 (tCO ₂ e)	2022 ¹⁴	2023	2024
1) Purchased goods and services	71 394	59 244	138 470 ⁸
2) Capital Goods (tCO ₂ e)	-	-	5 607 ⁹
3) Fuel and energy-related activities (not included in Scope 1 and 2) ¹⁰	-	-	7 088
6) Business trips	398	856	1 543 ¹¹
13) Leased assets	-	-	1 095 704 ¹²
15) Investments	-	6 779 578	8 350 239
Scope 3 gross GHG emissions	71 792	6 839 678¹³	9 598 650

Similarly, the Group's total GHG emissions in 2024 surpassed previous years, reaching 9 610 110 tCO₂e (market-based).

⁶ In 2022, the figures are not included in the Millennium bim.

⁷ Heat acquisition only applies to Poland.

⁸ Emissions consider Portugal and Poland.

⁹ Emissions consider only Portugal.

¹⁰ Location-based value.

¹¹ Emissions consider Portugal and Mozambique.

¹² Category of emissions only applicable to Bank Millennium Group (Poland).

¹³ In 2024, the total value of Scope 3 emissions in 2023 was updated to include categories 1 and 15, in addition to category 6.

Total GHG emissions (tCO ₂ e)	2022 ¹⁴	2023	2024
Location-based gross emissions	101 941	6 864 163	9 620 650
Market-based gross emissions	84 104	6 850 635	9 610 110

The calculation of the Bank's GHG emissions intensity considers the net revenue corresponding to the Group's banking product, as reported in the financial statements, totalling 2 688 tCO₂e/million € (market-based).

Intensity of GGE emissions	2024
Net revenues (million €)	3 575
Emissions intensity based on location (tCO ₂ e/million €)	2 691
Market-based emissions intensity (tCO ₂ e/million €)	2 688

For the purposes of this report, it was not possible to determine the interim targets for expected emissions in 2025 and 2030. These values are expected to be determined in future reports, following the formalization of the Climate Transition Plan.

The methodologies and assumptions considered for the purposes of collecting and consolidating quantitative information are duly reported in the Methodological Notes section.

E1-7 - GHG removal and mitigation projects financed through carbon credits

The Bank did not carry out any GHG removals in 2024, nor did it finance mitigation projects financed by carbon credits.

E1-8 - Internal carbon pricing

The Bank does not apply internal carbon pricing schemes.

¹⁴ In 2022, the figures are not included in the Millennium bim.

Social Information

ESRS S1 – In-house workforce

Strategy

ESRS 2 SBM-2 - Stakeholders' interests and points of view

The Bank recognises its employees as an essential group of stakeholders. Not only because they are widely impacted by its activities, but also because of the important role they play in defining its strategy and determining the implementation of its business model.

For these reasons, their interests, opinions and rights, including respect for human rights, are of the utmost importance. To ensure the active participation and involvement of employees, the Bank provides various communication channels, such as the corporate portal, climate surveys and whistleblowing channels (more information in ESRS 2 SBM-2 - Interests and views of stakeholders).

Climate surveys are a regular opportunity for employees to express and convey their opinions. They make it possible to identify the factors that most influence the environment in the company at any given time, as well as the impacts, positive or negative, that affect workers. In 2024, the participation rate was 88.2% in Portugal and 63% in Poland.

These participation rates give a high level of reliability to the results obtained, both globally and by specific areas. Once the results have been analysed in detail, they are disseminated throughout the organisational structure and then to each team, involving employees in identifying the main challenges and implementing the corrective measures best suited to each situation.

Similarly, Bank Millennium's strategy for the 2025-2028 period includes, among other things, the pursuit of a series of initiatives arising from the results of the annual Employee Satisfaction Survey.

In addition to the Climate Questionnaire, there are other complementary surveys, such as the Internal Customer Survey, which is carried out annually and aims to help improve internal service by identifying the obstacles faced by employees who depend on other areas to carry out their duties, including Medical Services, and the Facility Services Survey, which assesses services such as the canteen, gym and public transport provided by the Bank. As part of the monitoring of strategic Human Resources indicators, such as diversity and non-discrimination, the Bank also submits a survey on parenthood to all employees who have taken parental leave.

An additional reference to the flow of internal information, supported by corporate communication platforms, covers business, operational, training and technological topics, but also content on sustainability, social responsibility, financial literacy, employee benefits and other topics of general interest.

In Portugal, in terms of internal communication, 5,717 pieces of content were published on the intranet, 365 of which were videos produced by Millennium TV and 170 related to sustainability issues. In addition to sustainability, the regular features include content on Financial Literacy, Compliance 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 2024, 96 editions were carried out (Portuguese and English), with an average circulation of 6,203 units per edition.

ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

The dual materiality analysis process identified a total of 19 material IROs related to in-house workforce issues (more information in SBM-3 - Material impacts, risks and opportunities and their interaction with the strategy and business model), which cover all the BCP Group's salaried employees (more information in S1-6 - Characteristics of the company's salaried employees).



Positive impacts result from initiatives and practices that promote a safer, fairer and more favourable working environment for employees. Among the positive aspects identified are the implementation of fixed working hours and a teleworking policy, which contribute to work-life balance and improve employees' quality of life; fair pay, minimum entry pay and social benefits, with salaries aligned with benchmarks; the promotion of diversity and inclusion, a key element of the organisational culture; and the strengthening of social dialogue, ensuring greater employee participation, which favours a more transparent and collaborative environment.

On the other hand, negative impacts refer to potential challenges that could jeopardise their satisfaction and well-being. Among the issues identified are job security, where the precariousness of working conditions, such as mass redundancies or precarious contracts, can affect the financial stability and mental health of employees; health and safety, considering exposure to potential physical attacks due to direct contact with customers; and privacy and data protection, since failures in information security can compromise the confidentiality of employees' data, affecting their security and trust.

The risk identified is related to inadequate working conditions, which can impact on worker satisfaction and productivity, compromising organisational performance and talent retention.

The opportunities demonstrate the potential for the business to grow and prosper by establishing solid relationships of trust with salaried employees. Among them, the following stand out as sources of worker satisfaction and retention and, consequently, of boosting their productivity, investment in training and skills development, promoting professional growth; the promotion of gender equality and pay for work of equal value, creating a fairer and more inclusive environment; the expansion of benefits, such as access to adequate housing and to special credit conditions, strengthening worker stability; and social dialogue and collective bargaining, guaranteeing better working conditions and a more participatory environment.

The IROs identified as material reinforce the need for a strategic and integrated approach to the management of in-house workforce, ensuring that risks are mitigated, positive impacts are amplified, and opportunities are exploited. This information is analysed in more detail in the following sections.

Management of impacts, risks and opportunities

S1-1 - Policies related to in-house workforce

In order to manage its material impacts, risks and opportunities related to its in-house workforce, the Bank has a number of policies applicable across the board to all salaried workers.



* Each geography has its own individual Policy, complying with its context and applicable national legislation.

Human Resources Policy

Bank Millennium's Human Resources Policy describes both the human resources management model and the regulations that serve as the legal basis for the HR management system (onboarding, remuneration and benefits, training and development, leadership). The HR department is responsible for implementing the policy, which applies to all employees.

Human Rights Policy

The BCP Group's Human Rights Policy reflects the Bank's commitment to protecting and respecting human rights, ensuring compliance with applicable legislation and regulations and alignment with national and international best practices, namely with the principles set out in the following 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 (OCDE);
- 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.

Thus, in the context of relations with employees, this policy provides, among other things, for the prohibition of trafficking in human beings, forced labour and child labour, non-discrimination and the fight against harassment, and freedom of association and collective bargaining.

Its implementation is carried out through a wide range of mechanisms, including its promotion and dissemination, the regular assessment, follow-up and monitoring of risks related to human rights (more information in IRO-1 - Description of the process for identifying and assessing material impacts, risks and opportunities), and the provision of a specific and confidential whistleblowing and reporting channel (more information in S1-2 - Processes for dialogue with in-house workforce and employee representatives on impacts).

BCP's Board of Directors is responsible for approving and reviewing the Human Rights Policy, after receiving an opinion from the Corporate Governance, Ethics and Sustainability Committee, in consultation with the Executive Committee and the Sustainability Commission. It is subject to periodic review (every 2 years) or whenever necessary, and the Human Resources Division (HRD) and the Corporate Sustainability Area are the internal areas responsible for reviewing its content. This policy, like the others, is available internally on the corporate intranet and publicly on the Bank's [institutional website](#).

Diversity and Equal Opportunities Policy

The BCP Group's Diversity and Equal Opportunities Policy establishes the guiding principles for diversity, equal opportunities, non-discrimination and inclusion in human resources management practices, including "the prohibition of discrimination based on ancestry, gender, sexual orientation, family status, nationality, place of birth, ethnic origin, religion, age, marital status, social status, trade union membership and political beliefs".

The Bank recognises diversity and inclusion as critical factors for business success, promoting a culture of respect and suitable conditions for employees. In this respect, it complies with the recommendations issued by the International Labour Organisation and the guidelines for voluntary commitments in this area, such as the Charter for Diversity (in Portugal and Poland), the Women Empowerment Principles (WEP) of the United Nations Global Compact and iGen - Organisations for Equality Forum.

The implementation of this Policy is ensured through the fulfilment of the Gender Equality Plan, an annual document through which the Bank communicates the main objectives, targets and progress in terms of promoting equality and inclusion.

Its approval and revision is the responsibility of the Board of Directors, on the recommendation of the Corporate Governance, Ethics and Sustainability Committee, having heard the Executive Committee and the Sustainability Committee. It is subject

to periodic review (every 2 years) or whenever necessary, with the Human Resources Division and the Sustainability Area being the internal areas responsible for reviewing its content.

Occupational Health and Safety Policy

The Occupational Health and Safety Policy establishes general principles for preventing occupational risks and protecting the safety, hygiene and physical and mental health of employees, regardless of their contractual relationship or place of work. It therefore aims to promote their safety and health by preventing accidents at work and occupational illnesses, guaranteeing a safe and healthy working environment.

To this end, specific procedures have been defined, namely an internal emergency plan, which includes firefighting, evacuation, first aid, occupational risk prevention, health promotion and health surveillance examinations.

Millennium bcp's performance in Health and Safety at Work is monitored and reported annually in the Sustainability Report.

The policy applies to all the Bank's operations in Portugal. Its approval and revision is the responsibility of the Executive Committee, with the opinion of the Sustainability Commission, and it is reviewed every two years or whenever necessary. The Human Resources Division, the Logistics and Procurement Division and the Sustainability Area are responsible for reviewing the content.

In the different geographies, other complementary policies may also be in place to manage particular issues related to the health and safety of employees. For example, in Millennium bim there is a Policy for Workers with HIV/AIDS, whose scrupulous compliance with the principles laid down in the standard is ensured by the operations of a dedicated office of the local medical centre.

Employee Remuneration Policy

This policy establishes the guidelines and principles for employee remuneration, covering definitions, general aspects, employees with key functions and the malus clause. The aim is to guarantee transparency and fairness in the remuneration policy.

Benefits and Social Support Policy

The BCP Group, in its different geographies, provides its employees with a Benefits and Social Support Policy, detailed on the Human Resources corporate intranet, through which the Bank has sought to promote support for work-family reconciliation, support for education and incentives for mobility and housing. The application of this policy is complemented by other internal procedures.

An example of this is the internal procedure, which extends to all employees, for granting home loans, a rule which defines the general conditions, specific procedures and complementary regulations for granting this credit. The aim is to standardise the procedures for these operations, guaranteeing fairness and transparency. Monitoring compliance with the standard is the responsibility of Internal Audit and the Compliance Division.

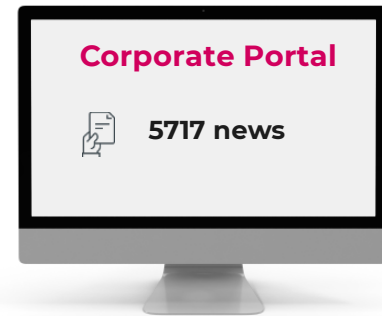
Regulations on the Provision of Remote Work

This regulation defines the guidelines to be followed by Organic Units and employees when working remotely. The aim of this rule is to guarantee a clear framework for the implementation of remote working, promoting a balance between professional and personal life. All employees with compatible functions are covered and the standard is available on the Human Resources corporate intranet.

In addition to these, the Code of Conduct (more information in G1-1 - Policies on business conduct and corporate culture), the Principles for the Processing and Protection of Personal Data, the Privacy Policy (more information in S4-1 - Policies related to consumers and end users) and the Sustainability Policy (more information in E1-1 - Policies related to climate change mitigation and adaptation) are also fundamental for managing the impacts related to the in-house workforce.

S1-2 - Processes for dialogue with the in-house workforce and with workers' representatives on impacts

The Bank promotes a continuous and structured dialogue with its employees, ensuring that all opinions and contributions are valued and taken into account in decision-making. To this end, it provides various channels for communication and involvement, such as the corporate intranet, where news of interest to employees and the Bank is published. With regard to specific People Management issues, employees have access to an area of the intranet dedicated to Human Resources, where they can view relevant information and turn to a designated Human Resources Manager to answer questions related to their career and people management.



The Bank's involvement with its employees starts as soon as they are hired and continues throughout their careers through internal communication channels. In the first two years of employment, seven moments of interaction with the employee are formally established.



Furthermore, throughout the year, employees are called upon to intervene and express their opinion, for example in the performance evaluation process, which includes the evaluation and self-assessment phase (February/March) and the mid-term meeting (October).

They also take part in the annual organisational climate survey, which measures the level of employee satisfaction and motivation (more information in ESRS 2 SBM-2 - Stakeholders' interests and points of view).

On the other hand, the internal idea generation programmes - *Mil Ideias* (A Thousand Ideas) - in Portugal, - Call 2 Action - in Poland (both currently being re-evaluated to improve the value proposition of these programmes) and - *Ideias que Contam* (Ideas that Count) - in Mozambique, are based on the recognition that employees are a creative force that generates valuable ideas, and also represent a means of increasing, stimulating and enhancing their individual capacities, either through direct participation with ideas or indirectly through comments or votes.

In Mozambique, the Forum - *Ideias que Contam* (Ideas that Count), a space for sharing and discussing ideas, was visited throughout 2024 by 287 employees, who were responsible for 452 ideas or their comments, of which 301 are currently being analysed and 151 have been archived.

At Bank Millennium, meetings are held between employees and the Board of Directors to discuss matters of labour importance. In addition to these, meetings are also held between Board members and specific groups of employees, acting as open channels for clarifying doubts or sharing suggestions directly with management.

In Portugal, the Bank also maintains an active dialogue with employee representatives. The Workers' Committee meets monthly with the Chief Executive Officer and the HRD, who reports directly to the CEO. At the same time, the Human Resources Commissions hold quarterly meetings to address strategic issues related to people management and follow the evolution of the main monitoring indicators.

Working conditions - namely remuneration regulations and incentives; rules on remote working and individual employee issues - are defined in the Collective Labour Agreement (ACT) that is negotiated with the various unions.

S1-3 – Processes to correct negative impacts and channels for the workforce itself to express concerns

In the context of working conditions, equal treatment and opportunities for all and other in-house workforce-related rights, the Bank seeks to minimise any negative impacts in all management decisions.

Therefore, the timely identification of any situations that could trigger these impacts, namely the dialogue established with employees, is crucial (more information in ESRS 2 SBM-2 - Stakeholders' interests and points of view).

In all the countries in which the Bank operates, there are formal complaint mechanisms available so that employees can report irregular situations arising from the provisions of the Code of Conduct and the Code of Good Conduct for Preventing and Combating Harassment and for Promoting Equality and Non-Discrimination, which have been publicised and subject to training. At the same time, for other issues, employees can turn to their Human Resources Manager. Employees who report irregular situations or complaints are safeguarded by the Bank's Code of Conduct, which provides a system of protection against any possible retaliation.

In this regard, at Millennium bcp, the Compliance Office monitors and handles, according to specific formal procedures, all communications made by employees, reporting information about them to the Corporate Governance, Ethics and Sustainability Committee. At Bank Millennium, all communications are recorded by the Human Resources Division, which is responsible for informing the Process and Operational Risk Committee about them.

These processes result in multiple actions and/or specific action plans that allow the BCP Group to mitigate and/or minimise their negative impacts, as described in the following pages. The effectiveness of these measures is monitored through continuous follow-up and internal surveys.

Similarly, employee confidence in these processes as an effective means of raising concerns and obtaining appropriate solutions is also regularly assessed through the Climate Survey, within the framework of which all measures are also provided to avoid identifying those who respond (more information in ESRS 2 SBM-2 - Interests and points of view of interested parties).

S1-4 – Taking action on material impacts on the in-house workforce and approaches to managing material risks and pursuing material opportunities related to the in-house workforce, as well as the effectiveness of these measures

Following the results of the risk analysis and employee engagement processes, the Bank's different Divisions, in liaison with the HRD (together with the Human Resources Manager) and with the approval of the Human Resources Commission, define their own and/or transversal action plans. These plans establish strategic action to improve the negative aspects identified, whether real or potential, and boost the positive ones. All these actions and/or action plans have their own monitoring and follow-up processes.

To ensure a better and more complete understanding of the effects of these actions, they are described under the reporting requirements set out below in the “Metrics and targets” section.

Metrics and targets

S1-5 - Targets related to managing negative material impacts, promoting positive impacts and managing material risks and opportunities

The Bank establishes strategic objectives which it monitors regularly, presenting strategic topics for analysis to the Human Resources Commission on a quarterly basis. Employee motivation and satisfaction indicators are assessed annually against market benchmarks.

Issue	Indicator	Performance		Ambition	
		2022 baseline	2024 result	2024 target	2025 target
Diversity and inclusion	% of under-represented gender in the management body	35%	35%	At least 1/3 of the under-represented sex on the management body	At least 1/3 of the under-represented sex on the management body
	% of women in new leadership positions	38%	43%	35%	41,25%

Training	Average annual training hours per employee	52	50	54	54
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S1-6 - Characteristics of the company's employees

Millennium bcp's Human Resources Management focuses on providing the organisation with the right talent for its strategic initiatives. Thus, in 2024, the priority was to ensure that the goal of leading the transformation of the business in Portugal in a very demanding regulatory context is accompanied by the strengthening of the technology and digital teams, as well as the control areas.

Continuing Millennium bcp's Strategic Plan, the Bank remains committed to recruiting high-potential young people to train and develop as a means of ensuring the sustainability of rejuvenating teams and passing on critical business knowledge. At the same time, it has reinforced its commitment to candidates with differentiating skills, especially in the areas of digital, technology and analytics. Also in risk control, auditing and sustainability, special care was taken in selecting profiles, ensuring that the high standards of risk, excellence and ethics that characterise the institution were maintained. In addition, recruitment for the commercial areas was a priority, in line with the Bank's renewal strategy.

With the aim of strengthening its positioning for the future, throughout 2024 the Bank built an integrated value proposition aligned with the interests of university students with a vocation for innovation, a critical spirit and a taste for banking.

In 2024, the Bank took part in various on-campus events and maintained its proximity to universities that train young talents in the areas of technology, engineering, maths and science. Wanting to know and be known, it incorporates into the Millennium bcp Brand's mission of attracting business and employer branding the fact that it is at the forefront of digital banking.

These included bootcamps, job fairs and presentations, including “A Maior Aula de Programação do Mundo” (The World's Largest Programming Class), attended by around 2,000 participants, mostly university students, with the aim of strengthening the “Technological Portugal” brand in international markets and communities. Millennium bcp was one of the 9 sponsors of the event held at the Instituto Superior Técnico and the only bank represented. One of the aims of this class was to place Portugal and the country's technological talent in the ‘Guinness World Records’, emphasising the growing relevance of technology in career choices and the importance of digital skills.

In 2024, Millennium bcp carried out 203 external recruitments, with an average age of 26 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.

New employees identified as part of these various initiatives are subject to a selection process that promotes equal opportunities and respect for inclusion from the outset.

Traineeships held in 2024 (entity-specific disclosure)

	Quantity ¹
CURRICULAR TRAINEESHIP	19
Women	9
Men	10
PROFESSIONAL TRAINEESHIP	319
Women	203
Men	122
SHORT-TERM TRAINEESHIP (new)²	156

¹ The figures presented include all trainees in 2024, regardless of their contractual situation on 31/12/2024.

² Short-term traineeships mostly refer to summer traineeships offered to young people who are still studying, to be carried out during their summer holidays.

Women	97
Men	59
TOTAL TRAINEESHIPS	500

In 2024, the number of Employees of the BCP Group decreased by 0.15% (24 fewer Employees) compared to the previous year. Resignations and retirements continue to be the main reasons for departure. The number of resignations was very close to that recorded in 2023, while retirements continued to show an increase associated with the natural evolution of the average age of employees, combined with the Bank's efforts to rejuvenate its workforce.

Workers by gender and country

Country	2022			2023			2024		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Mozambique	1 173	1 331	2 504	1 200	1 374	2 574	1 235	1 390	2 625
Poland	2 378	4 609	6 987	2 366	4 506	6 872	2 419	4 417	6 836
Portugal	3 484	2 768	6 252	3 433	2 809	6 242	3 395	2 808	6 203
Total	7 035	8 708	15 743	6 999	8 689	15 688	7 049	8 615	15 664

Workers by gender and contract

Type of Contract	2022			2023			2024		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Permanent	6 571	7 879	14 450	6 624	8 025	14 649	6 706	8 121	14 827
Temporary	464	829	1 293	375	664	1 039	343	494	837
Non-guaranteed hours	0	0	0	0	0	0	0	0	0
Total	7 035	8 708	15 743	6 999	8 689	15 688	7 049	8 615	15 664
Full-time	6 971	8 575	15 546	6 941	8 546	15 487	6 991	8 483	15 474
Part-time	64	133	197	58	143	201	58	132	190
Total	7 035	8 708	15 743	6 999	8 689	15 688	7 049	8 615	15 664

Rotations

	2022				2023				2024			
	MZ	PL	PT	Total	MZ	PL	PT	Total	MZ	PL	PT	Total
No. of workers who left the company	0	1 732	225	1 957	166	1 204	237	1 607	154	1 034	262	1 450
Turnover rate	0%	25%	4%	12%	6%	18%	4%	10%	6%	15%	4%	9%

The turnover rate per employee in 2024 was 10.2 (Total resources (on and off-balance sheet) + gross loans: 160,141 M€/15,664 employees).

The methodologies and assumptions considered for the purposes of collecting and consolidating the quantitative information are duly reported in the Methodological Notes section.

S1-7 - Characteristics of non-employees in the undertaking's own workforce

In order to support the company's core activities, such as IT activities/projects, digital, control functions (risk; compliance; auditing), Legal and Financial Advice, the BCP Group uses external expertise and competences, by hiring non-salaried workers.

The methodologies and assumptions considered for the purposes of collecting and consolidating the quantitative information are duly reported in the Methodological Notes section.

Non-salaried workers

2024	
Self-employed workers	648
Workers supplied by companies primarily engaged in 'employment activities'	1 971
Other	1 059
Total	3 678

S1-8 - Coverage of collective bargaining and social dialogue

The BCP Group promotes a working environment based on transparency, respect and mutual collaboration. Thus, reinforcing its commitment to the 10 Principles of the United Nations Global Compact, it recognises and supports freedom of association and the right to collective bargaining as fundamental mechanisms for defining fair and balanced conditions for workers, guaranteeing rights, benefits and job security.

Coverage of collective bargaining and social dialogue

Coverage rate	Collective bargaining coverage		Social dialogue
	Salaried workers (EEA)	Salaried workers (non-EEA)	Workplace representation (EEA only)
0% - 19%	Poland		Poland
20% - 39%			
40% - 59%			
60% - 79%			
80% - 100%	Portugal	Mozambique	Portugal

Overall, in 2024, 56% of BCP Group salaried employees were covered by collective bargaining agreements (100% in Portugal and 95.3% in Mozambique) and 45% were unionised.

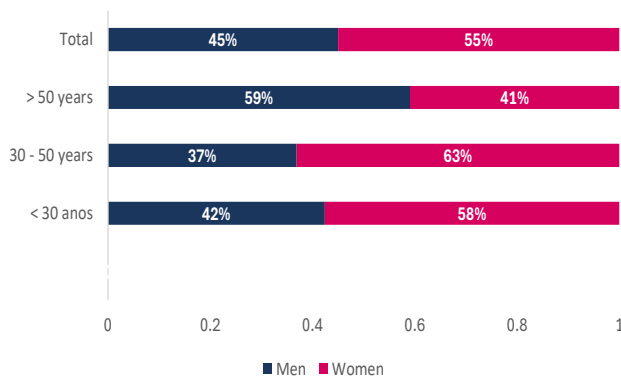
The working conditions of employees not covered by collective bargaining agreements are generally determined in compliance with the labour legislation applicable in each geography. In the particular case of Bank Millennium, where there is no collective bargaining agreement in force, employees' conditions are established in agreement with the trade unions.

With regard to the consultation and negotiation mechanism specified in collective bargaining agreements, Millennium bcp, through the Collective Labour Agreements it has negotiated, has defined a minimum period to be observed for the purposes of communicating transfers to Employees (30 days under the *ACT Vertical*, clause 32, no. 6; 60 days under the *ACT Quadros*, clause 34, no. 3), without prejudice to another deadline being observed by agreement between the parties, given the specificity of each situation.

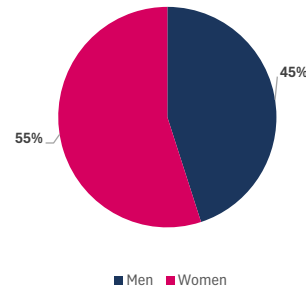
S1-9 - Diversity metrics

The BCP Group ensures fair treatment and equal opportunities for all employees, valuing meritocracy at all stages of their professional career.

Age range by gender

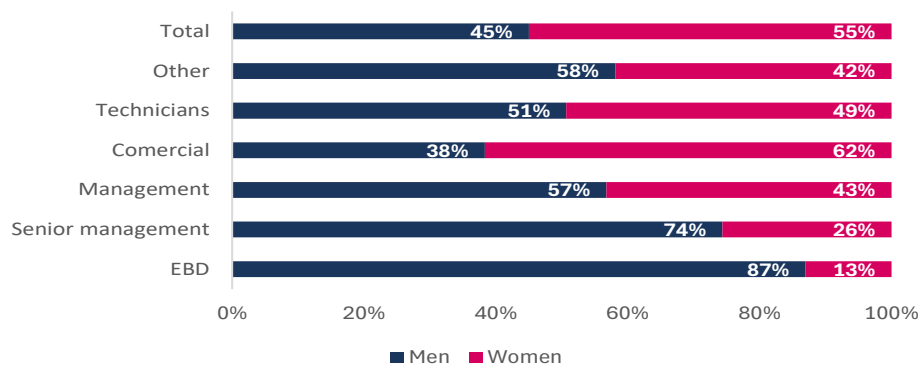


Distribution by gender (%)



In 2024, 758 women held Management positions (Executive Committee/Top Management and Management), which corresponds to 41% of these positions - 24% in Portugal, 54% in Poland and 27% in Mozambique. In Commercial functions, this figure rises to 62% in the Group, with 50% in Portugal, 74% in Poland and 61% in Mozambique.

Professional category by gender (%)



The BCP Group is continuously committed to promoting equal opportunities, with a special focus on gender parity. This commitment is reflected in all the actions carried out by the Bank, ensuring a balanced recruitment process and providing opportunities for professional progression on equal terms. These guidelines are formalised in the Gender Equality Plan, published annually, as well as in the “Valorizar 28” Strategic Plan.



Measures implemented

Regular monitoring of management indicators

Strict application of the Remuneration and Promotions Policy

Work-life balance support

Greater participation of the less represented gender in leadership skills development programmes

Recruitment of new employees with gender diversity and equal pay criteria

In addition, Millennium bcp is a signatory to the Commitment Agreement of the Organisations for Equality Forum (iGen), an initiative promoted by the Commission for Equality in Labour and Employment (CITE), which encourages the implementation

of concrete measures to promote gender equality. Since 2017, the Bank has actively participated in the Task Force's monthly meetings and in the two Working Groups (WG) to which it belongs (WG2 - Gender Equality Measures and WG4 - iGen DNA).

In 2020, the Bank joined the Women's Empowerment Principles (WEPs) of the United Nations Global Compact, an important international platform for promoting gender equality, in a commitment that demonstrates a long-term vision and the will to integrate - and boost - a collective dynamic based on diversity, cooperation and trust. Millennium bcp is also a member of the WEPs Steering Committee in Portugal, a collegiate body coordinated by the Global Compact Portuguese Network.

In line with the BCP Group's diversity and inclusion policy, in 2024 Millennium bcp signed up to the European Commission's Charter for Diversity, promoted in Portugal by APPDI - the *Associação Portuguesa para a Diversidade e Inclusão* (Portuguese Association for Diversity and Inclusion). Bank Millennium, in Poland, is also a signatory to this European commitment, promoted locally by the Responsible Business Forum.

Since 2019, Millennium bcp has also been a signatory to the 'CEO Guide to Human Rights', an initiative of the World Business Council for Sustainable Development (WBCSD) and the Business Council for Sustainable Development (BCSD Portugal).



Equality Plan

In fulfilment of the Diversity and Equal Opportunities Policy, the Bank defines an Equality Plan every year, which translates the principles of this Policy and the reference framework for people management into concrete actions. Based on Article 7 of Law 62/2017 of 1 August, it follows the guidelines of the "Guide to Drawing Up Equality Plans", including a self-diagnosis to identify gender equality policies and practices.

The plan covers several dimensions: the company's strategy, mission and values; prevention of harassment at work; equal working conditions and access to employment; initial and ongoing training; protection during parenthood and reconciliation of professional and personal life.

Applicable to all BCP operations in Portugal, it is monitored by the Human Resources Commission and reviewed annually in accordance with Article 4 of Normative Decision No. 18/2019.

Some measures implemented:

- Granting of travel allowances (Millennium bcp): whenever mobility implies additional costs for employees, allowances are granted for compensation. At the end of 2024, approximately 316 travel allowances were in force;
- Adjustment of objectives on return from maternity/paternity leave;
- Adjustment in work organisation: whenever possible, methods such as remote work and flexible working hours are made available, allowing for a better work-life balance.

By being inclusive, Millennium ensures a greater variety of points of view and a more diverse and sustainable organisation and broadens its talent attraction base. Millennium bcp's commitment in this area has had a positive impact, both on the evolution of the Bank's overall gender parity and on parity in leadership positions which, although still below total parity, has evolved positively in recent years.



S1-10 - Adequate salaries

BCP ensures that all its employees receive an adequate salary, in accordance with the applicable benchmarks, and also guarantees a minimum entry salary for new employees.

S1-11 - Social protection and S1-15 - Work-life balance metrics

The Bank ensures that all employees are covered by social protection against loss of income due to illness, unemployment, accidents at work and disability, parental leave and retirement. These programmes are promoted through public mechanisms, complemented by a diverse range of benefits offered by the company. Likewise, all workers have the right to family leave.

 Social protection mechanisms against loss of income
 • Medical assistance and health care - includes reimbursement of medical expenses, diagnostic tests, medicines, hospitalisations, surgeries, treatments and prosthetics; • Insurance for accidents at work and occupational diseases - workers travelling away from their place of work are covered by personal accident insurance. In addition, both workers and their families are entitled to compensation, in cash or in kind, for damages resulting from accidents at work or occupational diseases (these two indemnities are not cumulative); • Protection in the event of illness, disability or retirement: full-time workers who become ill, disabled or reach retirement age receive monthly instalments in accordance with the rules of the ACT. These benefits also apply to workers without union membership, except in the case of social security and medical assistance, which are compulsory; • Support for parenthood and education - payment of subsidies.
 • Payment of subsidies from the Company's Social Benefits Fund for workers or pensioners in a difficult life situation; • Payment of indemnity for termination of employment contract due to retirement or pension; • Payment of compensation in relation to the extinction of a workplace; • Severance pay for a reduction in the period of notice of an employment contract on the employer's initiative; • Payment of salaries for sick leave of up to 33 days per year.
 • Millennium bim ensures social protection against loss of income due to illness, unemployment, accidents at work and disability, parental leave and retirement, exclusively through public mechanisms.

Likewise, non-salaried workers, regardless of the geography in which they operate, are also covered by social protection against loss of income through public mechanisms.



100% of BCP Group employees are also guaranteed the right to family leave and, in 2024, all those who showed an intention to take advantage of this right were able to do so.

In addition to the benefits to mitigate the impact of potential loss of income and the right to family leave, the Bank, in its different geographies, offers its employees a range of other benefits, through which it seeks to contribute to improving their health, well-being and work-life balance. These benefits are therefore, in general terms, factors that promote employee satisfaction and, consequently, employee retention.

At Bank Millennium, employees enjoy the same benefits regardless of the type of employment contract. In Portugal and Mozambique, the vast majority also extends to part-time workers, and the exceptions, if any, are mentioned in the following sections.

Health, safety and well-being

BCP Group employees, as well as their families, benefit from health insurance with subsidised conditions that guarantee very comprehensive coverage plans.

In Portugal and Poland, BCP Group employees also benefit from medical units and a dedicated medical staff, through which the provision of curative medicine, occupational medicine and medical assistance services is ensured. 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, 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. It should be noted that 229 appointments were made in 2024, resulting in 124 hospitalizations (90 in 2023).

In order to reinforce the health benefits for Employees, the Bank also guarantees, at the Internal Medicine Services in Taguspark, monitoring in the specialities of Nutrition (493 consultations vs. 653 in 2023) and Clinical Psychology (1,201 appointments vs. 1,114 in 2023), specialities also available to Employees located in Porto. The Physiotherapy services are also available in Taguspark and in the registered office of Club Millennium in Lisbon. A collection service for clinical tests is also available.

Health Bureau ⁽¹⁾

	2024	2023	2022	VAR.% 24/23
MEDICAL SERVICES				
Consultations made	24 871	26 203	25 220	- 4.6%
Check-up carried out	8 124	8 465	10 426	- 4.0%
HEALTH INSURANCE				
Persons concerned	42 933	43 141	44 733	-0.5%

(1) Includes active Employees and retired Employees.

In the case of Portugal, to reinforce the health benefits, Millennium bcp offers specialised monitoring in the areas of Nutrition and Clinical Psychology at its Internal Medicine Services in Lisbon and Porto, services that are accessible to all the Bank's employees.

The Business Continuity Unit, part of the Logistics and Procurement Division, is responsible for monitoring, defining and publicising contingency plans, in collaboration with the Bank's Medical Services and local health authorities, especially in pandemic scenarios or other critical situations.

As part of its social and corporate responsibility, Millennium bcp in Portugal has been stepping up its support for workers on long-term sick leave, guaranteeing ongoing medical care.

In Mozambique, Millennium bim has several health and well-being support units for employees at its headquarters. These include a medical office offering general medical consultations and some specialities, an office dedicated to HIV prevention and monitoring, and a social affairs office. The latter is aimed at counselling workers at risk of social vulnerability.

In this geographical area, the Bank also has a Health Insurance Scheme, as well as a Medical Centre that caters for employees and their families in active service and retired employees and their spouses in other medical specialities.

In Poland, workers have access to specialist doctors, procedures and comprehensive medical diagnostics. Since 2023, the standard offer has included, among other things, access to psychological consultations, prevention programmes (vaccinations, laboratory tests), as well as regular dental check-ups and dental prophylaxis. As part of the regular prevention effort, a medical diagnosis programme is available, focusing on the most common cancers in women and men.

Bank Millennium employees enjoy the same social and financial benefits regardless of their contractual relationship (fixed-term/uncertain-term) and working hours (part-time/full-time). Employees who have retired or are on parental leave also benefit from access to medical care.

The dissemination, through corporate internal communication platforms, of informative content on topics related to health and well-being, mental health, disease prevention and healthy lifestyle habits is a practice that cuts across all BCP Group operations.



Remote work

Millennium bcp, in Portugal, based on the experience of remote work due to the Covid-19 pandemic, approved in 2022 and revised in 2024 a new “Regulation on the provision of remote work” in addition to the legal provisions. For compatible functions (essentially Central Services), this system provides for the possibility of using a hybrid work system, with a weekly distribution of 60% in the workplace (3 days) and 40% in remote work (2 days), at the option of each employee, thus promoting a better balance between work and personal life.

In Poland, meanwhile, 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 needs require, with regard to the tasks and projects underway and the efficiency achieved by the teams.

This hybrid scheme allows for a better balance between professional and personal/family life, reconciling the interests and priorities of the Bank and its employees, and also helps to reduce commuting.

Credit

Employees of the BCP Group have the possibility of benefiting from housing loans for the purchase of their own permanent home 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;

Credit to Employees¹ (Disclosure specific to the entity)

	2022		2023		2024	
	Amount	Employees	Amount	Employees	Amount	Employees
Housing						
In portfolio	371.8	5 739	374.4	5 833	343.2	5 339
Granted in the year	21.3	173	21.2	175	20.3	152
Social Purposes						
In portfolio	10.5	1 737	10.3	2 230	10.5	1 687
Granted in the year	4.5	747	4.0	922	4.5	747

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.

Since 2023, Millennium bim has had financial measures in place to mitigate the impact of possible interest rate rises. In order to ensure a balance between the financial needs of employees and their ability to pay, the maximum amount of credit for social purposes was increased.

Parenting

Millennium bcp also prioritises supporting the needs of parents in the early years of their children's lives and pregnancy protection.

CAware of the demands that maternity and paternity entail, the Bank has had a Parenthood Protection Programme in place since 2015 - "Bebé Millennium" (Millenniumbaby) - which aims, on the one hand, to celebrate the special moment when people become parents and, on the other, to create the necessary conditions for employees to find a balance between work and family life.

In 2024, in Portugal, we celebrated the birth of 66 babies, with the award of Millennium Baby Vouchers worth €874.90 net of taxes, with around 1,150 employees enjoying the possibility of spending the afternoon of their children's birthdays with them.



To support children at the annual start of school, under the Parental Protection Programme, parents are given half a day off to accompany their children who are entering the 1st and 5th grades.

In Poland, in addition to providing attractive working conditions, development and social support, Bank Millennium supports employees returning to work after maternity/parental leave, and encourages participation in social solidarity actions, employee volunteering, sports and cultural activities.

This programme continues to be valued by our employees, both for providing various benefits and for allowing Millennium bcp to be part of a milestone in their lives and those of their families.

Support to Education

As part of the incentive to constantly develop employees' skills, in addition to the initiatives described in the "Training" chapter, Millennium bcp also provides for the payment of external training or the co-payment of academic qualification courses

¹ Includes active and retired workers.

in certain situations and where the relevance to the duties performed is demonstrated. In 2024, 15 Employees, participated in this programme.

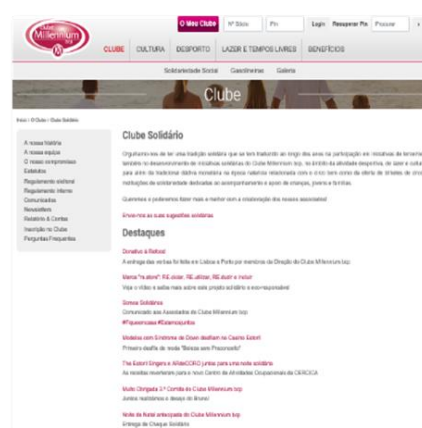
In Portugal, within the scope of education and through monthly subsidies, the Bank also supports: i) employees with student-worker status, having allocated a total of 8,598.9 thousand euros, distributed among 48 beneficiaries; ii) employees with school-age children, having supported 3,076 employees, totalling 1,132 thousand euros; and iii) school-age descendants of deceased employees, having supported 52 young people, totalling 113,950 thousand euros.

Culture and leisure

Clube Millennium bcp, the cultural and recreational association for workers and pensioners of Banco Comercial Português Group, organised various cultural, leisure and sporting activities aimed at the well-being and quality of life of its 34,198 members.

Main initiatives in 2024:

- Diversification of activities - an increase in activities outside Lisbon and Porto, with 15,105 registrations for activities such as the Christmas Circus, sporting events, shows and leisure activities;
- Landmark activities - Christmas circuses in various cities, distribution of Christmas presents, 6th Club Race, tickets for events such as Rock in Rio and cultural visits;
- Classes and courses - music, painting, foreign languages, gymnastics, yoga, karate, pilates and jewellery;
- Solidarity actions - distribution of tickets for shows to IPSS, donations to institutions that support children in need, participation in Food Bank actions and clothing donations;
- Partnerships - discounts at gyms, hotels, restaurants, travel agencies and petrol stations.



Clube Millennium bcp continues to work to expand its activities and improve the quality of life of its members.

Clube Millennium bcp Members

	2024	2023	VAR.% 24/23
Active Employees	4 961	5 096	-2.6%
Retired Employees	5 434	5 419	-0.3%
Subtotal	10 395	10 515	-1.1%
Relatives	23 803	23 940	-0.6%
Total	34 198	34 455	-0.8%
Total of signing up in events on the Website	15 105	14 235	6.1%

Source: Members database and website December 2024

In Mozambique, the Millennium Club was also continued with the aim of supporting the development of initiatives in areas such as sport, culture and leisure, which promote cohesion, identification and employee involvement with the Banco, while encouraging the adoption of healthy habits, regular physical exercise and access to artistic events.

In Poland, employees who are members of MilleKlub, a recreational club that promotes initiatives outside work hours - sports, travels, culture and art projects -, can submit ideas / initiatives within these areas and manage them to completion, with the possibility of co-funding of up to 50% of the project. Additionally, Kids Projects also allows the co-financing of projects that encourage family activities.

Other benefits

Since 2017, Millennium bcp's Taguspark facilities in Portugal have turned Thursdays into a day dedicated to life in the countryside. The terrace of the restaurant area hosts a weekly market where various food products are sold, such as fruit, vegetables and smoked products. This initiative, which arose from a suggestion by employees, aims to make it easier for them to access seasonal, national and quality produce without having to travel far.

Two years after its launch and the distribution of plots of land to teams of the Bank's volunteer workers for planting in Taguspark, the initiative has proved to be a success. In this close contact with nature, teams of volunteers have grown and harvested organic produce, always following responsible practices. As well as reinforcing the organisation's commitment to sustainability, this action provides an enriching experience, promoting health, well-being and greater involvement with the community.



Also available is the Book Bank, an innovative space next to the Taguspark dining area. This library is based on a sharing concept in which any Bank employee can take home a book of their choice, as long as they replace it with another. The Book Bank is a collective project built by everyone, so its collection is all the richer the more the library is used.

In addition, to make it easier for employees working at Taguspark to get around, Millennium bcp has reinforced the routes of its free daily dedicated bus service, with three different routes covering the following cities: Lisbon, Cacém, Barreiro and Montijo, every working day and at different times in the morning and evening.

In Mozambique, 2024 saw the continuation of the initiatives implemented by Millennium bim in the previous year, with the aim of increasing employee satisfaction and commitment:

- To promote team cohesion and reinforce a sense of pride and identification, end-of-year get-together events were organised in all the provinces, from the north to the 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 organisation;
- Celebration of diversity, through specific actions for Mozambican women, emphasising their cultural values and recognising the vital role of women in the leadership and growth of organisations;
- Reinforcing its commitment to workers' families by offering activities and programmes involving their children. These activities, which include solidarity actions and donations to orphanages, as well as offering children's books, aim to strengthen ties with the community and pass on the values of Mozambican culture.

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

S1-12 - People with disabilities

By being inclusive, the BCP Group ensures a greater variety of points of view, a more diverse and sustainable organisation and broadens its talent attraction base.

	2022	2023	2024
% of workers with disabilities	1%	1%	2%

The methodologies and assumptions considered for the purposes of collecting and consolidating the quantitative information are duly reported in the Methodological Notes section.

To promote the inclusion of people with disabilities, Millennium bcp in Portugal and APSA - *Associação Portuguesa de Síndrome de Asperger* (Portuguese Asperger Syndrome Association) signed a protocol in 2022 to include their members in the labour market, which is still active. With this partnership, and within the framework of its commitment to Law no. 4/2019, which establishes a system of employment quotas for people with disabilities (with a degree of incapacity equal to or greater than 60 per cent), Millennium bcp aims to help meet the challenges posed by the inclusion of people with special needs 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 plays an active role, both through the Working Group meetings and the “*Vencer no Mundo do Trabalho*” (Winning in the World of Work) training, which is described in more detail in section 6 regarding training.

As part of its Corporate Social Responsibility plan, Millennium bcp also has a co-operation agreement with BIP-Semear, a social and professional inclusion project that employs and trains young people and adults with intellectual and developmental disabilities (IDD) with a view to their employability.

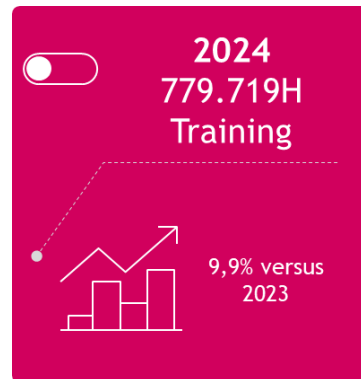
S1-13 - Training metrics and skills development

Training and skills development

In 2024, the Bank reinforced its commitment to the continuous development of its employees, promoting initiatives in line with the demands of the financial sector and the evolution of the labour market.

Average number of training hours per employee

Professional category	2024		
	Men	Women	Total
EBD	43	30	41
Senior Management	41	41	41
Management	47	54	50
Commercial network	63	62	62
Technicians	26	32	29
Others	31	25	28
Total	47	52	50



Training²

Type of training	2024	2023	2022	VAR.% 24/23
Number of participants³				
In-person	14 435 (W 63%, M 37%)	14 719 (W 59%, M 41%)	58 453	-1.9%
E-learning	360 298 (W 65%, M 35%)	417 291 (W 65%, M 35%)	409 711	-13.6%
Remote	98 800 (W 56%, M 44%)	83 081 (W 57%, M 43%)	47 545	18.9%
Number of Hours				
In-person	115 876 (W 61%, M 39%)	82 782 (W 59%; M 41%)	176 784	39.9%
E-learning	406 985 (W 57%, M 43%)	402 731 (W 58%, M 42%)	366 785	1.1%
Remote	256 172 (W 57%, M 43%)	208 122 (W 58%, M 42%)	117 053	23.1%
Per worker	50 (W 58%, M 42%)	46 (W 58%, M 42%)	45	8.7%

Through the Millennium Banking Academy (MBA), the Bank in Portugal invests in programmes to strengthen the necessary behavioural and technical skills of its employees and the following programmes are worth mentioning:

- **Training (transversal pathway for new employees)** - All employees and trainees undergo training that includes topics such as Code of Conduct, Sustainability, Safety and Hygiene at Work, Data Protection, Information Security, Importance of Data Governance, Prevention of Money Laundering and Combating Terrorism, Prevention of Risks of Corruption and Related Offences and Microsoft Information Protection (MIP);
- **LEAD Programme - Integrated postgraduate management programme** - Developed by ISCTE, which develops leadership skills, covering topics such as Sustainability, Artificial Intelligence and Cybersecurity;
- **Power On 2.0 Programme** - Carried out with Nova SBE, focused on leadership for first lines and second lines, with 10 different themes such as Sustainable Finance and ESG practices, Innovation and circular economy and Artificial Intelligence.

² The information presented in the table refers to entity-specific disclosures

³ The same worker may have attended several training sessions

- **Millennium Leader Programme** - Aimed at developing competence for leaders from all hierarchies of the Bank, with modules on Diversity and Inclusion, Servant Leadership and Problem Solving;
- **inGenious Programme** - Training for young talent in strategic areas such as technology and finance;
- **Digital Academy** - Focus on digital reskilling and upskilling, with training activities on technology and digital topics (artificial intelligence, DORA).
- **Inclusion training** - *Vencer no Mundo do Trabalho* (Winning in the World of Work) training sessions, promoted in the context of NOVA SBE's Inclusive Community Forum (ICF), with the aim of improving the social skills and employability of people with disabilities, involving both trainees and the technicians who accompany them;
- **Competition Law** - In October 2024, MBA made the updated version of the "Competition Law" e-learning course available to all the Bank's employees. This training is intended to help disseminate the rules applicable to the financial system in terms of competition. By 31 December 2024, 5,746 employees had completed the course, corresponding to 5,746 hours of training.
- **Human Rights training** - Ongoing training programmes covering human rights issues.

Training in Human Rights, Ethics and Sustainability

	Employees	Time
Human Rights	3 182	9 954
Ethics and Conduct	3 078	3 746
Sustainability	5 984	36 475
Total	12 244	50 175

In addition to the above-mentioned programmes, the Bank has ensured the ongoing training of its employees in accordance with regulatory requirements:

- **Annual renewal of the MiFID II** - Provision of Information certification, corresponding to the PRIIPs - Impact of Regulations on Information and Marketing Duties, Structured Products, IPF Module 1-Different Financial Instruments, Transaction Costs and Applicable Taxation, IPF Module 2-Main Risks of Financial Instruments, IPF Module 3-Notions of Valuation of Financial Instruments, with an estimated training time of 20 hours. As for the annual renewal of the MiFID II - Investment Consultancy Certification, it corresponded to the same courses chosen for the provision of information, plus Sustainability Reporting - SFDR and CSRD: vision of sustainability reporting, Sustainable Finance Disclosure Regulation (SFDR), Corporate Sustainability Reporting Directive (CSRD), Other sustainability reporting, Recent Changes, Challenges and Trends within the scope of Financial Intermediation Activity, with an estimated training time of 30 hours;
- **Credit Certification** - Mandatory training in Mortgage Credit and Credit Intermediation Certifications, in accordance with Decree-Law No. 74-A/2017 of 23 June and Decree-Law No. 81-C/2017 of 7 July, respectively;
- **Insurance Certification** - Complying with Regulatory Standard No. 6/2019 of 3 September;
- **Euro banknote and coin knowledge course;**
- **Duties of Assistance and Information to Consumers in Mortgage Credit;**
- **Prevention of Money Laundering and Terrorist Financing;**
- **Prevention of Corruption Risks and Related Offences**

Employees trained

Attendance at training sessions	2024	2023	2022	Var.% 24/23
Activity in Portugal	25 556	10 244	18 866	149.5%
international Activity	17 036	65 295	45 816	-73.9%
TOTAL	45 592	75 539	64 682	-39.6%

Duties of Assistance and Information to Consumers in Mortgage Credit

In Poland, training at Bank Millennium is an important part of daily activity and is treated as an investment in human capital and as activities that boost employees' professional development. To this end, the activities carried out in this area include components such as: i) continuously improving our training programmes and our training offers to be in line with the latest trends and best practices in the market; ii) creating a commitment to employees by investing in their professional development; iii) offering a wide range of training programmes ranging from technical training to soft skills training; iv) using an e-learning platform to allow employees to learn at the time and place of their choice.

The programmes delivered in 2024 include:

- **M#leaders** - Completion of another edition of the M#leaders leadership skills improvement programme.
- **ESG training** - A webinar training course was held for all employees, covering ESG issues. During the training, participants learnt about basic ESG issues, the impact of sustainability on the financial sector and the applicable EU regulations. The training also addressed issues related to sustainable financing, greenwashing and greenhouse gas emissions.
- **Green Academy** - The Green Academy is an in-house development programme for corporate banking consultants, which aims to increase their skills and support the development of the green financing programme, in line with the bank's ESG strategy.

The knowledge and skills in areas relevant to the business of sustainability, from a business perspective, make it possible to actively support companies in implementing "green" investments, enabling them to deploy and develop long-term transition strategies with significant participation from the Bank.

In addition, comprehensive training is regularly given to specific groups of employees in all lines of business, for example: training for employees in branches and franchising networks; training for employees in Direct Banking, Corporate Banking, Affluent Customers and those selling insurance products; development training for regional managers.

In Mozambique, 2024 will mark the 7th year of activity for the Millennium bim Academy (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. The year was marked by a commitment to operational rigour, through mandatory training in subjects such as the 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 behavioural 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 1,100 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 this initial training, the following topics stand out: Operational Rigour; Products and Services, Excellence in Customer Service, as well as training in the collaborative tools essential for carrying out their daily work.

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

Career Development Programmes

As well as investing in training and skills development, the Bank has invested in accompanying young talent in a close and personalised way, reflected in various dimensions.

Firstly, it has a careful onboarding process from a communication point of view, from the selection process to 24 months of seniority at the Bank, allowing for a positive and consistent work experience.

Employees and trainees with the greatest potential are accompanied by their Human Resources Manager on a regular and systematic basis, which involves regular individual meetings during the first two years within the organisation, allowing expectations to be aligned and providing a faster and more successful integration.

The figure and function of the Patron is strongly rooted in Millennium bcp's culture, with the aim of being a reference figure and a source of inspiration for the employee, who can share their vision and help them learn more about the Bank's main challenges, facilitating their growth over the first 5 years of their career.

In Portugal, it is an example of a training action under the inGenious Programme, which impacted 81 participants in this edition;

Performance evaluation

In Portugal, the performance evaluation cycle (*MDesempenho*), which concluded in 2024, continues to receive a good level of appreciation from the vast majority of those involved, evaluators and evaluated, evident in the satisfaction rates with the process.

In addition to the Recognition Awards listed below, which have a significant impact on the motivation and visibility of the best performing Employees, at the end of 2024 the Bank carried out another edition of the Organisational Climate Survey. This survey is extremely important for both the Bank and the Employees, as it provides an insight into the current situation, reinforces strengths and identifies areas for improvement. The excellent response rate (88.3%) to the survey and the increase in comments compared to the previous year show a high level of employee involvement and interest in contributing to the company's development.

The survey results revealed very favourable indicators in the dimensions of leadership and level of commitment to the Bank, reflecting the effectiveness of current strategies. It should be noted that divisions with more modest results were challenged to draw up action plans with specific initiatives to address feedback from teams. This process is crucial to ensuring that all areas of the Bank continually evolve and improve, promoting a better and more productive working environment for everyone.

	Evaluators	Evaluated
Total Responses	789	4 006
Very satisfied	34.00%	28.6%
Satisfied	51.80%	48.43%

Employees with performance evaluations – BCP Group

	2024	%
Men	6 610	94%
Women	7 814	91%
Total	14 424	92%

Excellent performance is incentivised and rewarded in different ways, such as merit-based promotions, distribution of commercial incentives and the attribution of annual variable remuneration. These recognitions are granted taking into account the balance between valuing individual performance, rewarding exceptional results and adapting to a sustainable risk profile, both now and in the future.

The identification of employees to be rewarded is based on performance evaluations or widely known commercial objectives, following transparent criteria that guarantee alignment with the Bank's strategy.

The Commercial Incentive Scheme is aimed at employees in the Commercial Networks (Retail, Private Banking, Companies, Corporate, Large Corporate, ActivoBank and Investment Banking), as well as employees in other Divisions of the Bank who meet the criteria indicated (Treasury Markets & International, Credit Recovery - Retail and Specialised, Specialised Credit and Real Estate - property sales and commercial teams supporting the existing Networks in the Marketing Divisions) and consists of attributing a variable remuneration based on an above-expected contribution to results.

The culture of meritocracy is one of the pillars of people management in the Group. As challenges become more demanding, there is a growing need to recognise the commitment, dedication and results achieved by employees and teams. The performance evaluation system, which measures the employee's annual performance in relation to the established objectives, is the basis for highlighting each person's level of performance and accurately identifying the suitability of promotions and other forms of recognition for those with above-average results.

In addition to the incentive systems of the business areas, associated with financial performance, and the variable remuneration applied to the central areas, Millennium bcp maintains a transversal recognition programme - Millennium People. In 2024, as part of the programme's annual categories, awards were given:

- 15 employees in the Millennium Leader category;
- 8 employees in the Millennium Impact category;
- 69 employees in the Millennium Excellence category;
- 1 employee in the Millennium Trainer category.

Millennium Leader - This category recognises leaders who stand out for their skills and for disseminating effective management practices. The selection of winners is based on performance and the results of the Climate questionnaire.

Millennium Impact - Honours first and second level employees who have led projects or teams that have made a significant contribution to the bank's success. The selection is made by the Executive Committee.

Millennium Excellence - This category recognises employees who have made exceptional contributions and had a significant impact on the results of their teams. Selection is made by the Coordinating Manager, and those eligible are those with top performance evaluations in the last two years.

Millennium Trainer - Recognises employees who stand out as trainers at the Millennium Banking Academy, contributing to the sharing of knowledge and good practices. The three trainers with the best evaluations by the trainees are honoured.

S1-14 - Health and safety metrics

BCP Group provides a workplace 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) visits to the premises, so as to find and correct problems. During 2024, the Group carried out 213 visits and 14 air quality tests. At the Bank, the health and safety management system, based on legal requirements, covers 100% of the workforce.

Health and safety metrics

	2024			
	MZ	PL	PT	Total
No. of deaths due to work-related injuries	0	0	0	0
No. of accidents at work recorded	5	28	17	50
Accident rate	0.94	2.57	1.66	1.89
No. of days lost due to injuries and deaths	61	545	870	1,476

Also in this context, in Portugal, 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 the Bank in Portugal and the applicable legal and regulatory context, but also good practices of voluntary implementation.

Training related to health, hygiene and safety at work, which is periodic and mandatory for all employees, covered 1,019 employees in 2024, totalling 1,780.8 hours. The increase in the number of participants/hours compared to 2023 stems from the fact that last year employees had access to more training on new platforms that allow more generalised access. It was also a year in which investment was made in updating knowledge on this subject, with several training initiatives carried out across all BCP Group operations. In Portugal, for example, special emphasis was given to specific training on first-response firefighting measures, which covered 157 employees.



S1-16 - Remuneration metrics

The BCP Group ensures fair treatment and equal opportunities for its Employees, promoting meritocracy at all stages of their professional career and defining their remuneration according to their category and degree of fulfilment of the established objectives and the 1:1 salary ratio between men and women with comparable functions, levels of responsibility and career paths.

Salary disparity

	2024			
	MZ	PL	PT	Group
Annual salary gap (W/M)	37.4%	30.4%	24%	33.8%

In 2024, the total annual remuneration ratio⁴ was 28 in Mozambique, 38 in Poland, and 19 in Portugal. The BCP Group remains committed to promoting a fair and transparent salary structure, strengthening practices that encourage equity and the professional growth of its employees.

The methodologies and assumptions considered for the collection and consolidation of quantitative information are duly reported in the Methodological Notes section.

S1-17 - Incidents, complaints and serious impacts and incidents of human rights violations

In 2024, the BCP Group, which voluntarily conducts regular self-assessment processes on human rights matters in its main geographies, did not identify any work-related complaints or incidents of discrimination, including harassment. Consequently, it was not necessary to pay any fines, penalties or compensation for damages resulting from such complaints or violations. Nor has the Bank recorded any incidents of human rights violations (such as forced labour or child labour). No sanctions, fines or damages related to human rights violations have been imposed on the Bank.

⁴ Consolidated information unavailable. Necessary efforts will be made to ensure the reliability of this metric in the next Sustainability Report.

ESRS S4 – Consumers and end users

Strategy

ESRS 2 SBM-2 - Stakeholders' interests and points of view

For the Bank, consumers and end users are important to its strategy and business model, as its ability to generate value depends on its proximity to and involvement with those who use its services (more information in ESRS 2 SBM-2 - Stakeholders' interests and points of view).

To ensure that their needs and expectations are heard and incorporated, BCP uses various participation mechanisms, such as surveys, consultations and feedback systems, whose information is analysed and used to define improvements, mitigate impacts and determine opportunities for improvements. In this way, consumers directly influence the Bank's strategy and offer, enabling the development of more sustainable financial products, accessible digital platforms and services adapted to vulnerable groups.

Committed to protecting consumer rights, the Group applies its Code of Conduct in all its operations, guaranteeing responsible, ethical and inclusive service. The security and privacy of user data is also a priority, driving continuous investment in cybersecurity and ensuring strict compliance with GDPR standards. Ethical marketing initiatives and financial education programmes are also promoted, especially aimed at Customers at greater risk of financial exclusion. In addition, recognising the growing demand for sustainable solutions, the Bank has been driving the expansion of green financing initiatives, which align the company's offers with sustainability goals.

This approach, focussed on the interests of consumers and end users, allows for the creation of long-term value, strengthening the bank's reputation and credibility in the market.

ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with the strategy and business model

The material impacts, risks and opportunities identified are integrated into the company's strategy and business model, resulting in 7 IRO ESRS (more information in IRO-1 - Description of the process for identifying and assessing material impacts, risks and opportunities).



Among the main negative impacts were (i) issues related to privacy, due to breaches and the lack of protection of customer data, (ii) the increase in student debt due to education loans, and (iii) the potential failure to respond correctly to customers' needs, which is why the Bank actively implements efforts to ensure the monitoring and continuous improvement of IT and information management processes and regulatory compliance applicable to the sector on the transparency of the products and services offered. At the same time, there are significant positive impacts associated with (i) non-discrimination and (ii) better adaptation of customer service, as a result of the implementation of policies, employee training on these issues and on information security, and satisfaction surveys that make it possible to analyse the profiles of the various types of customers in order to continuously improve the products and services provided. With regard to the risks intrinsic to its activity, the Bank may be subject to public and regulatory scrutiny, related to the need for transparency, access to quality information and inadequate marketing communications.

These factors guide strategic adaptation, promoting investments in cybersecurity, data governance and inclusive digital tools. In addition, there are opportunities in creating accessible financial products for vulnerable groups, strengthening inclusion and expanding the market.

The materiality analysis did not identify intrinsically harmful products, but indicated indirect risks, such as excessive indebtedness, reinforcing the need for responsible credit practices. Regulations such as the GDPR require robust data protection measures, while transparency in product communication prevents harmful financial decisions.

Vulnerable groups, such as students or the elderly, face specific risks, including digital exclusion and inappropriate marketing. To mitigate negative impacts and maximise opportunities, the Bank invests in financial literacy, inclusive products and feedback mechanisms.

Finally, sustainability-conscious consumers drive the expansion of green finance, while the development of accessible platforms responds to the needs of less experienced users. By incorporating these risks and opportunities, the Bank strengthens its resilience, customer confidence and competitive advantage.

This information is analysed in more detail in the following sections.

Managing impacts, risks and opportunities

S4-1 - Policies related to consumers and end users

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. To regulate this set of principles and objectives, the BCP Group has prepared several internal policies and guidelines to support the management of the material impacts, risks and opportunities associated with the Bank's Customers.

These policies apply to the Group in the various geographies and to all the Bank's employees and are used in day-to-day operations as a basis for dealing with Customer issues. They also apply across the board to all the Bank's products and services, and consequently to all its customers, both individuals and legal entities. The Executive Committee is responsible for ensuring that the policies are implemented in the Bank's operations.

In addition to the policies listed, the Code of Conduct also establishes a commitment to acting with integrity and honesty in all established relationships, including with customers, and the Diversity and Equal Opportunities Policy promotes respect, non-discrimination and equal treatment (more information in S1-1 - Policies related to in-house workforce).



* Each geography has its own Policy, complying with the respective context and applicable national legislation.

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

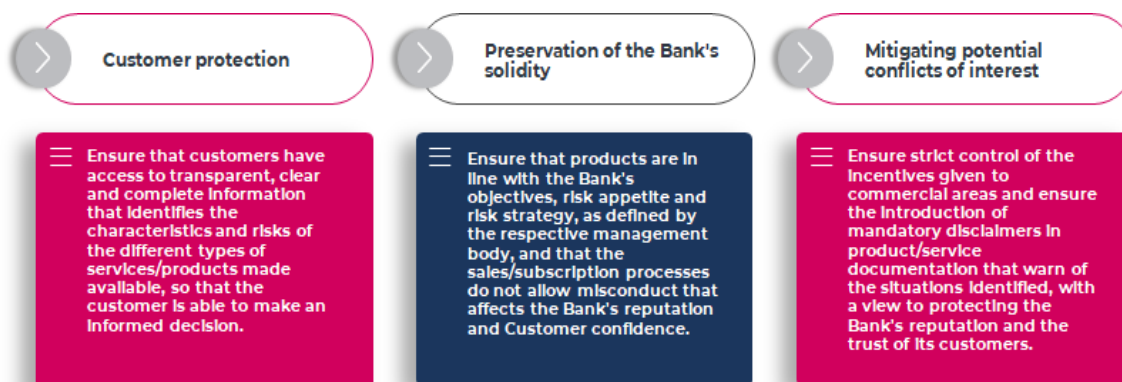
Article 26 of the **Code of Conduct** provides for the protection of customers' assets, defining that the Group must ensure, through all the legal and regulatory instruments at its disposal, the protection of assets entrusted to it for management or custody, and that instructions received from customers and requested by them must be carried out with respect for the safeguarding of their assets, within the constraints imposed on the exercise of financial intermediation activity and executed with diligence, rigour and transparency.

The Policy for the Approval of New Products, 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.

The Process for the Approval of New Products (PANP) covers the process of preparing, approving and launching new products and significantly altering products currently on the market and in demand, with the main objectives being:

- Promote best practices in the management and control of risks associated with the launch and marketing of new products and services at the Bank, ensuring that the process is carried out with the appropriate analyses, assessments and operating procedures and that the products and services marketed have their risks duly identified, eliminated or mitigated;
- Promote a culture of compliance with the duties of satisfying the Customer's needs and rights 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;
- 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.
- Ensuring that products comply with the rules and recommendations of supervisory and regulatory entities;
- Ensure that the assumptions regarding the Bank, the Customer, the market or the regulation that led to the approval remain unchanged throughout the marketing period.

This process of development of products and services, formalised in a specific service order, should be subject 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 currently on the market, guaranteeing:



With regard to the processes for the approval of new investment products consisting of securities or whose remuneration is dependent on the variation of securities, the Bank ensures that the securities in question do not contradict the principles of responsible financing, in order to prevent the new products from financing, investing in or being associated with projects or companies whose main activity is carried out in excluded or restricted sectors.

All the investment products that make up the Bank's distribution offer, namely investment funds, financial insurance and certificates, are classified in accordance with the provisions of the SFDR, making it easy to understand which investment products contain transparent pre-contractual information regarding: the integration of sustainability risks or an explanation as to why they are not relevant (Article 6 of the SFDR); the promotion of environmental or social characteristics, not having sustainable investment as their main objective (Article 8 of the SFDR); and the main objective of sustainable investment (Article 9 of the SFDR).

Credit Risk Policies

The principles and guidelines regarding the credit activity carried out by the BCP Group's financial institutions 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 rigour, reflected in the overall attitudes and behaviour of all employees involved in credit risk

management, aimed at ensuring that credit is granted to borrowers who meet the criteria defined in the aforementioned code, guaranteeing good capital management in line with profitability and sustainability targets.

Of particular note are transactions with Related Parties, regulated according to the applicable regulations (including Banco de Portugal Notice 3/2020 and the Legal Framework for Credit Institutions and Financial Companies), which require a specific approval procedure and the guarantee of compliance with legally defined contractual prices and conditions.

With the aim of complying with the applicable regulatory requirements and the guidelines issued by national and European institutions, the Bank's internal regulations establish the guiding principles, rules and decision-making competences for the BCP Group's process of granting, monitoring and recovering credit, in its activity in Portugal and Macau. As a result, the requirements and procedures specifically applicable to each loan grant 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.

When assigning the Customer's Credit Strategy, in addition to factors intrinsic to the Customer, more transversal factors are taken into account, such as the assessment of sector risk and ESG impacts. Proposals for medium and long-term loans to Customers who, under the terms of the rating rules in force, must have a risk rating assigned by the Rating Division (RATD), must be accompanied by a business plan for the individual companies and/or the economic group they belong to, as well as information that makes it possible to assess the respective ESG rating, and/or the ESG risks that result from the nature of the business, namely in financing such as short-term loans, equipment or property leasing, property development and investment loans, commercial paper and bond loans.

In 2024, the Group code dedicated to the principles of management and control of environmental, corporate and governance risks (ESG Management and Control Principles - GR0047) was revised, which provides for the BCP Group's ESG management model according to the three lines of defence model and the responsibilities of the different bodies and committees involved. With regard to credit risk policies, GR0047 integrates sustainability principles into all stages of the credit granting and monitoring process, especially considering climate and environmental risks:

- The 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;
- The implementation of adequate due diligence to understand Customers' vulnerabilities before granting credit;
- The consideration of ESG risk factors in credit analyses and assessments;
- The incorporation of a promotional pricing policy based on criteria established by BCP's Green Taxonomy;
- The internal ESG risk analysis process is part of the ordinary credit risk analysis process to which large companies are subject.

In the **ESG Management and Control Principles**, the ESG risk integration model, within the scope of the credit granting process and involving the RATD, the Credit Division and the Risk Office, promotes the involvement of Customers in sharing data on climate, environmental and social aspects related to their activity, by standardising questionnaires addressed to them and automatically screening the data collected to obtain ESG scores that reflect companies' exposure and vulnerability to risk factors, filtering out customers and transactions that require 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.

The Group code that sets out the Principles of Risk Management and Control was also revised in 2024 in order to densify the component of physical and transition risks considered within the scope of the risk appetite statement (RAS), based on the sector of activity of the Customer companies, the location of their headquarters, in the intermediate scenario RCP 4.5 (Representative Concentration Pathway) or the energy certification of the properties pledged as collateral, in accordance with the Energy Performance of Buildings Directive.

Policies for the management of conflicts of interest

In the Code of Conduct, the issue related to conflicts of interest involving customers is addressed in Article 27, which defines that the BCP Group: (i) organises itself in such a way as to identify potential conflicts of interest and to act in order to avoid or reduce, to a minimum, the risk of their occurrence; (ii) in the event of conflicts of interest, it must act to ensure transparent

and equitable handling of customers, attributing precedence, under the terms of the applicable legal and regulatory provisions, to the interests of its customers in accordance with the approved conflict of interest policy.

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 may occur within the scope of the Bank or any entity directly or indirectly controlled by it, which is part of the BCP Group, are defined. This Group Code implements in the BCP Group the guidelines issued by the European Banking Authority on governance and other applicable regulations in force, formalising the governance principles applicable to the provision of investment services and activities and complementary services identified in Articles 290 and 291 of the Securities Code. In addition, it identifies the control process that allows for an effective and prudent management of situations of conflict of interest, at an institutional or personal level, including the segregation of duties, information barriers and the specific decision-making process on transactions with Related Parties, in order to simultaneously defend the interests of all stakeholders and the interests of the Bank and the BCP Group. In addition, it sets the structure of responsibilities within the scope of the identification and management of conflicts of interest, the involvement and responsibilities of internal control functions and the regular report 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 Companies, 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 subsidiaries of the BCP Group, of the information necessary to comply with the reporting obligations arising from IAS 24, complying with 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, the acquisition of goods or the contracting of services related to the management and supervisory bodies of the Group's credit institutions or with holders of a qualifying holding equal to or greater than 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 competencies assigned to each division, as well as the interactions necessary to ensure adequate regulatory compliance.

Privacy Policy

The BCP Group considers it essential that its stakeholders know their rights regarding the protection of their personal data and the way in which the Bank processes them. The main instrument of this exercise is the **Privacy Policy**, publicly available on the website, which reflects the Bank's commitment to: (i) communicate, in a transparent manner, about the personal data it processes and under what conditions it does so; (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 process of processing personal data, whose rules are defined by the policy, allows, among other purposes, the development and direct marketing of products and services, with a view to better adapting the communications addressed to each customer. For this purpose, using mathematical and statistical models, the personal data generated by the use of the Bank's products and/or services are processed, with the aim of assessing customers profile and building consumption patterns based on their transactions in any of the Bank's channels. Thus, the customers propensity towards such products and/or services, and others of a similar nature, is determined, with the aim of personalising the offers communicated to them according to their preferences, in the context of the financial activity and insurance mediation that the Bank pursues.

While only employees with the proper authorisations have access to customers' private data, everyone is responsible for complying with the Privacy Policy.

Policy for the Management and Processing of Complaints

The Bank treats as a "Complaint" any and all disagreements received from customers in the provision, deficient provision, or non-provision of a service, or when the conditions resulting from the sale of a product occur, in their opinion, situations that do not respect what was previously agreed, do not correspond to their wishes or expectations, or do not respect the applicable legal or regulatory standards.

In this sense, the Policy for the Management and Processing of Complaints was developed, which establishes all the available complaints communication channels (Millennium bcp or branch, contact and customer service centres, Client's Ombudsman Office), the entities to which they can be addressed and also the processes for handling, deciding and communicating the response to the complaint submitted, confidentiality and legal compliance being always ensured during these procedures. The process conclusion is always communicated to the complainant, in person or by email, letter or other communication

channel. The Policy is made available for consultation by customers and non-customers at the branches, when requested, and publicly through the www.millenniumbcp.pt website and the Bank's App.

Human Rights Policy

The Bank assumes responsibility for the fulfilment of human rights and is committed to implementing solutions that mitigate negative impacts that may cause or contribute.

Through its Human Rights Policy, the Bank is committed to promoting respect for human rights in the relationships it establishes with its customers, ensuring access to financial products and services designed to foster social inclusion and non-discrimination and to be adjusted to the characteristics and needs of each customer. As such, the Group implements policies and procedures that ensure adequate knowledge of its customers' profiles, compliance with applicable legal requirements, communication and resolution of irregularities and the guarantee of privacy, confidentiality and data security. The BCP Group also ensures that all its customers are treated fairly and respectfully, and discrimination based on ancestry, sex, sexual orientation, family situation, nationality, ethnic origin, religion, social condition, political beliefs, physical limitation or disability is not allowed (more information in S1-1 – Policies related to in-house workforce).

The Bank, which carries out regular self-assessment processes on Human Rights matters in its main geographies under the terms of a dedicated Standard of Procedures, ensures the alignment of the Human Rights Policy with the main international references, principles and commitments in this area, including the United Nations Universal Declaration of Human Rights, the Conventions of the International Labour Organisation (ILO) on fundamental principles and rights at work, and the Guidelines of the Organisation for Economic Co-operation and Development (OECD), with no situations of non-compliance with these references having been recorded in 2024.

S4-2 - Processes for engaging with consumers and final users on impacts

Dialogue with customers

The BCP Group regularly interacts with its customers through daily business processes, either through branches or in digital format, for example, by applying surveys, during customer service, through communication/complaint channels, among others (more information in SBM-2 – Stakeholders' interests and points of view). In order to respond to the needs of its customers in the development of new products or in the modification of existing ones, the Bank also monitors customer satisfaction with the products made available through the evolution of sales and complaints made.

In Portugal, for individual customers, there are several forums for monitoring customer feedback. One of these forums is customer satisfaction surveys and studies, keeping the Bank committed to the "Experience Evaluation" model of its consumers and final users. Within 24 hours of interacting with the Bank, the customer is invited to answer a brief questionnaire that aims to assess their satisfaction with their experience and the respective recommendation degree. Subsequently, the results are assessed according to several criteria. In the case of Millennium bcp, the NPS (Net Promoter Score) indicator of Marktest's BASEF Study is analysed, which translates the level of Recommendation of the Bank by its customers. In 2024, there was a very positive evolution, reaching an overall value in Portugal of 72.8 NPS points, with greater emphasis on Customised Management platforms, surpassing the values recorded in previous years:

- In the case of Prestige Customers, there was an increase to 65.1 NPS points, 5.5 points more than in 2023. This figure includes Prestige Customers of the "Physical" Network, which recorded a value of 67.3 NPS points (5.9 points more than in 2023) and Prestige "Direct" Customers with remote management who recorded an increase to 60.0 NPS points (5.7 points more than in 2023);
- In Business Customers, there was an increase to 69.1 NPS points (4.6 points more than in 2023);
- In the Mass Market Customers segment, there was also an increase in NPS by 2.7 points, to a value of 76.6 NPS points.

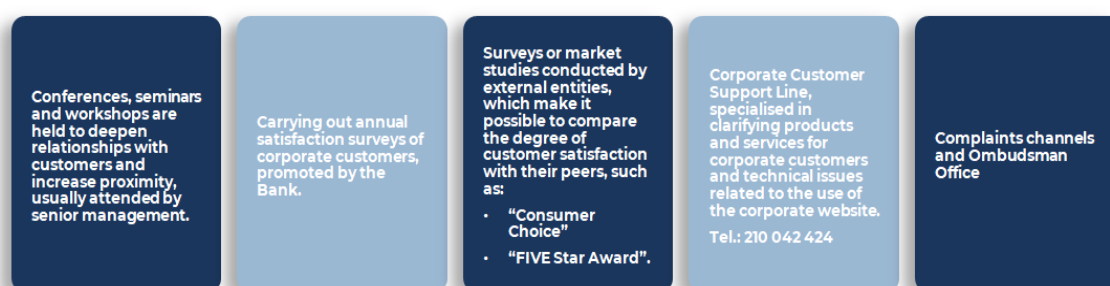
In addition to the Bank's Recommendation, the Recommendation of the Service provided by the Employee/Manager is also analysed, which, in the same way, reached the highest value ever this year, 87.7 points, considering more than 146,000 customer experiences. Thus, in 2024, Millennium bcp will once again reach the first place in the ranking, in both indicators, of the five largest banks operating in Portugal, positioning itself at a level of excellence. Millennium bcp continues to assess

other customer experiences on a recurring basis, namely: the opening of Individuals, Companies and On-line accounts; the management of complaints; the interaction with the Contact Centre; the Customer Service of the Portuguese Diaspora; Home Loan in its several aspects; the moment of account closure in order to determine the reasons for abandonment; the use of Millennium Transaction Machines (MTM); and the 1st Anniversary of the various Integrated Solutions.

In Portugal, this year, 42 surveys were carried out, with different methodologies, to monitor customer satisfaction with the several Direct Channels and Business Networks, translating into more than 257,000 experiences with Millennium bcp evaluated by customers. It is through this monitoring that the Bank gains visibility into whether it is ensuring the quality of its services and responding to the needs of its customers. As such, given its importance, the Bank integrates a Customer Experience Indicator (CEI) into the Incentive System (SIR) of its employees to monitor their performance and measure the quality of customer service in the various branches, awarding quarterly prizes and recognition seals to those who reach the highest levels.

The Bank also launched the Sustainability Questionnaire (QESG) for customers using investment services. In 2024, this questionnaire was improved, with the aim of increasing the granularity of information on investors' sustainability preferences, aiming to match the preferences expressed with the more densified information on products disclosed by the respective producers. The QESG continues to evolve to meet the expectations of the supervisor, the market and investors.

At the level of corporate customers, in addition to the regular working meetings with the Customer Managers, which follow a specific planning and schedule, other communication channels are used, namely:



The planning of meetings with customers, and their objectives, are defined quarterly by the Marketing Division, in alignment with the Coordination Divisions and the Business Commission. The regularity of meetings aims to strengthen relationships, trust and loyalty, increase customer satisfaction through customised support, retain more customers and identify new business opportunities and customer needs.

After the meetings, reports of the business meetings with customers are carried out, along with satisfaction surveys and measurements of the number of meetings of the Commercial Teams with the Corporate Customers. Through this information, regular reports are made, to be disseminated to the commercial areas for the implementation of the necessary actions, and the indicators for monitoring the satisfaction of Corporate Customers are regularly analysed, from which action plans also arise.

Within the scope of remote communication channels with its Corporate Customers, Millennium bcp maintained its corporate satisfaction rates with these channels at high levels, namely, 85.6% of user Customers responded to be satisfied or very satisfied with "Internet Banking – Corporate" and 78.3% with "Corporate Mobile Banking".

S4-3 - Processes to correct negative impacts and channels for consumers and final users to express their concerns

The BCP Group guides its performance by excellence in the exercise of its activity. Notwithstanding, and bearing in mind that unexpected events may sometimes lead to dissatisfaction on the part of some customers, the Group is committed to providing timely, fair and effective solutions when it identifies a potential negative impact on consumers and final users. The complaint resolution process follows industry best practices and regulatory guidelines, ensuring transparency and accountability. Key elements of BCP Group's approach include:



Within the scope of complaints received about products or services, the BCP Group assumes as a priority the continuous improvement of its management in the different geographies of the Group, either by optimisation, simplification and streamlining of response processes, or by regularly assessing and monitoring the satisfaction of complainants with the resolution presented, through a survey and performance indicators. The Bank also actively ensures that its customers are aware of and can trust its complaint management and handling processes. The identification and characterisation of the causes of complaints with a view to their correction, the carrying out of audits of the management and handling processes of complaints, the carrying out of training actions for employees who are in contact with customers, the continuous improvement of communication, including on the rights and complaint mechanisms available, and the performance of employees guided by the Group policies and principles of the non-discrimination/unfavourable processing of complainants, are part of the Bank's unequivocal orientation towards customer service.

Complaints can be submitted by customers through multiple channels provided by the Bank, ensuring accessibility and ease of use, such as: institutional website; customer service direct lines (e.g. via telephone call); e-mail; online dispute resolution platforms in the case of Millennium bim; complaint books at the branches; or through complaints sent through Central Banks (more information in S4-1 – Policies related to consumers and final users). The Bank seeks to respond to complaints as timely as possible, always ensuring compliance with the periods defined by law.

Issues related to complaints are closely monitored, and plans can even be developed to improve the effectiveness and quality of the actions to be taken in the short and medium term, not only in terms of internal procedures, but also in terms of responses to customer complaints, and these plans are presented at the Audit Committee. Director on a monthly basis and is also regularly presented to the Retail Commission.

Complaints

	2022	2023	2024	Var. 24/23
Complaints registered				
Activity in Portugal	66 557	69 234	76 624	10.7%
International activity	135 271	153 938	191 998	24.7%
Complaints solved				
Activity in Portugal	42 859	53 821	46 321	11.7%
International Activity ⁽¹⁾	132 323	132 323	188 933	30.4%

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

In Portugal, the number of complaints increased by 10.7% in 2024 compared to the previous year, with a total of 76,624 complaints (69,234 in 2023), mainly due to card-related issues (about 80% of the total complaints submitted), in particular about the acquisition of products and services through digital channels. Despite this increase, it was possible to maintain the average resolution time at 4 days, due to the Bank's constant effort to resolve complaints submitted by customers as quickly as possible.

Millennium bcp customers may also submit complaints about actions or omissions of the Bank's bodies and employees to the Client's Ombudsman, a body independent of the Bank's hierarchical structures, which carries out its actions in accordance with its own Regulations, defending and promoting the rights, guarantees and legitimate interests of Millennium bcp's customers. All complaints addressed to the Client's Ombudsman are, in the first instance, forwarded to the Bank's own bodies

for resolution, and it is the exclusive competence of the Client's Ombudsman to analyse and give the final opinion to complaints received within the scope of previous unfavourable decisions presented by customers.

Client's Ombudsman

Activity in Portugal	2022	2023	2024	Var. 24/23
Recorded complaints	2 838	2 802	2 751	-1.8%
Complaints	2 745	2 695	2 664	-1.1%
Requests*	93	-	-	-
New complaints	80	107	87	-18.7%
Concluded	78	105	88	-16.2%
Upheld	11	5	8	60.0%
Not upheld	67	100	80	-20.0%
Average Response Time (days)	6	5	9	80.0%

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

Thus, looking at the activity carried out in 2024, the Client's Ombudsman appraised 2,751 interpellations (2,802 in 2023), which represent, in cumulative and year-on-year terms, a reduction of 1.8% compared to 2023. 2,664 complaints and 87 appeals were appraised and forwarded to the Customer Service Centre, responsible for ensuring the analysis and final response to complainants, which, by their nature, were analysed and responded to by the Client's Ombudsman Office.

From a financial product/service perspective, this year the matters that raised the highest number of interpellations from customers were related to issues about current accounts (33% vs 26% in 2023), with the main topics being maintenance (e.g., data update and accounts blocking) and cards (13% vs 16% in 2023), with a focus on fraud situations. When assessing the targeted business networks, the most representative is Retail, with 77% of the exposures presented, followed by ActivoBank with 18%.

As part of the requests usually received from the Portuguese Association for Consumer Protection (DECO), in 2024, 11 inquiries were addressed to the Bank on the most diverse topics, a reduction of 68% compared to 2023, with an average response time of 4 days, a figure that also decreases by half compared to last year.

S4-4 – Adoption of measures on significant impacts on consumers and final users, and approaches to manage material risks and seek material opportunities related to consumers and final users, and effectiveness of such actions

The BCP Group recognises that the implementation of social and environmental criteria and standards in the commercial offer translates into more effective risk management, reputation value and a better quality of the products and services made available to its customers. In this way, it manages to meet the needs and pretensions of a market increasingly concerned with sustainability.

In the context of banking products and services, namely in the granting of credit for environmental purposes to individuals or companies, the Bank has started to ensure that both the pre-contractual process and the contractual documents provide for the collection of information on the borrower's sustainable objectives and how the funds are used for environmentally sustainable activities. In order to ensure the applicability of the products offered, it is necessary to present documents proving the suitability and allocation of the funds for the respective proposed objectives, and all operations must meet the pre-defined eligibility criteria for this purpose.

In 2024, the Group did not record cases of human rights violations related to consumers and final users.

Support to Corporate Customers

In Portugal, continuing the work implemented during the Portugal 2020 community framework, in 2024, Millennium bcp developed several initiatives to proliferate practical information and share knowledge, with its customers and stakeholders (through informative emails, clarification sessions and meetings), on the investment support opportunities arising from the Recovery and Resilience Plan (RRP) and the Community Framework Portugal 2030. It should be noted that investments supported by EU funds have as a cross-cutting concern the minimisation of environmental impact, being, in certain cases, specifically and directly aimed at this purpose (e.g., in the case of support for the de-carbonisation of industry).

In this context, Millennium bcp has a specialised team dedicated to the permanent monitoring of the financial needs of customers' projects in the implementation phase, also organising events to promote and clarify customers, of which the "Millennium Talks" and "Volta a Portugal 2030" initiatives stand out. This team participated in several events on sustainability, organised 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, Portuguese Leasing Association (ALF), Factoring and Renting, among others.

Millennium bcp is a pioneer bank in the intermediation of financial instruments to support economic agents, from national and European government entities. As such, it provides its Corporate Customers with specific Credit Lines to support the Energy Transition, the social sector and Entrepreneurship, namely:



At the same time, Millennium bcp also provides Sustainable Credit solutions, such as:

- **Leasing and Green ALD Car** – This solution includes special pricing conditions to boost its commercialisation. In 2024, several initiatives were developed aimed at simplifying operations, implementing processes that facilitate access to information and improve the service level provided to customers (879 operations carried out in the amount of 40,351 thousand euros).
- **Green Real Estate Development Credit** - Through this solution, Millennium bcp supported sustainable/green projects with international BREEAM or LEED certifications, as well as affordable housing projects, under the Housing at Controlled Costs regime, and projects with a sustainable approach that lies mainly in the energy efficiency of the installed systems (portfolio operation in the amount of 58,117 thousand euros).

In Mozambique, Millennium bim provides several Credit Lines to support companies, including:

- **KFW Credit Line** – Made available in partnership with the German Development Bank, this fund is aimed at Micro, Small and Medium Enterprises (MSMEs), and comes in two forms: a generic fund, made available with the aim of financing investments to improve their productivity and competitiveness and to generate employment; and a specific fund for the agricultural sector intended to finance investments to improve the sector's productivity.
- **FECOP Calamities Credit Line** - Created within the scope of cooperation between the Government of the Portuguese Republic, the Government of the Republic of Mozambique and the Mozambican Association of Banks, it is intended to finance investment projects and operations to support the treasury of Mozambican micro, small and medium-sized enterprises in the regions affected by the natural disasters decreed by the Government.
- **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.

Microcredit

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 supporting Microcredit projects, with lines with European guarantees available, namely from the European Investment Fund and a credit line with protocols with national guarantees, through the Microinveste Programme, the Support Line for Entrepreneurship and Own Job Creation.

In 2024, there was an increase in the amount of credit granted compared to the previous year, as a result of the Bank's decision to increase the maximum amount in this type of financing and the good performance of the economy. 615 thousand euros of credit were financed, regarding 18 projects, which correspond to the creation of 34 jobs.

Millennium bcp is also a participant in the European Microfinance Network, with which it maintains regular contact, allowing an up-to-date follow-up of European issues related to Microfinance.



Support Solutions for Individual Customers

The BCP Group provides products and services that, while meeting the needs and expectations of individual customers, also incorporate social benefits.

In Portugal, Millennium bcp is committed to ensuring customer service with convenience and agility, in a customised and high-quality way, with solutions supported by excellent human service and cutting-edge mobile and digital platforms, in order to continuously maintain the service quality and its reputation as a bank, as published in **Customer Charter** - Individual customers. This year, the offer of several products and services stands out:

- **Personal Credit** - Throughout 2024, the following products remained on sale, which impacted 250 customers:
 - Crédito Universitário (Training Personal Credit) - in this type of credit, which allows financing Customers who do not meet the requirements to access the Mutual Guaranteed Credit line, 46 loans were granted in the amount of 563 thousand euros;
 - Car leasing for new 100% electric vehicles - a product that benefits from the exemption of the initial fee (dossier fee) where 66 operations were carried out, in the amount of 2.4 million euros;
 - Sustainable Buildings Personal Credit – a credit product that benefits from a lower rate, aiming to promote the increase in the energy efficiency of residential buildings, under which 138 loans were granted in the amount of 1.4 million euros.
- **Home Loans** - Within the scope of the Bank's Sustainability Policy, the incentive for properties with better energy ratings (Green Housing Credit) was maintained, which translates into the reimbursement of the amount corresponding to the Dossier and Setup Fee, after contracting the Credit for the Acquisition or Construction of properties with A+/A/B energy class. This offer is also applicable to financing for works on properties that already have a A+ or A energy certification, or that obtain an improvement in the 2-level energy certification as a result of the execution of the works, benefiting customers, in these cases, from a credit of an amount equivalent to that of the Dossier Fee and the cost of the energy Certificate. During the year, the incentive was granted in 1,687 operations.
- **Financial advisory service (SAF)** - Millennium bcp, in Portugal, with the aim of supporting customers in financial difficulties and preventing and avoiding default situations, maintained the availability of SAF packages, which include restructuring and credit consolidation solutions and aims to preserve the financial stability of Individual Customers with ongoing responsibilities. The Bank's concern continues to be to propose to customers the most appropriate solution for their budget, enabling them to meet their responsibilities by reducing the costs of their credit instalments. During 2024, 229 customers were supported in Real Estate Credit and 1,093 in Personal Credit in Portugal, which represents a restructuring value of 32 million euros.

- **Offer for minors Young people** - In order to meet the needs of young people, Millennium bcp launched Millennium Let's GO!, an integrated solution of financial products and services aimed at individual customers aged between 0 and 17 years (inclusive) subscribing to the Digital Statement service. This solution includes a savings solution that allows monthly reinforcements from €25, a half-year maximum reinforcement of €2,500 and a maximum savings of €5,000, a rechargeable prepaid card, several insurances and a set of advantages in selected partners. The possibility of young people aged 14 and over being able to make consultations on the App was also approved. The total number of subscriptions to this solution in 2024 amounted to 12,750.
- **Charitable Cards** - In Portugal, credit cards issued by Millennium bcp continue to encourage social support. Through the Millennium Rewards loyalty program, our customers accumulate points with the purchases they make with their credit cards and later redeem these points for items available in the Millennium Rewards Catalogue. In 2024, donations totalling 3680 euros were made: Portuguese League Against Cancer – 221 donations worth 2965 euros and AMI – 54 donations worth 715 euros.
- 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 live 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, on the website or in the Call Centre, with all the convenience, availability and security.

In Poland, Bank Millennium offers a debt consolidation loan, with an option to repay debts from other banks to customers looking for an opportunity to reduce the service costs of their current liabilities. In addition, customers can benefit from the deferral of payment of an instalment of a demand or consolidation loan (credit holidays), which represents a relevant aid in the case where the funds intended for an instalment in a given month are to be used for other purposes. In 2024, 69,753 loans were made for a total amount of 629 million euros.

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 customer'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 customers 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).

Since 2008, Bank Millennium has supported WWF Polska (Worldwide Fund For Nature). WWF is an independent environmental organisation supported by more than 35 million people, with a global network active in almost 100 countries. The Millennium Mastercard WWF card gives customers the possibility to support the defence and protection of the environment. For each card issued, the Bank transfers 50 zlotys to the WWF Poland, in addition to the special funds it secures annually for the protection of forest ecosystems and associated animal species. This co-operation has been extended for a further three years and will cover lynx protection activities, including monitoring of this predator in the forests of north-eastern Poland.



In Mozambique, several products with social benefits are available, including:

- **IZI Microcredit** – Short-term financing (up to 45 days), currently available to customers with a salary transferred at the Bank who meet a set of eligibility criteria, in order to meet small everyday expenses. This product has no interest rate, applying a 4% fee on the amount to be financed, and is presented in ranges between 500 to 5,000 MZN. In 2024, this financing registered a positive evolution compared to the previous year, with just over MZN 4.2 billion being disbursed to around 211,000 customers.
- **Salary Credit** - Short-term financing (up to 4 months) with a subsidised interest rate and an amount of up to 100,000 MZN. This financing allows eligible customers, with a salary transferred to the Bank, to meet specific needs by applying for a consumer loan, without having to go to a branch, immediately and fully digitally through Mobile Banking (IZI and Smart IZI), being able to pay in monthly instalments. This product has a daily average of 65 thousand eligible customers, where about 56% of customers have already joined the financing at least once, with about

2 billion MZN having been disbursed in about 98,000 operations, proving to be a product of great acceptance by customers.

- **Millennium 4X4 Deposit** - 90-day term deposit, with a minimum constitution of 10,000 MZN, made available through a savings incentive campaign at the end of the year that enabled its subscribers to participate in a competition. As a prize, the 3 customers awarded won a new 4X4 Ford ranger car, a 4-wheeled motorcycle with 250 cc, and 100,000 MZN (in 1st, 2nd and 3rd place respectively). This product, in addition to competitive rates, provides the application user with flexibility in managing their savings, allowing them to be constituted and managed in a fully digital way.

SRI Funds (Socially Responsible Investment)

The BCP Group meets the needs of investors who think it is relevant to consider social and environmental risk factors in their investments, making Responsible Investment Funds available for subscription.

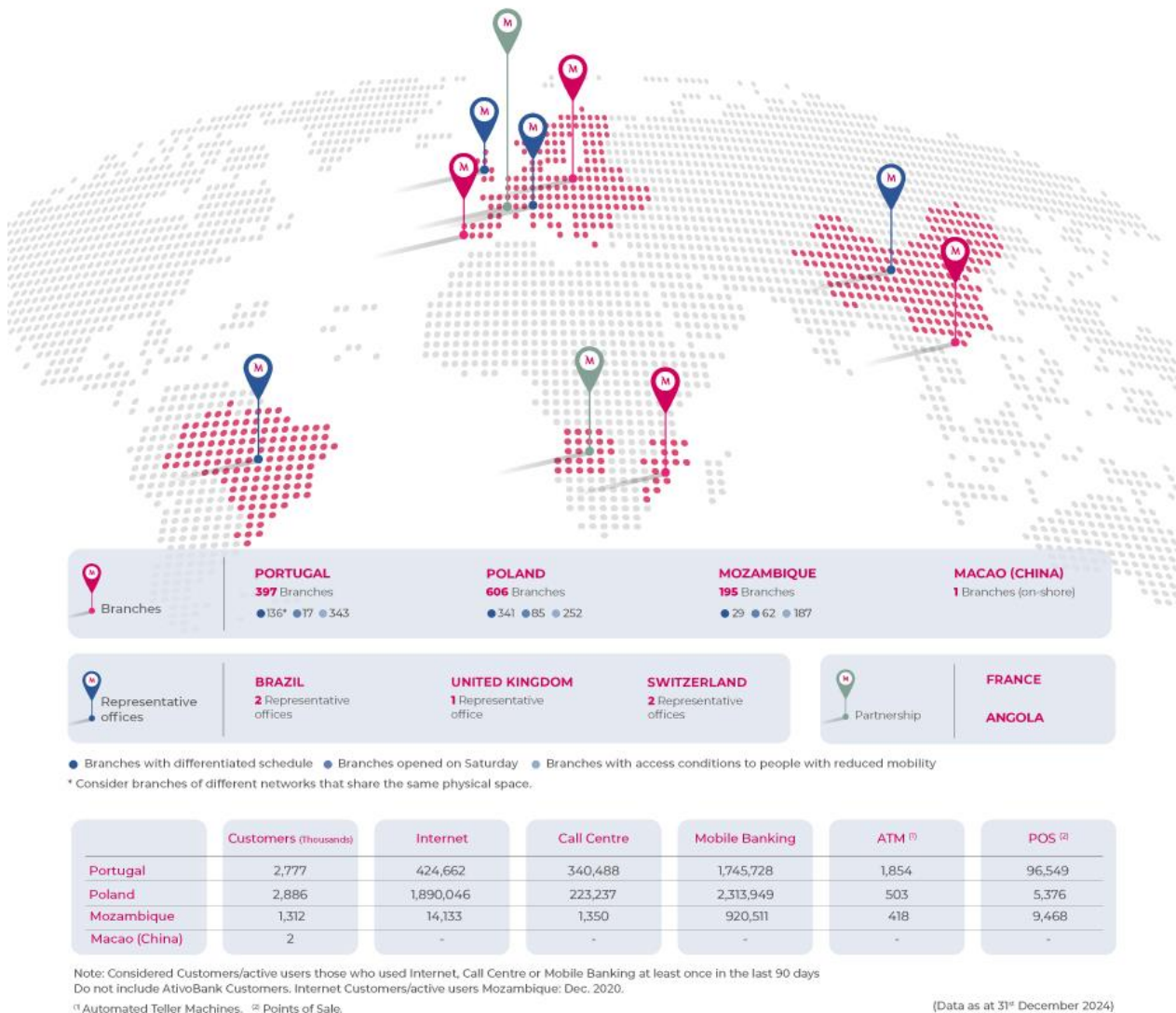
In Portugal, SRI funds are available for sale on the online and physical platforms of Millennium bcp and ActivoBank, with the decision being made in 2022 to classify this type of product under the SFDR (Sustainable Finance Disclosure Regulation), in accordance with their contribution/promotion to environmental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

- Article 8º- Light Green: investments associated with the product promote environmental and/or social sustainability;
- Article 9º- Dark Green: the investment goal is exclusively sustainable.

At the end of 2024, Millennium bcp had 348 sustainable Investment Funds on sale (326 Article 8 and 22 Article 9) whose accumulated amount in the portfolio reached 8,058 million euros, representing an increase of 14% compared to 2023 (7,073 million euros), of which about 97% are integrated in Article 8 - Light Green. The total amount invested in these Funds represented, at the end of the year, about 83% of the Bank's total investment fund portfolio (81% at the end of 2023).

In recent years, ActivoBank has invested in making several SRI Funds available to its customers. In 2024, 498 of the Portfolio Funds were SRI Funds, which corresponds to about 75% of the total assets under management. The total number of SRI Funds grew by 30.4% in 2024, reaching 142 million euros. In addition, the number of Funds with PUs subscribed in Article 8 grew by 5.9%, while in Article 9 the growth was 23.8%. The volume subscribed in SRI Funds under Article 8 increased by 69%, reaching €53,671,180, a growth that reflects ActivoBank's commitment to promote sustainable investments and its ability to attract more customers to this type of investments.

In Poland, Bank Millennium integrated ESG factors in the asset selection processes in investment portfolios, in order to respond to the growing concerns of investors with sustainability criteria in their investment decisions. Bank Millennium had 41 SRI funds with subscribed PUs (39 Article 8 and 2 Article 9) in 2024, for a total amount of 181,332 million euros, which represented around 10.2% 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).



Accessibilities

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

As part of its social commitment, so that all its customers, including those with disabilities, have convenient access to services, the BCP Group also promotes accessibility for people with special needs for the several contact channels with the Bank, from: i) branches with access to people with reduced mobility; in Portugal, as well as in the other operations of the Group, there is a policy of priority service throughout the branch network; ii) internet with functionalities that respect the recommendations issued by the Web Accessibility Initiative (WAI); in Poland, Bank Millennium was the first Bank to receive the "Internet site without barriers" certificate and iii) ATM with the placement of equipment with facilities available for the blind (e.g., head-phone connections and keys with programming for Mobile Banking) are also, due to their speed and ease of use, privileged access channels for people with reduced mobility or the blind. The accessibility rules implemented on the website and in the App are applied in Portuguese and English.

In 2024, in Portugal, Millennium bcp implemented several measures in this area, including: i) the provision of a new informational website, developed and managed in compliance with the WCAG (Web Content Accessibility Guidelines) 2.1 level AA accessibility rules; ii) training on accessibility and its application on websites and Apps, aimed at about 120 employees with digital-related functions, and on the accessibility of digital documents, provided by the IFB to 200 employees who produce or approve this type of documents; iii) an accessibility assessment in the Millennium bcp Individuals App, with the aim of detecting sections that must be corrected in order to achieve the double (AA) compliance satisfaction of WCAG 2.1. and facilitate use by people with disabilities; iv) ensure the application of accessibility principles, based on WCAG, in communications via email, allowing access to information on equal terms for all customers; v) and we started issuing cards with sharp edges, to allow Customers with visual impairment to easily identify the correct position in which they should insert the card at ATM or POS. This change has been gradually applied to all Individuals and Business cards.



In Poland, Bank Millennium continuously works to eliminate digital and physical barriers to access to financial and non-financial services. In facilities where architectural barriers still exist, the Bank seeks to remove the barriers as much as possible.

Over the years, many facilities for the visually impaired and wheelchair users have been introduced, such as: (i) lifts and at the Bank's branches; ii) documents in Braille; audio recordings; iii) documents written in very large letters; iv) and development of the "blind notch" solution on Millennium debit cards, which consists of a semi-circular cutout on one providing convenience for visually impaired and blind by greatly facilitating the use of the card. The Bank Millennium website, the Millenet internet banking system Bank Millennium mobile application are continuously being adapted to meet the needs of the blind and visually impaired, even allowing a visually impaired user to use the website with a keyboard, without the need to use a mouse to navigate the portal.



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Bank Millennium has also developed a special procedure to serve blind or visually impaired customers in branches. This procedure includes, among other things, instructions for product presentation and customer contact. Customers with special needs have the right to receive the general conditions of contracts and articles of association in forms that make it easier for them to familiarise themselves with their content, for example, a document prepared with a large font size, an audio file or a file prepared in braille. These documents are prepared at the customer's request and, if the customer requests it, it is agreed with the customer, the type of document they wish to receive, how it should be prepared and how to deliver it to them.

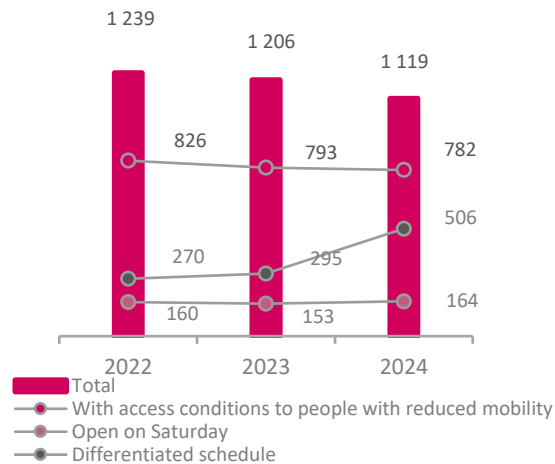
Bank Millennium is also extending the idea of a world without barriers to other areas in which it is active, namely in culture sponsorship. During Millennium Docs Against Gravity, Poland's largest documentary film festival, cinema films with audio description were made available to facilitate access to the world of culture for people with visual impairments.

In Mozambique, as part of the initiatives to improve accessibility for disabled people, Millennium bim has adopted specific measures, such as: i) the installation of access ramps, prioritising the installation of ramps in all branches that do not yet have these facilities; ii) the guarantee of adequate dimensions of doors and spaces to facilitate the movement of people with reduced mobility in the branches; iii) the incorporation of sanitary facilities equipped for people with disabilities; iv) and the implementation of elevators with dimensions that allow easy access for employees to the facilities of the central services.

Branches continue to represent a relevant contact channel for many customers, so in the different geographies where it is present, the BCP Group diversifies its service hours, responding to the needs and accessibility requirements of its customers. Branches with access for people with reduced mobility stand out, which, in Portugal, correspond to 86% of the total network and, in the other geographies, to 76%. Also in Portugal, 124 branches offer differentiated service hours, which vary between 8:30 a.m. and 7:00 p.m. In Poland, this number is 137 branches and in Mozambique 29. In addition, the opening on Saturdays is provided, which in international activity covers a total of 147 branches, representing, in the case of Mozambique about 32% of the total. In Portugal, Millennium bcp continues to transform its branch network.

In this context, Millennium bcp created Customer Branch Experience 2.0, an innovative customer-centred approach, through a cultural change, the redesign of products and processes and the integration of digital channels. Focused on creating a new generation of branches that are more sustainable and efficient in customer service, Millennium bcp implements several measures, namely: i) paper continues to be discarded and the documentary formalisation of contracts is replaced by digital signatures through tablets; ii) and treasury activity is available 24/7 through intelligent transactional machines, the first equipment to allow the deposit and withdrawal of coins and the payment of checks automatically at any time, which can also be used without any *multibanco* card, simply by using the multichannel code provided by the Bank. In addition to technological innovation, the branches provide spaces especially dedicated to customers, with lounge areas, free wi-fi, wireless chargers and digital experience areas with access to the Bank's Apps, and customer communication is also innovative, with a digital price list and electronic advertising panels.

Branches accessibilities
(Number of branches)



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 modernisation of the branches' network, will continue during the next few years.

In the BCP Group, Mobile banking solutions, which in the whole of the BCP Group already have more than 4.7 million users (4.6 in 2023), continue reinforcing their role as the preferred channel for access to products, services and financial transactions.

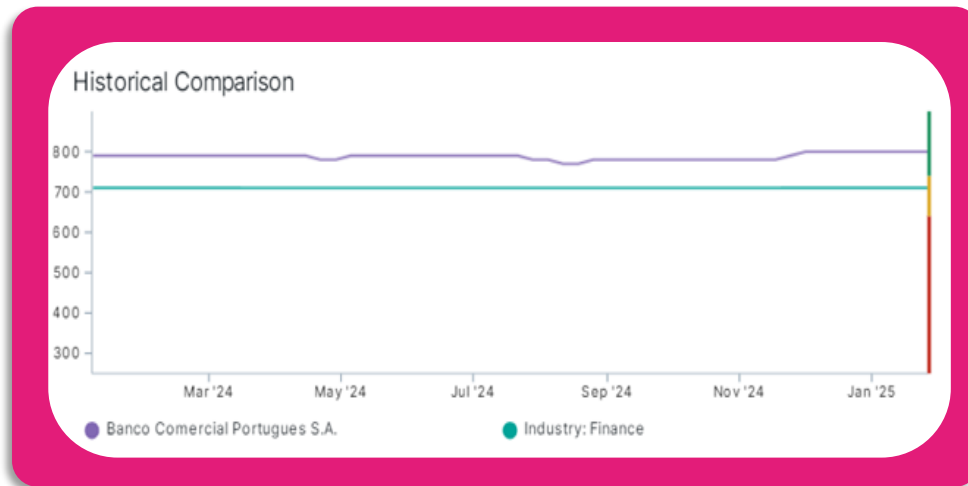
Information Security

The information security programme implemented at the Bank is orientated towards risk management and information protection, taking into account its confidentiality, integrity and 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 Group's resilience and ensure the protection of stakeholders, reputation and the activities for the creation of value.

The Bank's Operational Resilience Commission is responsible for analysing cybersecurity metrics and providing visibility on the main topics relevant in this context, such as cybersecurity rating, vulnerabilities, contained attack attempts, results of the continuous penetration testing process and the monitoring of attacks suffered by customers. BCP also has a Security Operations Centre (SOC) and a Threat Intelligence service for the prevention, detection and mitigation of intrusion attempts, illegal acts and new threats, as well as in the strong investment in 24x7x365 security monitoring, on incident response and risk assessment of information systems to support the business. The Bank also has a vulnerability management process that is supported by the execution of continuous intrusion tests on websites and Apps and monthly vulnerability scans on the internal network, with the aim of detecting weaknesses, classifying and correcting them according to a plan that prioritises their correction with SLAs (Service Level Agreement) defined according to the risk level. Despite the high number of security events that are detected daily, during 2024 no information security incidents were recorded.

The activities carried out between 2023 and 2024 continued the 2019/2022 strategic plan for information security, aiming to obtain a more effective response and improve the Bank's resilience by leveraging: (i) advantages of artificial intelligence for detection and investigation of threats automated by machines, simplifying complexity and accelerating responses; (ii) understandable and actionable metrics through the generation of valuable information, which allows forecasting situations, leading to more correct decisions in the information security area; and (iii) the use of resilience as a competitive advantage, through the definition of the Minimal Viable Bank concept and crisis simulations and wargaming. Additionally, to ensure compliance with Regulation 2022/2554 of the European Parliament and of the Council (DORA), this year several initiatives were addressed in the areas of Information and Communication Technology (ICT) risk management, ICT Incident Management, digital operational resilience and risk management of external entities in the ICT area.

To strengthen the existing monitoring mechanisms, Millennium bcp has partnered with the BitSight platform, which continuously collects and assesses data on the security behaviours and implementation of security policies of associated companies. On this platform, companies are rated on a scale of 250 to 900, and the higher the rating, the more effective the company is in implementing good cybersecurity practices. The BitSight Security Rating thus allows us to obtain an indication of the Bank's overall cybersecurity performance, as well as a comparison with the Portuguese Banking. In 2024, Millennium bcp consistently maintained one of the best cybersecurity ratings (800) in Portuguese Banking. During the year, the evolution of Millennium bcp's BitSight security rating was relatively constant:



With the aim of improving security with data and operations carried out on digital channels, in addition to raising awareness and internal training of the Bank's employees, several initiatives were developed:

- Internal and external communication initiatives and practices, alert articles for fraud/scams that are occurring at the moment, in digital format (e.g., push notification through the App, email, Bancomail, homebanking, internal portal of the Bank);
- Production of videos on the safe use of digital channels, detailing information about cyberattacks and what behaviours should be adopted;
- Monitoring of a public fraudulent message box, which allows the identification and control of possible cyberattacks, which may affect the user's access to digital channels, homebanking or the Bank's App, which are assessed by the Security and Information Division;
- Analysis of reported phishing/scam attacks and activation of measures to mitigate fraud, adjusting existing heuristics or implementing new risk analysis conditions, limits and security blocks, in order to ensure the security of customers' assets in the use of digital channels. The Bank uses artificial intelligence to detect new forms of attack and identify changes in habitual patterns of behaviour;

Collaboration with several external entities, such as the Portuguese Banking Association, Banco de Portugal, *Polícia Judiciária* (Judiciary Police), *Centro Nacional de Cibersegurança* (National Cybersecurity Centre) or Europol, in awareness campaigns on the security precautions to be adopted when using devices with an internet connection in order to avoid fraud;

Awareness, training and knowledge sharing

In the BCP Group, in order to complement the training requirements of employees who may provide investment services to clients, specific training programs are made available. In Portugal, in order to complement the training requirements of employees who can provide investment services to customers, in addition to the training administered by the *Instituto de Formação Bancária* (IFB) (Banking Training Institute) and the mandatory training provided for in MiFID II, Millennium bcp has updated its internal sustainability training manual. The standard report on ESG information of international investment funds distributed by the Bank, which aggregates information provided by the respective producer and by Morningstar, was also

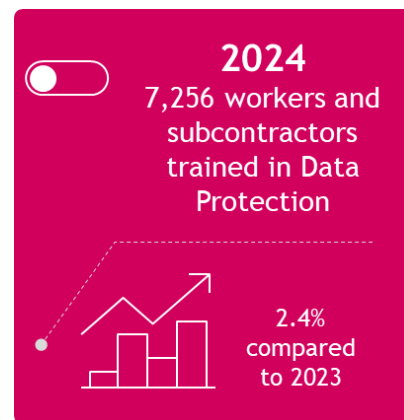
available for consultation by the commercial network. In Poland, training programs on ESG topics are also developed for business networks.

Data privacy and security

Aware of the vital importance of the use, control and proper security of data, the Bank has developed a set of initiatives and training processes aimed at stakeholders, in particular its employees, with the aim of strengthening the level of maturity in information security and building a more resilient and secure organisation. Millennium bcp promotes a regular process of awareness of information security, covering a set of relevant items, namely the main information security policies, the risks and threats to which the Bank is subject on a daily basis. Simulated phishing and social engineering attacks and bimonthly awareness actions on various cybersecurity topics are also carried out monthly.

All new employees are subject to the regular information security awareness program. In Portugal, throughout 2024, internal initiatives for dissemination, awareness and training on topics related to Privacy, Security and Data Protection were continued, namely:

- Regular publication of universal informative content for all employees, or functionally directed to the commercial areas, on corporate communication platforms;
- Sending a quarterly newsletter to disseminate ongoing projects, opinion articles, testimonials, tips and good practices, activities of the Data Protection Office (GPDP) and other related news;
- Promotion of the Data Protection Course (e-Learning), which, in 2024, made it possible to strengthen and update the skills in these matters of 7,256 (+2.4% compared to 2023) employees and outsourcers in Portugal;
- Strengthening the skills of the members of the team responsible for managing the topic at Millennium bcp, through IAPP (International Association of Privacy Professionals) certifications. In compliance with the Continuing Privacy Education (CPE) plan, a fundamental requirement for maintaining the validity of these certifications, a total of 98.5 credits were obtained during the year 2024;



Also in this continuous training process, throughout this year, the Data Protection Office (GPDP) participated in several training events and knowledge sharing forums. These opportunities for acquiring and sharing information allowed the strengthening of 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 to prepare for new challenges and approaches, such as:

- EU Digital Markets - Technology, Business and Regulation - *Faculdade de Direito da Universidade Católica* (Faculty of Law of the Catholic University), a multidisciplinary course that integrates the latest developments in the technological, economic and regulatory fields;
- European Data Protection Congress 2023 - Event promoted by the International Association of Privacy Professionals - IAPP, where data protection professionals gathered to share knowledge on the latest developments in data protection legislation and operations;
- TrustWeek Tour - Event promoted by OneTrust, a provider of applications to support data protection activity, to disclose new features and solutions, share experiences and disseminate good practices.

Service Quality

To improve customer service, some internal communication and customer/employee experience initiatives stand out, focused on strengthening the knowledge, skills and satisfaction of the Bank's employees:

- Holding general Retail meetings with employees to celebrate achievements and align priorities with a focus on the customer and service excellence;
- In partnership with the Millennium Banking Academy, training content is offered on products and service of excellence to the customer;

- A monthly dossier with quality indicators was developed to support the entire commercial structure in monitoring and improving customer service.
- In Retail, the "#1 Customer Experience Forum" is promoted monthly, where different customer service areas (e.g., products, segments, channels) get together, to share quality indicators and identify areas of action and service improvement, with the promotion of a strategic agenda in customer service. Panels are also held, such as "A Voz da Rede" (The Network Voice) to listen to and solve pain points and "COM o Retalho" (COM Retail) to address operational difficulties;
- In terms of internal communication, the Bank, in addition to simplifying internal processes and implementing tools to centralise information on campaigns and initiatives, has developed several initiatives, such as an internal page on the customer experience with training materials and relevant news, communication sections, among others.

Mystery Customer

Throughout this year, 4 "Mystery Customer" actions were again carried out, in a total of 1,375 visits in Portugal to Millennium bcp branches, with an overall score of 80.5% (-1.5 pp compared to 2023) which compares with the global average of 67.3% of other institutions. These actions aim to evaluate the behaviours in customer service in branches, within the scope of Privacy, analysing several issues, from whether there are documents with confidential customer data in sight, whether the monitor used by the worker was visible and exposed confidential information unrelated to the service, whether the computer was unlocked and unattended, whether the employee had parallel conversations during the service and exposed confidential information to third parties, whether unnecessary personal information was requested, whether the employee had any behaviour that jeopardised the privacy (their own or others') during the service, among other issues.

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

Credit Certification

Certifications in Mortgage Loans and Credit Intermediation are mandatory training for the entire Portuguese 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.

In 2024, 152 Headcount Employees completed the Mortgage Loan Marketing and Credit Intermediation certifications, which corresponds to 2,898 hours of training.

Follow-up and monitoring

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

The Bank has Commissions (e.g., Business, Sustainability) that follow and monitor performance and anticipate potential future needs of its customers. When potential needs are identified, they are internally assessed, and action plans are proposed for the implementation of new products or changes to existing ones. These Commissions also have the mission of defining strategic plans that give rise to multiannual guidelines.

The Marketing Divisions, in accordance with the internal group code, regularly supervise their products after they are introduced on the market, in order to verify that they remain appropriate to the interests, objectives and characteristics of the target market, mitigating, if necessary, the risks detected and ensuring their trade under the terms approved by the approval process for new products. This formal exercise of annual monitoring and follow-up of the families of products and services considered to be material includes the analysis of information on the production, distribution and marketing channels of the several products in the Bank's portfolio, namely with regard to sales in and outside the target market and complaints or requests for information. However, if a circumstance is identified during the life cycle of a product that may cause a damage risk to the customer or the Bank, an extraordinary review of that product must be carried out, which is requested by the Marketing Divisions, the Risk Office or the Compliance Office. If it is not possible to mitigate the losses detected, the withdrawal of the product from trade should be considered by the Marketing Division, to which the results of this review are intended (more information in S4-1 – Policies related to consumers and final users).

It should be noted that the Bank, in Portugal, strengthened the process of monitoring compliance with regulatory requirements in relation to advertising campaigns and other behaviour matters of the Bank, which included a training session on the compliance of advertising campaigns, through electronic means, aimed at employees in the communication and marketing areas, and the quarterly report to the Compliance and Operational Risks Commission. In 2024, in order to identify and mitigate the risk of greenwashing, the sustainability area also started to intervene in the approval processes of advertising campaigns, which involve environmental, social or governance (ESG) sustainability claims related to institutional positioning or campaigns, products or services.

In addition, Millennium bcp's Quality and Satisfaction Models Department maintains a policy of simplifying and optimising processes, choosing, whenever possible, more efficient, sustainable and digital channels for carrying out surveys, and is even migrating the Experience Evaluation processes to 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.

The quality and efficiency of the service provided to the customer is also a reflection of employees' satisfaction, which is why the Bank annually promotes satisfaction surveys with the internal service among all employees who interact with other areas to perform their duties, in order to identify opportunities for improvement and optimisation of processes, technological solutions and procedures in force. In 2024, an assessment of 76.0 index points (i.p.) was obtained, slightly below that recorded in the previous year (76.8 i.p.) but remaining at a positive level. Another 11 recurring surveys were also carried out, which aim to monitor satisfaction with several internal operation processes.

Market Studies on 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 annual study for the banking sector, based on an econometric model for measuring the satisfaction and loyalty of the Customer and their 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: (i) the *Índice CSI Balcão* (CSI Branch Index), which evaluates the satisfaction of customers who preferentially use Bank branches; (ii) and the *Índice CSI Canais Digitais* (CSI Digital Channels Index), which evaluates the satisfaction of customers who preferentially use Digital Banking solutions. In 2024, Millennium bcp rises to #1 in the ranking in CSI Digital Channels and maintains the #4 ranking in CSI Branch, with scores of 79.3pts and 78.6pts, respectively, both with increases compared to the previous year. As a result, in the CSI Banca (CSI Banking) index, it rose to the lead, with a 79.0pts score, among the 6 largest banks operating in Portugal, with Crédito Agrícola being excluded from the analysis.



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 provided by banks. In 2024, Millennium bcp continues to be the most used Bank by Companies in Portugal.

Regarding its image, Millennium bcp was also elected as the "Most Innovative Bank", the "Globally Most Efficient Bank", the "Bank with the Most Suitable Products for Companies", the "Closest Bank", the "Globally Best Bank for Companies" and the "Bank with the Best Online Security System", an indicator evaluated for the first time this year.

In the "Consumer Choice", a study by Consumer Choice, Millennium bcp is once again distinguished in Portugal, in the "Large Banks" category, as "Consumer Choice" in 2025, with a final score of 71.5%, the fifth consecutive year in which the Bank has received this distinction. Of the 13 editions of the award, Millennium bcp has won 9 editions. This study aims to publicly promote companies that have services and products with a high degree of satisfaction and acceptability among consumers, helping them to make an informed purchase regarding a certain product and service.





To this distinction is added the 2025 **"Five Star Award"**, in the "Large Banks" category, with an overall rating of 78.5%, above the main competitors. Millennium App also won this award in the "Banking Apps" category, with an overall satisfaction rating of 80.8%, being the third consecutive year that Millennium bcp has won the award in these two categories.

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. In 2024, Millennium bcp was once again recognised for the excellence of its digital offer.

In Portugal, Millennium bcp also won **IDC's Portugal Digital Awards** with the E2E Home Loan process. Still with the same process, it also won the **Navegantes XXI Award from ACEPI** and, finally, was considered **"Product of the Year"** with the Millennium App. Abroad, the E2E Home Loan process won the **Finovate Awards** in the "Best Customer Experience Solution" category and was considered **"Best Consumer Digital Bank"** in Portugal for Global Finance, in addition to 13 more awards in 13 sub-categories.

Millennium bcp also maintained its leadership in the recognition as **"Best Digital Bank"** in 2024, for the 7th consecutive year, with 57% of nominations in the total number of Customers in the BrandScore Banca study, 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 recognised as the **"Best Corporate Bank"**, also for the 7th consecutive year, with 49% of the nominations.

The awards and good results obtained in 2024 reflect the trust and satisfaction of customers with Millennium bcp, recognising the excellent service that the Bank provides through face-to-face service and digital channels, offering products with convenience and security, as a result of the large investment in innovation.

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

Definition of metrics and targets

The Bank's new **"Valorizar 28"** (Add more value) Strategic Plan defines as one of its strategic ambitions the reinforcement of the ESG commitment, with the goal of positioning itself in the top quartile of the S&P Global CSA ranking and promoting the growth of sustainable financing, providing financing solutions for the energy transition aimed at supporting Corporate Customers in projects in the energy sector and adjacent, thus being their partner Bank in the sustainability scope.

The commercial objectives of Millennium bcp are defined jointly by the Marketing Divisions, the Commercial Network Coordination Divisions and the Management Information Division, and are approved by the Executive Committee, being aligned with the macroeconomic perspectives and levels of ambition contained in the Strategic Plan. These objectives are then divided among the branches, according to the distribution model duly validated by the coordinators, who, based on the portfolio of each branch and the customers potential, make the quarterly distribution to each manager and branch. The Coordinator and Commercial Manager can adjust the objectives, but always maintaining the final objective.

The commercial area contacts its Business Customers directly and regularly in the course of its commercial activity, which allows to identify their needs. The DMENI also maintains regular contacts with European bodies, such as the European Investment Bank and the European Investment Fund, to identify opportunities, within the scope of European funds and projects, that can meet the customers' needs, such as guarantee lines for sustainable credit (more information in S4-4 – Adoption of measures on significant impacts on consumers and final users, and approaches to manage material risks and seek material opportunities related to consumers and final users, and the effectiveness of such actions). According to the characteristics of each available solution, an analysis of eligible customers or sectors is carried out, and priority targets are defined to be contacted by the commercial area.

The Bank maintains the targets set in previous years, aimed at consumers and final users, and these are applied to the three geographies globally.

Issue	Indicator	Performance		Ambition	
		2022 baseline	2024	2024 target	2025 target
Transparency of the information provided to customers about products and services	Customer complaints (BdP claims) (PT) ⁵	Top 6	Top 6	Non-Top 3	Non-Top 3
Customer satisfaction and experience	Global Satisfaction 1st Bank NPS (Individual Customers PT) ⁶	Top 2	Top 1	Top 2	Top 2
	Satisfaction with the Main Bank NPS (Corporate Customers PT) ⁷	Top 3	Top 2	Top 2	Top 2
Management of the brand and reputation	Reputation - NPS (PT) ⁸	Top 1	Top 1	Top 2	Top 2
Cyber-security, privacy and information protection	Cyber risk security rating (PT) ⁹	> 740	800	> 740	> 740
	Cyber risk security rating (PL) ⁹	> 780	810	> 780	> 780
	Cyber risk security rating (MZ) ⁹	> 740	760	> 740	> 740

The Bank ensures the measurement of credit production and customer satisfaction, regularly monitoring its performance, with a view to continuous improvement of its activities.

⁵ 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.

⁶ Ranking in the 'Global Satisfaction Score 1st NPS Bank', from the BASEF study. Values referring to the end of the year. Top 5 banks (CGD, BCP, BPI, BST and NB).

⁷ Ranking in the 'Degree of Satisfaction with the main Bank NPS' (Corporate PT) of BFIN DATA-E. Annual values. Top 5 banks (CGD, BCP, BPI, BST and NB).

⁸ Ranking in the '1st Bank Recommendation Score – NPS' of the BASEF study. Values referring to the end of the year. Top 5 banks (CGD, BCP, BPI, BST and NB).

⁹ Score of the BitSight (safety procedures, practices and incidents).

Governance Information

ESRS G1 - Business conduct

Governance

ESRS 2 GOV-1 - The role played by the management and supervisory bodies

The activities of the BCP Group are conducted based on the fundamental principles of compliance with the legislation and internal regulations in force. In this context, the management and supervisory bodies play an essential role in defining, implementing and monitoring the Group's business conduct policies, ensuring that the Bank's activities in all the countries where it operates are aligned with legal requirements and with the best practices of corporate integrity and ethics, especially in the fight against corruption and bribery, responsibility, transparency, rigour and professionalism.

The Board of Directors monitors the work carried out by the Corporate Governance, Ethics and Sustainability Committee, to which it delegates the monitoring of policies and implementation of appropriate processes in terms of corporate governance, conduct, culture, values and social responsibilities and monitors and supervises the measures for the development of the Bank's activity in terms of sustainability, in accordance with the powers set out in its Regulations.

The Audit Committee has generic competences, of internal control, inspection, and related to reports of irregularities and management of conflicts of interest. These include the issuance of an opinion prior to the approval by the BoD on the Code of Conduct, defining, in particular, the responsibilities of the control functions, the procedures for regularly verifying their compliance, the measures for preventing, identifying, managing and mitigating conflicts of interest and the associated duties applicable to the Directors, including the members of the CAud, the members of Senior management, key-function holders and other employees of the Bank.

This Committee is monitored by the Compliance Office, which, in turn, has the mission of ensuring that all management bodies, functional structures and employees of the Group comply with legislation and internal regulations, preventing legal, financial and reputation risks. To this end, it maintains interaction with the competent authorities and ensures compliance with reporting duties, especially in transactions subject to international sanctions, such as those related to the restrictive measures applicable to Russia and Belarus, in the context of the war in Ukraine.

In addition, it supervises compliance in the development of new products and services, ensuring that they are aligned with regulatory requirements. It also acts in the supervision of international operations, promoting training actions for local teams, monitoring external audits and supporting the implementation of new IT platforms for Anti-Money Laundering and Counter-Terrorism Financing (AML/CFT).

The Audit Division, which also reports to the Audit Committee, has as its main mission to assess, as a whole, and report to its stakeholders – in particular, the Audit Committee and the Board of Directors – the adequacy and effectiveness of the organisation culture, the risk management process, the internal control system and the governance models. This includes the analysis of matters of a behavioural nature, compliance with legislation, standards and codes of conduct, correct use of delegated powers and respect for the other action principles in force in the relationship with Customers, both external and internal.

The investigation of situations or attempts of internal fraud and the conduct and monitoring of disciplinary or judicial proceedings resulting therefrom are also an area of activity of the Audit Division. All complaints, claims or whistle-blowing reports of situations that indicate socially inappropriate behaviour by Employees, either among themselves or in relation to Customers, are subject to analysis and investigation, giving rise to disciplinary proceedings whenever justified.

In 2024, 89 preliminary investigation procedures were concluded. In the same year, 9 disciplinary proceedings were concluded against Bank Employees in Portugal, with one process underway at the end of the year. In none of the cases were situations of corruption at stake.

DISCIPLINARY PROCEEDINGS FOR BREACH OF RULES CONCLUDED

	2024	2023	2022	VAR.% 24/23
Activity in Portugal				
Internal Rules	8	6	19	33%
External Standards	1	1	0	-
TOTAL	9	7	19	29%

Detailed information as to the duties and responsibilities regarding the business conduct of these management and supervisory bodies, as well as the specialised knowledge and experience of their members in these matters, can be consulted in the Corporate Governance Report ³⁶.

Management of impacts, risks and opportunities

G1-1 - Business Conduct and Business Culture Policies

The BCP Group's policies, in general, guide the conduct and procedures of the Bank, according to criteria of business ethics and transparency, in line with the best governance practices. With regard to the management of material impacts and opportunities related to business conduct and culture, the following policies are particularly relevant:



Code of Ethics and Conduct

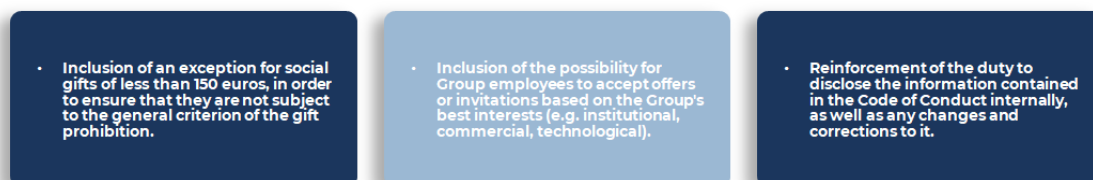
The BCP Group's Code of Ethics and Conduct is directly applicable to the members of management and supervisory bodies, to all the Group's employees and trainees, and to the representatives or employees of the service providers, and this provision must be included in the respective service supply contracts, when applicable, hereinafter referred to as "covered entities".

This Code reflects the Bank's commitment to ethics, transparency, integrity and corporate responsibility, ensuring that all the Group's activities are conducted in compliance with applicable legal and regulatory standards.

³⁶ Chapters: 'B. GOVERNING BODIES AND COMMITTEES'; 'C. INTERNAL ORGANISATION'; and "Annex I".

Thus, it establishes the fundamental principles that should guide all the Bank's activities and business relationships, such as non-discrimination, the prohibition of harassment practices, due diligence, efficiency and responsibility, combined with the best market practices. Financial integrity, social and environmental responsibility and the prevention of corruption are also reflected in this document.

Ensuring the relevance of the principles established therein, in view of the contextual reality in which the Bank and its value chain operate, the Code of Conduct is reviewed biannually or whenever deemed relevant. In 2024, the following changes were applied:



To comply with these principles, several strategic and rigorous measures are adopted, namely, to fight financial crimes, including the prevention of corruption, fraud and money laundering, and also the protection and security of the personal data of all those involved. An example of these measures is the training of all employees on the contents of the Code of Conduct, promoted by the Human Resources Division, every two years, through e-learning.

Any irregularity or violation of this Code, whether consummated, ongoing or expected to happen in the light of the available evidence, must be immediately reported by employees and/or third parties to the Audit Committee, using, for this purpose, the available irregularity communication channel.

Policy on the Reporting of Irregularities (Whistleblowing)

The Policy on the Reporting of Irregularities establishes the principles, rules and circuits adopted for the report, reception and processing of irregularities communications transmitted to the Companies. This policy aims to ensure that all irregularities are reported securely and confidentially, protecting whistleblowers against any form of retaliation, in accordance with Directive (EU) 2019/1983 and the applicable national law.

The procedures established for the whistleblowing of infractions ensure that all reports are dealt with promptly, independently and objectively. The Audit Division follows up on these occurrences, conducting internal investigations and ensuring that any disciplinary actions are applied in a fair and transparent manner.

The Bank provides its employees with specific training on whistleblowing procedures and employees' rights in this area.

Anti-Corruption and Anti-Bribery Policy

The Anti-Corruption and Anti-Bribery Policy reinforces the Bank's commitment to fight and prevent all forms of corruption and bribery. As a signatory to the 10 Principles of the United Nations Global Compact, BCP Group is committed to complying with its principles, including the fight against corruption in all its forms, such as bribery, extortion and facilitation payments (Principle No. 10).

This Policy therefore defines the principles and guidelines for preventing and managing corrupt practices, ensuring that all the group's activities are conducted in accordance with legal requirements and the highest standards of ethics, responsibility, transparency and rigour, and is in line with other internal regulations of the Bank, including the Related Party Identification standard, the Policy for the Prevention and Management of Conflicts of Interest and the Sustainability Guidelines for Suppliers (more information in G1-2 – Management of relationship with suppliers).

Following a zero-tolerance approach to corruption and bribery, all employees are required to refrain from such acts. The Policy sets out clear rules to prevent and manage corruption and bribery, including the obligation to report, under the Policy on the Reporting of Irregularities.

The training on the Code of Conduct, aimed at all employees, includes specific content on preventing and fighting corruption and bribery. In addition to this, more in-depth training on these topics is also made available to the functions most exposed to the risk of corruption and bribery.

BCP promotes the adoption of this policy in its international business operations, respecting the autonomy of local management bodies and ensuring compliance with the regulatory framework applicable in the countries where it operates, under the terms of the United Nations Convention against Corruption.

Functions most exposed to the risk of corruption and bribery

1. Commercial Customer Service;
2. Credit Granting;
3. Acquisition of Goods and Services;
4. Management of Judicial and Administrative Proceedings;
5. Preparation of financial and accounting information;
6. Transactions in Financial Markets;
7. Analysis of suspicious situations of Money Laundering and Financing of Terrorism.

Policy for the Prevention and Management of Conflicts of Interest

This Policy defines the principles, governance model and fundamental processes adopted for the identification and management of situations of Conflict of Interest that may occur within the scope of BCP or any entity directly or indirectly controlled by the Bank.

Circumstances that may cause conflicts of interest are defined, such as situations in which there is a conflict between the interests of the bank or persons related to the bank and the duties that the bank has towards a customer, or between the different interests of two or more customers. To mitigate these conflicts, effective organisation and administrative measures are implemented.

Employees receive appropriate training to act in accordance with the assumptions established by the Policy for the Prevention and Management of Conflicts of Interest, and the Bank reserves the right to modify or add new rules to the policy as necessary.

Anti-Money Laundering and Financing of Terrorism Policy

The BCP Group's Anti-Money Laundering and Financing of Terrorism Policy (AMLFT) defines the basic principles and key definitions related to the prevention of ML/FT, specifying the responsibilities of the different bodies, namely the Compliance function. In addition, it describes the key processes, monitoring and reporting activities, which comprises performance indicators (KPIs) and risk indicators (KRIs), for the entire Group and identifies the information technology systems and tools used to support their prevention.

Within the scope of Anti-Money Laundering and Financing of Terrorism (AML/FT), the performance of the Compliance function, in 2024, focused on attention to the fulfilment of the following duties:

Identification and due diligence

Implementation of rigorous pre-validation processes for the opening and maintenance of accounts and entities, especially in a context of increased risk, in particular the effect of the war in Ukraine, with the continued issuance of successive sanctions packages against Russia.

Examination of operations

Improving the processes for filtering operations to ensure compliance with sanctions and embargoes decreed by the competent national and supranational authorities, monitoring them in order to detect and prevent potentially irregular situations.

Control

Improving IT systems and monitoring mechanisms, adapting them to new regulatory requirements and new risk factors, contributing to the effectiveness of the risk management model.

Report

In order to inform the competent authorities in a timely manner whenever there are any suspicions or sufficient reasons 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 scope.

Collaboration

Collaboration with all entities responsible for the supervision and inspection of the activity of BCP and its Subsidiaries in Portugal;

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

Training and communication plan on Anti-Money Laundering and Financing of Terrorism.

BCP's performance in the area of AML/FT is based on dedicated technological solutions, and on the definition and management of risk models according to the evolution of the several competing variables for the establishment of scorings to be applied to operations.

Regarding the development of new, more effective and efficient solutions, based on automation processes for the analysis of the risk factors inherent to new account openings and transaction screening and the effort to update internal rules to ensure alignment with recent changes in the legislative environment, in 2024, it is important to highlight in Millennium bcp:

- The implementation of automatic transaction filtering processes to ensure permanent and timely compliance with the sanctions and embargoes decreed by the various international bodies, in a more demanding international context resulting from the war in Ukraine;
- The creation of an organic unit, within the Compliance Office, for the prevention, detection and fight against fraud;
- The reinforcement of the control of the risk of Money Laundering and Financing of Terrorism (ML/FT) in terms of Customer onboarding, on the segments and jurisdictions involved in business relationships;
- 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;
- Continued commitment to training and specialisation of the Compliance Office teams within the scope of AML/FT, in its various dimensions.

Organisational culture

In addition to the established policies, the BCP Group's organisational culture is continuously promoted and strengthened through several strategic initiatives and practices.



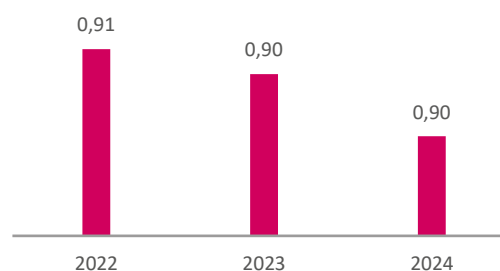
The effectiveness of the Policies on ethics and corporate culture and the actions that result from them is monitored with reference to concrete targets.

Issue	2024 Target	Performance			Ambition
		2022 baseline	2024	2024 target	2025 target
Ethics, conduct and compliance	Internal Control System (ICS scoring index) (Group) ³⁷	2.2	3.35	≤ 5.5	≤ 5.5
Sustainability Governance	Annual SMP execution level (Group) ³⁸	0.94	0.92	≥ 0.85	≥ 0.85
Prevention of corruption and money laundering	No. of customers with low/medium AML risk per 100,000 (PT) ³⁹	11.5	10,2	≤ 30	≤ 30

G1-2- Management of relationship with suppliers

At BCP Group, the supplier selection process is based on fundamental criteria such as the company's global competence, the functionality, quality and flexibility of the specific solutions to be acquired, as well as the continued capacity to provide the service and respect for sustainability criteria. In all the Group's operations, the acquisition from local suppliers continues to be privileged, which is reflected in a value of 89.8% of payments to local suppliers.

Payment to local suppliers
(Percentage %)



Sustainability Guidelines for Suppliers

The BCP Group's Sustainability Guidelines for Suppliers seek to establish the main commitments and principles to be taken into account in any acquisition made, in alignment with the Universal Declaration of Human Rights, the OECD Guidelines, the ILO Principles, the United Nations Global Compact and the APEE Portugal Charter of Principles. These principles are applicable when contracting third-party services and cover topics such as: Legal Compliance and Ethical Conduct; Human rights; Labour Rights; Prevention, Health and Safety; Environment; and Management.

Suppliers undertake to cooperate in the provision of information to assess compliance with these principles, through questionnaires or visits to the places of activity. These principles apply to all BCP Group entities in Portugal and to all contracted suppliers.

The approval of the Sustainability Guidelines for Suppliers is the responsibility of the Board of Directors and is reassessed biennially or as necessary, with the support of the Sustainability Office and the Procurement and Logistics Division.

³⁷ Ability of the Bank to implement the internal control recommendations of the AAR (Annual Self-Assessment Report on the Control System) each year.

³⁸ Level of global execution of the SMP commitments in terms of the Group and locally.

³⁹ Number of high-risk AML customers per 100,000 customers.

Approach to ESG impacts, risks and opportunities

The Bank's main suppliers are companies that disclose their economic, environmental and social performance, ensuring responsible procurement of goods and services. Since 2007, the Bank has included, in annex to all its contracts, clauses covering various aspects such as legal compliance and ethical conduct, human rights, environmental and labour practices, health and safety, in addition to the application of these principles in the hiring of third parties.

As of 2022, in Portugal, a Sustainability Questionnaire for Suppliers was developed and implemented, which, in 2023, was sent to suppliers with contracts over €50,000. This due diligence process allows us to assess the alignment of companies with sustainability requirements and with the Guidelines for Suppliers defined by the Group. So far, 132 suppliers have been evaluated, obtaining a 0.6 average on a scale of 0 to 1.

The process of acquiring goods and services is supported by eligibility criteria aligned with ESG principles. These criteria are determined by the Office for Economic Research, Sustainability and Supervision Affairs (GESS), and are adjusted according to the growing requirement of this classification. The aim is to ensure that the Bank's key suppliers whose activities have a significant impact on sustainability are previously evaluated before their acceptance or renewal.

This evaluation is ensured through a specific survey, template 10903540, sent to the supplier prior to its contracting, whenever possible, together with the contract documents, ensuring that the supplier is heard on an annual basis. If the sustainability profile does not reach the minimum level defined by the Bank, additional and/or complementary information may be requested, whenever justified, and information and a request for mitigation/resolution may be sent.

In Poland, the selection and evaluation process, as in Portugal, is based on the Sustainability Questionnaire for Suppliers. In addition, 100% of new contracts include a clause that obliges suppliers to comply with the principles of the Code of Ethics and Conduct. The bank also encourages the use of electronic invoices to avoid delays due to postal delivery and adopts a digital workflow for invoice processing, reducing the risk of late payments.

Bank Millennium collaborates with several commercial partners for the acquisition of goods and services in different market segments, ranging from office and branch maintenance to IT, security and marketing services. The selection of suppliers is conducted through tenders, ensuring objective criteria and transparency in the procurement process. The commercial and technical evaluations of the proposals are carried out by independent units of the bank, minimizing risks related to the quality of the provision of banking services.

In 2024, Millennium bim, in turn, developed and implemented its own ESG assessment procedure for suppliers, based on a questionnaire fully adapted to its reality. During this procedure, the results of the questionnaire are duly shared with the suppliers, being reinforced by the principles set out in Annex I of the purchase procurement letter. Social and environmental criteria are integrated into the selection and evaluation of suppliers and are also reflected in the eligibility criteria letter.

Payments to suppliers

The BCP Group adopts an approach that guarantees equity in the relationship with its suppliers, ensuring, through the established contractual clauses, conditions of transparency and the best compliance with payment deadlines, especially for SMEs (more information in G1-6 – Payment practices).

Regarding payments to suppliers, as outlined in the internal regulation NP0041 - Accounting, verification and payment of invoices, Millennium bcp complies with the payment deadline provided for in the contracts, which by default is 30 days, regardless of whether it is an SME or a large company.

In Poland, Bank Millennium recommends the use of electronic invoices to avoid possible delays due to late delivery by postal services and regularly analyses unprocessed invoices. The Bank also uses a special paperless workflow to process invoices in order to avoid late payments.

In Mozambique, the invoice payment process follows a set of rules, which define the procedures for all parties involved in receiving, processing and paying suppliers. Each step of the process must respect the internally established service levels, with the Bank ensuring that these deadlines are met to avoid delays in payments. The payment policy is transversal, without distinction between suppliers, regardless of whether they are SMEs or large companies.

G1-3 - Prevention and detection of corruption and bribery

The BCP Group is committed to the highest standards of ethics, transparency and compliance in its operations, adopting a structured approach to prevent, detect and fight corruption and bribery. In this sense, it implements a set of policies, procedures and control mechanisms in line with the best practices and international regulations.



Commitment to preventing and detecting corruption and bribery

Risk management and due diligence in all contractual relationships

Independence in investigations to ensure impartiality

Secure and confidential whistleblowing channels

Ongoing training for all employees and relevant stakeholders

In the different countries where it operates, it adapts its policies and procedures to regulatory requirements and market specificities, always maintaining a high standard of risk control and mitigation. To this end, it has a robust governance model to manage these issues (more information in ESRS 2 GOV-1 – The role played by the management and supervisory bodies).

In Portugal, Millennium bcp adopts a structured approach to fighting corruption and bribery, based on a model of risk management, compliance monitoring and strengthening of the ethical culture among employees. The bank conducts regular risk assessments, ensuring that third-party engagement processes include due diligence throughout the contractual relationship. In addition, it provides a whistleblowing channel that allows the confidential communication of irregular suspicions.

The response to allegations of corruption follows strict protocols, ensuring impartial investigations and the application of sanctions or corrective measures where necessary. The governance of this process is under the supervision of the Compliance and Operational Risks Commission (CORC) and the Audit Commission, ensuring continuous monitoring of the actions implemented and the independence of those responsible for the investigation from the management chain involved in it.

To ensure accessibility and understanding of its policies, Millennium bcp promotes regular training sessions and keeps documents available on its internal portal, allowing all employees and relevant stakeholders to be informed about their responsibilities. Anti-corruption training programs include specialised modules for higher-risk functions, addressing topics such as the identification of illegal practices and procedures for reporting irregularities. By the end of the fourth quarter of 2024, 46% of the members of the management and supervisory bodies had already completed this training, which will continue to be provided in the first quarter of 2025.

At Bank Millennium, the prevention and fight against corruption is managed through a comprehensive set of institutional policies and standards, which establish clear guidelines for employee conduct and risk mitigation. Among these policies, the principles of fighting corruption, the policy for managing conflicts of interest and the procedures for reporting infractions stand out.

The responsibility for preventing corruption falls on all bank employees, who are required to report any suspicion of an unlawful act to the Compliance Division. To this end, Bank Millennium provides a specific whistleblowing channel, accessible via internal email for internal communications or external email for third parties. If the whistleblower fears reprisals, they are allowed to send the report anonymously.

If a corruption incident is identified, the Head of the Compliance Division shall immediately report the situation to the Chairman of the Board of Directors and the Chairman of the Supervisory Board, ensuring that appropriate measures are taken in cooperation with the other members of the Board. The Compliance unit operates independently.

The anti-corruption training at Bank Millennium covers key topics, including the identification of corrupt practices, the management of supplier relationships and the ethical approach to interacting with stakeholders. In addition, strict criteria are defined for the acceptance and offering of gifts and the participation of employees in representation and

business events. All functions considered to be at risk, including members of the Board of Directors, are covered by this training, which is mandatory for all employees.

Millennium bim adopts preventive measures and control mechanisms to mitigate the risks of corruption and bribery, ensuring high standards of ethics and conduct. In the context of contracting suppliers, detailed analyses are carried out to identify potential conflicts of interest and verify background with independent sources, ensuring that business relationships follow integrity and transparency principles.

Training is an essential component of Millennium BIM's anti-corruption strategy and is provided periodically to all employees. To strengthen irregularity detection mechanisms, the bank is improving its irregularities reporting system, with the creation of a Whistleblowing Channel that ensures greater protection for whistleblowers and allows a more efficient response to suspicious cases.

The results of all investigations are reported to the Management Bodies, either through the provision of reports or through participation in the internal commissions responsible for overseeing compliance. To ensure access to up-to-date information on compliance and best practices, all recently approved legislation and regulations are made available to employees as soon as they come into force. The bank also keeps the document portal accessible to all employees.

The training is part of Millennium Bim's ethics and conduct program, and is given to all employees, including management bodies.

Training employees in the organisation's anti-corruption policies and practices

	2024		
	MZ	PL	PT
% Employees with anti-corruption training	100%	93%	100%

In 2024, the promotion of a culture of compliance was one of the Bank's main initiatives. This promotion occurred both through the Training Plan and through communication programs aimed at all areas, with emphasis on commercial networks.

The items "Data Update", "Compliance Cases", "Essential", "1st Line of Defence", "Internal Fraud" and "Beneficial Owners" are items with a lot of visibility, with a significant impact on the different lines of defence, especially in the 1st line, and more specifically, on the employees of the commercial structures. The purpose of these headings is to inform, clarify and support employees on key aspects related to financial crime risk and compliance risks. The content is presented in a clear and educational way, using accessible language. In addition, innovative solutions have been implemented, including the active participation of 1st line of defence employees, addressing a broad spectrum of compliance and conduct risks.


Topics discussed under the several headings

- Anti-Money Laundering and Financing of Terrorism;
- Code of Conduct;
- Restrictive measures, sanctions and embargoes;
- Internal Control;
- Good practices in the sale of financial products.

Metrics and Targets

G1-4 - Incidents of corruption or bribery

In 2024, no cases of corruption in the BCP Group were detected. There was no case of compliance that led to dismissal or disciplinary measures being applied to employees. Similarly, no situations were identified where contracts with business partners were terminated or not renewed due to corruption-related violations. Nor have any legal proceedings been brought against the Bank or its employees, nor have fines been imposed for product-related infractions.

Recorded cases of:

	2024		
	MZ	PL	PT
Corruption and/or bribery	0	0	0
Discrimination and/or harassment	0	--	0
Conflicts of interest	0	--	0
Money laundering and/or insider trading	0	--	0
No. of alerts/questions/requests for advice received via the whistleblowing system	0	--	15

In 2024, no complaints were registered with the Group.

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 3,960 communications to local Judicial Entities and replied to 950 requests.

Reports to local judicial entities

	2024	2023	2022	VAR.% 24/23
OWN INITIATIVE				
Activity in Portugal	2 907	1 636	427	77.7%
International Activity	1 053	1 084	1 223	2.9%
RESPONSE TO REQUESTS				
Activity in Portugal	407	226	200	80.1%
International Activity	543	121	1 484	348.8%
TOTAL	4 910	3 067	3 334	60.1%

G1-6 – Payment practices

Millennium bcp's general contractual conditions of payment are payment after receipt of the invoice to suppliers, which represents about 80% of the value of its annual invoices. The customer pays for the services they receive within 30 days of receiving the invoice, which represents about 5% of their annual invoices. Other invoices are paid within 90 days of receipt, except for those from Poland which, according to market standards, are paid within 17 days of receipt. In Mozambique, the average payment period is 8 days.

In Poland, the Bank mainly recommends the use of e-invoices to avoid late delivery by postal services, regularly reviewing unprocessed invoices to avoid late payments, and using a special paperless workflow to process invoices in order to avoid late payments.

Payment practices

	2024		
	MZ	PL	PT
The average time to pay an invoice from the date the contractual or statutory payment term starts to be calculated	8 days	17 days	30 days
Standard payment terms (in number of days) by main category of suppliers and the percentage of payments	30 days	30 days	30 days
Number of ongoing court cases for late payment	0	0	0

OTHER SUSTAIN- ABILITY INFOR- MATION

Note: the additional information presented in this chapter, structured in line with the Global Reporting Initiative (GRI) and as provided for in DL No. 89/2017, corresponds to voluntary and temporary reporting by the BCP Group, in accordance with the provisions of ESRS 2 BP-2, No. 15.

Main Events 2024

Every year, the BCP Group carries out social and environmental actions and initiatives in its main geographical areas (Portugal, Poland, and Mozambique), as part of its sustainability strategy and social responsibility policy.

JANUARY

- In Portugal, **Millennium bcp** Volunteers and the 'Brigada do Mar' carried out another beach cleaning and waste sorting campaign, this time at Praia da Tocha.
- **Bank Millennium**, in Poland, is included in the Financial Times' 'European Diversity Leaders 2024' ranking, in a list of 850 companies that support and promote diversity in their organisations.

FEBRUARY

- **Millennium bcp**, in Portugal, increasing accessibility, has started issuing cards with a notch for visually impaired customers, so that they can easily identify the correct position for inserting the cards in ATMs or POS terminals;
- **Bank Millennium** stands out in the ranking of Best Employer in Poland with the title of 'Top Employer Polska 2024', a distinction that confirms the Bank's high standards in human resources management and its strong position as one of the best and most valued employers in the country;
- **Bank Millennium Foundation** publishes report for 2023 and marks the 33rd year of its activity, continuing two key programs: Financial ABC and the volunteering program 'Our People'23: Save the Planet', focused on financial education for youngest and protection of the planet.

MARCH

- For the 10th time in a row, **Bank Millennium** has been honoured with the title of 'Reliable Employer' of the year, an award given to companies that care about safety and working conditions as well as the development of their employees;
- With the participation of more than 250 volunteer workers, **Millennium bim** in Mozambique is promoting the 'A Clean City for Me' initiative with the aim of raising awareness in society about the importance of preserving

public spaces and protecting the environment and encouraging responsible behaviour for the sake of collective well-being;

- In an action organised by AMI - Projeto Ecoética and supervised by officials from ICNF - Instituto da Conservação da Natureza e das Florestas, **Millennium Volunteers** replanted 2,000 trees that had failed to thrive on the five hectares that had been rehabilitated and reforested in 2020 with the support of **Millennium bcp**.

APRIL

- **Millennium bcp** once again joins the Portuguese government's 'Portugal Chama' initiative, which, under the slogan 'Prevention starts with you. It starts with everyone', aims to contribute to the prevention of rural fires and raise public awareness of risky behaviour;
- **Millennium bcp** is among signatory Credit Institutions of the Cooperation Protocol signed between APB - Associação Portuguesa de Bancos and ADENE - Agência para a Energia, which provides for regular exchanges of relevant information for the purposes of pursuing the decarbonisation and energy transition objectives applicable to the buildings sector in Portugal;
- As part of its energy transition process, **Millennium bcp** has signed an agreement with the Grupo Greenvolt, through Greenvolt Communities, so that the Bank's branches in the national market will become consumers of the clean energy generated by Greenvoltv communities.

MAY

- **Millennium bcp**, for the 4th consecutive time, and **Bank Millennium**, for the 2nd time, distinguished as companies leading the fight against climate change, according to the 'Europe's Climate Leaders 2024' ranking by the Financial Times and Statista;
- **Millennium bcp** and Cleanwatts, a pioneering company in Renewable Energy Communities (RECs) in Portugal, have signed an agreement that reinforces their long-standing partnership in the area of energy management in their

buildings and includes the integration of 28 of the Bank's branches as members that use energy shared by Cleanwatts' RECs.

- As part of the long-standing partnership between **Millennium bcp** and the Food Bank, Millennium Volunteers took part in the regular campaign to collect food for people in need.

JUNE

- As a company committed to the values of diversity, inclusion and equality, **Millennium bcp** renews its commitment to iGen - Forum of Organisations for Equality.
- **Bank Millennium** has achieved the 2nd place in the ranking of 'Best Employers in Poland 2024' - consisting of a list of 300 companies - in the category of Banks and Financial Services, da published by Forbes in collaboration with the company Statista.
- **Bank Millennium** is launching a new edition of the program 'Our People'24: Save the Planet', an initiative of **Bank Millennium** employees and Bank Millennium Foundation Volunteers that centres around the idea of protecting the planet through sporting activities and voluntary work.

JULY

- The 16th edition of the Millennium Festival at Largo, an annual initiative sponsored by **Millennium bcp**, presents a variety of performances of symphonic music, opera, and ballet, all with free access, at the Largo de S. Carlos in Lisbon.
- **Millennium bim** is promoting various activities as part of its 'More Mozambique for Me' Social Responsibility Program, including lectures on savings and financial literacy attended by more than 300 students.
- The **Millennium bcp Foundation**, which has cultural promotion and dissemination as one of its most important areas of activity, presents its first inclusive exhibition: 'The Roman Kitchen at NARC', which has the particularity of being prepared to receive blind and low-vision people.
- **Bank Millennium** takes the podium in this year's edition of the 'ESG Ranking: Responsible Management', organised by the Kozminski Business Hub of Kozminski University: the Bank came 3rd in the Governance section and was in the Top 10 of the overall ranking.

AUGUST

- **Millennium bcp** leads the banking syndicate set up to finance the Chicomba Water Dam project, located in southern Angola, worth 65 million euros.

SEPTEMBER

- **Millennium bim** inaugurates its 6th new generation branch, which is equipped with solar panels to reduce its ecological footprint and actively contribute to promoting the green economy and the sustainability of the planet.
- **Millennium bcp** launches the 'SIBS ESG Solution' campaign, a project to support the sustainability journey of companies in Portugal, which allows them to report their ESG information in a single technological portal.

OCTOBER

- **Bank Millennium** in Poland presents the 'Millennium Eco-Index 2024', which aims to assess the scale and pace of development of Polish regions in the country's 'green' transformation.
- **Bank Millennium**, in solidarity with the flood victims, provides in its App the possibility to make transfers to those in need and donates PLN 1 million to the Polish Red Cross and Caritas Poland.
- Repeating the awards received in the past two years, Global Finance magazine once again honours **Millennium bcp** as 'The Best Bank for Sustainable Finance in Portugal'.
- In the context of the annual Corporate Social Responsibility plan of **Millennium bcp**, Millennium Volunteers are engaged in another action focused on support the inclusion and employability of people with special needs, this time with Bipp/Semear.
- **Millennium bcp** in partnership with the **Millennium bcp Foundation** collaborate with EPIS - Empresários pela Inclusão Social in its program to educate and promote the social inclusion of young people identified as being at risk of drop-out or academic failure.

NOVEMBER

- **Millennium bim** supports 'Uma Sopa Pra Mim' and 'Sopa Solidária', initiatives in which volunteer workers prepare and serve meals to people in vulnerable conditions.
- **Millennium bcp** signs the Charter for Diversity, a European Commission initiative promoted in Portugal by APPDI - Portuguese Association for Diversity and Inclusion.

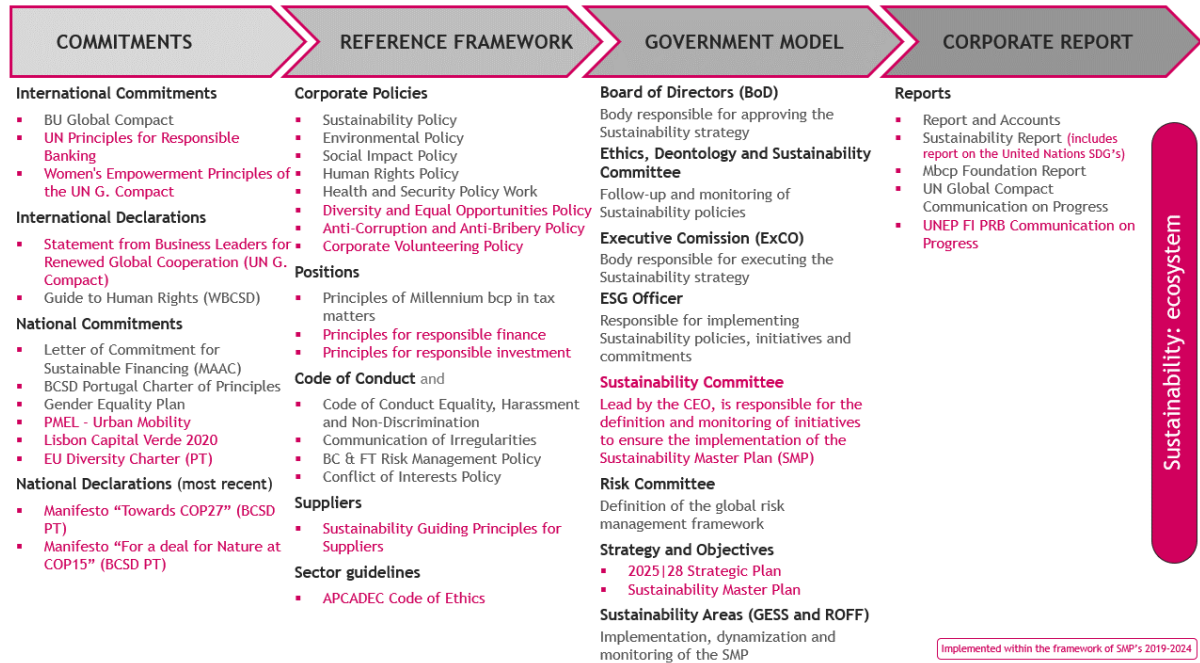
Bank Millennium is once again included in 'Europe's Diversity Leaders 2025', a ranking drawn up by the Financial Times and Statista, reaffirming its place

among European employers that promote and support diversity in their organisations

DECEMBER

- For the 11th year running, **Millennium bcp** is taking part, with around 100 volunteers nationwide, in the biannual campaign promoted by the Food Bank to collect food for people with proven economic difficulties.
- EDP and **Millennium bcp** join forces to develop solar neighbourhoods, a decarbonisation project in which more than 130 branches of the Bank are integrated into the energy communities that EDP is developing throughout the country.
- The 'Millennium Solidarity: Christmas 2024' Social Responsibility Campaign brings together **Millennium bcp** employees and the **Millennium bcp Foundation** to support children with oncological diseases through donations to the Acreditar Association.
- **Millennium bim** offers ad Solidarity Christmas across the country with the Bank's volunteer workers visiting 20 organisations, including shelters, hospitals and orphanages, to bring support and comfort to the communities most in need.
- **Bank Millennium** publishes the new edition of the 'Millennium Eco-Index', a report created by the Bank that evaluates 16 Polish regions in terms of eco-innovation potential and supports the debate on the ecological transformation of the country's economy;
- **Millennium bcp** 2024 Corporate Social Responsibility (CSR) program has been distinguished by the Fundação Fosun as part of the 7th edition of 'One Fosun CSR Week', an initiative that aims to publicise and reward the CSR programs or actions of companies owned or participated by Fosun.

ESG ecosystem



Partnerships

Millennium bcp, aware of the importance of sharing good practices, public testimony and active participation in deepening the principles of Responsible Business, is a founding member and part of the governing bodies (Board, Executive Secretariat and Advisory Board), for the 2022-2024 term, of BCSD Portugal - Business Council for Sustainable Development, an association integrated into the WBCSD - World Business Council for Sustainable Development network.

Since its foundation in 2019, BCP has been a member of the Technical Committee 217 - Sustainable Finance of the 'ISO - International Organisation for Standardisation', promoted in Portugal by 'APEE - Associação Portuguesa de Ética Empresarial'.

One of the main objectives of this TC was to participate in the drafting of ISO Standard 32210:2025 'Sustainable finance - Guidelines on the application of sustainability principles for organisations in the financial sector' and its translation into Portuguese, which was completed at the end of 2024.

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

Within the framework of developing and increasing the impact of its Corporate Social Responsibility (CSR) policy, Millennium bcp and its Foundation maintain cooperation protocols or partnership relationships, 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 in 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) Acreditar - Associação de Pais e Amigos das Crianças com Cancro.

Working and reflection groups

Millennium bcp also participates in a selected number of working groups and forums for reflection on Sustainability and Sustainable Finance, a presence that must be seen in the context of the European Union's Action Plan, the ongoing changes in the normative and regulatory framework and the evolution of risk management and business practices applicable to ESG matters, which also constitutes an opportunity to (re)evaluate impacts, anticipate trends, strengthen skills and project future transformations.

Thus, it integrates, among others, the Working Groups (i) Regulatory Framework for Sustainable Financing of the APB - Portuguese Banking Association; (ii) Working Group on Prudential Treatment of ESG Risks; (iii) Sustainable Finance of

the EBF - European Banking Federation; and (iv) Technical Committee on Sustainable Finance ISO/TC 217 of the APEE - Associação Portuguesa de Ética Empresarial and ISO - International Organisation for Standardisation.

It is also part of the: (v) Technical Reflection Group for Sustainable Financing in Portugal of the Ministry of Environment; (vi) of the Specialised Commission on Sustainable Finance and Sustainability of AEM - Associação de Empresas Emitentes de Valores Cotados em Mercado; (vii) of the Task Force on Sustainable Taxonomy of APB; and (viii) of the International Chamber of Commerce (ICC) Working Group on Sustainable Finance.

In the context of the Thematic Working Groups of BCSD Portugal, Millennium bcp has been represented since 2016 in (ix) Reporting and Sustainable Finance, where it is one of the promoters of the [website www.sustainablefinance.pt](http://www.sustainablefinance.pt); but also in (x) Climate Change; (xi) Value Chain; and (xii) Circular Economy.

Following its adherence to the Women's Empowerment Principles (WEP), Millennium bcp has been a member, since 2021 of the (xiii) WEP Steering Committee, Portugal, promoted by the United Nations GCNP.

Since 2022, we have been part of the (xiv) Working Group on Sustainability of the Association Business Roundtable Portugal (BRP); and, since 2024, the (xv) APB/ADENE Collaboration Task Force.

Commitments

The BCP Group's position on the management of ESG issues is reinforced by its adherence to and endorsement to a set of external commitments and initiatives, through which efforts are maximised for a common purpose - sustainable development.

Following its adherence to the United Nations 'Global Compact Principles', formalised in 2005 and reaffirmed in 2018, the BCP Group is committed to supporting its 10 Principles, which establish a set of values in the areas of Human Rights, Working Conditions, Environmental Protection and Anti-Corruption.

Since 2017, Millennium bcp has subscribed to the Charter of Principles of BCSD Portugal - Business Council for Sustainable Development. This document establishes the principles that constitute the guidelines for good business management and allows signatory companies to be recognised by their customers, suppliers, and society in general for adopting sustainability commitments.

In 2019, as part of the 'Reflection Group for Sustainable Financing in Portugal', promoted by the Ministries of the Environment, Finance and Economy (in the context of the Roadmap for Carbon Neutrality 2050) and with the participation of the main banks in the market, supervisors and sector associations, two reference documents were produced: (i) '[Guidelines for accelerating sustainable financing in Portugal](#)'; and (ii) '[Letter of Commitment for Sustainable Financing in Portugal](#)' - signed by Millennium bcp -, which sought to highlight the importance, now widely confirmed, of integrating environmental, social, and governance risks into decision-making and risk management processes in the financial sector and which continue to serve as guidelines for the Bank.

In 2020, Millennium bcp also signed the 'Lisbon European Green Capital Commitment', an initiative promoted by the Lisbon City Council (CML) that brought together more than 200 entities operating in the city, including companies, schools and institutions, in a commitment - with objectives to be achieved by 2030 - in favour of climate action and towards sustainability with the aim of fostering a collective dynamic that will allow the goals set by the Paris Agreement to be met and accelerate the path towards carbon neutrality.

In 2019, the Bank had already joined the 'Lisbon Mobility Business Pact', a joint initiative of the Lisbon City Council, the WBCSD - World Business Council for Sustainable Development and BCSD Portugal, which brought together, in a voluntary public agreement with targets until 2030, companies that operate in Lisbon and have the common ambition of improving and transforming mobility in the city, making it more sustainable.

Millennium bcp also signed the 'CEO Guide on Human Rights,' an initiative of the World Business Council for Sustainable Development (WBCSD) and the Business Council for Sustainable Development (BCSD Portugal) achieved in 2019. The Guide incorporates reference policies, practices and aims to contribute to the implementation and promotion of human rights in organisations and their value chains.

Emphasizing its commitment to human rights and ethical and inclusive management, in 2020 Millennium bcp signed the United Nations Global Compact 's 'Statement from Business Leaders for Renewed Global Cooperation', an international declaration that aims to demonstrate a commitment to ethical leadership, based on good governance practices,

materialised through values, strategy, policies, operations and close relationships and involvement with all stakeholders. This commitment also aims to establish a partnership with the United Nations, governments, and civil society in order to contribute to strengthening justice and transparency, promoting equality and respect for human rights.

Also in 2020, Millennium bcp joined the 'Women's Empowerment Principles' (WEP) of the United Nations Global Compact, an important international platform for promoting gender equality that highlights our long-term vision and our desire to integrate - and boost - a collective dynamic based on cooperation and trust. Since 2017, Millennium bcp has also been part of iGen - Organisations for Equality Forum, an initiative that brings together private, public, and social companies to promote decent work.

Since 2018, Bank Millennium has been a signatory to the Charter for Diversity in Poland, a commitment promoted by the European Commission, thus reaffirming its determination to respect and promote diversity among customers and employees. In 2024, Millennium bcp also joined the Charter for Diversity, an initiative that in Portugal is promoted by APPDI - Associação Portuguesa para a Diversidade e Inclusão.

As part of its value chain, in 2023 Millennium bcp signed to the Code of Ethics of APCADEC - Associação Portuguesa de Compras e Aprovisionamento, which brings together a set of values, principles and guidelines for Procurement professionals.

A table identifying the main commitments, the proposed targets and their degree of achievement is available in Annex 10 of this Report

Principles of Responsible Banking (PRB)

As part of its Sustainability Master Plan (SDP), Millennium bcp joined the United Nations Environment Programme - Finance Initiative (UNEP-FI) and [signed its 'Principles of Responsible Banking' \(PRB\)](#) thus emphasizing its commitment to responsible investment policies and awareness of the impacts of its activity on both society and the planet. By joining UNEP-FI and signing the PRB, Millennium bcp is committed to placing sustainability at the heart of its strategy, integrating these Principles into its value proposition, processes, and operations, in the different business areas and geographies.

In June 2022, the Bank formally adhered to the PRB, having published a preliminary voluntary analysis of the application of the principles in the 2022 Sustainability Report. In the 2023 Sustainability Report, Millennium bcp published its first mandatory report in response to the PRB, following the template provided by UNEP-FI - Principles for Responsible Banking Reporting and Self-Assessment Template - in which it details its contribution to the 6 principles: 1) Alignment; 2) Impact and Goal Setting; 3) Customers and Consumers; 4) Interested Parties/Stakeholders; 5) Governance and Culture; 6) Transparency and Accountability.

In order to respond to Principle 2 (Impact and Goal 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 on the Portuguese geography. Based on this analysis, the Bank has identified three main impact topics for its activities: Climate Stability, Resource Intensity and Housing.

In this report, we publish in Annex 9, the 2nd progress report detailing the Bank's contribution to the six Principles that structure the PRBs

In 2025, Millennium bcp will continue this process, defining additional targets and incremental evolution implementation plans for each of its main impact topics. The Bank will continue to publish the monitoring reports proposed by the PRBs, detailing its progress in each of the six principles, in line with its annual non-financial reporting cycle.

United Nations Sustainable Development Goals (SDGs)



The Sustainable Development Goals (SDGs) of the United Nations, approved in September 2015, represent the largest global voluntary commitment – adopted by all 193 Member States of the United Nations in 2015 – constituting a broad and ambitious agenda aimed at improving the quality of life of the global population, in social, environmental, and economic dimensions, by 2030, and promoting peace, justice, and effective institutions.

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

The 17 goals and 169 targets that make them up thus represent an opportunity to improve society's quality of life by mobilizing globally to eliminate extreme poverty and hunger, provide quality education, protect the planet, and promote peaceful and inclusive societies.

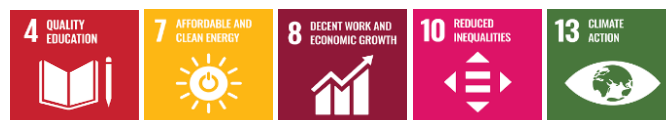
Considering that its pursuit implies a joint effort by states, civil society and private entities, particularly companies, the Bank is committed to working actively towards sustainable, socially inclusive and environmentally responsible development in all the geographies in which it operates, particularly in its relationship with People, whether they are employees, clients, 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, particularly in its close relationship with People and ability 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 the communities in which we operate.

The BCP recognizes in the SDGs a unifying and aspirational framework that will allow for the drafting of a new 'social contract' and stimulate processes of change that the economic, social, and environmental reality imposes and demands from us.

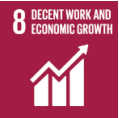


To make its actions in these areas more effective, the Bank regularly reflects on the commitments set out in the SDGs, establishing priorities that take into account the impacts of its activity and those that affect its value creation potential. In 2023, in the context of the regular stakeholder consultation process, BCP reviewed the SDGs to which its contribution should preferably be directed. Thus, SDG 4 - Quality Education, SDG 7 - Affordable and Clean Energy, SDG 8 - Decent Work and Economic Growth, SDG 10 - Reduced Inequalities and SDG 13 - Climate Action are now considered priorities for the implementation of the 2030 Agenda for Sustainable Development.



Below is an overview of the Bank's effective contribution to the achievement of the priority SDGs and other relevant SDGs for which the Bank seeks to ensure alignment with its value proposition in the different operations and with the needs and expectations of stakeholders.

SDG	Our goals	Our contribution in 2024
	Promoting employment and social innovation by supporting social enterprises	Financing, support, and products for social enterprises Initiatives: Non-Profit Associations Account - current account with special conditions. Results: Opening of 273 'Non-Profit Associations' accounts, corresponding to a total of 5,377 accounts in the Bank's portfolio.
	Contribute to improving quality of life and reducing poverty	Donations to the community and collaboration in community support initiatives Initiatives: - Outreach initiatives and the creation of social value, namely volunteering activities, which will be developed by the Foundation, the OSSS - Office of Sustainability Studies and Supervision and the Human Resources Department, within the framework of the Corporate Social Responsibility Plan in force; - Cooperation protocols with 'CASA - Centro de Apoio ao Sem Abrigo' and 'BIPP/Projeto Semear'; - Partnership between the Millennium bcp Foundation, Millennium bcp and EPIS - skills volunteering through which a group of Millennium bcp employees/volunteers tutor student from disadvantaged backgrounds; - Corporate volunteering action in collaboration with the SEMEAR Project - Land of Opportunities, a sustainable socio-professional inclusion program for young people and adults with IDD (Intellectual and Developmental Disabilities); - The 'Girl Move' project - a partnership aimed at helping young Mozambican women gain access to more and better education, in order to break the cycle of poverty and thereby build their own future and contribute to a better, fairer, and more inclusive society.
	Developing employees' personal and professional skills	Promotion of training and skills development activities Featured initiatives: LEAD Development Program - integrated management program (post-graduate) developed by ISCTE in partnership with Millennium bcp for leadership development, covering topics such as: Servant Leadership, Assertive Communication, Agility and Change, Sustainability, Artificial Intelligence and Cybersecurity; Millennium Campus - Bank Millennium's knowledge and skills development program, which aims to support the growth of innovation throughout the organisation through a series of lectures. In 2022/2023, the sessions focused on security. Results: 8,079 training actions 779,719 hours of training

SDG	Our goals	Our contribution in 2024
		50 hours of training per employee BCP Group
	Promoting the financial literacy of the population, contributing to more informed management of personal finances, and promoting entrepreneurship	Promotion of financial literacy activities Initiatives: 'Afinal de contas' - an article launched on social networks and the Millennium App with the aim of deconstructing banking or financial issues. - Digital Literacy Program in partnership with APB (Portuguese Association of Banks) on digital banking, aimed at senior citizens who are not yet familiar with the use of electronic banking. - European Money Week and European Money Quiz organised jointly with the APB. "Financial ABC" program - a financial literacy program run by the Bank Millennium Foundation in Poland, which aims to introduce basic financial concepts to pre-school children. - Banking Olympics - a project whose main objective is to train young people in Mozambique in financial knowledge, enabling them to make responsible decisions when managing their savings.
	Strengthen the Bank's position regarding the promoting of gender equality and non-discrimination	Promoting of gender equality Featured initiatives: - Signing to the Commitment Agreement of the Forum Organisations for Equality (iGen); - Adherence to the WEP's (Women's Empowerment Principles) of the UN Global Compact; - Promotion of cycles of debate and reflection aimed at women. Results: 55% of women in the total workforce 35% of women on the Board of Directors 41% of women in management positions (Executive Committee/Leadership and Management): 24% in Portugal 54% in Poland 27% in Mozambique
	Ensure universal access to modern and affordable energy services	Financing renewable energy infrastructure and equipment projects and others that contribute to or enhance renewable energy consumption Examples of initiatives: - Personal loans for Sustainable Buildings - loans to finance the purchase of equipment to produce renewable energy or to improve the energy efficiency of residential properties. - Millennium Line IFFRU 2020 - credit allocated for the financing of investment projects to be developed by collective entities, whether public or private, aimed at urban rehabilitation and regeneration, enhancing the energy efficiency improvements of buildings. - Millennium TFI Funds - funds aligned with Article 8 of the SFDR. 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.
	Promote financial inclusion products that support productive activities, job creation and entrepreneurship	Job creation by offering microcredit Initiatives: - SAF (Financial Monitoring Service) Packages - include credit restructuring and consolidation solutions, with the aim of preserving the financial stability of private clients. "Microinveste" credit lines - to support investment projects for business creation and self-employment. - KfW credit line - aimed at Mozambican micro, small and medium-sized enterprises (MSMEs), to finance investment in improving productivity and competitiveness and generating employment.

SDG	Our goals	Our contribution in 2024
		Results: 34 jobs created under the support lines for business creation projects.
	Protect labour rights and promote safe and secure working environments for all employees	Promoting a safe and secure workplace Initiatives: - Medical units and a dedicated medical staff on the premises. - Internal medicine services, with specialties such as nutrition, clinical psychology, and physiotherapy. Results: 213 occupational health and safety visits to facilities
	Contribute to the development of entities in the social economy sector by providing management training	Training for managers of social entities under the “GOS” (Management of Social Organisations) Programme by AESE Results: The 2024 edition had 60 participants (Lisbon and Porto).
	Ensuring equal opportunities at work and reducing inequalities (internally)	Promoting equal opportunities Initiatives: - Participation in Inclusion Labs - meetings of the Inclusive Community Forum (ICF) working group. - Participation in the initiatives of iGen - Forum of Organisations for Equality. “Winning in the World of Work’ training - support for the training that addresses key concepts for improving the social skills and employability potential of people with disabilities. - Continued partnership with APSA - Portuguese Asperger's Syndrome Association - with the objective to include its members in the job market. Results: 58% of the total hours of training provided is aimed at women - No. of employees with disabilities: 273
	Contribute to limiting global warming to 2°C	Promoting decarbonisation in the BCP Group Examples of initiatives: - In Portugal, two photovoltaic plants are in operation and the process of installing micro photovoltaic plants in selected branches has begun. - Business travel has been minimised in the different geographies, with meetings and training being held online whenever possible. Results: - In Portugal, 20.4% of the fleet is made up of electric or hybrid vehicles. A progressive increase that contributes to achieving the commitment to increase the % of energy-efficient vehicles in the Bank's vehicle fleet (80% by 2030). - In Poland, the Bank has replaced 100% of the vehicles in its fleet with gasoline-powered hybrid models. - The BCP Group reduced the total CO₂ emissions (scope 1, 2 and 3 - Category 6) of its operations by 20% compared to 2022, considering the emissions produced in Portugal and Poland. In 2023, the scope of reporting was extended to include Mozambique operations in scope 1 and 2.
	Increase the percentage of renewable energy in total fuel consumption	Renewable energy consumption Results: - In Portugal and Poland, in 2024, all the electricity purchased was 100% green, in a mix of energy produced by Taguspark's photovoltaic plants 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. - In Poland, since 2022, all the electricity purchased has been certified as being of renewable origin and is also 100% 'green'.

SDG	Our goals	Our contribution in 2024
	Mobilize and increase financial resources for the conservation and respect of biodiversity and ecosystems, as well for the promotion of sustainable forest management, including conservation and reforestation	Funding for projects that contribute directly or indirectly to the conservation of biodiversity and ecosystems; as well to sustainable forest management Examples of initiatives: • The BCP finances various environmentally responsible projects, with direct and indirect contributions to biodiversity conservation, in the areas of energy, forestry, and agriculture, through the Guarantee Lines with the European Investment Fund (EIF) and the European Investment Bank (EIB), under the new InvestEU European Program for the period 2023 to 2027; Credit Lines supporting the Agricultural and Forestry Sector - IFAP Short Term, Decarbonisation and Circular Economy; Biznesmax Guarantee Program; Polish Green Economy Financing Facility; FECOP Credit Line for Disasters, among others.

Sustainability Indexes and Recognitions

Throughout 2024, the BCP Group remained present in several Sustainability Indexes.

In order to promote transparency in the dialogue with Stakeholders, monitor the evolution of 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 assessment carried out by analyst Standard Ethics, BCP Group is included in the 'European Banks Index', and in the 'Europe's Climate Leaders 2024' ranking by 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 included in the 8 'STOXX Indices', the 'STOXX Emerging Markets 50 ESG-X', the 'STOXX Emerging Markets 800 LO ESG-X', the 'iSTOXX L&G Emerging Markets Diversified Multi-Factor ESG' and the 'iSTOXX L&G Global Multi-Factor ESG'.

In Portugal, Global Finance magazine once again distinguished Millennium bcp, in 2024 and for the 3rd year in a row; as the 'Best Bank for Sustainable Finance' for the third consecutive year.

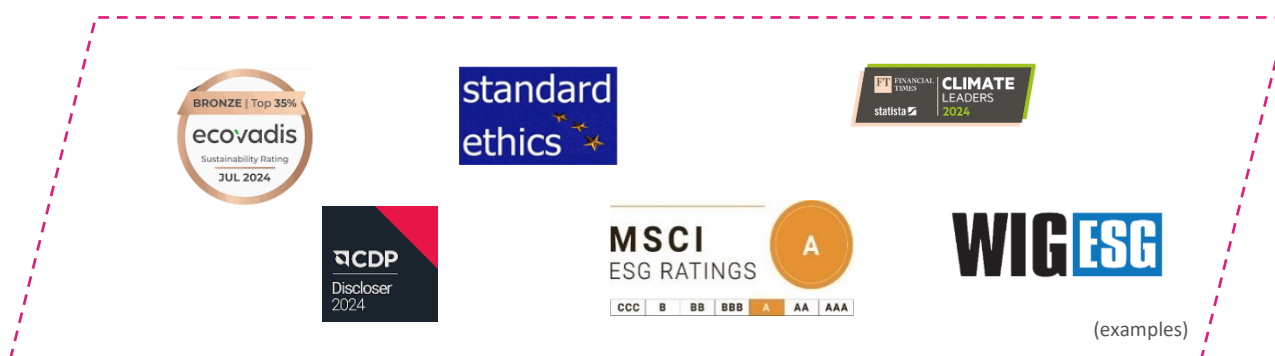
In its most recent evaluations, analyst Sustainalytics assigned a score of 24.5 / Medium risk (19.5 / Low risk in 2023) to the BCP Group's ESG performance, while S&P's CSA evaluates it with a 63% rating (56% in 2023), which corresponds to an 86th percentile in the financial sector/peer group. The MCSI continues to rate the BCP Group with an 'A' rating, Ethifinance (formerly Gaia Rating) rated it 70% and LSEG (formerly Refinitiv) 80%.

In Poland, Bank Millennium has once again been 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 2024 edition of the CDP - Carbon Disclosure Project (Climate), the BCP Group remained, as it has been since 2021, in the 'Management' group, with a 'B' rating, after joining the 'Leadership' group in 2020 and obtaining an 'A-' rating.

For CDP, the BCP Group is also one of the leaders in Supplier Engagement Rating (SER), in this case for the 2024 edition, in terms of Sustainability, maintaining, as in 2023, a 'B' rating, after having been part of the 'Supplier Engagement Rating Leaderboard' in 2022 with an 'A' rating. Also, in the context of the supply chain, in this case in the assessment of analyst Ecovadis, the Bank obtained a 'Bronze' rating, which ranks it among the 35% of companies with the best rating.

Índice/analista	2024		2023
MSCI ^(*)	A	=	A
CSA S&P (antes DJSI)	63%	-	56%
Carbon Disclosure Project (Climate)	B	=	B
Carbon Disclosure Project (SER)	B	=	B
Vigeo Eiris	na ^(**)		46% (88% disclosure)
EthiFinance (antes Gaia Rating)	na ^(**)		70%
LSEG (antes Refinitiv)	80%	-	74%
Sustainalytics	24,5	-	19,7
ISS ESG	na ^(**)		C-
Ecovadis	Bronze		-



(*) The use by Banco Comercial Português of any MSCI ESG research LLC or its affiliates (“MSCI”) data, and the use of MSCI logos, trademarks, service marks or index names herein, do not constitute a sponsorship, endorsement, recommendation, or promotion of Banco Comercial Português by MSCI. MSCI services and data are the property of MSCI or its information providers and are provided ‘as-is’ and without warranty. MSCI names and logos are trademarks or service marks of MSCI.

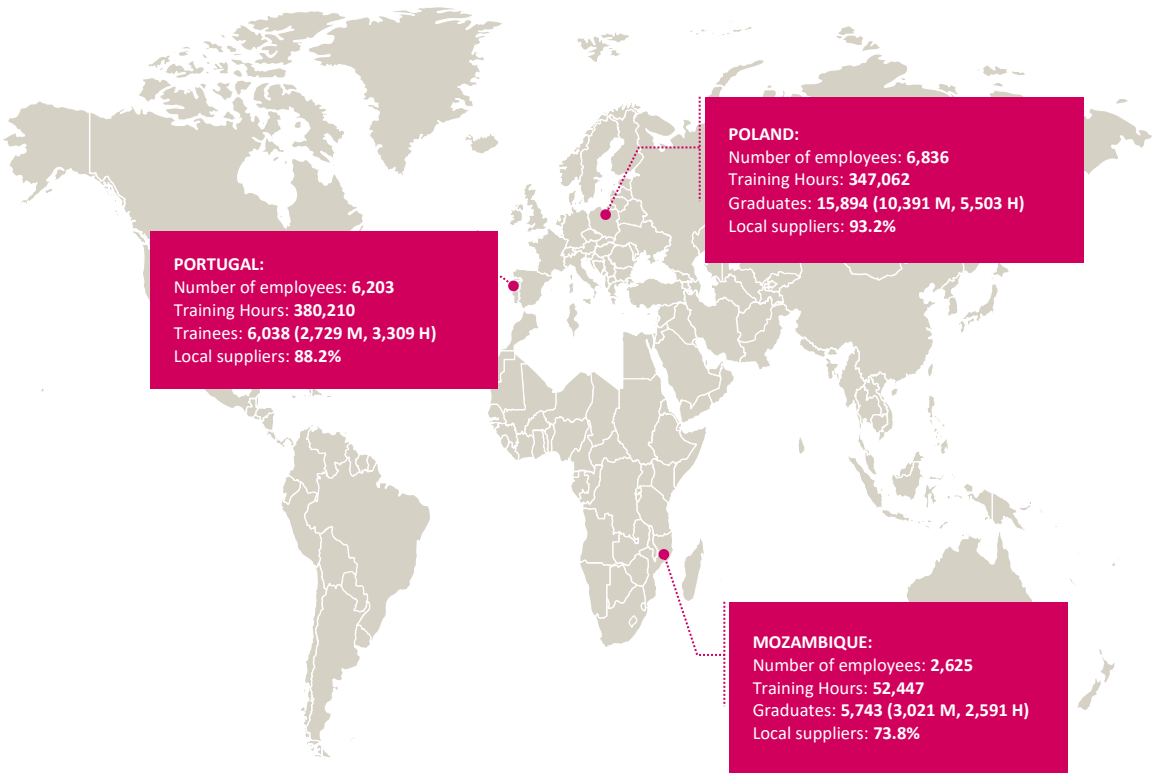
(**) nd - not available.

Other Economic and Governance in- formation

Economic and governance responsibility

The BCP Group carries out its activity in all the countries where it operates, with responsibility in its relations with Employees, Customers, Shareholders, Suppliers, and other Stakeholders, always guided by compliance with internal principles of rigor, applicable legislation and the provisions issued by regulatory and supervisory bodies.

Main highlights 2024



Shareholders

At Millennium bcp, the Investor Relations Department (IRD) is the unit responsible for ensuring a transparent and continuous relationship with the Bank's Shareholders and Investors, Analysts and Rating Agencies, as well as with players in the financial markets in general and their supervisory bodies.

IRD's activity with investors is characterised by:

- Ensuring an effective and accessible relationship with investors and analysts, as well as with the financial markets in general and their respective regulatory bodies, especially with regard to the disclosure of inside information and other mandatory information, including the production of BCP's Annual Report.
- Monitor updates to the composition of the shareholder structure;
- Managing contact with the Rating Agencies, including the preparation and provision of relevant regular information or information related to significant events, as well as clarifying questions about profitability, asset quality, capitalisation, funding, and liquidity, among others.
- Represent the Bank at conferences or other events directed at investors in BCP shares or debt.

In 2024, as in previous years, the Bank carried out extensive communication activities with the market, in compliance with the applicable legislation and in line with the regulator's guidelines. BCP published 124 press releases on the CMVM's information broadcasting system (now Balcão Único Eletrónico) and also some of these, not related to interest payments and repayments of debt securities, on Euronext Lisbon and also on the institutional website, in the Investors area. Of these, around 36 referred to insider information.

In order to meet the legal requirements for financial reporting, the Bank discloses information on its results and activity, including the Annual Report and Accounts, the Half-Yearly Report and Accounts and the Interim Reports and Accounts. Together with the Annual Report, the Corporate Governance Report, which is the responsibility of the Company Secretariat, is also approved and published.

As part of its relationship with Shareholders and Investors, the Bank took part in 14 conferences and roadshows. During these events, the Bank conducted institutional presentations and one-to-one meetings with investors, having held more than 350 meetings with more than 190 investors during 2024.

In order to maintain constant and close contact with investors, the Bank offers a telephone line, and an email address dedicated to answering requests for information.

Millennium bcp also provides a space for its shareholders, the 'Millennium bcp Acionista' (Millennium bcp Shareholder), which has more than 48,000 members, through which individuals holding Banco Comercial Português shares deposited in Portugal can communicate with the Bank in which they invested, participate in General Meetings, access relevant information aimed at investors and a newsletter directed at Shareholders. They can also access the Bank's products and services under preferential conditions and a range of advantages and discounts agreed between Millennium bcp and its partners. In 2024, 306 discount vouchers were issued as part of the 192 offers/partnerships established.

Access to the 'Millennium bcp Acionista' area is free of charge and is housed in a specific area of the millenniumbcp.pt website.

Innovation

Customers' relationship with their Bank, and with the banking sector in general, has changed significantly. This change has various origins and explanations, including technology and the emergence of new players that open up new possibilities and options for banking customers.

The opportunity cost of not being part of this evolutionary movement, serving customers from different segments with different needs, is still perceived as too high to be ignored by the banking sector.

At Millennium bcp, the mobilisation of talent and the Bank's digital transformation, fundamental pillars of the strategic plan defined for 2021-2024, have enabled the Bank to be equipped with tools, knowledge and new working methods which, together, help us to act and respond quickly and effectively to the challenges we face on a daily basis.

2024 was a year in which we continued to improve the digital experience focused on mobile, with increasingly efficient and innovative digital experiences, new features, and services, and reinforcing our increasingly personalised and targeted communication strategy. The consistent investment that has been made in the App has consolidated this channel as a central platform in the banking relationship with the Customer.

This vision of the Bank's digital transformation includes different priorities that deserve to be highlighted:

Accounts | it is now possible, via the App, for Customers to request salary advances for accounts with 2 holders. In addition, it is now possible to open an account by video call with a passport from 6 countries.

Digital Mobile Key | i) We made the data update process available, with information collected via digital mobile key; ii) we also made it possible to register in the App using the digital mobile key; and iii) we improved the process and enriched the offer when opening an account with a digital mobile key.

Cards | new way of applying for and issuing credit, debit and prepaid cards online, with a digital version available for immediate use; Launch of M Travel, a subscription service with advantages for travellers, which allows you to pay abroad without commissions, especially outside Europe, and the use of Smart Delay, which gives you access to VIP lounges if your flight is delayed by more than an hour. The new tracking system has also been made available so that anyone who orders a card can keep an eye on its delivery. We now alert Customers by push notification of suspicious movements on their cards, and provide management of these occurrences with the possibility of immediately unblocking or cancelling the card in the app, reinforcing security in the use of Millennium bcp cards;

Home Loans | We are the first and only bank with a 100% digital home loan process. We have improved the credit hub and information for customers, as well as allowing pre-analysis of eligibility for simulations. In this new simulator we communicate the advantages of applying for credit for sustainable real estate: reimbursement of 25% of the value of the dossier and formalisation commissions (in the case of credit for purchase or construction), as well as the cost of obtaining the new energy certificate (in the case of credit for renovations);

Manage | a new area has been created that provides a detailed view of money coming in and out over time, with organisation of movements into categories and information on future payments, for more effective management of finances and day-to-day life. In this area 'Manage', which works with real-time analysis supported by AI, is now possible: 1) See spending averages by category and expected payments. 2) Add *tags* to movements and create personalised categories. 3) Insert insights to understand spending habits.

Investment & Savings | A savings hub has been created, where customers can see what they have invested and the options available in a single space, with personalised suggestions and the possibility of creating monthly reinforcement plans. In addition, we launched investment plans in certificates and structured deposits.

Insurance | Customers can now take out HOMIN multi-risk home insurance, Volta e Volta 55+, for personal accident insurance, the car insurance Móbis, for motorcycles, and they can also carry out a digital inspection for their own damage cover, allowing the vehicle to be inspected without having to travel;

Process re-engineering | New workflow solutions, allowing the majority of requests to the Millennium Operations Centre (COM) to be made via service catalogue workflow, to the detriment of the use of email and telephone, saving resources, reworking and promoting marked improvements in Customer Service levels. Currently, the existing service catalogue has around 928 services, of which around 346 are used on a recurring basis. There are more than 60,000 requests per month, resulting in 172,000 individual tasks.

Robotic Process Automation (RPA) | use of these technologies for the main credit operations, with a strong impact on energy consumption.

Reduction of local printing and digitisation of processes | start of operations, with opening and registration directly in the systems and applications, avoiding the physical circulation of documents;

Business support for all Commercial Networks | through a more comprehensive chat contact management model - chatbot MAX - for more effective responses on first contact. In 2024, MAX consolidated its role as the primary point of contact for supporting all of the Bank's Commercial Networks. Based on the use of an artificial intelligence algorithm and with the aim of resolving issues automatically on first contact, also providing chat support in more complex situations, it has managed to show a positive evolution of its main indicators, namely:

- It has maintained more than 4,100 active users.
- 667,000 more questions answered (an increase of 21% compared to 2023).
- 62% of automation answered the first question (an increase of 4% compared to 2023).

- More than 86,500 chats answered (an increase of 16% compared to 2023).
- NPS with a service quality rating of 92.8 pts, out of a total of around 22,000 ratings.

During 2024, the internalisation of the support service for issues related to MTM and MDE machines, a service initially provided by an outsourcing team, was also completed.

Since October, when this service was fully internalised, the impact has been positive, as evidenced by the following indicators:

- Greater autonomy of Commercial Networks translated into a reduction of the average number of chats by 11% from 1604 (January-September) to 1438 (October-December).
- Effectiveness in the diversion and resolution of blockages with a resolution rate of 75% without the need for technical intervention.
- NPS with a service quality rating of 91 pt.

In 2024 Millennium bcp was once again recognised for the excellence of its digital offer.

In Portugal, we won the 5 Star Award in the 'Banking Apps' Category, the IDC Portugal Digital Awards with the E2E Mortgage process, and with the same process we also won the ACEPI Navegantes XXI Award and, finally, we were 'Product of the Year' with the Millennium App.

Outside Portugal, the E2E Mortgage process won the Finovate Awards in the 'Best Customer Experience Solution' category and we were 'Best Consumer Digital Bank' in Portugal, for Global Finance, as well as 13 other awards in 13 sub-categories.

Continued 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 also make it possible to address business needs in the area of sustainability (e.g., potential differentiation in communication or commercial conditions for operations that promote sustainability). This platform is based on an architecture that guarantees the correct updating and centralisation of data, which will have a component available for the automatic generation of reports, eliminating the need for manual intervention, and has already been used in the reporting for the first quarter of 2024.

In Poland, Bank Millennium is one of the leaders in innovation. Customers can choose from several payment methods without a card or wallet. They can make HCE contactless payments, Apple Pay, Garmin Pay, Fitbit Pay and BLIK contactless payments. This offer has been complemented with Google Wallet and the availability of these solutions has been expanded, including making BLIK contactless payments available to new customer groups (children and micro-companies) along with organizing activation campaigns. 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 a defined transfer. Bank Millennium, together with the Polish Payment Standard, continued to work on a new service in the area of deferred payments - BLIK Płać Później. Customers who buy online can take advantage of a purchase refund program.

Bank Millennium has been the most versatile organisation on the Polish financial market in implementing *open banking* solutions. The Bank offers the option of adding accounts and requesting transfers from other banks. It also uses *open banking* in the sales and acquisition processes (opening of individual and corporate accounts).

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

Fiscal Policy

Corporate social responsibility increasingly requires the adoption of behaviours and commitments to the communities in which we live, such as environmental protection, social well-being, and the quality of governance of institutions. More recently, conscious, and fair fiscal behaviour on the part of companies has been gaining prominence as an integral dimension of corporate social responsibility. Companies are faced with high levels of tax burden (taxes, fees, and contributions), which often leads to tax planning schemes that jeopardize the desired standards of fiscal responsibility. The payment of a fair amount of taxes by companies has become one of the main challenges of the European Union (EU (2018) Action Plan for Fair and Efficient Corporate Taxation in the EU) and the OECD, in the BEPS Report – (Base Erosion Profit Shifting) whose action has been to control anti-avoidance and tax evasion behaviour. In this context, the concept of fiscal governance has emerged as a fundamental part of corporate social responsibility, requiring companies to adopt good fiscal governance practices, such as: (i) The timely fulfilment and payment of their tax obligations. (ii) The management of tax risks. (iii) Good relations with the tax authorities, shareholders, investors, and other stakeholders.

Good corporate tax responsibility practices include the promotion of principles such as tax transparency, the careful and transparent definition of tax strategies and the disclosure of tax governance practices. Aware of the relevance of this topic, BCP complies with the tax burden to which it is subject, having adopted a policy of fiscal transparency based on the good practice of disclosing the amount of its taxes and contributions, as expressed in notes 6 and 31 of the disclosure of the annex to the consolidated accounts and in notes 6 and 27 of the disclosure of the annex to the individual accounts. It is also through this relevant contribution that BCP assumes itself as an institution with a relevant contribution to the development of a more inclusive, fair, and sustainable society.

BCP discloses on its corporate website, on the Sustainability /Main Corporate Policies and Principles page, the Principles it adopts in tax matters: [Millennium bcp principles in tax matters](#)

The BCP Group no longer carries out any activities in countries, territories, and regions with clearly more favourable privileged taxation regimes, as set out in Ministerial Order no. 150/2004, of February 13, and it should be noted that the BCP Finance Bank entity, based in the Cayman Islands, was liquidated in the course of 2024.

Disclosure of tax information

The activities carried out by the BCP Group are subject to various types of taxes, fees, and financial contributions which, when considered as a whole, determine the level of taxation to which the BCP Group is subject.

In its quarterly Reports and Accounts, the BCP Group indicates the main characteristics of the tax systems applicable in the countries in which it operates, such as nominal income tax rates, the framework for tax losses/benefits and the most relevant legislative changes. In addition, the information publicly disclosed in this context includes an analysis of the reconciliation between the nominal rate and the effective income tax rate applicable to the BCP Group, in individual and consolidated terms.

Through this analysis, the BCP Group explains the weight of the income tax accounted for in its results, which includes, in a global way, the impact of current tax and the impact of deferred taxes associated with existing temporary differences. In view of the International Financial Reporting Standards (IFRS) that govern the preparation and disclosure of the BCP Group's financial statements, 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 consortium of multinational companies, fully complies with the annual reporting and disclosure obligations that translate into a financial and tax declaration per country, resulting from the transposition into Portuguese tax legislation (article 121-A of the CIT Code) of the provisions of Action 13 of the OECD BEPS project. This reporting obligation is complied with in Portugal by BCP, as the ultimate parent entity of a group of multinational companies, in accordance with the established legal deadlines, respecting the last reporting period for the financial year 2023. Information included in the 2023 financial and tax return by country.

Information Included in the 2023 Financial and Tax Statement by country

The financial and tax information by country reported by BCP to the Portuguese tax authorities is reproduced below, as the ultimate parent entity of a group of multinational companies, for the financial year 2023 (values in thousands of Euros):

Tax Jurisdiction	Revenues			Profit Before Income Tax	Income Tax Paid (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 Value of Tangible Assets Excluding Cash and Cash Equivalents
	from Transactions with Independent Entities	from Transactions with Related Entities	Total								
Portugal	3,941,750	118,325	4,060,075	914,970	8,047	7,400	72,564	3,775,193	3,319,637	6,231	327,661
China	48,618	6,431	55,049	10,271	1,967	1,244	0	0	13,253	26	3,116
France	0	0	0	0	0	0	0	0	25,619	0	0
Netherlands	0	0	0	-761	255	-70	0	19	523,917	0	0
Caiman Islands	20	0	20	-647	0	0	0	230,882	288,448	1	0
Poland	6,535,171	117,366	6,652,537	290,540	47,180	134,957	13,226	314,813	1,370,916	6,777	131,452
Mozambique	425,545	4,890	430,435	147,127	27,812	31,578	0	63,766	459,907	2,541	84,541
Brazil	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

*The information on specific taxes paid on the banking sector is not reported to the tax authorities in the Country-by-Country Financial and Tax Declaration.

Information Included in the 2022 Financial and Tax Statement by country

Below is the financial and tax information by country reported by BCP to the Portuguese tax authorities, as the ultimate parent entity of a group of multinational companies, for the 2022 financial year (amounts in thousands of euros):

Tax Jurisdiction	Revenues			Profit Before Income Tax	Income Tax Paid (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 Value of Tangible Assets Excluding Cash and Cash Equivalents
	from Transactions with Independent Entities	from Transactions 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
Caiman 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
Brazil	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

*The information on specific taxes paid on the banking sector is not reported to the tax authorities in the Country-by-Country Financial and Tax Declaration.

The following aspects are relevant to justify effective income tax rates that are lower or higher than the nominal rates in force in the most relevant tax jurisdictions:

- In addition to the autonomous taxation in CIT and State and Municipal Surcharges, the expenses with the taxation of the BCP Group's income in Portugal in 2023 and 2024 translate, above all, in view of the growth in taxable profits, into expenses with the reduction of Deferred Tax Assets covered by the Special Regime applicable to Deferred Tax Assets. In 2024, the costs of reducing Deferred Tax Assets is mainly due to the result of the period of activity in Portugal, being positively influenced by the recognition of additional deferred tax assets in relation to fair value losses in venture capital funds, credit impairments not deducted for tax purposes in previous years and, negatively, by the reduction in the CIT rate and taxes on the banking sector (Contribution on the Banking Sector and Additional Solidarity on the Banking Sector);
- In terms of the activity in Poland, the income tax figures for 2023 and 2024 were strongly conditioned by the constitution of provisions related to legal risks associated with the portfolio of mortgage loans granted in foreign currency and by taxes on the banking sector, partly non-deductible for tax purposes, and, in terms of Deferred Tax Assets, by the decision handed down by the Supreme Administrative Court on December 6, 2023. In fact, this court confirmed that the costs incurred in cancelling mortgage credit contracts indexed to foreign currency and mortgage credit contracts granted in foreign currency (in particular in Swiss francs) following court rulings are not deductible for tax purposes, while establishing the possibility of recovering the current tax paid on income (interest, commissions and exchange gains) obtained from such contracts in the last five years prior to cancellation. Following the aforementioned court decision, the Polish subsidiary of Bank Millennium recognised a deferred tax asset in 2024 of PLN 186.7 million (EUR 43.4 million) related to tax amounts to be recovered in the future in relation to probable cancellations of credit agreements granted that are currently associated with ongoing legal proceedings and whose outcome may prove unfavourable;
- In terms of the activity carried out in Mozambique, the income tax figures for 2023 and 2024 reflect the impact of taxation, at an autonomous rate of 20%, of interest on public debt securities;
- The results obtained in China, within the scope of the Macau Branch's activity, are also taxed in Portugal in terms of income tax;
- In Portugal, during the year 2024, Law No. 41/2024, of 8 November, initiated the transposition into national law of Council Directive (EU) 2022/2523 of 15 December 2022, on ensuring a worldwide minimum level of taxation for groups of multinational companies and large national groups with a volume of consolidated annual revenues equal to or greater than €750 million (Pillar Two Directive), establishing common measures for the minimum effective taxation of these groups. Under the aforementioned law, the Global Minimum Tax Regime was approved, and the regulatory rules needed to implement it are expected to be published in 2025. In Poland, the directive was transposed on November 15, 2024;

- According to the analysis carried out on the potential impacts of this regime, the BCP Group estimates that it will comply, in the main jurisdictions where it operates, namely Portugal, Poland and Mozambique, with the necessary requirements for the application of the so-called safeguard provisions based on the declaration of financial and tax information by jurisdiction for the transitional period (2024-2026), thus being excluded, in that period, from the obligation to calculate a possible supplementary tax (due when a minimum level of taxation of 15% is not observed, measured by jurisdiction).

Specific taxation of the banking sector

Specific taxation on the banking sector has a significant impact on the BCP Group and is generally not related to the results of the economic activity carried out, thus reducing part of the shareholder value. Poland and Portugal are, for different reasons, the countries with the highest levels of taxation.

In the case of Portugal, the significant level of taxation is reflected both in the number of taxes and in terms of amounts collected, even after the change and harmonisation of the regulatory framework for resolution mechanisms and their financing within the European Union from 2015 onwards. In fact, since 2015, the two domestic resolution contributions and the contribution established by European Union law within the framework of the Single Resolution Mechanism have coexisted, in addition to which, since 2020, there has been the solidarity surcharge on the banking sector, created under the pretext of the VAT exemption that applies to most banking operations, but which does nothing to benefit banking institutions.

It should also be noted that, in 2024, the BCP Group paid the Deposit Guarantee Fund a very significant amount related to irrevocable payment commitments that had been set up until 2011 and whose liquidation was promoted by the respective Executive Committee. The amounts 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	
	2024	2023	2024	2023	2024	2023
Contributions and Taxes on the Banking Sector	799,483	602,673	87,386,625	71,961,317	88,186,108	72,563,990
<i>Funding of the National Resolution Fund</i>	<i>444,381</i>	<i>444,096</i>	<i>34,971,606</i>	<i>46,960,328</i>	<i>35,415,987</i>	<i>47,404,424</i>
Contribution on the banking sector	360,488	355,137	27,560,130	37,558,709	27,920,618	37,913,846
Contribution on the banking sector - Litigation	-	-	1,005,512	-	1,005,512	-
Contribution to the National Resolution Fund	83,893	88,959	6,405,964	9,401,619	6,489,857	9,490,578
<i>Social Security and Deposit Guarantee Fund</i>	<i>355,101</i>	<i>108,577</i>	<i>52,415,019</i>	<i>7,322,223</i>	<i>52,770,120</i>	<i>7,430,799</i>
Solidarity surcharge for the banking sector	65,543	64,570	5,010,410	6,828,546	5,075,953	6,893,116
Solidarity surcharge for the banking sector - Litigation	(129,495)	-	-	-	(129,495)	-
Contribution to the deposit guarantee fund	19,198	44,007	209,564	493,677	228,762	537,683
Contribution to the deposit guarantee fund - Commitments	399,856	-	47,195,045	-	47,594,901	-
Revenues of Non-Resident Authorities	-	50,000	-	17,678,767	-	17,728,767
Contribution to the European resolution fund	-	50,000	-	17,678,767	-	17,728,767

in the case of Poland, the conclusion, in 2024, of the implementation of the Recovery Plan of the Polish subsidiary determined the end of the suspension of the payment of the special tax on the banking sector, which had been determined in 2023 when the Plan was activated. In 2023 and 2024, no additional contributions to the Polish institutional protection fund, created in 2022, or contributions to the deposit guarantee fund were required.

The banking sector taxes paid by the BCP Group in Poland amounted to the following amounts:

(Thousands of Euros)

Group Millennium Bank

	2024	2023
Banking Sector Contributions and Taxes:	68,126	13,226
Banking Tax	53,991	-
Contribution to the national resolution fund	14,135	13,226
Contribution to the deposit guarantee fund	-	-
Institutional Protection Scheme for Commercial Banks	-	-

Other Taxes Borne by BCP

In 2023 and 2024, the banking activity carried out by the BCP Group in Portugal also incurred the following taxes:

Withholding Taxes on IRS/IRC, Stamp Duty, and VAT Collected in Banking Activities

With regard to the taxes collected by the BCP Group in its banking activity in Portugal and handed over to the Portuguese State (third-party charges), their value exceeded €332 million in 2023 and €441 million in 2024 in 2024, and it should be noted that the activity of collecting taxes on behalf of the State absorbs significant resources:

(Euros)

	ActivoBank		BCP		Portugal	
	2024	2023	2024	2023	2024	2023
Income taxes withheld and taxes charged to third parties	19,253,423	7,432,239	422,378,064	324,568,358	441,631,487	332,000,597
Personal Income Tax	14,235,676	3,300,001	208,928,307	153,613,927	223,163,983	156,913,929
Employees, retirees and pensioners	1,825,010	1,926,309	97,761,002	114,707,221	99,586,012	116,633,530
Customers and others	12,410,666	1,373,692	111,167,305	38,906,706	123,577,971	40,280,399
Corporate Income Tax	7,585	9,617	53,991,759	26,648,424	53,999,344	26,658,042
Stamp tax	4,491,910	3,903,835	119,282,020	107,493,965	123,773,930	111,397,800
VAT charged to customers	518,251	218,785	31,006,479	27,365,123	31,524,730	27,583,908
Property Tax and Additional to Property Tax (Leasing)	-	-	9,169,500	9,446,919	9,169,500	9,446,919

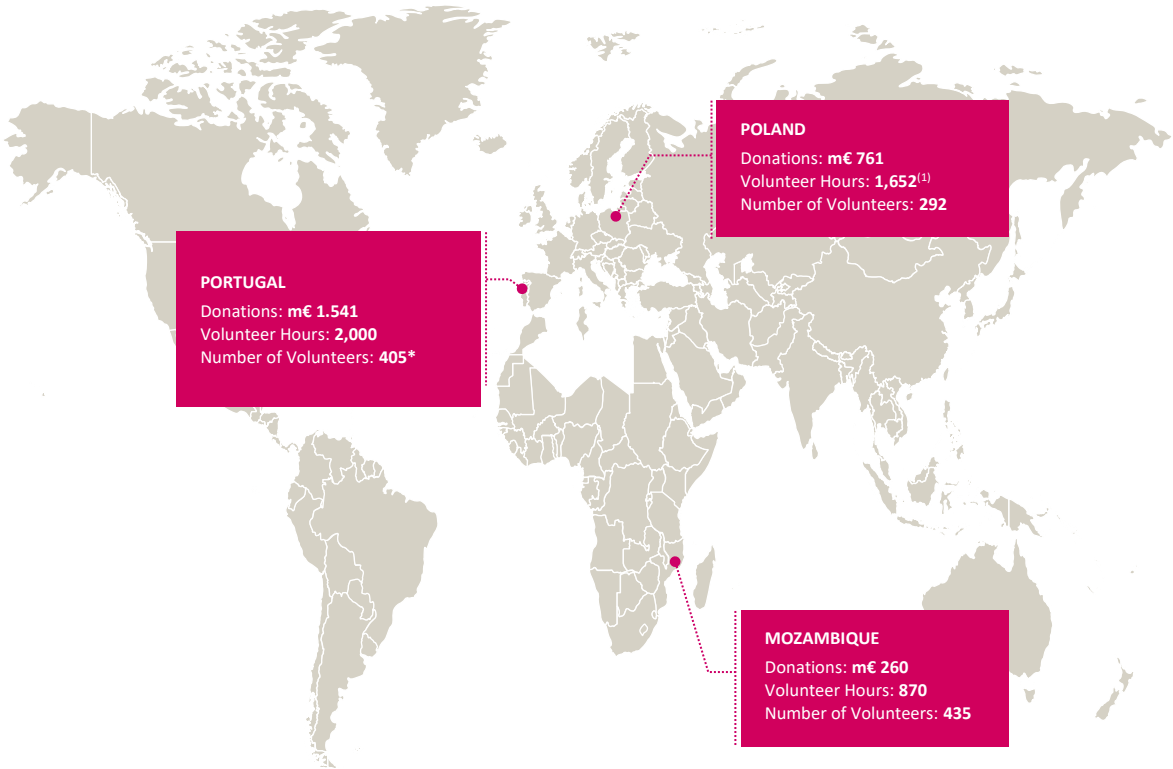
Other Social Information

Participate and share | Social responsibility

The BCP Group's strategy aims to promote a culture of social responsibility, developing actions for and with various stakeholder groups with the purpose of directly or indirectly contributing to the social development of the countries in which it operates.

It is thus, in a framework of approximation to the community, that the Bank has materialised its social responsibility policy, focusing its intervention preferably on initiatives in the areas of culture, education and social support.

Main highlights 2024

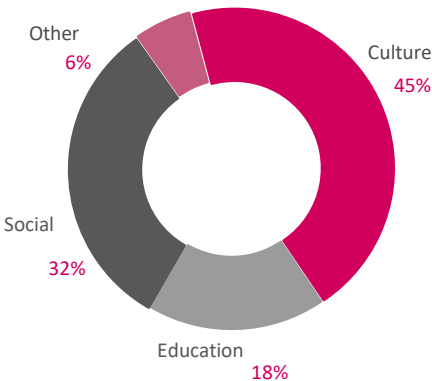


*Of which 318 are employees
(1) "Our People" volunteer programme: volunteers in the "Save the Planet" and "Financial ABC" initiatives.

"Making a Difference"

At Millennium bcp, 'Making a Difference' in the community and in society is part of our DNA. At Millennium bcp, Employees have the opportunity to dedicate part of their time to taking part in volunteer initiatives, putting their professional and personal skills and abilities at the service of the community. In 2024, 14 actions were carried out (9 social, 2 environmental and 3 education and financial literacy), with a total of around 2,000 hours spent. Amongst employees, family and friends, support was given to various organisations, of which we highlight the following: Vela sem Limites, Banco Alimentar, Casa, Semear, Just a Change, Brigada do Mar, AMI and EPIS.

Donations allocated by intervention area
(Percentage)



Volunteering in Portugal, in numbers:

Social	Environmental	Education	Total
 266 Employees 71 Family/ Friends 9 1.543 9 Actions Hours Locations  Vela sem Limites - Adapted sailing-Cascais - 11 volunteers (31h)  Banco Alimentar - separation of food in BA Warehouses- 152 volunteers (81 employees and 71 companions (760h)  Maria Drost Florinhas de Rua - Setting up and donating bicycles- 68 volunteers (68h)  CASA - Distribution of meals to the homeless - Porto and Lisbon - 9 volunteers (36h)  SEMEAR - Labelling and packaging of products prepared and sold by the Organisation - Sintra - 49 volunteers (216h)  Just a Change - Rehabilitation of homes and institutions for people in need - Alverca do Ribatejo e Porto - 48 volunteers (432h)	 49 Volunteers 33 Employees 16 Family/ Friends 2 309 2 Actions Hours Locations  Brigada do MAR - Cleaning the coastline at Praia da Tocha, Cantanhede - 17 volunteers (85h)  Pinhal de Leiria - replanting in Pinhal de Leiria - total of 32 volunteers, 16 workers (224h)	 19 Volunteers 19 Employees 3 148 8 Actions Hours Locations  Empresários para a Inclusão Social - school support (23/24) - ES Baixa da Banheira - 9 volunteers (98h)  No Banco da minha Escola 2023-2024 - Financial literacy - ES Fernão M Pinto (Almada); EB Eng. Duarte Pacheco (Loulé) and EBS Buzio (Vale Cambra); EB D. Dinis (Odivelas); ES José Afonso (Loures); Agrup Esc Verde Horizonte (Mação) - 8 volunteers (32h)  Capacitar para Empregar - training for the job market - 2 volunteers (18h)	 405 Volunteers 318 Employees (79%) 14 2.000 Actions 18 Different Locations (Braga, Porto, Viana do Castelo, Loures, Odivelas, Mação, Vale de Cambra, Cantanhede, Leiria, Cascais, Almada, Setúbal, Santarém, Lisboa, Baixa da Banheira, Loulé, Alverca do Ribatejo e Sintra)

Of the various volunteer activities carried out in the communities, we would highlight the following:



Tocha beach, in Cantanhede, was the stage for another corporate volunteering initiative. 17 employees from different areas of the Bank, from the north and centre of the country, got together to clean up the beach and collected 550 kg of garbage.

The action was organised by 'Brigada do Mar', an NGO (Non-Governmental Organisation) for development) whose main activity is the decontamination of the coastline, and which has already collected around 976 tons of garbage with the help of 9.023 volunteers, under the collaboration protocol established with Millennium bcp.

The action, organised by AMI - Projeto Ecoética and supervised by ICNF (Instituto da Conservação da Natureza e das Florestas) officials, was targeted at replanting the trees that failed to thrive on the five hectares that had been rehabilitated and reforested in 2020 with the support of Millennium bcp. 32 volunteers took part, including workers, family members and friends, who came together for another corporate volunteering initiative, this time to plant 2,000 maritime pine trees in the Leiria Pine Forest.



With SEMEAR - Terra de Oportunidades/Bipp, responsible for a sustainable socio-professional inclusion program for young people and adults with IDD (Intellectual and Developmental Difficulties), based on training, skills development for employability and professional integration, we carried out other volunteer actions with an environmental and social impact.

The initiative was attended by 23 Volunteers from different areas of the Bank, divided into 2 groups, who dedicated part of their day to helping label and package the handmade gourmet products prepared and sold by the organisation.



Considering the success of the first action, in November we carried out a second action with the participation of 26 Bank Volunteers, also divided into two shifts.

Within the framework of the Cooperation Protocol established with CASA - Centro de Apoio ao Sem Abrigo, two pilot volunteering actions were carried out with this entity, one in Lisbon and the other in Porto in July. The purpose was to serve meals to the homeless using a CASA van on one of the three daily routes provided by the institution.



These initiatives were developed within the framework of the new Corporate Volunteering Policy and the Program that materializes it, the aim of which 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 areas, aligning its actions with the Group's Sustainability strategy.



As has been tradition and our commitment for several years, we once again participated in the regular food collection campaigns promoted by the Food Bank, held in May and December, which were attended by 152 volunteers (52 in May and 100 in December), including employees, family members and friends, distributed by nine of the warehouses in Portugal (distributed throughout Lisbon, Porto, Braga, Santarém, Setúbal, and Viana do Castelo), helping in the separation and packaging of the donated food

We participated again in the regular food collection campaigns promoted by the Food Bank, held in May and December, which involved 134 volunteers (70 in May and 64 in December), including employees, family members, and friends, distributed across nine warehouses in Portugal (Lisbon, Porto, Santarém, Coimbra, Funchal, Aveiro, Setúbal, and Palmela), helping in the separation and packaging of the donated food.



The partnership established between Millennium BCP, its Foundation, and EPIS - Empresários pela Inclusão Social continued once again with the purpose of bringing together a group of bank employees/volunteers who are interested and available to provide tutoring to students in the 2nd and 3rd cycles of school from disadvantaged backgrounds (with a higher risk of academic failure and school dropout), thus helping to promote their social inclusion through education. Nine employees (2023/2024) volunteered to tutor various subjects via digital media for 1 hour/week.

EPIS is responsible for the largest program involving civil society in promoting the social inclusion of young people through school success and professional integration, working in close partnership with the Ministry of Education, Regional Governments and Local Authorities throughout the country.

Millennium bcp also renewed its support for the 'Sailing Without Limits' project, an initiative of the Cascais Naval Club that allows the regular practice of sailing to several dozen people with disabilities, with the participation of 11 volunteers.

In Poland, social programs are primarily managed by the Bank Millennium Foundation and focus on financial education, cultural sponsorship, academic support, and volunteering. The Bank Millennium Group values the involvement of its employees in social campaigns. To enable them to pursue their own volunteering ideas, internal competitions are held to motivate the banking community to take action, in which grants are awarded to be used to carry out employee solidarity projects.

Bank Millennium and the Foundation are not indifferent to environmental problems, which is why employee volunteering focused on environmental initiatives. In addition, due to the flood crisis that unfolded in southern Poland, volunteers had the opportunity to present projects to support those affected by the calamity and the volunteer programme called 'Our People '23: Save the Planet' was continued, focused mainly on protecting the planet and aimed at all Bank and Group employees in Poland.

The program is divided into two interdependent parts: sports challenge and eco-volunteering. The sports part of the campaign was based on involving volunteer employees in sporting activities. Every kilometre travelled and calorie burned contributed to the stated goal of donating PLN 250,000 to the Bank Millennium Foundation. 1,433 volunteers were involved in the activities, covering a total of 531,000 kilometres between April and June 2024. 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, our volunteers gave up driving or using public transport and instead walked, ran, or cycled. As a result, we saved 32 tons of carbon dioxide.

As the second part of the campaign, 49 different voluntary initiatives were implemented thanks to the money donated to the Foundation. Eco-volunteering collectively involved 205 volunteers. Green initiatives required volunteers to be involved in their work, be responsive to local communities, plan for the long-term impact of their activities, use raw materials and recycled materials, and minimise purchases. The campaign created an ideal space for creative ideas and, above all, solidarity. As a result, each of the initiatives was unique.

Projects implemented for flood victims:

- Projects were organised to improve the living conditions of the inhabitants of the flooded areas. Assistance was provided to rebuild and support infrastructure such as schools and shelters.
- Local communities, including the Volunteer Fire Brigade, were supported by providing equipment and resources.
- The affected families were helped by providing them with the necessary resources and support.
- Collection of donations, which were then transferred to the most affected municipalities.

For the grant program Our People'24: Save the Planet, the Bank Millennium Foundation allocated more than PLN 250,000. (For more information, see the Bank Millennium Foundation section).

In Mozambique, the commitment to be an active agent in the social development of the country is also assumed by Millennium bim employees who, through the 'More Mozambique for Me' 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-minded, and altruistic attitude of Millennium bim employees.

We launched the initiative "A Soup for Me", a project aimed at ensuring at least one nutritious meal for children and families in vulnerable situations. The initiative took place in the cities of Tete and Nacala, during which, in addition to the meals prepared and served by the Bank's volunteer employees, a space for reception and community support was also provided. In parallel with the 'A Soup for Me' initiative and in partnership with the Makobo Platform, the Bank held the 'Solidarity Soup' in Maputo City. Around 2,600 people in need have benefited from these initiatives.

These solidarity actions reflect our ongoing commitment to contributing to the well-being of the communities we serve.

The Bank's corporate volunteering project, 'More Mozambique for Me', involves employees and their families in actions of collective interest, realizing 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 gain 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. For the seventh year running, we are proud to have positively transformed the lives of 33 young women by supporting the Girl Move association in Nampula. By awarding a scholarship, we enable access to the Leadership and Social Innovation Program.

It is an advanced leadership and social entrepreneurship program for young university students from all over the country. These young women receive support at various levels, particularly in the area of education, making them role models for adolescent girls in their community.

When the life of a girl is improved through education, health, safety, and more opportunities are created, these changes have a positive multiplier effect on society. By becoming an educated mother, an active citizen, a trained professional, the girl becomes her community's greatest asset in breaking the cycle of poverty. The Girl Move project believes that by empowering Mozambican girls and women, they can become the country's main agents of development.

For the 9th consecutive year, Millennium bcp is once again supporting the non-governmental development organisation Girl Move, in a partnership that aims to empower young Mozambican women to become agents of social, economic, and political development in



their communities, combating cycles of poverty through education. This year it was the turn of Albertina Tembe, a young Mozambican woman who aims to lead the implementation of innovative projects focused on disseminating knowledge about financial literacy in Mozambique. In addition to a scholarship to attend the Leadership and Social Innovation Program, Albertina did a short-term internship at the Bank with the aim of developing and improving her skills. During the internship, she had the opportunity to work in the Corporate, Business and Institutional Marketing Department, Investment Banking, Economic Studies, Sustainability and Supervision, the Direct Banking Department of Companies, visit the Núcleo Arqueológico da Rua dos Correeiros and learn about the work carried out by the Millennium bcp Foundation.

From the point of view of the human resources function in connection 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 retraining people at risk of unemployment is one of the key initiatives.

In 2024, Millennium bcp was involved in three different equalification laboratories and collaborated in the launch of the respective classes, as well as the allocation of vacancies for Vocational Training in a Work Context (VTWC).



	Classes	FPCT no Millennium bcp
Digital	2	2
Sales	1	2
Business Intelligence	1	1

With the aim of strengthening the employability of the various participants, Millennium bcp also held 4 workshops (2 on Personal Marketing and 2 on Interview Simulation).

Further information on this program can be found in point 6 on Training under the heading - Other initiatives.

The Bank has also organised, encouraged, and monitored, in what constitutes an important contribution to the materialisation of its Social Responsibility policy in Portugal, internal solidarity actions that promote a culture of proximity and add social value. Among these initiatives, the following stand out:

"Millennium Solidarity – Christmas 2024"



As part of the traditional Christmas solidarity campaign, the Bank, and the Millennium bcp Foundation have this time teamed up with ACREDITAR - the 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 (yet another) successful partnership between the Bank's employees and the Millennium bcp Foundation, which made it possible to support 'ACREDITAR' with EUR 20,000 to guarantee the maintenance, for one year, of two rooms at Casa Acreditar in Lisbon.

With the help and involvement of the employees, 50 donations were collected, worth a total of 1,755 euros. In order to purchase all the furniture needed for the two rooms at Casa Acreditar in Lisbon, for a total of 3,050 euros, the Millennium bcp Foundation contributed the remaining 1,295 euros, which was added to the 20,000 euros earmarked for its maintenance for one year. Each contribution was an important step in this journey of solidarity and collective involvement, which helped Make a Difference and reinforced our commitment to social responsibility.

The social impact policies of Millennium BCP and its Foundation, which aim to develop actions that create social value and strengthen a culture of partnership and closeness with surrounding communities, had in this initiative a renewed example of the materialisation of principles of solidarity and corporate social responsibility. This is a clear reflection of consistent individual and collective citizenship, with a real impact on people's lives.

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In Mozambique, as part of Millennium bcp's Social Responsibility program, and to celebrate December 25, Family Day for some and Christmas for others, we organised a meeting with people in need, reinforcing our commitment to the development of the communities we serve. It was a day spent in an atmosphere of unity, love and sharing.

We take this opportunity to offer food, hygiene products, toys and provide a moment of fraternisation by distributing snacks to thousands of people.

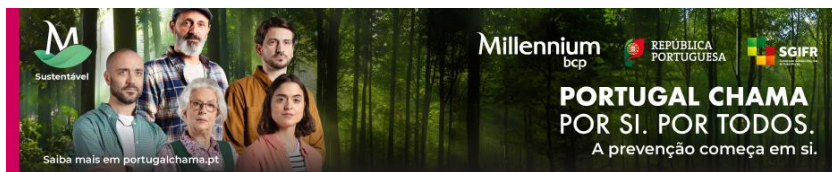
Oeiras Solidarity Program (POS) and local proximity actions

The Bank has publicised and promoted, using its communication channels, several initiatives of the Oeiras Solidária Program (OSP), an organisation of which it is a member, but also of entities in the social sector, such as CERCI Oeiras or CERCICA. It was in this context that the Bank once again made its premises available for the annual sale of Magic Fireflies, with the main aim of helping to raise funds for CERCIs



In Portugal, Millennium bcp has also guaranteed a series of initiatives to support institutions with the capacity to add social value:

- Regular support to institutions through the donation of used, but still in good condition, computer equipment and office furniture. In 2024, including computer equipment and furniture, the Bank donated 1,408 goods to 8 institutions;
- As part of the 'Paper for Food' campaign, an action promoted by the Portuguese Federation of Food Banks with environmental and solidarity implications, Millennium bcp donated 9 tons of paper. The value of this donation, obtained by selling the paper to certified waste operators, was converted by the Portuguese Federation of Food Banks into basic food products to be distributed locally to the needy, making it possible to provide more than 1,800 breakfasts. This was another opportunity for the Bank to make its contribution to the fight against hunger and, at the same time, to protecting the environment and nature.
- Materialising its Corporate Social Responsibility Policy and its commitment to the preservation of nature and biodiversity and to the mitigation of climate change, Millennium bcp was once again present at 'Portugal Calls', a prevention campaign launched annually by the Portuguese state, with the purpose to avoiding forest fires, protecting people, rural ecosystem services and minimising the environmental, economic and social impact of fires.



- As for Culture, the highlight was the 16th edition of the Millennium bcp "Festival ao Largo", an annual initiative with free access that once again took place in the Largo of the Teatro Nacional S. Carlos, with a program by the Companhia Nacional de Bailado, the Teatro Nacional de São Carlos and guests and Estúdios Victor Córdon, transforming summer nights into an unforgettable moment of full encounter between the public, music and dance. Musical diversity, dances and the presentation of young talents were all part of the program. Millennium continued its commitment to being 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 2024, we reinforced our corporate volunteering activities, with 1,132 volunteers taking part in the activities carried out in the BCP Group's main geographies (405 in PT, 292 in PL and 435 in MZ), which corresponded to 4,522 hours of environmental and social volunteering.

The number of volunteer hours recorded in Portugal, 2,000, made it possible to exceed the target of a 4% increase when compared to 2023, when we recorded a total of 1,097 hours.

In 2024, we reinforced corporate volunteering actions, with the actions carried out in the main geographies of the BCP Group having the participation of 1,132 volunteers (405 in PT, 292 in PL and 435 in MZ), which corresponded to 4,522 hours of environmental and social volunteering.

In Mozambique, the Bank's social commitment is embodied in the 'More Mozambique for Me' program, one of the BCP Group's benchmarks in terms of Corporate Social Responsibility and getting closer to local communities, which has continued to give priority to projects in the areas of health, education, culture, and community development:

Health

The contribution in the field of health translates into support for the implementation of projects that can provide greater quality to the Mozambican Health System, whether through long-term projects or by responding to requests for immediate intervention.

Reborn with Juju

In 2024, in partnership with the 'Reborn with Juju' project, we will carry out a campaign to support 50 needy women facing cervical cancer. The aim of this campaign was to make patients aware of the importance of not giving up on treatment and to encourage their families, emphasizing that they play a fundamental role in the success of recovery.

Blood donation campaigns

Support for blood donation campaigns is essential, as donations are vital for saving lives. The shortage of blood banks directly affects patients who need transfusions for medical treatment, surgery, and emergency situations.

It is in this sense that we support blood donation campaigns promoted by the District Hospital of Mandimba and the provincial hospital of Linchinga. Volunteer employees took part in these initiatives.

Support for hospital institutions as part of the opening of branches

In the context of the reopening of the Boane Branch, we supported the Hospital of Boane Sede with various essential items to improve the quality of healthcare provided by this hospital unit. These actions are a reflection of our ongoing commitment to providing better medical care for the people of Boane.

Also in this area, on the occasion of the reopening of the Massinga Branch, in Inhambane province, we supported the Massinga District Hospital with the supply of hospital blankets, benefiting around 180 daily users.

These initiatives reflect our bank's commitment to strengthening public health and improving medical conditions for the Mozambican population.

Donation of washing machines to Maputo Central Hospital

In August, the Bank donated two washing machines to the Neonatology Service at Maputo Central Hospital (HCM), which will help improve the hygiene conditions of the newborns at this important health unit.

Recognising the importance of providing a clean and safe environment for babies, especially those in vulnerable situations, we joined forces with the Maputo Central Hospital team to identify areas where improved hygiene conditions could have a significant impact.

The official handover of the machines was attended by the Director General of the Maputo Central Hospital, Dr. Mouzinho Saide, as well as Dr. Joyce Ventura, head of neonatology at HCM.

Children's Month celebration

As part of our Social Responsibility program, 'More Mozambique for Me', we had the honour of supporting several institutions in the celebration of International Children's Day on June 1st. These activities provided moments of celebration and joy while also highlighting the often-overlooked rights of children.

Activities carried out:

- Maputo - Central Hospital, we held a special event for 100 children hospitalised in the Department of Physical Medicine and Rehabilitation - Physiotherapy Service of the Central Hospital.
- Lichinga - Niassa Province, we provided lunch for 150 orphaned and vulnerable children, in partnership with the Office of the Spouse of Her Excellency, the Governor of the Province.
- Nicoadala - Zambezia Province, we provided a lunch for 130 orphaned and vulnerable children, in collaboration with the District Health, Women's and Social Action Services of Nicoadala.

Support for the Our Lady of Livramento orphanage

As part of the project to restructure the branch network, the Social Responsibility area gave mattresses to the Our Lady of Livramento orphanage. The aim of this action was to improve the quality of life in the communities where we operate.

Support for the Eduardo Mondlane Inclusive Education Resource Centre

Regarding actions aimed at improving the living conditions of vulnerable people, the Bank donated 4 wheelchairs and 2 pairs of crutches to the Eduardo Mondlane Inclusive Education Resource Centre (CREI), an institution that provides inclusive education for students with visual, auditory, physical, mental, and other disabilities from the southern provinces of the country. The donation took place during a symbolic ceremony attended by representatives of the Bank and the beneficiary institution.

Through this support, we promote the comfort, independence and inclusion of students who require mobility assistance, the enhancement of the quality of life of students with special needs, greater inclusion, and participation of students in the school community, and improved travel and accessibility within the school environment.

Culture has been one of Millennium Bim's areas of intervention and represents a clear commitment to supporting the development of Mozambican arts and culture.

Partnership with the Franco-Mozambican Cultural Centre

The Franco-Mozambican Cultural Centre (CCFM) and Millennium BIM have announced the formalisation of a strategic partnership through the signing of a Memorandum of Understanding (MoU).

This partnership aims to strengthen the Mozambican cultural scene, allowing Millennium BIM to finance the production of five annual exhibitions at the CCFM, offering essential support to local artists. In addition, we will support the continuation of free cultural activities for children, held every Saturday, promoting cultural education and encouraging access to culture from an early age.

With this Memorandum of Understanding we reaffirm our commitment to the development and promotion of culture in Mozambique, while at the same time expanding the range of cultural events accessible to all.

Exhibition "a pente fino"

Under the partnership with the Franco-Mozambican Cultural Centre (CCFM), which is part of our Social Responsibility plan in terms of support for culture, the first art exhibition sponsored by the Bank was held in August. As part of the agreed quid pro quo, our clients and guests had access to the pre-opening event of the exhibition by the renowned Mozambican visual artist and photographer Filipe Branquinho. This partnership aims to establish a platform to support and promote Mozambican art and artists.

Exhibition of the Millennium bim collection: Between Colours and Shapes: Plurality of Voices

In October, Millennium bim inaugurated the first edition of a series of exhibitions of its art collection, entitled 'Between Colours and Shapes: Plurality of Voices'. This exhibition, which brought together part of the collection of works that the

Bank has collected over the years, highlighted works by some of the most prestigious Mozambican artists and reflected the Bank's ongoing commitment to promoting and valuing culture and art as fundamental pillars for social development.

The Bank has always maintained a strong commitment to culture as an expression of a people's identity, believing in the transformative power of art. The exhibition brought to light works by important artists such as Malangatana, Bertina Lopes, Estêvão Mucavele, Shikani, Naguib and Eugénio de Lemos, among others. Also present were works by Jacob Estêvão, José Pádua, Victor Sousa and João Paulo, who represented a rich diversity of styles and approaches to Mozambican art.

Clean City

On February 24, 2024, Millennium BCP launched the volunteer initiative 'A Clean City for Me', with the aim of raising awareness in society about the importance of preserving public spaces and protecting the environment. The action aims to encourage the adoption of responsible behaviour for the sake of collective well-being.

With the participation of more than 250 volunteers, the event was held simultaneously in several cities across the country, including Maputo, Xai-Xai, Inhambane, Beira, Chimoio, Tete, Quelimane, Nacala, Pemba and Lichinga.

Planting mangroves

We took part in a volunteer activity at Praia dos Namorados, located in Nacala-à-Velha, in the province of Nampula. We relied on the valuable collaboration of a dedicated team of volunteers and carried out significant work planting mangroves, contributing to the revitalisation of an ecosystem that is essential to local biodiversity.

During this action, 25 volunteers came together to plant approximately 400 mangrove seedlings, evidencing our team's commitment to preserving the environment and improving the quality of life of the local community. Beyond our environmental contribution, this activity fostered a strong spirit of unity and collaboration among colleagues, reinforcing the idea that small actions can create a significant impact.

Financial literacy

The BCP Group's strategic objective in all its operations is to increase levels of financial literacy. An example of this commitment is 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 behaviour and informed decision-making. In this context, the Group promoted a diverse set of initiatives throughout 2024, among which we highlight, in Portugal:

- As part of the 'Financial Education' Working Group of the Portuguese Banking Association (APB), in which Millennium BCP participates, throughout the year the APB promotes or associates itself with various events aimed at developing 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 website - 'Saber de Contas' - there are many initiatives aimed at promoting greater culture and financial inclusion among civil society.
- The organisation of another edition of 'European Money Week' and the 'European Money Quiz', which in Portugal are promoted by APB.

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 involves more than 20 countries at European level.

This European competition, played online, promotes financial literacy among young people and tests their knowledge of subjects such as savings, debt, managing the family budget, digital security, among others. The main aim of this project is to raise awareness of the importance of greater and more comprehensive financial education in Portugal and Europe, making the community aware of the importance of adopting appropriate behaviour in present and future financial choices.



'On my School Bench'



The Bank continues to support and participate in the 'On my School Bench' initiative, promoted by the Portuguese Banking Association (APB). The aim of this project is to promote financial education among young people, giving them the essential tools to manage their money more responsibly.

In three sessions throughout the 2024/2025 school year, the member banks visit schools from north to south of the country to discuss:

- 1st Period: Family Budget Planning and Management (Expenditure vs. Income);
- 2nd Period: The financial system and basic financial products (Credit, Deposits, Payments, Insurance);
- 3rd Period: Preventing Online Fraud (the types of fraud that exist and the precautions to be taken when using digital channels).

Knowing your Accounts

"Knowing your Accounts" has content aimed essentially at young people, bank customers and senior citizens, with the aim of increasing their knowledge and financial literacy and helping them to make more informed and responsible decisions when managing their day-to-day lives.

Also in Portugal, with the aim of continuing to expand the publication and dissemination of content on sustainability issues, particularly sustainable finance, the Bank continued to support the ECO Capital Verde project. Among the initiatives carried out and materials published, we highlight the presence in the ECO Sustainability Yearbook and the Green Economy Forum, ECO Capital Verde's annual conference dedicated to the green economy, sustainable finance, and the 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.



negócios
Sustentabilidade
20 30

O nosso futuro
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negócios



With the same objective, the Bank also continued to support the Jornal de Negócios project on Sustainability. Of the activities carried out in 2024, we would highlight Millennium bcp's participation in a CEO conference on Sustainability issues - 'Miguel Maya - Sustainability transforms the way we do banking' - as well as its presence at the three ESG conferences which debated topics such as: Environmental (Decarbonisation, Circular Economy, Preservation and Natural Capital); Social (Equality and Diversity, Well-being Sustainable Cities); Governance ESG

(Sustainable Finance, Sustainability Communication and Digital Transformation in Sustainability).

In Mozambique, in 2024, the bank developed the following initiatives in the area of education:

Banking Olympics

The 'Banking Olympics' project is an educational initiative that aims to promote knowledge about the financial and banking system among students at different levels of education. Through a series of competitions and interactive activities, participants have the opportunity to learn about concepts such as economics, financial management, and investing in a dynamic and engaging way.

For the first time, the cities of Beira and Inhambane hosted the Millennium bim Banking Olympics project. Among 800 students from 20 schools, ranging from 9th to 11th grade, Matadouro Secondary School, in the city of Beira, and Eduardo Mondlane Secondary School, in the district of Morrumbene, stood out as winners with their sustainable projects utilising recyclable materials.

Students from Matadouro Secondary School presented an innovative project: a low-cost welding machine built from recycled materials. This project aims to train students in the area of metalwork, preparing them for the job market. For their part, students at Eduardo Mondlane Secondary School in Morrumbene developed a project aimed at producing compost and organic fertilizer through home composting. This fertiliser, rich in essential nutrients, not only increases agricultural productivity in an environmentally friendly manner but also promotes environmental sustainability.

School Savings

As part of the financial education project, we carried out a financial literacy initiative that benefited more than 300 children from the elementary school of the III Congress, Completa Francisco Manyanga, 11 de Novembro and Amílcar Cabral, in the provinces of Inhambane, Tete, Sofala and Niassa, respectively.

The main objective of this project was to raise and instil awareness in children about the importance of saving in their daily lives. The initiative was guided by a specialised team from the Bank, with the support of comic books and piggy banks to facilitate understanding.

Dissemination of content on social networks

In addition to the previously mentioned initiatives, Millennium bim has been dedicated to regularly sharing information about financial literacy on its social media platforms. This action aims to reach even more people, providing them with essential knowledge for more conscious and effective financial management. We believe that by sharing accessible educational content, we are contributing to the formation of a more informed society capable of making better financial decisions. Join us in this mission to promote financial education!

Global Money Week

Every year, we have the honour of organising the celebration of Global Money Week. On March 22, 2024, we held an exhibition of products and services focused on financial literacy, under the theme "Plan Your Money, Plant Your Future". This year's initiative included various activities, such as workshops, debates, paintings, and drawings, role-playing and simulations, quizzes, and a fair. The aim was to empower children and young people to make more informed financial decisions, thereby enhancing their financial resilience.

In Poland, in addition to the financial literacy initiatives carried out by the Bank Millennium Foundation, the 'Financial ABC' program, a financial literacy program that aims to introduce basic financial concepts to pre-school children, held two editions of the Financial ABC workshops: the 12th edition in the spring and the 13th edition in the autumn. The 2024 program was implemented under the honorary patronage of the Children's Ombudsman. Also in 2024, the Global Money Week program continued, an annual international financial education campaign to ensure that children and young people develop financial literacy from an early age and gradually obtain the relevant knowledge.

For more information on the various Financial Literacy initiatives, see the Bank Millennium Foundation's 2024 Report at: https://www.bankmillennium.pl/documents/d/guest/raport_fundacji_2024_en?mv=1mv

Educational actions on the security of online banking operations [GRI FS16]

Customers who are taking their first steps into digital banking can use the website www.bankmillennium.pl/pierwszykrokonline since 2020

The problem of fraud or embezzlement in which bank customers are the injured parties concerns the entire banking sector in Poland and around the world. As customer awareness is of key importance in each of these cases, in terms of the safe use of online financial services, banks, including Bank Millennium, intensively educate their customers in collaboration with the Polish Banking Association and unilaterally, reminding them of the online risks they face and the need to comply with security rules. Bank Millennium publishes security warnings and recommendations on security rules on its website. Whenever the Bank receives information about a new scam or a new method of fraud, it immediately posts notices to customers on its website, in special campaigns and on social media. Bank Millennium also adopts various preventive measures and responds to any signs that may constitute an attempt to fraudulently obtain customer information or funds.

The number of frauds attempts through electronic channels has remained consistently high since 2020, prompting the Bank to continue its educational initiatives. Customers have constant access to informational materials and videos available on the bank's website and a dedicated tab in the mobile app. Bank Millennium provides a dedicated webpage on its portal with up-to-date information and interactive quizzes, allowing customers to test their knowledge of security issues and stay informed: <https://www.bankmillennium.pl/bankowosc-elektroniczna/bezpieczenstwo>. The video materials were also published on the bank's YouTube channel.

The website content is regularly supplemented with educational campaigns across digital channels, tailored to different audience groups, including seniors, teenagers, parents of young children, and specific segments identified through the Bank's risk profiles. We evaluate the need for additional communication with non-Polish-speaking customers, ensuring that information is available in English and, when necessary, in Ukrainian. The communication plans and content are created as a result of cooperation between several departments: Security Department, Electronic Banking Department, Quality Department and Customer Information Department. In addition, we analyse the needs of clients in this area to better adapt educational activities to their level of knowledge and expectations.

Cybersecurity issues are also addressed in other contexts, for example when establishing a relationship with a new client or submitting an electronic application for a cash loan. We address cybersecurity in our marketing activities with influencers and brand ambassadors.

Customers can also call a special helpline run by a team of consultants trained in cybersecurity.

On YouTube, there are a series of videos featuring children and comments from a bank expert, created as part of the activities of the Bank Millennium Foundation.

Language-adapted offer for Ukrainian customers

Ukrainian citizens can find information in Ukrainian on the bank's website. They can also use a special hotline number, where they will be answered in their own language. They can also fill in an online application for family benefits in Ukrainian. They also receive communications in their own language on important matters such as application deadlines and cyber security warnings.

We collaborate with the CFO Club of the ICAN Institute

Cooperation with the CFO Club of the ICAN Institute continued in 2024. The CFO Club is a development and networking initiative that brings together chief financial officers (CFOs). The CFO Club provides access to the latest knowledge and is also a platform for sharing experiences and networking. The topics discussed in the webinars, meetings, podcasts, and articles focus on the current challenges faced by finance departments in companies. These include green transformation, ESG (Environmental, Social, and Governance) criteria, securing public funds for business development, cybersecurity, and the use of artificial intelligence in operations.

We are partners of the Forbes Family Business Forum

In the 7th edition of the Forbes Family Business Forum - a joint initiative of Forbes magazine and Bank Millennium - 9 meetings were held with entrepreneurs in Poland's largest cities. During the presentations and panel discussions, we addressed topics concerning the opportunities and challenges faced by family businesses. These included the impact of political and macroeconomic factors on business strategy, succession planning and execution, investments in innovation, the green transformation of companies, and the use of artificial intelligence.



(Millennium Volunteers at the Lisbon and Porto Food Bank – May and December 2024)

BCP Group Foundations

MILLENNIUM BCP FOUNDATION

The Millennium bcp Foundation plays a decisive role in supporting and promoting initiatives aimed at the sustainable development of society, through a solid commitment to Culture, Solidarity and Knowledge. With the aim of enhancing and energizing cultural heritage, stimulating research, and fostering social support, the Foundation has been consolidating its role as an agent of positive and inclusive change.



Through an integrated approach, the Foundation supports projects that not only promote art and heritage, but also encourage training and research, underpinning the knowledge and innovation. In the social sphere, the company is actively

dedicated to corporate social responsibility and inclusion, aiming to make a positive impact on the communities in which it operates.

Throughout 2024, the Millennium bcp Foundation remained committed to its main strategic areas of activity, supporting projects in the areas of Culture, Solidarity and Knowledge. This commitment seeks to actively contribute to the sustainable development of society and to the growth and enhancement of the organisations it supports.

In the field of culture, particular emphasis was placed on sharing and promoting the artistic heritage of Banco Comercial Português. This includes supporting national museums, restoring the country's architectural and artistic heritage, and promoting contemporary art across a wide range of artistic expressions.

As part of the Arte Partilhada project, the tapestry exhibition titled 'Não vá o diabo tecê-las! A Tapeçaria em diálogo a partir da coleção Millennium bcp' showcased 86 works by 27 artists, presenting the remarkable collection of tapestries produced by the Manufatura de Tapeçarias de Portalegre, which are included in the Millennium BCP Collection.

Throughout the year, there was a consistent effort to promote the Núcleo Arqueológico da Rua dos Correeiros (NARC), offering free guided tours to anyone interested in learning about this National Monument. In 2024, a new temporary exhibition titled 'A Cozinha Romana no NARC' was inaugurated at the NARC. This exhibition is designed to welcome a very special audience, those who are blind or have low vision, making the cultural experience more inclusive.

Collaboration with the Museu Nacional de Arte Contemporânea (MNAC), under the current protocol, continued to be a priority for the Foundation. This support has enabled the Museum to develop its activities, hold relevant exhibitions and share works from the Millennium bcp Collection, and has ensured that there is always a high-quality program at the Millennium bcp Gallery.

In terms of heritage restoration, collaboration with the National Museum of Ancient Art continued, ensuring the continuity of the restoration and preservation program for important works in its collection.

In addition, initiatives were supported to restore and preserve monuments and essential works of national culture. These include, among others, the Almada Negreiros Panels at the Rocha do Conde d'Óbidos and Alcântara Maritime Stations, the Church of the Convent of São Francisco in Porto, and the Independence Palace.

Also noteworthy is the signing of a cooperation agreement with Museus e Monumentos de Portugal to restore the mural paintings in the Sala das Descobertas of the Palácio Nacional de Mafra and enhance their museum value.

In the field of Science and Knowledge, the Millennium bcp Foundation has focused on research, training, and scientific dissemination projects with a special focus on health and postgraduate programs at leading Portuguese universities.

For the area of Social Solidarity, it sought to contemplate relevant projects in the field of social innovation and structuring social programmes that contribute to local development, with particular attention to the most vulnerable populations.

The Foundation supported, in 2024, a total of about 111 projects, of which 54% were in the area of Culture, 11% in Knowledge and 35% in the field of Social Solidarity.

For the area of Social Solidarity, it sought to contemplate relevant projects in the field of social innovation and structuring social programmes that contribute to local development, with particular attention to the most vulnerable populations.

With regard to Corporate Social Responsibility, the Foundation has taken an active role in promoting a culture of participatory corporate citizenship, contributing to the development of the communities where the Banco Comercial Portuguese S.A. Group is present, in order to contribute to a response to the challenges that arise in the social, environmental, and corporate governance axes. To this end, it integrates the internal team of the Group responsible for promoting and monitoring volunteer programs for employees.

The growing relevance of environmental issues and the commitment to Agenda 2030, which defines the Sustainable Development Goals (SDGs), led the Foundation to sign the 'Convention for Cooperation in the Implementation of the SDGs - Towards 2030'. This document is the result of joint work with the Portuguese Foundation Centre and aims to strengthen the contribution of the foundation sector to the implementation of the SDGs.

In 2024, the request for the entities supported by the Foundation to reflect on the environmental impacts of their projects and their contribution to the SDGs was reinforced, encouraging their dissemination to society and reinforcing the importance of their implementation.

In Culture, the following initiatives supported by the Foundation stand out:

- **Arte Partilhada – Exhibition “Não vá o diabo tecê-las! A Tapeçaria em diálogo a partir da coleção Millennium bcp”**

The exhibition 'Não vá o diabo tecê-las! A Tapeçaria em diálogo a partir da coleção Millennium bcp', produced by the Millennium bcp Foundation in collaboration with Lisboa Cultura, could be visited completely free of charge at the Torreão Nascente of the Cordoaria Nacional between September 26, 2024, and January 12, 2025.

The exhibition, curated by Rita Maia Gomes, offers a historical perspective on tapestry in Portugal from 1946 onwards. It features 87 works by 27 artists and includes more than 50 documents displayed across two floors.

On the ground floor of the Torreão Nascente, the Millennium bcp Collection was on display, with an important collection of tapestries produced by the Manufatura de Tapeçarias de Portalegre from originals by the artists António da Costa Pinheiro, Artur do Cruzeiro Seixas, Graça Morais, Lourdes Castro, Luís Pinto-Coelho, Manuel Cargaleiro, Maria Helena Vieira da Silva, José de Almada Negreiros, José de Guimarães, Júlio Resende, Júlio Pomar and Guilherme Camarinha.

On the 1st floor, using works from institutions, private collections and artists' estates, the research and experiences of artists who were interested in exploring the plastic potential of tapestry were illustrated and documented, which evolved from being a reproduction of a painting to becoming an original author's tapestry.

On this floor you can see works by Altina Martins, Alves Dias, Amândio Silva, Charters de Almeida, Eduardo Nery, Flávia Monsaraz, Gisella Santi, Helena Lapas, Isabel Laginhas, João Abel Manta, Júlio Pomar, Margarida Reis, Maria Isabel Barreno, Mário Dionísio, Paula Rego and Teresa Segurado Pavão.

As part of the exhibition's curatorial project, two collaborative educational projects were proposed and developed with the António Arroio and Soares dos Reis art schools, which took place during the 2023/2024 school year with 12th grade students from the Artistic Production (specialisation in textiles) and Audiovisual Communication (specialisations in photography and video/cinema) courses.

A bilingual catalogue of the exhibition has been developed to continue promoting this initiative.



During the exhibition period, several guided tours (approximately 19) were organised, which allowed participants to gain a better understanding of the history and significance of the works on display. The educational service motivated 1,092 visits. In total, the exhibition received around 6,800 visitors.

- **National Museum of Contemporary Art**

Under the protocol signed with the Museu Nacional de Arte Contemporânea (MNAC), the Foundation supported a series of exhibitions that were held in the Museum's exhibition space and the Millennium bcp Gallery, namely:

a) "Cravos e Veludo Arte e Revolução em Portugal e na Checoslováquia 1968-1974-1989", curated by Adelaide Ginga and Sandra Baborovská. The exhibition presented Portuguese and Czechoslovak art with works from the 1960s to the 1990s (in addition to a nucleus with works of art from the 21st century, by Portuguese and Czech artists from post-revolution generations, on the theme in question), also including a documentary chronology on the 1960s to 1990s, with a special focus on the periods of the Prague Spring, Marcelista Spring, Carnation Revolution and Velvet Revolution. The exhibition included works by 50 artists and was open to the public from July 20, 2024, to October 27, 2024.



b) 'Enquanto isso // Meanwhile' is an exhibition that arises from research conducted by students in the Master's degree in Curatorial Studies at the Colégio das Artes da Universidade de Coimbra. This exhibition was developed during their curatorial residency at MNAC as part of the museum's partnership with the Millennium BCP Foundation and the UmbigoLAB Platform. It explores the creative process in a broad sense, with a particular focus on the nuances of time and procedure, including themes such as hesitation, pause, abandonment, risk, delay, and even laziness. This exhibition opened on December 12, 2024, and will remain open to the public until March 5, 2024.

c) 'Impressões Digitais MNAC Collection', the new long-term exhibition of the MNAC collection, which opened on December 12, 2024, includes works from the last 170 years and brings together painting, drawing, photography, engraving and sculpture, installation, and video.

d) 'Só porque foi, e voou', a partnership with Umbigo LAB and curated by students from the Master's degree in Curatorial Studies at the Colégio das Artes, da Universidade de Coimbra. This exhibition took place between 3 November 2023 and 14 April 2024.

e) 'Caminhos' support began to allow the realisation of this exhibition, to be inaugurated in 2025 at the Millennium bcp Gallery, which will feature 23 works from the Millennium bcp collection.

f) Under the existing protocol, MNAC's activities were supported through a series of grants that helped the museum to develop and implement its programming in terms of exhibitions, but also to democratize access to knowledge about them through quality publications, mostly bilingual. It also contributed to the continuation of the Museum's musical program (Summer Nights) as well as occasional aspects of its operation.

Environmental impact & Contribution to the SDGs:



- **Núcleo Arqueológico da Rua dos Correeiros (NARC)**

Classified as a National Monument since 2015, this space allows the public to come into contact with archaeological remains from the last 25 centuries of Lisbon's history through totally free guided tours. Visitors are provided with leaflets summarizing the main features of the Nucleus, and there is also a more exhaustive catalogue of the site's history.

June 2024 saw the opening of the inclusive temporary exhibition 'A Cozinha Romana no NARC', which has the particularity of being prepared to welcome blind and low-vision people.

This exhibition recreates a Roman kitchen and allows visitors to interact with various objects, with replicas that can be handled and with some ingredients and texts in Braille.



During 2024, the Núcleo Arqueológico da Rua dos Correiros received 7,516 visitors.

- **Arte Partilhada - Loan of works from the Millennium bcp Collection**

In the field of Shared Art, we should highlight the loan of a significant number of works from the Millennium bcp Collection, which were included in twenty-three exhibitions open to the public in 2024.

- **Museu Nacional de Arte Antiga**

Through the signing of a protocol for the three-year period 2023-2025, the Foundation is a strategic patron of the Museu Nacional de Arte Antiga (MNAA) for the conservation and restoration of a number of pieces from the museum's collection that are in need of urgent and in-depth intervention to guarantee their material and patrimonial integrity.

This protocol covers the interventions in the 'Painéis de São Vicente', in a set of six painted wallpapers, large sized of Chinese manufacture, dating from the 18th century, representing the cycle of manufacture and commercialisation of porcelain, as well as the study, conservation and restoration of the sixteenth-century stucco reliefs of the MNAA sculpture collection, from the former Mosteiro da Esperança and among which are the altarpieces 'Lamentação de Cristo Morto' and 'Milagre de Santa Clara, with a view to their return to the Museum's exhibition circuit.

Environmental impact & Contribution to the SDGs:



- **World Monuments Fund**

Support for the World Monuments Fund project to safeguard the Almada Negreiros murals in the Alcântara and Rocha do Conde d'Óbidos Maritime Stations, with the Port of Lisbon Administration planning to open these stations to the public.

The project seeks to enhance the existing heritage, made up of 14 panels covering an area of 357 m2. To this end, it is planned to conserve and restore it and to establish partnerships with the National Arts Plan and other entities that will increase knowledge about this important heritage and contribute to its dissemination. In phase II, corresponding to the intervention at the Alcântara Maritime Station, the project also plans to hold a workshop for master's degree students in the conservation and restoration of mural paintings in Portugal, thus helping to train professionals to implement conservation actions of the same type in the future.

- **Fundação Centro Cultural de Belém**

As 'Mecenas da Garagem Su', and within the scope of the collaboration protocol signed for the period 2022 to 2024, the Foundation supported the initiatives developed in this space dedicated to architecture, namely the exhibitions 'Marina Tabassum. Materiais, Movimentos e Arquitetura no Bangladesh.', 'Homo Urbanus. A Citymatographic Odyssey by Bêka & Lemoine' and 'Hestnes Ferreira - Forma | Matéria | Luz'.

Environmental impact & Contribution to the SDGs:



- **Museu Nacional Soares dos Reis**

Support for the Education Service of the Museu Nacional Soares dos Reis (MNSR), which aims to be a place where people are valued, providing mediation spaces that create learning, experiences, and memories, with a program directed at the whole community.

The program included educational activities and mediation activities, always based on the collections, and aimed at exploring and deconstructing the contents on display with a view to approaching and promoting the museum space as a place for building knowledge, understanding or simple enjoyment. The Foundation's support made it possible to carry out 604 activities that benefited 34,523 participants.



- **IFEMA / ARCO Lisboa 2024**

ARCO Lisboa, one of the most important international art fairs, took place between May 23 and 26, 2024 at the Cor-doaia Nacional. Organised by IFEMA MADRID and Lisbon City Council, ARCO is a meeting point for collectors, gallerists, artists, and professionals from all over the world.

The Millennium bcp Foundation supported the Millennium Art Talks, a space for debate and reflection that promotes thinking about contemporary art. In 2024, the Millennium Art Talk was organised by EGEAC / Lisboa Cultura and curated by Ángel Calvo Ulloa and Marta Mestre, with the participation of leading professionals in the field.

The Millennium bcp Foundation Prize for the best stand at the Feira Arco Lisboa 2024, which aims to recognize and support the work of gallerists who invest in a more ambitious presentation, either through the production of specific artistic projects for the fair or through a careful selection with great attention to the balance and dialogue created between the works on display, was awarded to the Ehrhardt Flórez gallery by a jury made up of David Barro and Mariana Pestana.

The 2024 edition featured 84 galleries from 15 countries representing around 470 artists. More than 32,481 entries were registered in Cordoaria, including approximately 300 young people under 25 years old who visited the event during the free schedule defined for this age group. Around 190 collectors and invited professionals from Europe and America were present. The event involved more than 1,000 professionals. The official parallel program, which took place outside the Cordoaria (40 events - Guest program, Journalists and Collectors) registered around 7,000 visitors.

- **DSHC – Associação Musical – Festival e Academia Verão Clássico**

Support for the 10th edition of the Festival e Academia Verão Clássico, which took place between July 22 and August 8, 2024, a performance and educational initiative that includes concerts and masterclasses with the participation of musicians and teachers from some of the most prestigious international teaching institutions and the best orchestras in the world. This initiative aims to support the development and public showcasing of young talents, providing them with opportunities to build their careers while promoting cultural exchange among participants from diverse national backgrounds.

There were 10 concerts attended in person by more than 5,600 spectators. These concerts were also shared on the Festival's YouTube channel and social networks. The Masterclasses Academia de Verão Clássico featured 580 sessions, bringing together 204 young musicians from Portugal and over thirty other countries.

Environmental Impact & Contribution to the SDGs:



- **Associação CIVIC - “Cascais Ópera - Concurso Internacional de Canto” project**

Support for the 1st edition of the 'Concurso Internacional de Ópera de Cascais', a groundbreaking event in the global operatic competition scene. The first edition took place from April 6 to 14, 2024, culminating in a grand final at the Teatro Nacional de São Carlos in Lisbon. With the aim of giving visibility to 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 old.

The 2024 edition received 213 applications from 39 countries, of which 47 candidates were selected. There were 750 spectators at the Opera Gala Carmen para Berganza, 540 spectators at the Cascais Opera Final, held at the Teatro Nacional de São Carlos, and 10,200 spectators at the live broadcast by RTP2.

The importance and relevance of this event in the national and international context motivated the renewal of the Foundation's support for the 2nd edition of the event, which will take place between April and May 2025, with the final to be held in the Fundação Calouste Gulbenkian's Grand Auditorium.

Environmental Impact & Contribution to the SDGs:



In the area of **Science and Knowledge**, the following scientific research projects stand out:

- **Fundação Rui Osório de Castro**

As part of the existing protocol, support was provided for the 8th edition of the Prémio Fundação Rui Osório de Castro / Millennium bcp. This initiative seeks to foster innovative scientific research in paediatric oncology, with the goal of enhancing care and treatment for children with cancer.

The prize went to Joana Costa Aguiar de Castro Peixoto, from Ipatimup and i3S, for her project 'THE ROLE OF INTRA-TUMOR HETEROGENEITY IN PAEDIATRIC BRAIN TUMORS: SEQUENCING OF ORGANOID SINGLE CELLS EX-BRAIN_CELL-ZOOM'.

Two Honourable Mentions were also awarded to the projects by Carla Isabel Gonçalves de Oliveira, from i3S, 'SAPO - PAEDIATRIC AND ORGANOID SARCOMAS: NEW DIAGNOSTIC BIOMARKERS' and Cláudia de Freitas Martins, from i3S, 'PRECISION NANOMEDICINE TO PREVENT THE ACCESS OF 'FUEL' TO THE TUMOR: 2-IN-1 SOLUTION TO TREAT PAEDIATRIC MEDULLOBLASTOMA'.

Environmental Impact & Contribution to the SDGs:



- **OPART - Organismo de Produção Artística EPE – Programa Território**

As part of the existing protocol, support was provided for the Programa Território, a project developed by Victor Córdon Studios. This initiative is designed for young ballet dancers aged 14 to 18 from dance schools across the country. Each year, this program welcomes internationally renowned choreographers who share their works and creative processes with the group of young people selected for each edition.

The 2024 edition saw the creation of the Millennium bcp Foundation Território Early Career Incentive Award, which resulted in support for the winner to take part in a three-week internship at NTD 2, the renowned youth company of the Nederlands Dans Theater.

The Território VII program received applications from around 30 dance schools and selected 12 young ballet dancers who performed in 6 shows at the Teatro Nacional São João in Porto, Teatro Aveirense in Aveiro, Teatro José Lúcio da Silva in Leiria and Largo de São Carlos in Lisbon, where their performance closed the Millennium Festival ao Largo. The shows were attended by around 3,000 spectators.

Environmental Impact & Contribution to the SDGs:



In the area of **Social Solidarity**, the Foundation supported actions by different organisations, including:

- **AESE – Associação Estudos Superiores de Empresa**

Support for the Programa GOS – Gestão das Organizações Sociais, which is the result of a partnership with AESE and ENTREAJUDA and aims to provide management training for managers of entities in the social economy sector, in an attempt to respond to the training needs felt in this sector.

GOS allows you to address the major management issues of organisations – financial management, processes and operations, communication and, above all, people – leaving the exclusivity of the sector, using the case method. The training favours the reflection of the essential concepts of management, in a participatory process between teachers, participants and guests, and then it is possible to apply the knowledge acquired and mobilised to the specificity of each organisation.

In 2024, a total of 60 people benefited from the Programa GOS, representing 46 organisations from the north to the south of the country and also the islands.

Environmental Impact & Contribution to the SDGs:



- **Banco Alimentar Contra a Fome – Food Bank**

Support for the food collection campaigns carried out by this institution in 2024.

The foundation's support went towards buying the paper bags used in the food collection campaigns. The bags are reused in subsequent campaigns or, if they are damaged or dirty, forwarded to the Papel por Alimentos campaign.

During 2024, the Food Bank distributed 27,305 tons of food, supporting 2,352 institutions and 360,128 people. The Food Bank relies on the regular participation of 1,938 volunteers, and in the campaigns carried out the number of volunteers rose to 40,773 volunteers. The Foundation's support enabled the production of 712,500 bags

- **Christmas Campaign – Millennium Solidário 2024**



As part of the traditional Christmas solidarity campaign, the Foundation and Millennium bcp have joined ACREDITAR - Associação de Pais e Amigos de Crianças com Cancro.

This campaign was based on a spirit of solidarity and collective involvement: the Millennium bcp Foundation gave ACREDITAR a donation to ensure the maintenance and operation, for one year, of two rooms in the Casa Acreditar in Lisbon; Millennium bcp Employees were invited to take part in this action through donations to finance the furnishing of these two rooms, with the Foundation completing the remaining amount. Employees were very supportive, and 50 donations were made.

For more information on the Millennium bcp Foundation's activities in 2024, see the Activities Report at:

[Fundação Millennium bcp](#)



FUNDAÇÃO BANK MILLENNIUM

For the Bank Millennium Foundation, the year 2024 was a period of intense work, full of challenges but also successes, achieved thanks to the commitment of Bank Millennium employees: 292 Volunteers who dedicated 1,652 hours to implementing almost 50 volunteer initiatives and continuing the activities of the Financial ABCs educational program.

In 2024, the Bank Millennium Foundation continued with its activities in two main areas: financial education and the promotion and implementation of volunteering by employees.

Its flagship programme, Financial ABCs, which has visited more kindergartens across Poland teaching young people the basics of financial management, enjoys constant interest and recognition among both children and their parents and is part of the national education strategy.

2024 was also the year of another edition of the Our People'24: Save the Planet sports and solidarity challenge, which mobilised more than 1,400 employees to take part in physical activity in favour of protecting the environment. The funds donated by Bank Millennium to the Foundation have enabled the implementation of many valuable ecological projects aimed at environmental protection and education.

This year, the volunteering programme took on a new dimension: in response to the flood crisis in Poland, the Foundation broadened its scope to include not only ecological projects but also initiatives aimed at supporting the affected communities.

ABOUT THE FOUNDATION

For 35 years, the Bank Millennium Foundation has followed the motto 'we multiply social capital' and supported community involvement projects.

PILLARS OF THE BANK MILLENNIUM FOUNDATION

Volunteering: Every year, the Foundation implements an Employee Volunteering program, which represents a special opportunity to make a positive impact on the environment. Volunteering involves considerable involvement on the part of Bank Millennium Employees, who carry out original initiatives for the benefit of the idea presented in a given volunteering round.



Financial education: Since 2016, the Foundation has been running its original financial education program for pre-school children. At the beginning of 2024, the program received honorary sponsorship from the Ombudsman for Children.

Culture: Since its inception, the Foundation has supported, promoted, and implemented many cultural initiatives. Bank Millennium has been the main sponsor of the Millennium Docs Against Gravity" festival for over 20 years.

**Millennium
DOCS
AGAINST
GRAVITY**

Selected programs of Foundation



FINANCIAL ABCs



Financial ABCs is an educational program aimed at children and parents, which has been implemented since 2016 in kindergartens across Poland.

The programme aims at the financial education of young people: through the game, children learn about the world of finance, where money comes from and its value, what savings is and what it means, spending planning, the types of payments and how to make safe payments or the distinction between whims and needs.

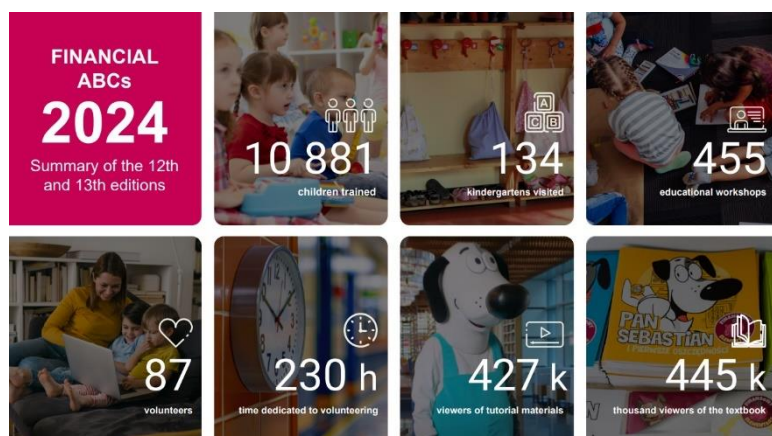
The Financial ABCs workshops are aimed at the age group of 4 to 6 years old and aim to:

- Awakening children's curiosity about finance.
- Promoting the idea of entrepreneurship.
- Transmitting knowledge about financial and economic education.
- Shaping positive social attitudes in financial matters.
- Learn independence, logical thinking, creativity and, above all, the ability to make reasonable decisions.

In 2024, the Bank Millennium Foundation held two editions of the Financial ABCs workshops: the 12th edition in the spring and the 13th edition in the fall.

Since the beginning of 2024, declared the Year of Economic Education, the Foundation has been involved in initiatives carried out by the Warsaw Banking Institute.

As part of the 2024 European Financial Congress, a debate on banking foundations was held, entitled 'Recommendations of the banking sector for systemic educational solutions – lessons learnt from years of practice and experience' with the participation of Iwona Jarzębska, Chairman of the Board of Directors of the Bank Millennium Foundation.



GLOBAL MONEY WEEK

Global Money Week is an annual international financial education campaign aimed at ensuring that children and young people develop financial literacy from an early age and gradually acquire relevant knowledge.

On March 21, representatives of the financial sector took part in the Congress of Financial Education and Enterprise. The Bank and the Bank Millennium Foundation were represented by Wojciech Rybak, a member of the Board of Directors of Bank Millennium, who participated in the debate 'Trust, security, stability – the role of banks as responsible companies and reliable financial education'.

OUR PEOPLE'24: SAVE THE PLANET

Our People'24: Save the Planet is a solidarity initiative organised by the Bank Millennium Foundation and Bank Millennium, with the aim of promoting a healthy lifestyle and protecting the environment. The challenge lasted three months and involved Bank Millennium employees in regular physical activities, who accumulated points and competed both individually and in teams.

The participants came together and, during that time, in a joint effort of healthy competition, earned points in various physical activities, such as running and cycling. These points were converted into PLN and, as a result, Bank Millennium donated PLN 250,000 to the Bank Millennium Foundation for the implementation and promotion of volunteering.

SPORTS CHALLENGE

Our People'24: Save the Planet has not only promoted a healthy lifestyle but has also contributed to the implementation of many volunteer initiatives.

Thanks to the involvement of Bank Millennium Employees in the sporting mission, some impressive results have been achieved, and the objective has been achieved: to raise significant funds to carry out social and environmental actions.

PROTECTING THE PLANET TOGETHER



The program Our People'24: Save the Planet aimed to involve employees in implementing projects to benefit local communities.

In 2024, the volunteering programme took on a new dimension: in the face of the floods that devastated Poland, the volunteer action focused not only on protecting the Planet, but also on helping those affected by them.

In response to the flood situation, the Bank Millennium Foundation has broadened its eco-volunteering initiatives to include community support projects:

- Projects have been organised to improve the living conditions of residents in flooded areas.
- Assistance was provided to rebuild and support infrastructure such as schools and shelters.
- Local communities, including the Volunteer Fire Brigade, were supported with the provision of equipment and resources.
- The affected families were helped by providing them with the necessary resources and support.
- Donations were collected and transferred to the municipalities most affected.



Eco-volunteering aims to:

Environmental protection - through the implementation of ecological projects, the programme contributes to the conservation of nature and to the improvement of the quality of life of local communities.

Ecological education - the programme promotes environmental awareness and education on environmental protection among Bank Millennium employees and local communities.

Eco-volunteering fosters community building by enabling employees to form new friendships, exchange ideas, and collaborate on ecological initiatives, strengthening integration and teamwork.



VOLUNTEER DAY: HEROES OF THE BANK MILLENNIUM FOUNDATION

Every year on December 5th, the Bank Millennium Foundation celebrates International Volunteer Day. This special occasion serves as an opportunity to express sincere gratitude to the community of Volunteers for their invaluable dedication and contribution to the Foundation's programs.

Thanks to your dedication and hard work, you can effectively support countless initiatives that bring real benefits to local communities. The unwavering help and support of these dedicated individuals form the foundation of their activities.



For more information, see the Bank Millennium Foundation's 2024 Report at:

https://www.bankmillennium.pl/documents/d/guest/raport_fundacji_2024_en?mv=1mv

In 2025, the Foundation will celebrate its 35th anniversary and will not only continue its programs, but also add activities for the benefit of communities of people with disabilities. In 2025, the Foundation will celebrate its 35th anniversary and

Initiatives of Social Responsibility and Solidarity



Millennium volunteers plant 2,000 trees in Pinhal de Leiria in an action organised by AMI - Ecoética Project (Portugal)



Financial ABCs Educational Program implemented since 2016 in kindergartens (Poland)



Volunteer employees take part in preservation of public spaces 'A Clean City for Me' (Mozambique)



Financial literacy project benefits more than 300 elementary school children (Mozambique)



Millennium volunteers in the regular food bank collection at Banco Alimentar (Portugal)

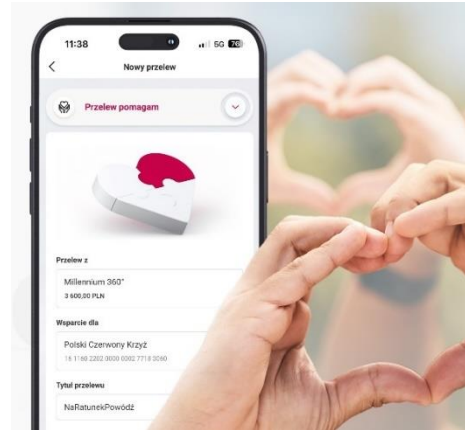


"Uma Sopa Pra Mim": project that aims to guarantee a nutritious meal to children and families in vulnerable situations (Mozambique)

Initiatives of Social Responsibility and Solidarity



Bank Millennium Foundation promotes nature protection with the involvement of Millennium Volunteers (Poland)



Bank Millennium Foundation supports communities affected by the floods (Poland)



Millennium Volunteers and 'Semear' promote the inclusion of people with special needs (Portugal)



"Natal Solidário": Volunteer employees visit institutions providing moments of hope (Mozambique)



Millennium Volunteers and the "Brigada do Mar" clean up the Portuguese coast (Portugal)



'Our People'24: Save the Planet' puts Millennium volunteers to exercise to raise social donations (Poland)

ActivoBank

ACTIVOBANK

ActivoBank continued its strategy of promoting and rewarding sustainable choices by offering differentiated interest rates on products linked to ESG initiatives. This approach encourages financing for the purchase of renewable energy equipment for self-consumption and the adoption of energy efficiency solutions.



Social benefit of products and services by business line

In the **Training Credit**, the purposes were expanded, including travel and subsistence expenses in order to meet the needs related to technical specialisation studies, bachelor's, postgraduate, master's, doctorate, Erasmus, exchange, executive masters, and executive education, in Portugal and abroad.

In the scope of **Home Loan**, a product in which ActivoBank acts as a credit intermediary for Millennium bcp, a set of financial literacy content was ensured, which was made available on ActivoBank's digital communication channels, as well as in targeted CRM actions, with the aim of contributing to the development of knowledge and skills of the Bank's current and potential Customers, fundamental to decisions they have to make about financing for home purchases, enabling them as consumers of financial products and services to deal with the growing complexity of financial contexts and instruments.

Environmental benefit of products and services by business line

In April, **Crédito + Energia** aimed at acquiring equipment for producing and storing energy from renewable sources, was incorporated into Crédito EcoActivo aimed at acquiring equipment for producing renewable energy for self-consumption and acquiring energy efficiency solutions, thus making it easier to offer more sustainable personal loans.

Crédito Auto Elétricos, which allows financing for the purchase of new or used cars and motorcycles, passenger cars and goods vehicles up to 3.5t, with 100% electric or hybrid engines, can now also be contracted on the App, thus making it possible to respond competitively to demand and provide an even more comprehensive and accessible offer on the App.

ActivoBank's initiatives demonstrate a clear alignment with the goals of reducing environmental impact, improving the customer experience, and promoting financial inclusion. In 2024, some important milestones were reached in terms of **digitalisation, inclusion, and innovation**:

- **Digitisation and Paper Reduction:**
 - 50% of the accounts were opened through their digital platforms.
 - 100% of the accounts were digitally signed, completely eliminating the need for paper documents.
 - 99.8% of customers chose to receive their bank statements in digital format.
- **Inclusion and Accessibility:**
 - The possibility of opening accounts by video call in English was introduced, extending the reach of its services to a more diverse audience.
 - A slot adapted for the blind was implemented in its Cards, promoting the inclusion of people with visual disabilities.
 - The minimum age for issuing Debit Cards for minors was reduced from 14 to 12 years old, encouraging financial education from an early age.
- **Innovations to Improve the Customer Experience:**
 - An innovative product was launched – Activo Viagem – which allows customers who travel to activate benefits (such as exemption from withdrawal and payment fees) on their card through a simple digital click.
 - The insurance offer within the app has been expanded, enabling customers to subscribe more quickly and affordably.
 - Transfers have been streamlined with the introduction of the 'SPIN' feature, allowing transactions to be linked to a mobile phone number, enhancing customer convenience.

- **SRI Investment Funds:**

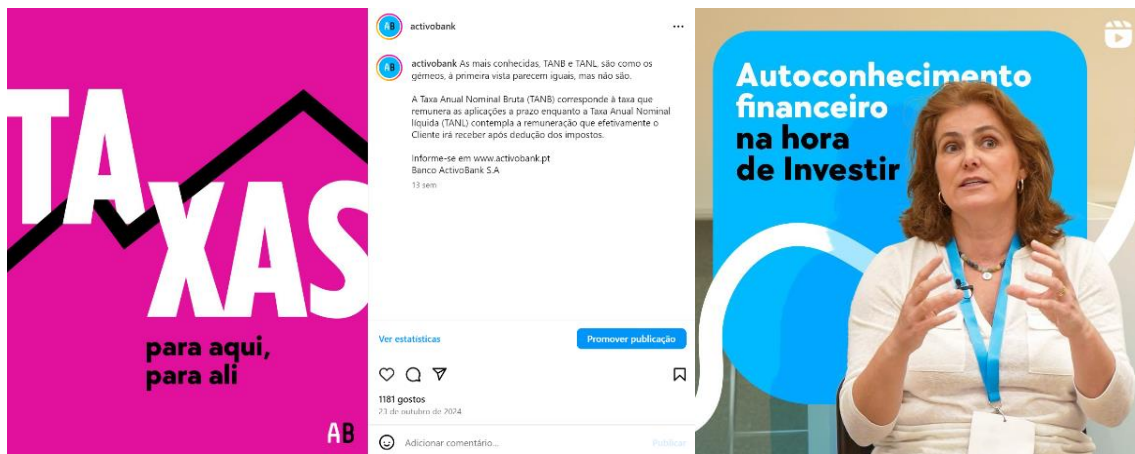
In recent years, ActivoBank has offered several SRI Funds to its customers as part of its Fund range. In 2024, of the Portfolio Funds, 498 were SRI Funds and 75% of the total assets under management were SRI Funds.

Total SRI Funds grew by 30.4% to 142 million euros. Additionally, the number of funds with PUs subscribed under Article 8⁽¹⁾ increased by 5.9%, while those under Article 9⁽²⁾ saw a growth of 23.8%. The volume subscribed to SRI Funds in Article 8 increased by 69% to 53,671,180 euros. These increases reflect ActivoBank's commitment to promoting sustainable investments and its effectiveness in attracting more customers and assets to its investment funds.

Each of the initiatives mentioned demonstrates ActivoBank's commitment to leading by example, promoting sustainable and accessible solutions that are centred around the needs of its Customers. The Bank will maintain its focus on investing in innovation and sustainability to ensure a positive impact on both society and the environment.

Initiatives to improve the community's financial literacy

As part of its Financial Literacy initiative, ActivoBank offered a variety of content, which was shared on Facebook, YouTube, Instagram, LinkedIn, and TikTok. This included conferences, podcasts, videos, and informative content.



Examples of posts made on ActivoBank's social networks related to financial literacy

As part of its Financial Literacy initiative, several articles on various financial topics were published in the online newspaper 'Observador.' Throughout 2024, a total of 11 articles were published covering topics such as taxation on investments, steps to take before investing, the Effort Rate, and how to fill out the IRS return.

ECONOMIA

O que é a taxa de esforço?

Contrair um empréstimo é, com frequência, a única forma de alguém conseguir comprar uma casa, por exemplo. Mas, para tal, é imprescindível que a taxa de esforço o permita. Sabe o que é?



(1) Funds that promote investments with positive social and environmental qualities, but do not have a sustainable investment objective
(2) Funds that have a sustainable investment objective, where the majority of the portfolio is comprised of ESG-focused Investments

ECONOMIA

Tributação sobre investimentos: o que muda?

Neste Explicador, vamos esclarecer o novo regime de impostos sobre investimentos e os benefícios fiscais de manter as carteiras de ativos por mais de oito anos.



Examples of articles from the Branded Content project in observador.pt/destaque/saber-ativo/.

In 2024, there was a commitment to podcasts with the launch of 6 episodes of a Financial Literacy podcast. This series communicates in a relaxed and straightforward manner, featuring 'Que Rico Casal' influencers as hosts and a different guest in each episode. In total, the episodes released in 2024 had a total of 18,000 views on YouTube.

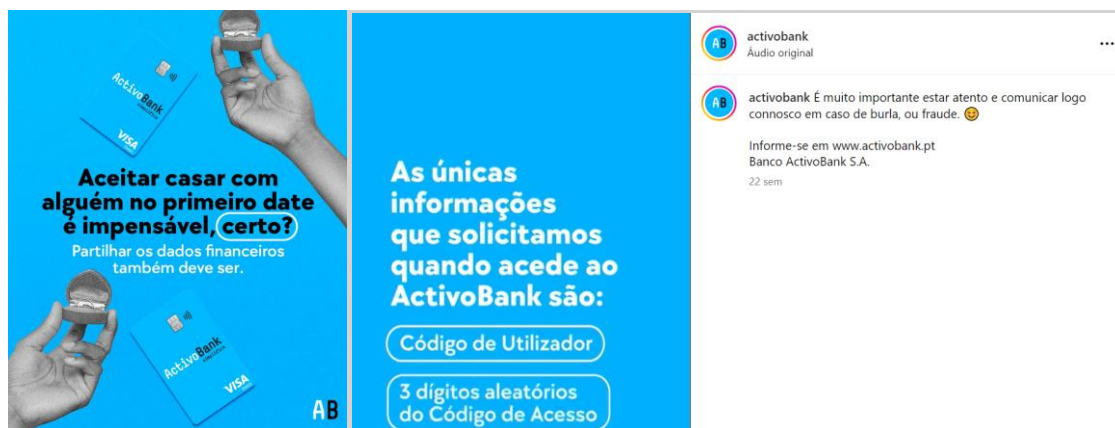


Due to the scope of the platforms used, this content was available to both customers and non-customers.

- **Digital Security**

Regarding digital security, ActivoBank provided a range of content that was shared on Instagram and LinkedIn.

These publications aimed to improve the knowledge of its customers and followers regarding the care and protection to be taken with personal and financial data.



Examples of publications on digital security

Involvement with the local community, impact assessment

- Give Credits Project

During 2024, ActivoBank carried out 12 social solidarity actions through its monthly 'Give Credits' programme, associating a Project or Social Cause that was supported with an amount of up to 3,000 euros. In total, 13 institutions were supported.

The amount donated was collected through 11 monthly Solidarity Campaigns, which ran from January to November and consisted of raising funds associated with subscribing to ActivoBank products or services. In December, a decision was reached through a face-to-face vote that included the participation of Customers and Employees during the 'Christmas Solidarity Padel Tournament' event.

In addition to the monetary contribution, each of the 13 institutions received visibility throughout the year on ActivoBank's digital platforms, including its Instagram page and website. This exposure is crucial as it helps raise awareness of the importance of these institutions within the community and attracts new support and volunteers.



Brand activation for the December Solidarity Campaign

Projects supported:

Month / Institution	About the cause	Contribution
January - Kindology	Kindology is focused on democratising access to mental health services by offering appointments at more affordable prices.	ActivoBank donated 2,818 euros to support Kindology, helping to expand the number of people with access to free psychology appointments.
February - Onda Pura	Onda Pura is an organisation that promotes water sports and organises annual events, allowing people with disabilities and children from disadvantaged backgrounds to engage with the aquatic environment.	ActivoBank donated 3,000 euros to support the Surf for All event.
March - Geota	Geota (Grupo de Estudos de Ordenamento do Território e Ambiente) is an NGO dedicated to defending the environment and promoting sustainable development. Its mission is to protect natural resources and promote responsible environmental policies.	ActivoBank donated 3,000 euros to support Geota's environmental conservation and awareness-raising projects.
April - Animalife	Animalife is an association that supports animals at risk and promotes responsible adoption. Its mission is to improve the quality of life of animals and raise awareness in society of the importance of animal welfare.	ActivoBank donated 3,000 euros to support Animalife's animal rescue and adoption programs.

Month / Institution	About the cause	Contribution
May - Movimento Claro	Movimento Claro is a youth association based in Cascais. The Association aims to raise awareness about the issue of single-use plastics in the oceans by working on multiple fronts, including educational activities in schools and organising events and initiatives in partnership with companies and the general public.	ActivoBank donated 2,272 euros to support the Association's initiatives to clean up plastic from the oceans.
June - Mulheres Sec. XXI	Mulheres Sec. XXI is an association that fights for gender equality and women's rights. Its mission is to empower women and promote equal opportunities in all areas of society.	ActivoBank donated 2,257 euros to support Mulheres Sec XXI empowerment and training programs.
July - AMCV	AMCV (Associação de Mulheres Contra a Violência) works to prevent and combat gender-based violence. Its mission is to support victims of violence and promote a culture of non-violence and respect for human rights.	ActivoBank donated 2,954 euros to support services for AMCV initiatives.
August - ZERO	ZERO is an environmental association that works to promote sustainability and defend the environment. Its mission is to reduce the ecological footprint and promote sustainable practices in all areas of society.	ActivoBank donated 3,000 euros to support ZERO's sustainability and environmental conservation projects.
September - APPEAL	APELA (Associação Portuguesa de Esclerose Lateral Amiotrófica) supports people with ALS and their families. Its mission is to improve the quality of life of patients and promote research into the disease.	ActivoBank donated 2,913 euros to support APELA's assistance and research services.
October - AECO	AECO (Associação para o Estudo e Conservação dos Oceanos) is dedicated to the research and conservation of marine ecosystems. Its mission is to protect marine biodiversity and promote ocean sustainability.	ActivoBank donated 2,168 euros to support AECO's research and conservation projects.
November - EcoGerminar	EcoGerminar is an association that promotes sustainable agriculture and environmental education. Its mission is to encourage ecological farming practices and raise awareness of the importance of sustainability.	ActivoBank donated 3,000 euros to support EcoGerminar's sustainable agriculture and environmental education projects.
December - CrescerSer	CrescerSer supports children and young people at risk, promoting their development and social integration. Its mission is to provide a safe and welcoming environment for children and young people in vulnerable situations.	ActivoBank donated 3,166 euros to support CrescerSer's reception and development programmes.
- Remar	Remar is an organisation that supports people in vulnerable situations, offering rehabilitation and social reintegration services. Its mission is to help people overcome situations of social exclusion and rebuild their lives.	ActivoBank donated 2,452 euros to support Remar's Christmas dinner initiative.

- MARDIVE Project

In addition to the monthly support given to the social causes mentioned above, in 2024 ActivoBank established a new partnership with MARDIVE.

MARDIVE is an association that promotes scientific research and participatory science, as well as experimental and technological development. It has contributed to training activities and the creation of educational content, in addition to preparing, publishing, and disseminating studies and other relevant initiatives focused on environmental and scientific literacy.

One of ActivoBank's key pillars is to support projects that promote ocean protection while also engaging the community on this important issue. Therefore, this partnership, which will last until July 2025, focuses on establishing coastal marine areas in the municipalities of Cascais, Sintra, and Mafra. It aims to achieve two objectives: Enable the establishment of future marine protected areas in Cascais, Mafra, and Sintra. Increase environmental literacy.



Prizes and awards

For the seventh time in a row, ActivoBank was once again awarded the 'Consumer Choice' prize in the 'Digital Bank' category, with a Final Score of 78.9%, a Recommendation Score of 78% and a Loyalty Score of 87%. The independent evaluations, which are the result of consumer opinion, once again highlighted the Bank's recognition among the public and the loyalty of its customers.

Also, in the Five Star Award, the Bank was once again distinguished, for the second year in a row, with the 'Five Star' award, in the 'Digital Banking' category, with an overall satisfaction rating of 8.04. ActivoBank received the highest evaluation for the attributes of Satisfaction, Experimentation, and Intention to Recommend.

In terms of communication, ActivoBank was awarded Bronze, out of eight finalists, in the 'Financial Services and Insurance' category of the Eficácia Awards for its 'Invejosa' Salary Campaign, which featured Bumba na Fofinha.

Communication and Training

- Sponsorship of the Women & Wealth Event

In 2024, ActivoBank sponsored Women & Wealth, an event aimed at increasing women's financial literacy. This sponsorship strengthened the Bank's commitment to female empowerment and financial literacy. The event gathered around 120 participants to discuss various topics through lectures, workshops, and discussion panels. It provided a valuable opportunity for learning and personal development, with a focus on empowering women in the financial sector.



Throughout 2024, ActivoBank actively engaged in social activism, commemorating events with its stance on key social issues:

Social media post to mark Women's Day and raise awareness of gender inequalities



Other Environmental information

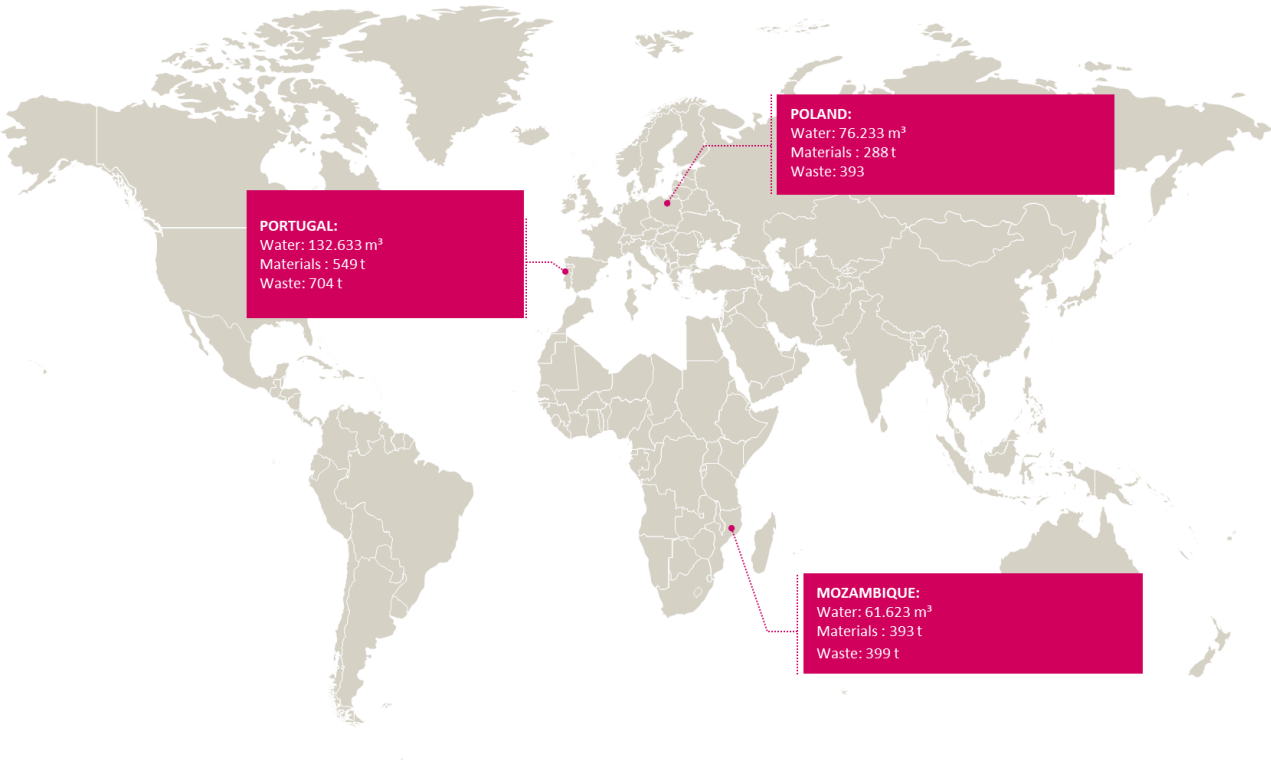
Further information on environmental performance

Responsible management of natural resources is essential for minimising environmental impacts and promoting sustainability. Efficient use of water, reduction of material consumption and proper waste management are key factors to ensure a more balanced and resilient future.

To track the eco-efficiency of its operations, the Bank regularly reviews key environmental performance indicators. This monitoring allows to identify opportunities and improvement actions more efficiently.

As outlined in its Environmental Policy, implemented across all geographies, the Bank is committed to preserving natural resources. Rationalising energy, water and materials consumption is a strategic priority, supported by the implementation of innovative solutions and the promotion of the circular economy.

Main highlights 2024



Resource Management – Water, Materials and Waste

Millennium bcp's path to efficiency

Water 2024 Target: +2% Performance: +1%	Waste 2024 Target: 0% Performance: -1%	Materials 2024 Target: -7% Performance: -19%
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WATER

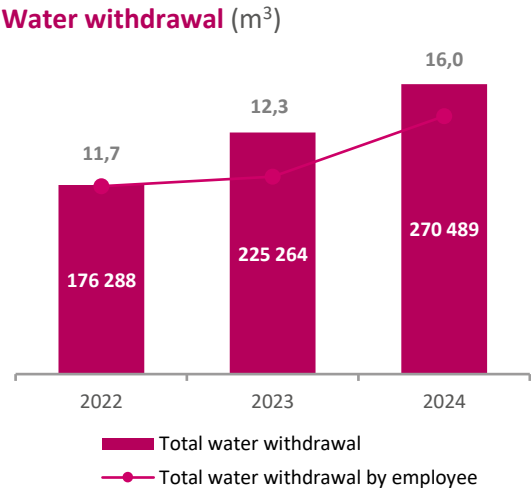
In the recent years, the total collection and consumption of water in the BCP Group, utilised both for human consumption in its facilities and for irrigation, has shown an increasing trend, primarily due to the return of employees to the physical facilities and the intensification of their use.

Additionally, the increase in consumption reflects the inclusion of Mozambique's operations in the calculation of this indicator, as well as the implementation of a new recording system. This system, utilising a measurement application, provides more accurate and reliable data compared to previous methods based on manual measurements.

On the other hand, there has been a significant reduction in the amount of water used for irrigation, which is lower than in 2020. This result demonstrates a more efficient and sustainable adaptation, reinforcing the growing awareness of the importance of conserving natural resources.

Despite the overall rise in consumption, the BCP Group remains committed to efficiently managing water resources, implementing measures to optimise water use across its operations.

In Portugal, the amount of water collected in 2023, reported in the last Sustainability Report, has been corrected. The value now presented, 97,896 m³, considers some amounts billed in 2024, referring to water withdrawals from the public network carried out in 2023, which had not been previously accounted for.



 Main initiatives to reduce water consumption



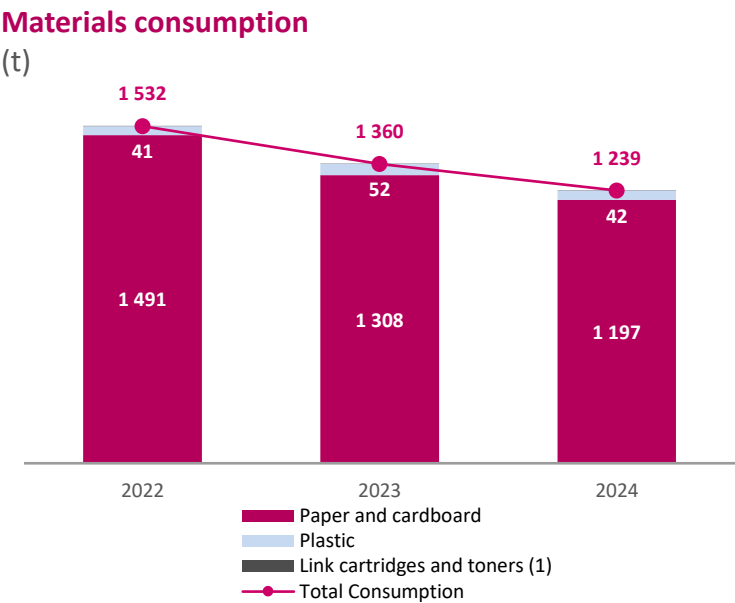
- Installation of timer taps, limiting the flow of water without compromising efficiency;
- Awareness raising actions.



- Installation of timer taps
- Presence sensors: in commercial environments, they allow the automatic activation of taps, avoiding waste;
- Preventative maintenance: inspection and repair of leaks in hydraulic systems to eliminate unnecessary waste.

MATERIALS

The BCP Group has achieved a significant reduction in the consumption of essential materials, recording a 10% decrease between 2023 and 2024. This reduction reflects ongoing efforts to optimise the use of resources such as paper, cardboard, plastic, and ink cartridges/tonners, with paper and cardboard accounting for 97% of total consumption.



	2022	2023	2024	Variação 24/23
Material Consumption (ton)	1 531.7	1 360,4	1 229.7	-9%
Paper and Cardboard	1 490.6	1 308.5	1 197.3	-8%
Plastic	40.8	51.8	41.8	-19%
Ink Cartridges and Toners	0.2	0.1	0.1	-3%
Material consumption per employee (kg)	97.3	86.7	79.1	-9%
Paper and cardboard	94.7	83.4	76.4	-8%
Plastic	2.6	3.3	2.7	-19%
Ink Cartridges and Toners	0.03	0.02	0.02	-2%

In the last five years, the cumulative reduction in material consumption has reached 30%, driven by various strategic initiatives focused on sustainability and operational efficiency.

**Main initiatives to reduce/promote efficiency in material consumption**

- Reduction in material consumption: implementation of 166 improvement initiatives in 2024, resulting in savings of €47,392.12 in consumables (paper, prints, envelopes, etc.);
- Digitization and paper reduction: continuity of the *GO Paperless program*, promoting the dematerialization of processes and reducing the need for printing;
- Process optimization: adoption of technological solutions to reduce waste and improve operational efficiency;
- Sustainability for 2025: strengthening digitalization and eliminating the use of paper, consolidating the *paperless culture*.



- Digitization of processes: encourage the replacement of physical documents with digital files, reducing the need for printing;
- Sending correspondence: the bank sought to limit mass and personal correspondence sent to customers;
- Decrease in the issuance of plastic cards: due to the growing popularity of payments using virtual cards, BLIK mobile payments and BLIK contactless payments via mobile application.



- Digitization of processes: encourage the replacement of physical documents with digital files, reducing the need for printing;
- Double-sided printing: implementation of printers configured to print on both sides of the paper, saving paper;
- Paper reuse: create systems for reusing already printed paper, using it as draft paper or for other purposes before being discarded;
- Reducing plastic consumption: replacing disposable plastic bottles with glass bottles.

WASTE

Regarding waste production, in global terms, in 2024 there was a 2% reduction in waste production, reflecting the continuous efforts to optimise waste management and the adoption of more sustainable practices.

Waste Produced, by destination (t)

	2022	2023	2024	Variation 24/23
	tone	tone	tone	%
Recycled/reused waste ¹	639.37	481.82	486.97	-2%
Waste to landfill	0.01	0.01	0.01	1%
Other destinations ¹	576.71	991.16	1 0049.46	-25%
Total	1 216.09	1 473.00²	1 496.43	-4%

¹ Calculation based on the assumption that 38% of waste is recycled (INE, 2020).

² In Mozambique, the amount of waste in 2023, reported in the last Sustainability Report, was rectified.

At the BCP Group, more important than the waste generated is the destination given to it, and the necessary efforts are made to ensure its recovery and reuse whenever possible.

In Portugal, there was a 1% decrease compared to 2023. This reduction is directly related to the decrease in cardboard waste, due to the devaluation of cardboard by suppliers, which impacted the volume of waste accounted for. The significant increase in the number of toners is due to the collection of accumulated stock from previous years in 2024, which impacted the reported figures.

Waste generated in Portugal

	2022	2023	2024	Variation 24/23
	tone	tone	tone	%
Total waste produced	718.49	711.06	683.96	-1%
Total recycled/reused waste	272.96	270.20	267.52	-1%
Paper	233.81	231.23	240.11	4%
Card	38.75	38.33	24.54	-36%
Plastic	0.19	0.18	1.59	789%
Ink Cartridges and Toners	0.20	0.46	1.28	177%
Total waste in landfill	0.01	0.01	0.01	-25%
Total waste incinerated with energy recovery	0.00	0.00	0.00	-25%
Total waste incinerated without energy recovery	0.00	0.00	0.00	-
Total waste with unknown destination	445.53	440.85	416.43	1%
Paper	381.48	377.27	391.77	4%
Card	63.23	62.53	40.04	-36%
Plastic	0.31	0.29	2.59	789%
Ink Cartridges and Toners	0.51	0.75	2.09	177%

RESOURCE MANAGEMENT

Key waste reduction/management initiatives



- COM-Paperies initiative : reducing the circulation of physical documents by challenging suppliers to adopt digital mail delivery and by scanning the same physical documents upon arrival at the Bank. The scanning of physical documents, right at the first point of entry, has resulted in significant advantages, such as:
 - Improved Operational Efficiency;
 - Remote Access and Greater Collaboration;
 - Improvement in process monitoring and control.
- In 2024, we will include automatic document indexing with data extraction and reading and integration with other Systems and Applications, making workflows more efficient. Digitization reduces the need for paper and paper transportation, contributing to more sustainable practices and reducing environmental impact.
- By 2024, around 15,000 documents will have been digitized under these conditions.
- Continuation of the process of destroying archive boxes related to documentation whose storage period has expired.



- Electronic waste collection: the bank promoted the collection of electronic equipment;
- Collection of plastic bottles and caps;
- Furniture donation.



- Waste management and recycling: installation of ecopoints for separating recyclable materials;
- Environmental education: educational campaigns on the importance of correctly separating waste;
- Reuse of resources: reuse of furniture and equipment, in addition to donating them to third parties, reducing waste;
- Material reuse: reuse of materials to reduce waste production;
- Correct disposal of hazardous waste: forwarding chemical products, batteries and electronics to specialized companies.

ESG Obligations Allocation and Impact Report



ESG Bonds

Allocation and Impact Report

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2.3.1 Impact Report 194

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 ICMA³ (“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. 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:
- How funds raised through ESG Bond issuances were applied;
- Show the total amount of ESG Bonds issued;
- Show the amount of proceeds allocated to each portfolio by eligible category;
- Total amount of unallocated proceeds;
- The percentage of proceeds aligned with the Substantial Contribution Criteria of the European Taxonomy;

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 that 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.

³ ICMA’s <https://www.icmagroup.org/sustainable-finance/the-principles-guidelines-and-handbooks/>

- 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 pre-ferred bonds with Social label, which was the first transaction, exclusively of this category, executed by a Portuguese bank. Below are listed its main features:

Issuer:	Banco Comercial Português, S.A.
ISIN:	PTBCPEOM0069
Issue Ratings (31 december 2024):	Baa2 (Moody's) BBB- (Fitch) /BBB (DBRS)
Amount:	€ 500M
Issue Date:	7 October 2021
Maturity Date:	7 April 2028
Call Option Date:	7 April 2027 subject to the prior approval of the Relevant Authority
Coupon:	1,75% p.a., until Call Option Date, then E3m Euribor + 2,00%
Use of Proceeds:	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, 2024, the portfolio consists of a total outstanding of around €593M and an average maturity of 1.5 years⁴.

⁴ Average Maturity is calculated as the remaining term to maturity, weighted by the outstanding amount of the loan.

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 €
Total ESG Bonds Issued		500.000.000 €

Eligible Social Category	31 dec 2024	
COVID-19 RECOVERY	Number of Loans	14.231
Supported SDGs	Amount of Refinanced Loans	593.001.890 €
 	Average Amount	41.670 €
	Average Maturity	1,5
	Total Amount of Refinanced Loans	593.001.890 €

Allocation	Amount
Total Social Bonds Allocated	500.000.000 €
Total Unallocated Bonds Amount	0 €

2.2.2 External Verification of the Allocation Report



KPMG & Associados – Sociedade de Revisores Oficiais de Contas, S.A.
Edifício FPM41 – Avenida Fontes Pereira de Melo, 41 – 15º
1069-006 Lisboa – Portugal
+351 210 110 000 – www.kpmg.pt

INDEPENDENT LIMITED ASSURANCE REPORT

(Free translation from a report originally issued in Portuguese language. In case of doubt the Portuguese version will always prevail.)

To the Board of Directors
Banco Comercial Português, S.A.

Introduction

We were engaged by the Board of Directors of Banco Comercial Português, S.A. ("Entity") to perform a limited assurance engagement on the information regarding to the allocation of funds resulting from ESG Bonds, as at 31 December 2024, included in the Report "ESG Bonds – Allocation and Impact Report" ("Allocation and Impact Report"), in accordance with the guidelines for annual reporting defined by the Bank in the Green, Social and Sustainability Bond Framework ("ESG Framework").

Management's responsibilities

The Management is responsible for the:

- Preparation of the information regarding to the allocation of funds resulting from ESG Bonds for the period ended 31 December 2024 in accordance with guidelines for annual reporting defined by the Bank in the Green, Social and Sustainability Bond Framework ("ESG Framework");
- For 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;
- Design, implementation and maintenance of an appropriate information and internal control system to enable a preparation of the allocation of funds resulting from ESG Bonds that is free from material misstatement, whether due to errors or fraud;
- Prevention and detection of fraud and errors and for the identifying and ensuring that the Entity complies with laws and regulations applicable to its activities; and,
- Process to ensure that the Management and staff involved with the preparation of allocation of funds resulting from ESG Bonds have the appropriate skills.

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KPMG & Associados – Sociedade de Revisores Oficiais de Contas, S.A.
Capital Social: 3.918.000 Euros – Pessoa Colectiva N.º PT 502 161 078 –
Inscrito na O.R.O.C. N.º 189 – Inscrito na C.M.V.M. N.º 20181489
Meticulada na Conservatória do Registo Comercial de Lisboa sob o N.º PT 502 161 078



Our responsibilities

Our responsibility is to perform a limited assurance work and to report thereon in the form of an independent limited assurance conclusion based on the evidence obtained.

We conducted our engagement 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 (IAASB) of the International Federation of Accountants (IFAC) and the other standards and technical guidelines of Ordem dos Revisores Oficiais de Contas, which require that we plan and perform our work to obtain limited assurance as to whether nothing has come to our attention that causes us to believe that the information regarding the allocation of funds resulting from ESG Bonds, issued by the Bank, included in the Allocation and Impact Report, presented in the Report "ESG Bonds – Allocation and Impact Report", for the period ended 31 December 2024, is not in accordance with the principles and criteria defined in the Bank's ESG Framework, in all material respects. For this purpose, this work included, amongst other procedures, the following:

- i. Conducting interviews with employees and those responsible for preparing information regarding the allocation of funds resulting from ESG Bonds, with reference to 31 December 2024;
- ii. Verify the application of certain eligibility criteria for financing projects described in the Bank's ESG Framework, in relation to Eligible Green and Social Categories, specifically, the CAE of activity and classification as SME;
- iii. Understand the procedures, criteria and systems used to obtain the information presented in the Allocation and Impact Report;
- iv. Verify, on a sampling basis, that the information related to the indicators included in the Allocation and Impact Report meets the criteria of the Bank's ESG Framework. Also verify that the indicators were adequately compiled from data provided based on the Bank's information sources;
- v. Verify that the information disclosed complies with the reporting requirements established in the ESG Framework.

The procedures selected depend on our understanding of the compliance with the requirements of the Bank's ESG Framework and other engagement circumstances, and our consideration of areas where material misstatements are likely to arise.

The procedures performed in a limited assurance engagement are different in nature and timing and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our conclusion.



Quality and independence

The firm applied the International Standard on Quality Management 1 which requires the firm to 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 in the Ordem dos Revisores Oficiais de Contas' code of ethics and the International Code of Ethics for Professional Accountants (including international independence standards), (IESBA Code), which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Conclusion

Our conclusion has been formed on the basis of, and is subject to, the matters outlined in this report.

Based on the procedures performed and evidence obtained, nothing has come to our attention that causes us to believe that the information regarding to the allocation of funds resulting from ESG Bonds issued by the Bank, included in the Allocation and Impact Report, for the period ended 31 December 2024, has not been prepared in accordance with the principles and criteria defined in the Bank's ESG Framework, in all material respects.

26 de março de 2025

SIGNED ON THE ORIGINAL

KPMG & Associados
Sociedade de Revisores Oficiais de Contas, S.A.
(n.º 189 e registada na CMVM com o n.º 20161489)
representada por
Pedro Jorge Quental e Cruz
(ROC n.º 1765 e registado na CMVM com o n.º 20161607)

2.3 Impact

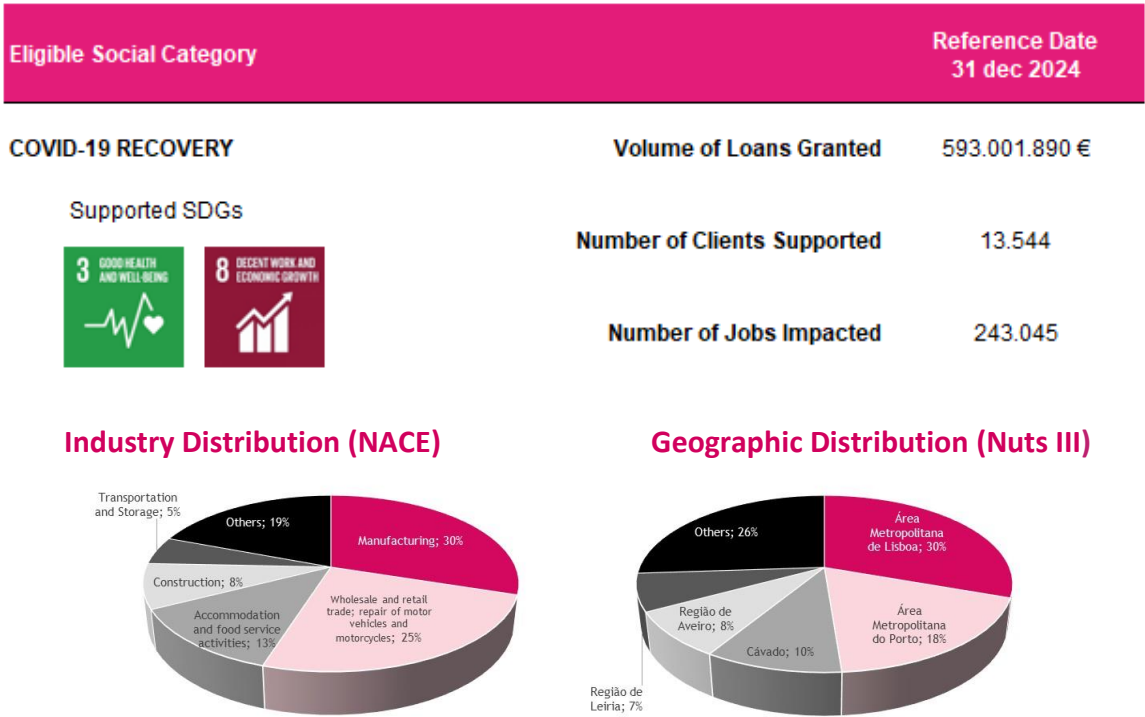
Annually, in accordance with the Framework, BCP issues a report on the environmental and/or social benefits of assets financed or refinanced by the issuance of ESG Bonds. Subject to data availability, this report should provide an aggregate estimate of impacts through the indicators defined in the Framework.

2.3.1 Impact Report

- **Around €593 mio** of financing under “Covid-19 lines”.
- More than **13.500 customers** supported.
- Over **240.000 jobs** impacted⁵.

As of December 31, 2024, the portfolio allocated to the issuance of ESG-Social Bonds includes a very diversified base of more than 13.500 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 whole-sale 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.



⁵ 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.

Methodological Notes

Methodological notes

ENVIRONMENTAL INDICATORS

E1-4 – Targets related to climate change mitigation and adaptation

The targets for Scope 3, Category 15, were defined in accordance with the requirements of Pillar 3. These targets are expected to impact the Bank's financed emissions across eight sectors, listed below, but do not cover the entirety of Scope 3 emissions within this category. These targets are intensity-based and represent gross emissions.

In line with the disclosure of Pillar 3 alignment metrics, a set of eight carbon-intensive sectors have been identified, for which banks are required to define transition approaches and calculate the distance to meeting the targets set by the International Energy Agency (IEA). These sectors include energy, fossil fuel combustion, automotive, aviation, shipping, cement, steel and aluminum, and chemicals.

The Group has set interim targets for 2026 for these eight sectors, applying the following methodology:

- The GHG reduction targets are set based on sectoral trajectories provided by the International Energy Agency (IEA), particularly those aligned with the Net Zero 2050 climate scenario, which is compatible with the Paris Agreement's 1.5°C target.
- To define the targets for each sector, the carbon intensity of the companies within them was assessed, prioritizing, whenever available, the use of actual climate data reported by the companies. In other cases, internal estimates were used, following the methodologies applied for reporting financed emissions, or applying sector averages provided by the IEA.
- The prudential consolidation perimeter was considered, comprising (corporate) exposures from all Group BCP entities. All banking book items corresponding to a) loans and advances; b) debt securities; or c) equity instruments, from non-financial corporations were covered.
- When determining the target, BCP assessed a) its current exposures and their respective maturities; b) effective capacity to engage with clients and counterparties; c) existence or absence of clients' net zero commitments; and d) national decarbonization plans and their performance to date. Thus, each target reflects the BCP's best perspective for the transition of the given sector and group of companies, considering available climate and economic scenarios, without compromising the ambition of aligning with the IEA NZE2050 scenario by 2030.

The Bank is assessing its commitment to the SBTi for setting targets for these and/or other relevant business sectors.

E1-5 – Energy consumption and energy combination

The value of consumption of natural gas and liquid fuels considers the total estimated based on the acquisition of these fuels. Electricity consumption considers the total estimated based on the energy billed. Regarding the consumption of energy derived from fossil sources, in mobile equipment the Group uses only gasoline and diesel. In stationary equipment, Portugal uses natural gas, Mozambique uses gasoline, and Poland uses natural gas and heating oil, the latter being the only geography to produce energy through heat generation.

The conversion factors used in 2024 were as follows:

	Density	Calorific Value
Portugal		
Natural Gas (fleet/equipment), diesel and petrol	NIR 2024	NIR 2024

Mozambique

Natural Gas (fleet/equipment), diesel and petrol

EMEP 2023

IPCC Guidelines for National Greenhouse Gas Inventories 2006

For more information on the conversion factors used to calculate energy consumption in Poland, and the respective methodology, please refer to the [ESG report of Bank Millennium and the Bank Millennium Group for 2024](#).

All fuels used are burned for energy purposes, no compensation for energy consumption is made and energy obtained within the organization's boundaries is not counted as energy purchased/acquired. The Bank does not operate in sectors with a high climate impact, nor does it consume nuclear or hydrogen energy.

This year, Mozambique's energy consumption in 2023 was updated compared to last year, considering electricity from the public grid only from fossil fuels. The scope of Poland's reporting in 2024 was also expanded to include the entire Bank Millennium Group. The 2022 figures do not include operations in Mozambique.

E1-6 – Gross scope 1, 2, 3 GHG emissions and total GHG emissions**Methodology for calculating scope 1 and 2 emissions**

The reporting of greenhouse gas emissions carried out by the BCP Group includes CO₂, CH₄ and N₂O emissions and takes into account the fact that its entities do not have activities covered by the European Emissions Trading System (ETS). The 2024 figures consider the Bank Millennium Group, with fugitive and biogenic CO₂ emissions (scope 1) corresponding only to these entities.

The emission factors used in 2024 to calculate scope 1 and 2 emissions were as follows:

	2024
Scope 1 Global Warming Potential (CO ₂ , CH ₄ , N ₂ O)	IPCC AR5
Portugal	
Scope 1 Emission factor for petrol, diesel and natural gas	NIR 2024
Scope 2 <i>Market-based</i> Renewable electricity supplier emission factor with Guarantees of Origin	EDP Comercial
Scope 2 <i>Location-based</i> Emission factor for electricity	APREN 2024
Moçambique	
Scope 1 Emission factor for petrol, diesel and natural gas	GHG Protocol Tool 2017
Scope 2 <i>Market-based e Location-based</i> Emission factor for electricity	ADEME

For more information on the emission factors used to calculate emissions associated with Polish operations, please refer to the [ESG report of Bank Millennium and the Bank Millennium Group for 2024](#).

Methodology for calculating Scope 3 Emissions

Scope 3 emissions are indirect greenhouse gas emissions resulting from activities within the company's value chain, both upstream and downstream.

The calculation of emissions for Millennium bcp and Millennium bim was conducted for the most relevant categories, for which the necessary data could be collected to estimate the values. The Bank Millennium Group reports significant

Scope 3 categories, determined through the materiality analysis conducted this year. For more information on the emission factors used for emissions calculation in Poland and the specific methodology for each Scope 3 category, please refer to [ESG report of Bank Millennium and the Bank Millennium Group for 2024](#).

In this regard, emissions were calculated for the following categories: 1 (purchased goods), 2 (capital goods), 3 (fuel- and energy-related activities not included in Scope 1 and 2), 6 (business travel), 13 (downstream leased assets), and 15 (investments/financed emissions).

Category 1

This category includes emissions associated with the products and services purchased by BCP Group in the reporting year.

Compared to the Sustainability Reports of previous years, there was a significant improvement in the methodology used to calculate this category emissions, which is now fully aligned with the reference protocol for these matters – the GHG Protocol. The protocol recognizes four distinct methodologies for calculating category 1 emissions, listed in order of preference: i) supplier-specific; ii) hybrid; iii) average-data; and iv) spend-based.

For emissions associated with the supply of consumable products, BCP prioritized the preferred calculation methodology, supplier-specific, whenever it was able to collect actual emission factors from the suppliers of the consumed products. The third approach, average-data, was adopted for the remaining products whose consumption was determined but for which actual emission factors data could not be obtained. For calculation purposes, emission factors from an external database were used (ADEME's Carbon Database V23.4, 2024). For all other products whose consumption was not determined, as well as for the procurement of services, the spend-based methodology was adopted, based on billing volumes and sector-specific emission factors available in an external database (ADEME's Empreinte Database, Purchasing Services, Money Ratios).

Recognizing that its emissions calculations still largely rely on sector-based estimates and the need to report increasingly accurate figures year after year, the Bank is working on collecting actual data from its suppliers. This initiative aims to significantly increase the percentage of emissions calculated using real emission factors, whether based on a unit of production or a financial variable in the case of services procurement.

Category 2

This category includes all upstream emissions from the production of capital goods purchased by the company in the reporting year. It encompasses emissions associated with the acquisition of IT equipment – hardware – and the Bank's fleet vehicles.

The disclosure of this category is a new addition to the Sustainability Report, having been calculated for the first time in this reporting year for goods purchased by the Bank in Portugal, in alignment with the GHG Protocol. Similar to category 1, for category 2 emissions, the protocol also recognizes four distinct methodologies, listed in order of preference: i) supplier-specific; ii) hybrid; iii) average-product; and iv) average spend-based.

For the procurement of all the aforementioned equipment included in this category, the calculation was performed using the average spend-based methodology, based on billing volumes and sector-specific emission factors available in an external database (ADEME's Empreinte Database, Purchasing Services, Money Ratios).

Category 3

This category refers to emissions related to the production of fuels and energy purchased and consumed by the Group in the reporting year, which were not included in the calculation of Scope 1 and 2 emissions.

This is a new category considered by the Group compared to previous years' Sustainability Reports. Calculations were carried out in accordance with the GHG Protocol to account for emissions associated with the extraction, production, and transportation of fuels and energy purchased by the Bank, as well as losses in the transmission and distribution of electricity consumed by the Bank.

For this category, the protocol recognizes two calculation methodologies: i) supplier-specific and ii) average-data. Since it was not possible to obtain the actual emission factors required for the calculation, the Group adopted the second approach, average-data, using Scope 3 emission factors from the database DEFRA GHG Conversion factors (full set), V1.1, 2024: WTT-fuels, WTT-UK electricity, Transmission and distribution, WTT-heat and steam.

To obtain the Scope 3 emissions value for Category 3 at the Group level, the location-based value determined by the Bank Millennium Group was considered.

Category 6

This category includes emissions from employee transportation for business-related activities, whether in company-owned vehicles (e.g., cars) or third-party-operated vehicles (e.g., airplanes and trains). For this category, the protocol recognizes three calculation methodologies: i) fuel-based, ii) distance-based, and iii) spend-based.

Since the traveled distances could be determined, the Bank adopted the second calculation methodology, distance-based, using kilometers traveled by transport type and emission factors sourced from the DEFRA databases:

- For the calculation of emissions associated with air travel, different emission factors were considered from the Air Travel Emissions Factors 2024, V1.0, for Short-, Medium- and Long-Haul flights, as well as for Business and Economic class tickets.
- Regarding the calculation of emissions associated with train travel, the emission factor from the Ground Travel Emissions Factors 2024, V1.0 database was used for National Rail.
- For the calculation of emissions associated with car travel, the average fuel costs—specifically diesel and gasoline—were considered, based on data from DGEG, along with the average fuel consumption of vehicles for each fuel type and the emission factors from Ground Travel 2024, V1.0, for Average Car Petrol and Average Car Diesel.

Category 13

Category 13 is only applicable to Millennium Bank Group (Poland) and includes emissions from the operation of assets owned by Millennium Leasing (acting as a lessor receiving payments for this service) and leased to other entities during the reporting year, which are not covered by Scope 1 or Scope 2.

For the calculation of emissions in this category, the GHG Protocol's lease-specific methodology was applied, which includes data on Scope 1 and Scope 2 emissions of lessors and the allocation of those emissions to the respective leased assets.

Category 15

This category includes emissions associated with investments/financing of the reporting company and is applicable to investors and financial institutions.

The standards developed by the GHG Protocol establish the framework for calculating greenhouse gas emissions across all scopes. However, for Category 15 of Scope 3, the calculation of emissions must be carried out based on a more specific methodology developed by the Partnership for Carbon Accounting Financials (PCAF), as described in the GHG Accounting and Reporting Standard for the Financial Industry, Part A – Financed Emissions (December 2022 version).

BCP followed PCAF guidelines and included in the calculation of this category Scope 1, 2, and 3 emissions. Regarding the data used, priority was given to emissions reported by companies whenever that information was available. In cases where individual counterparty data was not available or deemed unreliable, sector-specific values provided by Moody's (via Orbis and/or Score Predictor) were used, or sectorial ratios estimated internally based on aggregated information by sector and geography. This process considered financial and operational indicators to reflect the best approximation/estimate of the emissions associated with each financed company.

GRI 301-1 Materials consumption

In Portugal, the quantities of materials purchased (units) are considered for calculating material consumption and are multiplied by their respective weight.

The tonnes of materials relating to Bank Millennium reflect the units of materials consumed multiplied by their respective weight.

GRI 303-3 Water withdrawal¹

Sum of the volume of water purchased from third parties (public grid), in each geography – Portugal, Poland and Mozambique.

In Portugal, considering the differences in tariffs found in each region, the volume of water purchased from third parties is determined, considering an average price of €5.08/m³.

GRI 306-3 Generated waste

The amount of waste is determined based on the records outlined in the Electronic Waste Monitoring Guide provided by the responsible waste management entity. For toners, the quantities are supplied directly by the supplier.

SOCIAL INDICATORS

S1-6 – Characteristics of the employees of the company

The total number of employees includes all the people to be performed in each country, as of 31st December 2024, except for trainees, who are not counted in the headcount.

The turnover rate is reported in absolute value, and results from dividing the number of employees who left the company during the year, by the total number of employees in the same period. Employees who were transferred to Millennium bcp operations abroad (Expatriates) or to other companies are not considered.

Recruitment rate

The recruitment rate is calculated by dividing the total number of employees hired during the reporting year by the total number of employees as of December 31. Expatriate employees and those from other Group companies are excluded from this calculation.

Internal mobility rate

The internal mobility rate is calculated by dividing the number of employees who experienced an internal rotation process (between Companies, Directorates or Departments) in 2024 by the total number of employees.

S1-7 – Characteristics of non-employees in the undertaking's own workforce

The reported figures reflect the number of contingent self-employed persons as of 31st December 2024. The data were collected and categorised according to the nature of the employment relationship, distinguishing between self-employed workers, workers provided by companies specialising in "employment activities" (NACE code N78) and other types. It should be noted that in the years prior to 2024, such values were not reported.

Employees by professional category

Sum of the absolute number of workers performing functions in Portugal, Poland and Mozambique by function type.

¹ Reported in the Summary of Non-Financial Indicators as "Water consumption".

Employees by age range

Sum of the absolute number of employees performing duties in Portugal, Poland and Mozambique with ages within the defined age ranges.

Average age

Value calculated according to the following formula: (average age PT * No. of workers PT + average age PL * No. of workers PL + average age MZ * No. of workers MZ) / Total workers BCP Group.

Number of Interns

The total number of professional, curricular, and short-term interns who worked in the Group throughout the year 2024.

S1-14 – Health and safety metrics

The accident rate is calculated by dividing the number of accidents at work by the total number of hours worked, multiplied by 1,000,000. It therefore represents the number of accidents at work per million hours worked.

Absenteeism rate

The absenteeism rate is calculated by dividing the total number of days absent by the total number of days worked.

Days of absence include all instances of missing work for any reason. When counting these absences, only the working days on which the absence occurred are considered, starting from the first day of absence. Holidays, parental leave (both maternity and paternity), and student-worker leave are not counted as days of absence.

For the purpose of calculating the number of days worked, each employee is considered to have worked for 50 weeks, with 5 working days each week.

S1-12 – Persons with disabilities

The percentage of workers with disabilities results from the comparison between the number of workers with disabilities employed by the BCP Group on December 31, with the total number of workers on the same date.

Workers with disabilities are all those who have registered with a degree of disability equal to or greater than 60% (may include workers with physical/motor disabilities and/or workers disabled for health reasons (e.g. oncological disease)).

S1-16 – Compensation metrics

The gender pay gap results from the difference between the average annual salary for men and women, divided by the average annual salary for men, and expressed as a percentage of the average annual salary for men. For this purpose, all workers of all categories are considered.

The total annual remuneration ratio results from the division between the annual remuneration of the highest-paid individual and the total annual remuneration of all employees in Mozambique and Poland.

For Portugal, the presented ratio was calculated based on fixed and variable amounts paid, deducted from applicable taxes and mandatory contributions to the highest-paid individual in the organization and all employees of the organization. The total annual remuneration of the highest-paid individual in the organization does not include amounts not attributable to the 2024 financial year.

The remuneration considered was calculated in euro.

Lowest company salary and minimum national salary

The ratio between the lowest wage and the local minimum wage is the result of dividing the difference between the lowest wage paid locally in each of the geographies (Portugal, Poland, and Mozambique) and the respective national minimum wage.

ECONOMIC AND GOVERNANCE INDICATORS

Time of payment and time contractually agreed, in Portugal

Ratio is calculated based on the average payment term for invoices compared to the terms agreed with suppliers.

The bank always complies with the contractual payment terms as long as the underlying operational assumptions are met.

Donations

Amount calculated considering the sum of all Donations paid in 2024 by the BCP Group to entities recognized by local legislation as being of public utility or other specific status that normally allows obtaining tax benefits associated with the amount delivered.

Interest paid on deposits and interbank funding

Interest paid on deposits and other resources includes amounts corresponding to interest and similar costs of customer deposits and other loans, whether recorded at amortized cost or designated at fair value through profit or loss, in accordance with the notes to the accounts in the Group's 2024 Annual Report (note 2, net interest income).

External Auditor's Report



INDEPENDENT AUDITORS' LIMITED ASSURANCE REPORT ON NOS GROUP'S SUSTAINABILITY STATEMENT

(Free translation from a report originally issued in Portuguese language. In case of doubt the Portuguese version will always prevail.)

To the Board of Directors

Banco Comercial Português, S.A.

Limited assurance conclusion

We have performed a limited assurance engagement on the Consolidated Sustainability Statement of Banco Comercial Português, S.A. (the "Group") included in section "Sustainability Report - Non-Financial Statement" in Volume 2 of the Management Report (the "Consolidated Sustainability Statement") as at 31 December 2024 and for the period from 1 January to 31 December 2024.

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the Consolidated Sustainability Statement of Banco Comercial Português, S.A. as at 31 December 2024 and for the period from 1 January to 31 December 2024 is not prepared, in all material respects, in accordance with:

- the European Sustainability Reporting Standards (ESRS), including that the process carried out by the Group to identify the information reported in the Sustainability Statement (the "Process") is in accordance with the description set out in section General Information – Management of impacts, risks and opportunities – Double materiality assessment; and
- the disclosures required by Article 8 of EU Regulation 2020/852 (the "Taxonomy Regulation") included in section Taxonomy Disclosures under article 8 of Regulation (EU) 2020/852 of the Consolidated Sustainability Statement.

Basis for Conclusion

We conducted our limited assurance engagement 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 (IAASB) of the International Federation of Accountants (IFAC) and the other standards and technical guidelines of *Ordem dos Revisores Oficiais de Contas*.

The procedures performed in a limited assurance engagement are different in nature and timing and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under these standards are described in the “Our Responsibilities” section below.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Quality and Independence

Our firm applies International Standard on Quality Management (ISQM) 1, *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements*, issued by the IAASB. This standard requires the firm to 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) and of the *Ordem dos Revisores Oficiais de Contas*’ code of ethics.

Other matters

The comparative information included in the Group’s Consolidated Sustainability Statement at 31 December 2023 has been subject to a limited assurance engagement provided by other auditor. Our conclusion is not modified in respect of this matter.

Responsibilities of the Board of Directors for the Sustainability Statement

The Board of Directors is responsible for designing, implementing and maintaining a process to identify the information reported in the Consolidated Sustainability Statement in accordance with the ESRS and for disclosing this process in General Information – Management of impacts, risks and opportunities – Double materiality assessment of the Consolidated Sustainability Statement. This responsibility includes:

- understanding the context in which the Group’s activities and business relationships take place and developing an understanding of its affected stakeholders;
- the identification of the actual and potential impacts (both negative and positive) related to sustainability matters, as well as risks and opportunities that affect, or could reasonably be expected to affect, the Group’s financial position, financial performance, cash flows, access to finance or cost of capital over the short-, medium-, or long-term;
- the assessment of the materiality of the identified impacts, risks and opportunities related to sustainability matters by selecting and applying appropriate thresholds; and
- the selection and application of methodologies and making assumptions that are reasonable in the circumstances.

The Board of Directors is further responsible for:

- preparing the Consolidated Sustainability Statement in compliance with the ESRS;
- preparing the disclosures in section section Taxonomy Disclosures under article 8 of Regulation (EU) 2020/852 of the Consolidated Sustainability Statement, in accordance with Article 8 of the Taxonomy Regulation; and
- designing, implementing, and maintaining an appropriate information and internal control system to enable the preparation of the Sustainability Statement that is free from material misstatement, whether due to fraud or error; and

- selecting and applying appropriate sustainability reporting methods and making assumptions and estimates about individual sustainability disclosures that are reasonable in the circumstances.

Inherent limitations in preparing the Sustainability Statement

In reporting forward-looking information in accordance with ESRS, management is required to prepare the forward-looking information on the basis of disclosed assumptions about events that may occur in the future and possible future actions by the Group. The actual outcome is likely to be different since anticipated events frequently do not occur as expected.

In determining the disclosures in the Consolidated Sustainability Statement, management interprets undefined legal and other terms. Undefined legal and other terms may be interpreted differently, including the legal conformity of their interpretation and, accordingly, are subject to uncertainties.

Our responsibilities

Our objectives are to plan and perform the assurance engagement to obtain limited assurance about whether the Consolidated Sustainability Statement is free from material misstatement, whether due to fraud or error, and reporting our limited assurance conclusion to the Board of Directors. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence decisions of users taken on the basis of the Sustainability Statement as a whole.

As part of a limited assurance engagement performed in accordance with ISAE 3000 (Revised), we exercise professional judgement and maintain professional skepticism throughout the engagement.

Our responsibilities in respect of the Consolidated Sustainability Statement, in relation to the Process, include:

- Obtaining an understanding of the Process but not for the purpose of providing a conclusion on the effectiveness of the Process, including the outcome of the Process; and
- Designing and performing procedures to evaluate whether the Process is consistent with the Group's description of its Process, as disclosed in General Information – Management of impacts, risks and opportunities – Double materiality.

Our other responsibilities in respect of the Consolidated Sustainability Statement include:

- Obtaining an understanding of the control environment, processes and information systems relevant to the preparation of the Consolidated Sustainability Statement but not evaluating the design of particular control activities, obtaining evidence about their implementation or testing their operating effectiveness;
- Identifying disclosures where material misstatements are likely to arise, whether due to fraud or error; and
- Designing and performing procedures focused on disclosures in the Consolidated Sustainability Statement where material misstatements are likely to arise. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Summary of the work we performed as the basis for our conclusion

A limited assurance engagement involves performing procedures to obtain evidence about the Sustainability Statement.

We designed and performed our procedures to provide a basis for our conclusion. The nature, timing and extent of our procedures depended on our understanding of the Consolidated Sustainability Statement and other engagement circumstances, including the identification of disclosures where material misstatements are likely to arise, whether due to fraud or error, in the Consolidated Sustainability Statement.

In conducting our limited assurance engagement, with respect to the Process, we:

- Obtained an understanding of the Process by:
 - i. Performing inquiries of relevant personnel, at both corporate and operational levels, regarding the sustainability strategy and policies for materially-relevant aspects, and the implementation of these across various business areas; and
 - ii. Reviewing the Group's internal documentation of its Process; and
- Evaluated whether the evidence obtained from our procedures about the Process was consistent with the description of the Process set out in section General Information – Management of impacts, risks and opportunities – Double materiality.

In conducting our limited assurance engagement with respect to the Sustainability Statement, we:

- Obtained an understanding of the Group's reporting processes relevant to the preparation of its Sustainability Statement through the understanding of the control environment, processes, and information system of the Group relevant to the preparation of the Consolidated Sustainability Statement, but not with the purpose of expressing a conclusion on the effectiveness of the Group's internal control;
- Evaluated whether material information identified by the Process is included in the Consolidated Sustainability Statement;
- Evaluated whether the structure and the presentation of the Consolidated Sustainability Statement is in accordance with the ESRS;
- Performed inquiries of relevant personnel and analytical procedures on selected disclosures in the Consolidated Sustainability Statement;
- Performed substantive assurance procedures based on a sample basis on selected disclosures in the Consolidated Sustainability Statement;
- Obtained evidence on the methods, assumptions and data for developing material estimates and forward-looking information and on how these methods were applied;
- Obtained an understanding of the process to identify taxonomy-eligible and taxonomy-aligned economic activities and the corresponding disclosures in the Sustainability Statement.

26 March 2025

SIGNED ON THE ORIGINAL

KPMG & Associados

Sociedade de Revisores Oficiais de Contas, S.A.

(nr. 189 and registered at CMVM with the nr. 20161489)

represented by

Pedro Jorge Quental e Cruz

(ROC nr. 1765 and registered at CMVM with the nr. 20161607)



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INDEPENDENT LIMITED ASSURANCE REPORT

(Free translation from a report originally issued in Portuguese language. In case of doubt the Portuguese version will always prevail.)

To the Board of Directors
 Banco Comercial Português, S.A.

Introduction

We were engaged by the Board of Directors of Banco Comercial Português, S.A. ("Entity") to perform a limited assurance engagement on the information regarding to the sustainability indicators (the "Indicators") disclosed in Appendix I – Indicators of sustainability this report and included in section "Other Sustainability Information" of Volume 2 of Management Report, as at 31 December 2024.

Management's responsibilities

The Management is responsible for the:

- Preparation of the information regarding to the indicators for the period ended 31 December 2024, disclosed in section "Other Sustainability Information" of Volume 2 of Annual Bank's Report of the Management Report, in accordance with criteria's described in chapter "Methodological Notes" of Volume 2 of Management Report;
- Design, implementation and maintenance of an appropriate information and internal control system to enable a preparation of the information regarding to the performance indicators that is free from material misstatement, whether due to errors or fraud;
- Prevention and detection of fraud and errors and for the identifying and ensuring that the Entity complies with laws and regulations applicable to its activities; and,
- Process to ensure that the Management and staff involved with the preparation of the information of performance indicators have the appropriate skills.

Our responsibilities

Our responsibility is to perform a limited assurance work and to report thereon in the form of an independent limited assurance conclusion based on the evidence obtained.

We conducted our engagement 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

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 Capital Social: 3.916.000 Euros – Pessoa Colectiva N.º PT 502 161 078 –
 Inscrição na O.R.O.C. N.º 189 – Inscrição na C.M.V.M. N.º 20161489
 Matriculada na Conservatória do Registo Comercial de Lisboa sob o N.º PT 502 161 078



Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC) and the other standards and technical guidelines of Ordem dos Revisores Oficiais de Contas, which require that we plan and perform our work to obtain limited assurance as to whether nothing has come to our attention that causes us to believe that the information relating to the Indicators identified in Appendix I – Indicators of sustainability and disclosed in the section “Other Sustainability Information” of Volume 2 of Management Report, as at 31 December 2024, is not in accordance with the criteria’s described in chapter “Methodological Notes” of Volume 2 of Management Report, in all material respects. For this purpose, this work included, amongst other procedures, the following:

- Conducting interviews with employees and those responsible for preparing information regarding the performance indicators, with reference to 31 December 2024;
- Comparison of the information presented in chapter “Methodological Notes” of Volume 2 of Management Report, for the year ended December 31, 2024, with the respective sources of information to determine whether all relevant information included in these sources of information was included in the information on the performance indicators;
- Reading of the information presented in chapter “Methodological Notes” of Volume 2 of Management Report, to determine whether it is in accordance with our general knowledge of the Bank.

The procedures selected depend on our understanding of the indicators and other engagement circumstances, and our consideration of areas where material misstatements are likely to arise.

The procedures performed in a limited assurance engagement are different in nature and timing and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our conclusion.

Quality and independence

The firm applied the International Standard on Quality Management 1 which requires the firm to 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 in the Ordem dos Revisores Oficiais de Contas’ code of ethics and the International Code of Ethics for Professional Accountants (including international independence standards), (IESBA Code), which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.



Conclusion

Our conclusion has been formed on the basis of, and is subject to, the matters outlined in this report.

Based on the procedures performed and evidence obtained, nothing has come to our attention that causes us to believe that the information regarding to the indicators identified in the in Appendix I – Indicators of sustainability this report and included in section “Other Sustainability Information” of Volume 2 of Management Report, as at 31 December 2024, has not been prepared in accordance with the criteria’s described in chapter “Methodological Notes” of Volume 2 of Management Report.

26 de março de 2025

SIGNED ON THE ORIGINAL

KPMG & Associados
Sociedade de Revisores Oficiais de Contas, S.A.
(n.º 189 e registada na CMVM com o n.º 20161489)
representada por
Pedro Jorge Quental e Cruz
(ROC n.º 1765 e registado na CMVM com o n.º 20161607)



Appendix I – Indicators

Environmental Indicators
Waste Production
Water Consumption (except for Poland)
Material Consumption
Social Indicators
Distribution of employees by professional category
Distribution by age group
Average age
Number of interns
Recruitment rate
Internal mobility rate
Workplace accident rate
Absenteeism rate
Ratio between lowest company salary and minimum national salary
Suppliers
Ratio between time of payment and time contractually agreed
Other Indicators
Donations
Interest paid on deposits and other resources

ANNEXES

Alignment tables with ESRS (European Sustainability Reporting Standards)

ESRS disclosure requirements covered by the company's sustainability statement

Disclosure requirement		Page
ESRS 2	General Disclosure	
BP-1	General basis for preparing sustainability statements	14
BP-2	Disclosures in relation to specific circumstances	14
GOV-1	Role of the company's administrative, management and supervisory bodies	16
GOV-2	Information provided and sustainability issues addressed by the company's management, management and supervisory bodies	18
GOV-3	Integrating sustainability performance into incentive schemes	18
GOV-4	Declaration on duty of care	20
GOV-5	Risk management and internal controls for sustainability reporting	21
SBM-1	Strategy, business model and value chain	21
SBM-2	Stakeholder interests and views	26
SBM-3	Material impacts, risks and opportunities and their interaction with the strategy and business model	29
IRO-1	Description of the process of identifying and assessing material impacts, risks and opportunities	36
IRO-2	ESRS disclosure requirements covered by the company's sustainability statement	42
MDR-M	Metrics in relation to material sustainability issues	200
ESRS E1	Climate change	
ESRS 2 GOV-3	Integrating sustainability-related performance into incentive schemes	18
E1-1	Transition plan for climate change mitigation	48
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with the strategy and business model	48
ESRS 2 IRO-1	Description of processes for identifying and assessing material climate-related impacts, risks and opportunities	36
E1-2	Policies related to climate change mitigation and adaptation	49
MDR-P	Policies adopted to manage material sustainability issues	49
E1-3	Actions and resources related to climate change policies	51
MDR-A	Actions and resources related to material sustainability issues	51
E1-4	Targets related to climate change mitigation and adaptation	56
MDR-T	Monitor the effectiveness of policies and actions through targets	56
E1-5	Energy consumption and energy mix	57
E1-6	Gross scope 1, 2, 3 GHG emissions and total GHG emissions	58
E1-7	GHG removal and GHG mitigation projects financed through carbon credits	60
E1-8	Internal carbon pricing	60

Disclosure requirement		Page
E1-9	Expected financial effects of material physical and transition risks and potential climate-related opportunities	-
ESRS E2	Pollution	
ESRS 2 IRO-1	Description of processes for identifying and assessing material impacts, risks and opportunities	36
ESRS E3	Water and marine resources	
ESRS 2 IRO-1	Description of processes for identifying and assessing material impacts, risks and opportunities	36
ESRS E4	Biodiversity and ecosystems	
ESRS 2 IRO-1	Description of processes for identifying and assessing material impacts, risks and opportunities	36
ESRS E5	Use of resources and circular economy	
ESRS 2 IRO-1	Description of processes for identifying and assessing material impacts, risks and opportunities	36
ESRS S1	Own workforce	
ESRS 2 SBM-2	Stakeholder interests and views	62
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with the strategy and business model	62
S1-1	Policies related to the workforce itself	63
S1-2	Processes for engaging with the workforce itself and workers' representatives about impacts	66
S1-3	Processes to remediate negative impacts and channels for the workforce to express concerns	67
S1-4	Taking action on material impacts on own workforce and approaches to managing material risks and pursuing material opportunities related to own workforce, as well as the effectiveness of these measures	67
S1-5	Targets related to the management of negative material impacts, the promotion of positive impacts and the management of material risks and opportunities	68
S1-6	Characteristics of the company's salaried workers	68
S1-7	Characteristics of non-employees in the undertaking's own workforce	70
S1-8	Coverage of collective bargaining and social dialogue	70
S1-9	Diversity metrics	71
S1-10	Adequate wages	73
S1-11	Social protection	73
S1-12	People with disabilities	78
S1-13	Training and skills development metrics	80
S1-14	Health and Safety Metrics	84
S1-15	Work-life balance metrics	73
S1-16	Compensation metrics (pay gap and total compensation)	85
S1-17	Incidents, complaints and serious impacts and incidents of disrespect for human rights	85
S4	Consumers and end users	
ESRS 2 SBM-2	Stakeholder interests and views	86

Disclosure requirement		Page
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with the strategy and business model	86
S4-1	Policies related to consumers and end users	87
S4-2	Processes for engaging with consumers and end users about impacts	91
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to express concerns	92
S4-4	Adoption of measures on significant impacts on consumers and end-users, and approaches to manage material risks and pursue material opportunities related to consumers and end-users, and the effectiveness of these actions	94
S4-5	Targets related to the management of negative material impacts, the promotion of positive impacts and the management of material risks and opportunities	106
G1	Business Conduct	
ESRS 2 GOV-1	The role of administrative, supervisory and management bodies	109
ESRS 2 IRO-1	Description of processes for identifying and assessing material impacts, risks and opportunities	36
G1-1	Business Conduct Policies and Corporate Culture	110
G1-2	Supplier relationship management	114
G1-3	Prevention and detection of corruption and bribery	115
G1-4	Cases of corruption or bribery	117
G1-6	Payment practices	118

List of requirements deriving from other EU legislation

Requirement	Data point	SFDR	Pillar 3	Reference Indices	European Climate Law	Page
ESRS 2 GOV-1	Gender diversity on boards of directors -21, paragraph d)	n		n		16
	Percentage of board members who are independent - 21, paragraph e)			n		17
ESRS 2 GOV-4	Declaration on duty of care - 30	n				20
ESRS 2 SBM-1	Participation in activities related to fossil fuels - 40, paragraph d), subparagraph i)	n	n	n		22
	Participation in activities related to the production of chemical products - 40, paragraph d), subparagraph ii)	n		n		22
	Participation in activities related to controversial issues controversial weapons - 40, paragraph d), subparagraph iii)	n		n		22
	Participation in activities related to the cultivation and production of tobacco - 40, paragraph d), subparagraph iv)			n		22
ESRS E1-1	Transition plan to achieve climate neutrality by 2050 - 14				n	48
	Companies excluded from benchmarks aligned with Paris Agreement No. 16(g)	Not applicable				
ESRS E1-4	GHG emission reduction targets - 34	n	n	n		56

Requirement	Data point	SFDR	Pillar 3	Reference Indices	European Climate Law	Page
ESRS E1-5	Consumption of fossil fuel energy disaggregated by source (only sectors with high climate impact) - 38	n				57
	Energy consumption and energy matrix - 37	n				57
	Energy intensity associated with activities in sectors with high climate impact - 10 to 43	n				57
ESRS E1-6	Gross scope 1, 2, 3 and total GHG emissions - 44	n	n	n		58-59
	Gross GHG emissions intensity - 10 to 55	n	n	n		60
ESRS E1-7	GHG removals and carbon credits - 56				n	60
ESRS E1-9 ²	Benchmark portfolio exposure to climate-related physical risks - 66			n		-
	Disaggregation of monetary values by acute and chronic physical risk - 66, paragraph a) – and ESRS E1-9 Location of significant assets at material physical risk - 66, paragraph c)		n			-
	Breakdown of the carrying value of its real estate assets in terms of energy efficiency - 67, paragraph c).		n			-
	Degree of portfolio exposure to climate-related opportunities - 69			n		-
ESRS E2-4	Amount of each pollutant listed in Annex II of the RETP Regulation (European Pollutant Release and Transfer Register) emitted into air, water and soil - 28					-
S1 ESRS 2 — SBM-3	Risk of incidents arising from forced labour - 14, paragraph f)	n				62-63
	Risk of use of child labour - 14, paragraph g)	n				62-63
ESRS S1-1	Human rights policy commitments - 20	n				62-63
	Policies on due diligence on matters covered by International Labour Organization fundamental conventions 1 to 8 - 21			n		63-66
	Processes and measures to prevent human trafficking - 22	n				63-66
	Occupational accident prevention policy or occupational accident management system - 23	n				63-66
ESRS S1-3	Complaints handling mechanisms - 32, paragraph c)	n				67
ESRS S1-14	Number of fatalities and number and rate of work-related accidents - 88, points b) and c)	n				84
	Number of days lost due to injury, accident, death or illness - 88, paragraph e)	n				84
ESRS S1-16	Unadjusted gender pay gap - 97(a)	n		n		85
	Chief Executive Officer (CEO) Excessive Compensation Ratio - 97, paragraph b)	n				85

² Disclosure requirement introduced progressively.

Requirement	Data point	SFDR	Pillar 3	Reference Indices	European Climate Law	Page
ESRS S1-17	Incidents of discrimination - 103, paragraph a)	n				85
	Failure to comply with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines - 104, paragraph a)	n		n		85
S4-1	Policies relating to consumers and end-users - 16	n				87-91
	Failure to comply with the UNGP on business and human rights, the ILO principles and the OECD guidelines - 17	n		n		87-91
S4-4	Human rights issues and incidents - 35	n				94-106
ESRS G1-1	United Nations Convention against Corruption - 10, paragraph b)	n				110-115
	Protection of whistleblowers - 10, paragraph d)	n				110-115
ESRS G1-4	Fines for violation of anti-corruption and anti-bribery laws - 24, paragraph a)	n		n		118
	Rules against corruption and bribery - 24, paragraph b)	n				118

Issues related to ESRS E3 Water and marine resources, ESRS E4 Biodiversity and ecosystems, ESRS E5 Resource use and circular economy, ESRS S2 Workers in the value chain and ESRS S3 Affected communities were not considered material.

Correspondence table between the Management Report and Decree-Law 89/2017

DECREE-LAW NO. 89/2017 OF 28 JULY	CHAPTER/SECTION	Page
Article 3 (Referred to Article 508-G(2) of the CC)		
The non-financial statement must contain information to the extent necessary for an understanding of the undertaking's development, performance, position and impact of its activity, relating to, as a minimum, environmental, social and employee matters, gender equality, non-discrimination, respect for human rights, anti-corruption and bribery matters, including:		
a) A brief description of the undertaking's business model	24 AR Vol. II Sustainability Report > ESRS 2 GOV-1	16
	24 AR Vol. I Report and Accounts > Business model	
b) Description of the policies pursued by the undertaking in relation to those matters, including due diligence processes implemented	ENVIRONMENTAL:	
	24 AR Vol. II Sustainability Report > ESRS 2 IRO-1	36
	24 AR Vol. II Sustainability Report > E1-2	49
	24 AR Vol. II Sustainability Report > G1-1	110
	24 AR Vol. II Sustainability Report > TCFD Table	235
	SOCIAL AND WORKER-RELATED:	
	24 AR Vol. II Sustainability Report > ESRS 2 IRO-1	36
	24 AR Vol. II Sustainability Report > S1-1	63
	GENDER EQUALITY AND NON-DISCRIMINATION:	
	24 AR Vol. II Sustainability Report > ESRS 2 SBM-1	21
	24 AR Vol. II Sustainability Report > ESRS 2 IRO-1	36
	24 AR Vol. II Sustainability Report > S1-1	63
	HUMAN RIGHTS:	
	24 AR Vol. II Sustainability Report > ESRS 2 SBM-3	29
	24 AR Vol. II Sustainability Report > ESRS 2 IRO-1	36
	24 AR Vol. II Sustainability Report > S1-1	63
	FIGHT AGAINST CORRUPTION AND BRIBERY ATTEMPTS:	
	24 AR Vol. II Sustainability Report > G1-1	110
c) Outcome of those policies	ENVIRONMENTAL:	
	24 AR Vol. II Sustainability Report > ESRS 2 SBM-3	29
	24 AR Vol. II Sustainability Report > TCFD Table	235
	SOCIAL AND WORKER-RELATED:	
	24 AR Vol. II Sustainability Report > ESRS 2 SBM-3	29
	24 AR Vol. II Sustainability Report > S1-3	67
	GENDER EQUALITY AND NON-DISCRIMINATION:	
	24 AR Vol. II Sustainability Report > ESRS 2 SBM-3	29
	24 AR Vol. II Sustainability Report > S1-3	67
	HUMAN RIGHTS:	
	24 AR Vol. II Sustainability Report > ESRS 2 SBM-3	29
	24 AR Vol. II Sustainability Report > S1-1	63
	24 AR Vol. II Sustainability Report > S1-4	67
	Table UNGP - UN Guiding Principles Reporting Framework	232
	FIGHT AGAINST CORRUPTION AND BRIBERY ATTEMPTS:	
d) Main risks associated with these issues, linked to the company's activities, including, if relevant and proportionate, its business relationships, its products or services that may have negative impacts in these areas and how these risks are managed by the company.	ENVIRONMENTAL:	
	24 AR Vol. II Sustainability Report > ESRS 2 SBM-3	29
	24 AR Vol. II Sustainability Report > TCFD Table	235
	SOCIAL AND WORKER-RELATED:	
	24 AR Vol. II Sustainability Report > ESRS 2 SBM-3	29
	24 AR Vol. II Sustainability Report > S1-3	67
	GENDER EQUALITY AND NON-DISCRIMINATION:	
	24 AR Vol. II Sustainability Report > ESRS 2 SBM-3	29
	24 AR Vol. II Sustainability Report > S1-3	67
	HUMAN RIGHTS:	
	24 AR Vol. II Sustainability Report > ESRS 2 SBM-3	29
	24 AR Vol. II Sustainability Report > S1-1	63
	24 AR Vol. II Sustainability Report > S1-4	67
	Table UNGP - UN Guiding Principles Reporting Framework	232
	FIGHT AGAINST CORRUPTION AND BRIBERY ATTEMPTS:	

	24 AR Vol. II Sustainability Report > G1-1	110
	24 AR Vol. II Sustainability Report > G1-4	117
e) Non-financial key performance indicators relevant to the particular business	ENVIRONMENTAL:	
	AR 24 Vol. II Other information > Resource management	184
	24 AR Vol. II Sustainability Report > E1-5	57
	SOCIAL AND WORKER-RELATED:	
	24 AR Vol. II Sustainability Report > S1-6	68
	24 AR Vol. II Sustainability Report > S1-7	70
	24 AR Vol. II Sustainability Report > S1-8	70
	24 AR Vol. II Sustainability Report > S1-9	71
	24 AR Vol. II Sustainability Report > S1-10	73
	24 AR Vol. II Sustainability Report > S1-11	73
	24 AR Vol. II Sustainability Report > S1-12	78
	24 AR Vol. II Sustainability Report > S1-13	80
	24 AR Vol. II Sustainability Report > S1-14	84
	24 AR Vol. II Sustainability Report > S1-15	73
	24 AR Vol. II Sustainability Report > S1-16	85
	GENDER EQUALITY AND NON-DISCRIMINATION:	
	24 AR Vol. II Sustainability Report > S1-9	71

GRI Table - Global Reporting Initiative

Information sources:
AR – 2024 Report and Accounts
SR – 2024 Sustainability Report

Declaration of use	Banco Comercial Português S.A. reported in accordance with the GRI Standards for the period from 1 January 2024 to 31 December 2024.
GRI 1 used	GRI 1: Foundation 2021
Applicable sector standard	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
ORGANISATION AND REPORTING PRACTICES			
2-1	Organisation details	24 AR Vol. I Report and Accounts > BCP Group Information 24 AR Vol. II Terms and Conditions	
2-2	Entities included in the organization's sustainability report	24 AR Vol. II Sustainability Report > ESRS 2 BP-1	
2-3	Reporting period, frequency and contact point	24 AR Vol. II Sustainability Report > ESRS 2 BP-1 24 AR Vol. II Terms and Conditions	
2-4	Reformulations of information	24 AR Vol. II Sustainability Report > ESRS 2 BP-2	
2-5	External Verification	24 AR Vol. II Letter from the Auditors Corporate Governance Report > Section V - External Auditor	
ACTIVITIES AND WORKERS			
2-6	Activities, value chain and other business relationships	24 AR Vol. II Sustainability Report > Summary of Indicators 24 AR Vol. II Sustainability Report > ESRS 2 SBM-1 24 AR Vol. II Sustainability Report > ESRS 2 SBM-2 24 AR Vol. II Sustainability Report > G1-2 24 AR Vol. II Methodological Notes	
2-7	Employees	24 AR Vol. II Sustainability Report > Summary of Indicators 24 AR Vol. II Sustainability Report > S1-6	
2-8	Workers who are not employees	24 AR Vol. II Sustainability Report > S1-7	
GOVERNANCE			
2-9	Governance structure and its composition	Corporate Governance Report > Part I - B. Corporate Bodies and Committees 24 AR Vol. II Sustainability Report > ESRS 2 GOV-1	
2-10	Appointment and selection for the highest governance body	Corporate Governance Report > Part I - B. Corporate Bodies and Committees - II Management and Supervision a) Composition 16 and 17.1	
2-11	Chairperson of the highest governance body	Corporate Governance Report > A - Shareholder Structure - Items 4 and 5 and Item 17	
2-12	Role played by the highest governance body	Corporate Governance Report > Part I - B. Corporate Bodies and Committees - II Management and Supervision a) Composition 15, 17, 18 and 21	
2-13	Delegation of impact responsibility	24 AR Vol. II Sustainability Report > ESRS 2 SBM-3	

GRI STANDARDS		Content, page or link	UNGC Principles
		24 AR Vol. II Sustainability Report > ESRS 2 GOV-1 The management of impacts in the area of 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. 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</i> and <i>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.	
2-14	Role played by the highest governance body in Sustainability Reporting	24 AR Vol. II Sustainability Report > ESRS 2 GOV-1 24 AR Vol. II Sustainability Report > ESRS 2 GOV-5	
2-15	Conflicts of interest	24 AR Vol. II Sustainability Report > S4-1 24 AR Vol. II Sustainability Report > G1-1	
2-16	Communication of critical concerns	24 AR Vol. II Sustainability Report > G1-1 24 AR Vol. II Sustainability Report > G1-3 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).	
2-17	Collective knowledge of the highest governance body	24 AR Vol. II Sustainability Report > ESRS 2 GOV-1	
2-18	Performance assessment of the highest governance body	Corporate Governance Report > Part I - D. Remuneration 24 AR Vol. II Sustainability Report > ESRS 2 GOV-3	
2-19	Remuneration Policies	Corporate Governance Report > Part I - D. Remuneration 24 AR Vol. II Sustainability Report > ESRS 2 GOV-3	
2-20	Process for determining remuneration	Corporate Governance Report > Part I - D. Remuneration 24 AR Vol. II Sustainability Report > ESRS 2 GOV-3	
2-21	Annual total remuneration ratio	24 AR Vol. II Sustainability Report > S1-16 Portugal: The annual total remuneration ratio recorded in 2024 was 19. The ratio between the percentage increase in total annual remuneration for 2024 of the highest paid individual in the organisation and the median of the percentage increase in total annual remuneration of all employees (excluding the highest paid) recorded was 4.94. Notes: (i) The ratios presented were calculated based on the fixed and variable amounts paid, after deducting taxes and mandatory contributions applicable, to the highest-paid individual in the organization and to all employees of the organization; (ii) the annual total compensation of the highest-paid individual in the organization does not include amounts not attributable to the 2024 fiscal year. Poland: The annual total remuneration ratio recorded in 2024 was 38. The ratio between the percentage increase in total annual remuneration for 2024 of the highest paid individual in the organisation and the median of the percentage increase in total annual remuneration of all employees (excluding the highest paid) recorded was 0.59. Mozambique: The annual total remuneration ratio recorded in 2024 was 28.	

GRI STANDARDS		Content, page or link	UNGC Principles																										
		The ratio between the percentage increase in the total annual remuneration for 2024 of the highest paid individual in the organisation and the average of the percentage increase in the total annual remuneration of all employees (excluding the highest paid) recorded was -2.																											
STRATEGY, POLICIES AND PRACTICES																													
2-22	Declaration on sustainable development strategy	24 AR Vol. II Sustainability Report > ESRS 2 SBM-1																											
2-23	Policies	24 AR Vol. II Sustainability Report > ESRS 2 GOV-4 24 AR Vol. II Sustainability Report > E1-2 24 AR Vol. II Sustainability Report > S1-1 24 AR Vol. II Sustainability Report > S4-1 24 AR Vol. II Sustainability Report > G1-1																											
2-24	Incorporation of Policies	24 AR Vol. II Sustainability Report > ESRS 2 GOV-4 24 AR Vol. II Sustainability Report > E1-2 24 AR Vol. II Sustainability Report > S1-1 24 AR Vol. II Sustainability Report > S4-1 24 AR Vol. II Sustainability Report > G1-1																											
2-25	Processes to remedy negative impacts	24 AR Vol. II Sustainability Report > S1-1 24 AR Vol. II Sustainability Report > S1-3 24 AR Vol. II Sustainability Report > S4-1 24 AR Vol. II Sustainability Report > S4-3 24 AR Vol. II Sustainability Report > S4-4																											
2-26	Mechanisms for advice and raising concerns	24 AR Vol. II Sustainability Report > S1-3 24 AR Vol. II Sustainability Report > S4-3 24 AR Vol. II Sustainability Report > G1-1 24 AR Vol. II Sustainability Report > G1-3																											
2-27	Compliance with laws and regulations	24 AR Vol. II Sustainability Report > S1-17 24 AR Vol. II Sustainability Report > G1-4 <table><tr><td colspan="2">Portugal</td></tr><tr><td>Total no. of significant cases of non-compliance with laws and regulations</td><td>14</td></tr><tr><td>No. of significant cases of non-compliance with laws and regulations for which fines were applied</td><td>6</td></tr><tr><td>No. of significant cases of non-compliance with laws and regulations in which non-monetary sanctions were applied</td><td>8</td></tr><tr><td>Monetary value of fines imposed in significant cases of non-compliance with laws and regulations</td><td>324M</td></tr><tr><td>Monetary value of fines that occurred in the reporting period</td><td>324M</td></tr><tr><td>Monetary value of fines that were paid in the reporting period</td><td>0</td></tr><tr><td colspan="2">Internal Rules</td></tr><tr><td>Employees dismissed for violating Internal Rules</td><td>2</td></tr><tr><td>Employees punished for violating internal rules</td><td>6</td></tr><tr><td colspan="2">External Rules</td></tr><tr><td>Employees dismissed for violating external regulations</td><td>1</td></tr><tr><td>Employees punished for violating external rules</td><td>0</td></tr></table>	Portugal		Total no. of significant cases of non-compliance with laws and regulations	14	No. of significant cases of non-compliance with laws and regulations for which fines were applied	6	No. of significant cases of non-compliance with laws and regulations in which non-monetary sanctions were applied	8	Monetary value of fines imposed in significant cases of non-compliance with laws and regulations	324M	Monetary value of fines that occurred in the reporting period	324M	Monetary value of fines that were paid in the reporting period	0	Internal Rules		Employees dismissed for violating Internal Rules	2	Employees punished for violating internal rules	6	External Rules		Employees dismissed for violating external regulations	1	Employees punished for violating external rules	0	
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Employees punished for violating external rules	0																												
2-28	Participation in Associations	Information on the associations to which the Bank belongs is available on the corporate website: https://ind.millenniumbcp.pt/pt/Institucional/sustentabilidade/Pages/comunidade_externa.aspx																											
STAKEHOLDER ENGAGEMENT																													

GRI STANDARDS		Content, page or link	UNGC Principles
2-29	Stakeholder engagement approach	www.millenniumbcp.pt Institutional > Sustainability > Stakeholders management 24 AR Vol. II Sustainability Report > ESRs 2 SBM-2 24 AR Vol. II Sustainability Report > S1-1 24 AR Vol. II Sustainability Report > S1-2 24 AR Vol. II Sustainability Report > S4-1 24 AR Vol. II Sustainability Report > S4-2	
2-30	Collective negotiation agreements	24 AR Vol. II Sustainability Report > S1-8	
MATERIAL ISSUES			
3-1	Process of defining material issues	24 AR Vol. II Sustainability Report > ESRs 2 BP-1 24 AR Vol. II Sustainability Report > ESRs 2 IRO-1	
3-2	List of material issues	24 AR Vol. II Sustainability Report > ESRs 2 SBM-3 24 AR Vol. II Sustainability Report > ESRs 2 BP-2	
3-3	Management of material issues: E1 Climate change	24 AR Vol. II Sustainability Report > ESRs 2 SBM-1 24 AR Vol. II Sustainability Report > ESRs 2 E1-2 24 AR Vol. II Sustainability Report > ESRs 2 E1-3 24 AR Vol. II Sustainability Report > ESRs 2 E1-4	
3-3	Management of material issues: S1 In-house workforce	24 AR Vol. II Sustainability Report > ESRs 2 SBM-1 24 AR Vol. II Sustainability Report > ESRs 2 S1-2 24 AR Vol. II Sustainability Report > ESRs 2 S1-4 24 AR Vol. II Sustainability Report > ESRs 2 S1-5	
3-3	Management of material issues: S4 Consumers and end users	24 AR Vol. II Sustainability Report > ESRs 2 SBM-1 24 AR Vol. II Sustainability Report > ESRs 2 S4-2 24 AR Vol. II Sustainability Report > ESRs 2 S4-4 24 AR Vol. II Sustainability Report > ESRs 2 S4-5	
3-3	Management of material issues: G1 Business conduct	24 AR Vol. II Sustainability Report > ESRs 2 SBM-1 24 AR Vol. II Sustainability Report > ESRs 2 G1-1 24 AR Vol. II Sustainability Report > ESRs 2 G1-2 24 AR Vol. II Sustainability Report > ESRs 2 G1-3 24 AR Vol. II Sustainability Report > ESRs 2 G1-4	
CATEGORY: ECONOMIC			
ECONOMIC PERFORMANCE			
201-1	Direct economic value generated and distributed	24 AR Vol. I Report and Accounts BCP Group Information > Main indicators 24 AR Vol. I Report and Accounts Financial Information > Results and Balance Sheet > Profitability Analysis	
201-2	Financial implications, risks and opportunities due to climate change	24 AR Vol. II Sustainability Report > ESRs 2 SBM-3 24 AR Vol. II Sustainability Report > E1-3 24 AR Vol. II Annexes > Table of alignment with the recommendations of the TCFD - Task Force on Climate-Related Financial Disclosures https://www.cdp.net > Search responses > Banco Comercial Português SA	
201-3	Benefit plans defined by the organisation	24 AR Vol. I Financial Information > Results and Balance Sheet > Profitability Analysis	
MARKET PRESENCE			
202-1	Ratio between the lowest wage and the local minimum wage, by gender, in the Important operational units	24 AR Vol. II Summary of Indicators 24 AR Vol. II Sustainability Report > S1-10	6

GRI STANDARDS		Content, page or link				UNGC Principles
202-2	Proportion of employees hired locally		Men	Women	Total	
		No. of employees hired locally	7,004	8,592	15,596	
		% employees hired locally	99.4%	99.7%	99.6%	
		No. of employees of the EC and Senior Management hired locally	150	52	202	
		% of employees of the BoD, EC and Senior Management hired locally	92.6%	100.0%	93.4%	
INDIRECT ECONOMIC IMPACTS						
203-1	Development and impact of investments in infrastructure and services offered	24 AR Vol. II Other information > Share and Participate 24 AR Vol. II Other information > Financial Literacy 24 AR Vol. II Other information > BCP Group Foundations				
203-2	Significant indirect economic impacts, including the extent of impacts	24 AR Vol. II Other information > Share and Participate 24 AR Vol. II Other information > Financial Literacy 24 AR Vol. II Other information > BCP Group Foundations				
PURCHASING PRACTICES						
204-1	Proportion of expenses with local suppliers in important operational units	24 AR Vol. II Summary of Indicators 24 AR Vol. II Sustainability Report > G1-2				
ANTI-CORRUPTION						
205-2	Percentage of employees trained in the anti-corruption policies and practices of the organisation	24 AR Vol. II Sustainability Report > S1-13 24 AR Vol. II Sustainability Report > G1-3				10
205-3	Actions taken in response to corruption cases	24 AR Vol. II Sustainability Report > G1-4				10
TAXES						
207-1	Tax approach	AR 24 Vol. II Other information > Fiscal Policy				
207-2	Governance, Tax risk control and management	AR 24 Vol. II Other information > Fiscal Policy				
207-3	Involvement of stakeholders and management of their tax concerns	AR 24 Vol. II Other information > Fiscal Policy				
207-4	Report by geography	AR 24 Vol. II Other information > Fiscal Policy				
CATEGORY: ENVIRONMENTAL						
MATERIALS						
301-1	Materials consumption	24 AR Vol. II Other sustainability information > Resource Management				7, 8
ENERGY						
302-1	Energy Consumption within the organization	24 AR Vol. II Sustainability Report > E1-5				7, 8
302-3	Energy intensity	24 AR Vol. II Sustainability Report > E1-5				8
302-4	Reduction of energy consumption	24 AR Vol. II Sustainability Report > E1-5				8, 9
WATER AND EFFLUENTS						

GRI STANDARDS		Content, page or link	UNGC Principles
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 2024, all the water for irrigating 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. 24 AR Vol. II Other sustainability information > Resource Management	
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. 24 AR Vol. II Other sustainability information > Resource Management	
303-3	Water withdrawal	24 AR Vol. II Other sustainability information > Resource Management	7, 8
BIODIVERSITY			
304-1	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
EMISSIONS			
305-1	GGE direct emissions (Scope 1)	24 AR Vol. II Sustainability Report > E1-4 24 AR Vol. II Sustainability Report > E1-6	7, 8
305-2	GGE indirect emissions (Scope 2)	24 AR Vol. II Sustainability Report > E1-4 24 AR Vol. II Sustainability Report > E1-6	7, 8
305-3	Other GGE indirect emissions (Scope 3)	24 AR Vol. II Sustainability Report > E1-4 24 AR Vol. II Sustainability Report > E1-6	7, 8
305-4	Intensity of GGE emissions	24 AR Vol. II Sustainability Report > E1-6	8
305-5	Reduction of GGE emissions	24 AR Vol. II Sustainability Report > E1-3 24 AR Vol. II Sustainability Report > E1-4 24 AR Vol. II Sustainability Report > E1-6	8, 9
WASTE			
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. 24 AR Vol. II Other sustainability information > Resource Management	
306-2	Management of significant impacts related to waste	24 AR Vol. II Other sustainability information > Resource Management	
306-3	Generated waste	24 AR Vol. II Other sustainability information > Resource Management	8
CATEGORY: SOCIAL			
WORK			

GRI STANDARDS		Content, page or link	UNGC Principles																																																
401-1	New hirings and turn-over	24 AR Vol. II Sustainability Report > S1-6 <table> <tr> <th colspan="4">2024 Recruitment</th></tr> <tr> <th></th><th>Men</th><th>Women</th><th>Total</th></tr> <tr> <td><30</td><td>413</td><td>516</td><td>929</td></tr> <tr> <td>[30-50[</td><td>178</td><td>230</td><td>408</td></tr> <tr> <td>>=50</td><td>19</td><td>28</td><td>47</td></tr> <tr> <td>Total</td><td>610</td><td>774</td><td>1 384</td></tr> </table> <table> <tr> <th colspan="4">2024 departures</th></tr> <tr> <th></th><th>Men</th><th>Women</th><th>Total</th></tr> <tr> <td><30</td><td>214</td><td>339</td><td>553</td></tr> <tr> <td>[30-50[</td><td>229</td><td>408</td><td>637</td></tr> <tr> <td>>=50</td><td>143</td><td>117</td><td>260</td></tr> <tr> <td>Total</td><td>586</td><td>864</td><td>1 450</td></tr> </table>	2024 Recruitment					Men	Women	Total	<30	413	516	929	[30-50[	178	230	408	>=50	19	28	47	Total	610	774	1 384	2024 departures					Men	Women	Total	<30	214	339	553	[30-50[	229	408	637	>=50	143	117	260	Total	586	864	1 450	6
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401-2	Benefits for full-time employees that are not provided to temporary or part-time employees	24 AR Vol. II Sustainability Report > S1-11 and S1-15 The benefits identified in the Reports are granted to the Bank's employees (full-time or part-time), but are not extended to trainees or outsourcers.	6																																																
401-3	Maternity/paternity leave	24 AR Vol. II Sustainability Report > S1-11 and S1-15 <table> <tr> <th colspan="4">Maternity/paternity leave</th></tr> <tr> <th></th><th>Men</th><th>Women</th><th>Total</th></tr> <tr> <td>Employees entitled to parental leave</td><td>129</td><td>483</td><td>612</td></tr> <tr> <td>Employees who have taken parental leave</td><td>99</td><td>332</td><td>431</td></tr> <tr> <td>Employees returning to work</td><td>98</td><td>303</td><td>401</td></tr> <tr> <td>Employees who remain with the Bank 12 months after returning to work</td><td>75</td><td>399</td><td>474</td></tr> <tr> <td>Employees who have returned to work after taking leave that ended in the year prior to the reporting year</td><td>79</td><td>423</td><td>502</td></tr> <tr> <td>Return rate - % of employees who returned to work after taking parental leave</td><td>99.0%</td><td>91.3%</td><td>93.0%</td></tr> <tr> <td>Retention rate - % of employees who stayed with the Bank after taking parental leave</td><td>95.3%</td><td>94.3%</td><td>94.4%</td></tr> </table>	Maternity/paternity leave					Men	Women	Total	Employees entitled to parental leave	129	483	612	Employees who have taken parental leave	99	332	431	Employees returning to work	98	303	401	Employees who remain with the Bank 12 months after returning to work	75	399	474	Employees who have returned to work after taking leave that ended in the year prior to the reporting year	79	423	502	Return rate - % of employees who returned to work after taking parental leave	99.0%	91.3%	93.0%	Retention rate - % of employees who stayed with the Bank after taking parental leave	95.3%	94.3%	94.4%	6												
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LABOUR RELATIONSHIPS																																																			
402-1	Minimum notice period for operational changes	Minimum number of days to notify employees of structural / operational changes: 30 days.	6																																																
OCCUPATIONAL HEALTH AND SAFETY																																																			

403-1	Occupational health and safety management system	24 AR Vol. II Sustainability Report > S1-1 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. 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 the area of health, goes beyond the limits determined by law. The Bank's Occupational Health and Safety Policy is updated regularly, incorporating elements that reflect the reality of the Bank in Portugal and the applicable legal and regulatory context, as well as good voluntary implementation practices.	
403-2	Hazard identification, risk assessment and incident investigation	24 AR Vol. II Sustainability Report > S1-3 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. 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 in order to resolve the recommendations made. 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. Periodically, drills are carried out in order to identify improvements to be introduced in emergency procedures and also audits to buildings. In 2024, 24 drills were carried out covering both Branches and Central Buildings. 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.	
403-3	Occupational health services	24 AR Vol. II Sustainability Report > S1-11 and S1-15; S1-14 24 AR Vol. II Sustainability Report > S1-14 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. 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. 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. The following are available in this area:	

		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. 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. In 2024, in response to an increase in demand for psychology appointments, in order to provide the necessary support at this level, the Bank contracted an increase in the hours of psychology appointments made available to employees. 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. There is a Physiotherapy Centre in Taguspark, with an agreement signed with SAMS and with Médís. 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. As part of the Internal Customer Survey, Employees have the opportunity to assess the quality of the Medical Services provided by the Bank, and to make any comments they feel are relevant. The survey for 2024 will take place in the first months of 2025. The results for 2023 for the Medical Services showed a positive evolution, with a score of 91.8 compared to 87.7 in 2022.	
403-4	Worker participation consultation and communication to workers	The carrying out of internal satisfaction surveys with the various services and the possibility of making comments, allows the periodic monitoring of the opinion of the employees about the quality of the services provided and is an opportunity to present suggestions for improvement.	
403-5	Training of workers in occupational health and safety at work	Training related to health, hygiene and safety at work, which is periodic and mandatory for all employees, covered 1 019 employees in 2024, totalling 1 780.8 hours. The increase in the number of participants/hours compared to 2023 stems from the fact that last year employees had access to more training on new platforms that allow more generalised access. It was also a year in which investment was made in updating knowledge on this subject, with various training sessions being held on this topic. In 2024, mental health was given special attention, and a webinar was organised on this topic to mark Mental Health Day, given the importance of this issue. The recording of the Webinar was made available on the Bank's internal portal for all those interested who were unable to watch it live. The questions put to the Speaker and for which there was no time to respond during the duration of the speech were also shared.	
403-6	Worker health promotion	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. Clinical information is recorded in an autonomous application, with restricted access, in order to guarantee the confidentiality of all data. 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 wellbeing, with repercussions on the balance between professional and personal life.	

403-7	Prevention and mitigation of health and safety impacts directly linked with business relationships	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 firefighting, evacuation of premises and first aid, the occupational risk prevention plan, the development of health promotion activities and health surveillance examinations. 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.	
403-9	Work accidents	24 AR Vol. II Summary of Indicators 24 AR Vol. II Sustainability Report > S1-14	
TRAINING AND EDUCATION			
404-1	Average hours of training per year per employee by employee category	24 AR Vol. II Sustainability Report > S1-13	6
404-2	Competence management and lifelong learning programmes	24 AR Vol. II Sustainability Report > S1-13	
404-3	Percentage of employees receiving regular performance and career development reviews.	24 AR Vol. II Sustainability Report > S1-13	6
DIVERSITY AND EQUAL OPPORTUNITIES			
405-1	Composition of the corporate bodies of the company and list of employees by category, according to gender, age group, minorities and other diversity indicators.	24 AR Vol. II Sustainability Report > ESR5 2 GOV-1 24 AR Vol. II Sustainability Report > S1-6 24 AR Vol. II Sustainability Report > S1-9 24 AR Vol. II Sustainability Report > S1-12	6
405-2	Ratio of total remuneration between men and women by employee category.	24 AR Vol. II Sustainability Report > S1-16	6

NON DISCRIMINATION			
406-1	Discrimination cases and actions taken	24 AR Vol. II Sustainability Report > S1-17	6
FREEDOM OF ASSOCIATION AND NEGOTIATION			
407-1	Operations and suppliers identified at risk of violating the right to freedom of association and collective bargaining, and measures taken	24 AR Vol. II Sustainability Report > G1-2 In 2024, no cases of suppliers at risk of violating the right to freedom of association and collective bargaining were identified.	3
CHILD LABOUR			
408-1	Operations and suppliers identified with a risk of child labour, and measures taken	24 AR Vol. II Sustainability Report > G1-2 In 2024, no cases of suppliers at risk of child labour were identified	5
HUMAN RIGHTS ASSESSMENT			
	Operations subject to human rights assessments	24 AR Vol. II Sustainability Report > ESRS 2 IRO-1	
LOCAL COMMUNITIES			
413-1	Operations with programmes for involvement of local communities	24 AR Vol. II Other information > Share and Participate 24 AR Vol. II Other information > Financial Literacy 24 AR Vol. II Other information > BCP Group Foundations	1
FS13	Access in sparsely populated or economically disadvantaged areas	24 AR Vol. II Summary of Indicators 24 AR Vol. II Other sustainability information > Other economic and governance information	
FS14	Initiatives to improve access to financial services for disadvantaged people	24 AR Vol. II Summary of Indicators 24 AR Vol. II Other sustainability information > Other economic and governance information	
FS15	Policies for the fair design and sale of financial products and services	24 AR Vol. II Summary of Indicators 24 AR Vol. II Sustainability Report > S4-1	
PUBLIC POLICIES			
415-1	Political Contributions	24 AR Vol. II Sustainability Report > G1-5	
PRODUCT AND SERVICE LABELLING			

417-1	Information on products and services required by regulations, and the percentage of significant products and services subject to such requirements	24 AR Vol. II Sustainability Report > S4-1																					
CUSTOMER PRIVACY																							
418-1	Complaints regarding breaches of customer privacy and losses of customer data	<table><tr><td colspan="2">Millennium bcp</td></tr><tr><td>Complaints received from external parties and substantiated by the organisation</td><td>42</td></tr><tr><td>Complaints from regulatory agencies</td><td>0</td></tr><tr><td>Total no. of substantiated complaints regarding breaches of customer privacy</td><td>42</td></tr><tr><td>Total no. of customer data leaks, thefts or losses that have been identified</td><td>35</td></tr><tr><td colspan="2">AtivoBank</td></tr><tr><td>Complaints received from external parties and substantiated by the organisation</td><td>6</td></tr><tr><td>Complaints from regulatory agencies</td><td>0</td></tr><tr><td>Total no. of substantiated complaints regarding breaches of customer privacy</td><td>6</td></tr><tr><td>Total no. of customer data leaks, thefts or losses that have been identified</td><td>4</td></tr></table> 24 AR Vol. II Sustainability Report > S4-3 24 AR Vol. II Sustainability Report > S4-4	Millennium bcp		Complaints received from external parties and substantiated by the organisation	42	Complaints from regulatory agencies	0	Total no. of substantiated complaints regarding breaches of customer privacy	42	Total no. of customer data leaks, thefts or losses that have been identified	35	AtivoBank		Complaints received from external parties and substantiated by the organisation	6	Complaints from regulatory agencies	0	Total no. of substantiated complaints regarding breaches of customer privacy	6	Total no. of customer data leaks, thefts or losses that have been identified	4	
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Total no. of substantiated complaints regarding breaches of customer privacy	6																						
Total no. of customer data leaks, thefts or losses that have been identified	4																						
COMPLIANCE																							
	Amounts of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations	24 AR Vol. II Sustainability Report > G1-4																					
SECTOR SUPPLEMENT																							
PRODUCT PORTFOLIO - MATERIAL ASPECT																							
FS6	Percentage of specific business lines/segments in total volume, by region and size	24 AR Vol. I Report and Accounts Accounts and Notes to the Consolidated Financial Statements > 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	24 AR Vol. II Sustainability Report > S4-4																					
FS8	Volume (monetary) of products and services with environmental benefits, by business line	24 AR Vol. II Sustainability Report > S4-4																					

AUDIT			
FS10	Percentage and number of companies included in the portfolio with which it has interacted regarding social and environmental aspects	24 AR Vol. II Sustainability Report > S4-4	
FS11	Percentage of assets subject to environmental and social assessment	24 AR Vol. II Sustainability Report > S4-4	

GRI- Global Reporting Initiative
AR - Annual Report

SASB Table - Sustainability Accounting Standards Board

SASB – Commercial Banks		Category / measure unit	Content and location of the information	Scope																											
DATA SECURITY																															
FN-CB-230a.1	(1) Number of data violation, (2) percentage that involved personal identification information (PII), (3) number of affected account holders	Number, Percentage (%)	<table><tr><th colspan="2">Millennium bcp</th></tr><tr><td>No. of data breaches</td><td>42</td></tr><tr><td>% that involved personal identification information</td><td>83%</td></tr><tr><td>No. of affected account holders</td><td>511</td></tr><tr><th colspan="2">Millennium bcp</th></tr><tr><td>No. of data breaches</td><td>6</td></tr><tr><td>% that involved personal identification information</td><td>100%*</td></tr><tr><td>No. of affected account holders</td><td>2,899</td></tr></table> *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.	Millennium bcp		No. of data breaches	42	% that involved personal identification information	83%	No. of affected account holders	511	Millennium bcp		No. of data breaches	6	% that involved personal identification information	100%*	No. of affected account holders	2,899	Portugal											
Millennium bcp																															
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No. of data breaches	6																														
% that involved personal identification information	100%*																														
No. of affected account holders	2,899																														
FN-CB-230a.2	Description of the approach to identify and handle data safety risks	n/a	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. More information on the Bank's Information Security policies and procedures can be found in 24 AR Vol. II Sustainability Report > S4-1																												
FINANCIAL INCLUSION AND CAPACITATION																															
FN-CB-240a.1	(1) Number and (2) amount of pending loans qualified for programmes conceived to promote the development of small companies and the Community	Number, Currency	Millennium bcp supported in 2024 1,054 projects for the development of small businesses and communities (1), with a total credit of approximately 80,718 thousands euros (2). <table><tr><th>Projects</th><th>No. of projects</th><th>Amount (thousand €)</th></tr><tr><td>Lines to support Entrepreneurship (Microinvest and Investe+)</td><td>70</td><td>1 941</td></tr><tr><td>Decarbonization and Circular Economy</td><td>56</td><td>19 061</td></tr><tr><td>BPF InvestEU Sustainable Investment</td><td>2</td><td>542</td></tr><tr><td>Lines to Finance Tourism</td><td>4</td><td>6 117</td></tr><tr><td>FEI Lines</td><td>41</td><td>10 726</td></tr><tr><td>IFFRU</td><td>1</td><td>480</td></tr><tr><td>Green car (Leasing and ALD)</td><td>879</td><td>40 351</td></tr><tr><td>BPF Social Sector Financing Line</td><td>1</td><td>1 500</td></tr></table> More information on the number and amount of loans to businesses with social and environmental benefits can be found in 24 AR Vol. II Sustainability Report > S4-4	Projects	No. of projects	Amount (thousand €)	Lines to support Entrepreneurship (Microinvest and Investe+)	70	1 941	Decarbonization and Circular Economy	56	19 061	BPF InvestEU Sustainable Investment	2	542	Lines to Finance Tourism	4	6 117	FEI Lines	41	10 726	IFFRU	1	480	Green car (Leasing and ALD)	879	40 351	BPF Social Sector Financing Line	1	1 500	Portugal
Projects	No. of projects	Amount (thousand €)																													
Lines to support Entrepreneurship (Microinvest and Investe+)	70	1 941																													
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BPF Social Sector Financing Line	1	1 500																													

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 past-due and non-accrual loans is reported in 24 AR Vol. I Report and Accounts Results and Balance Sheet - Loans to Customers	
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	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 2024, 4,568 accounts were opened, presently accruing to 31,004 accounts. 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. 273 accounts with these features were opened in 2024, corresponding to a total of 5,377 accounts in the Bank's portfolio. More information on the Bank's Social Inclusion offer can be found in 24 AR Vol. II Sustainability Report > S4-2	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	In 2024, Millennium bcp impacted more than 2.500 people through its initiatives for the promotion of financial literacy. More information on the number and amount of loans to small businesses with social and environmental benefits can be found in 24 AR Vol. II Sustainability Report > S4-4	BCP Group
INCORPORATION OF ENVIRONMENTAL, SOCIAL AND GOVERNMENT FACTORS IN THE CREDIT ANALYSIS				
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 24 AR Vol. I Report and Accounts Results and Balance Sheet - Loans to Customers	BCP Group
FN-CB-410a.2	Description of the approach to incorporate environmental, social and governance factors in (ESG) the credit analysis	n/a	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. To this end, the Portuguese operation has created a list of excluded and conditioned sectors and activities of an environmental and social nature, as well as introducing an ESG matrix into the internal risk rating model for larger companies. The Bank's internal regulations in Portugal also provide for the need for due diligence by the department with the sustainability function in the case of active operations in climate-sensitive activities More information on the approach to incorporating ESG risks into credit analysis can be found in the 2024 Market Discipline Report, Environmental and Social Risks Chapter and in 24 AR Vol. II Sustainability Report> TCFD.	Portugal

SASB – Commercial Banks		Category / measure unit	Content and location of the information	Scope
BUSINESS ETHICS				
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, insider trading, anti-trust, anti-competitive behaviour, market manipulation, malpractice is found in 24 AR Vol. II Sustainability Report > G1-1	Portugal
FN-CB-510a.2	Description of the whistleblowing policies and procedures	n/a	In Portugal, a Communication of Irregularities Policy (Whistleblowing) is implemented, regulated by a specific Service Order. 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. More information on the Bank's Policy on the Reporting of Irregularities (whistleblowing) is available here: Institutional/Governance/Bank Articles of Association and main rules and regulations/Policy on the Reporting of Irregularities (whistleblowing) S	BCP Group
MANAGEMENT OF SYSTEMIC RISK				
FN-CB-550a.1	Notation of the <i>Global Systemically Important Bank</i> (G-SIB), per category	<i>Basis points (bps)</i>	The BCP Group and the banks part of it are not considered Global Systemically Important Bank (G-SIB). More information on the G-SIB (2024) available here: Financial Stability Board (FSB) - 2024 List of Global Systemically Important Banks (G-SIBs)	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	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 (RAC), the EC and the Group's top management, in its various stages. Since 2023, ICCAP has included climate scenarios. The results of the ICAAP allow the management bodies to test whether the Bank is adequately capitalised 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 BoD.	BCP Group

SASB – Commercial Banks		Category / measure unit	Content and location of the information	Scope
			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 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. More information on the incorporation of stress test results into capital adequacy planning, long-term corporate strategy and other business activities can be found in 24 AR Vol. I Report and Accounts Pension Fund Risks and 24 AR Vol. II Sustainability Report > TCFD.	
ACTIVITY METRICS				
FN-CB-000.A	(1) Number and (2) value of the current and savings accounts per segment: (a) individual and (b) small companies	Number, Currency	Information on Customer Funds can be found in 24 AR Vol. I Report and Accounts Customer Funds.	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).	Number, Currency	Information on Customer Funds can be found in 24 AR Vol. I Report and Accounts Customer Credits.	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 Whose human rights are addressed 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 It has also been a member of the UN Global Compact since 2005, which includes human rights in its principles, and is a signatory to other initiatives that promote the adoption of best practices in this area ((24 AR 24 Vol. II Sustainability Report > ESRS 2 IRO-1). 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 taken into account 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 Corporate Governance, Ethics and Sustainability Committee (reporting to the Board of Directors) and the Human Resources and Sustainability Commissions (reporting to the Executive Committee) are the governance bodies responsible for monitoring issues related to 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 (24 AR Vol. II Sustainability Report > ESRS 2 IRO-1). Based on this diagnosis, improvement plans were implemented throughout the process. In 2024, a new self-assessment was carried out, reinforcing the BCP Group's commitment to continuous improvement in the areas of Human Rights, identifying new opportunities for evolution and alignment with international best practices. However, the results are still being analysed and are expected to be finalised in 2025.
PART B: DEFINE THE SCOPE OF REPORTING		
B1 Statement of relevant issues State the main human rights issues associated with the company's activities and business relations 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 issues	The Human Rights Policy establishes a set of issues considered as most relevant (see answer B1. Statement of relevant topics), on which the self-assessment process carried out in 2024 was also focused. These issues were identified	

Describe how the main human rights issues were determined, including any concerned parties input.		based on the main national and international benchmarks and regulations, such as the Universal Declaration of Human Rights or the Ruggie Framework and based on the best practices in the market.
B3 Choice of local geographies	If the report on key human rights topics focuses on specific geographies, explain how this choice was made.	The information on Human Rights reported relates to the three countries where Group BCP operates: Portugal / Poland / Mozambique. Whenever such does not happen, such fact is duly identified.
B4 Additional severe impacts	Identify any serious impacts on human rights that occurred or were still being addressed during the reporting period, but are outside the relevant human rights issues, and explain how they were addressed.	No severe impacts on Human Rights arising from the activity of BCP Group were identified through the various mechanisms implemented, or through other means.
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? C1.1 How does the company convey the relevance and meaning of such policies to those who must implement them?	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. 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? 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? 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?	Millennium bcp seeks to actively involve its stakeholders in the development of its activity, including issues related to Human Rights. In addition to the current involvement practices (24 AR Vol. II Sustainability Report > ESRS 2 SBM-2), 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.
C3 Impact Assessment	How does the company identify changes in the nature of each relevant human rights issue over time? 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? C3.2 During the reporting period, did any serious impacts related to a relevant issue occur and, if so, what were they?	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. The self-assessment process conducted during 2023 and completed in 2022 also represents a potential source of information for identifying changes in human rights issues, and no significant changes or serious human rights impacts were identified. A new questionnaire was conducted in 2024, but the results are still being analysed, with conclusions to be drawn in 2025.
C4 Integrate findings and implementation actions	How does the company integrate its findings on each relevant human rights issue into its decision-making process and actions? C4.1 How are the parties of the company whose decisions and actions may affect the management of relevant issues involved in the search for and implementation of solutions?	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. In 2024, the implementation of improvement actions in the geographies continued, based on the results of the self-assessment.

	C4.2 When tensions arise between the prevention or mitigation of impacts related to a relevant issue and other business objectives, how are they addressed? C4.3 During the reporting period, what measures were implemented by the company to prevent or mitigate potential impacts related to each material issue?	
C5 Track performance	How does the company know whether its efforts regarding each relevant human rights issue are effective in practice? C5.1 What specific examples from the reporting period illustrate whether each relevant issue is being effectively managed?	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 (24 AR Vol. II Sustainability Report > ESRS 2 IRO-1) 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 2024, 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
Governance How we manage the climate-related risks and opportunities	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.	24 AR Vol. II Sustainability Report > ESRS 2 GOV-1 24 AR Vol. II Sustainability Report > ESRS 2 IRO-1
Strategy How we manage the current and potential impacts of climate-related risks and opportunities	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, taking into account the different climate-related scenarios, including the 2°C or lower scenario.	24 AR Vol. II Sustainability Report > ESRS 2 SBM-1 24 AR Vol. II Sustainability Report > ESRS 2 SBM-3 24 AR Vol. II Sustainability Report > ESRS 2 IRO-1 24 AR Vol. II Sustainability Report > E1 > ESRS 2 SBM-3
Risks and opportunities How we identify, assess and manage the climate-related risks and opportunities	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.	24 AR Vol. II Sustainability Report > ESRS 2 SBM-1 24 AR Vol. II Sustainability Report > ESRS 2 IRO-1 24 AR Vol. II Sustainability Report > E1 > ESRS 2 SBM-3 24 AR Vol. II Sustainability Report > E1 -2
Metrics and targets How we assess and manage the climate-related risks and opportunities	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.	24 AR Vol. II Sustainability Report > ESRS 2 IRO-1 24 AR Vol. II Sustainability Report > E1 > ESRS 2 SBM-3 24 AR Vol. II Sustainability Report > E1-4 24 AR Vol. II Sustainability Report > E1-5 24 AR Vol. II Sustainability Report > E1-6

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 establishes transparency rules, requiring financial institutions to disclose information regarding the integration of sustainability risks into their processes and products, as well as the consideration of the main 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 play a central role in this change and, in this regard, 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).

[BCP's remuneration policy](#) considers the integration of sustainability risks. To this end, it adopts good governance rules that guarantee that its managers and employees are aligned with responsible and prudent management. It also seeks to avoid incentives for excessive risk-taking and prevent potential conflicts of interest, contributing to the ethical and sustainable development of society.

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 included in corporate and individual KPIs. The qualitative evaluation of employee performance, which considers a set of behaviours 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 assessed by the most relevant ESG indices and analysts (see Sustainability Indices chapter) and we work continuously to improve our policies, processes and operations in order to achieve a benchmark position in the most relevant sustainability indices.

Detailed information on the disclosure of non-financial information in accordance with the SFDR regulation is available on the Millennium bcp website, under [Institutional/Sustainability/SFDR..](#)

Alignment with the CMVM model of report for the disclosure of non-financial information

Requirement		Chapter/section	36s
Part I - Information on the Policies adopted			
A - Introduction	Description of the Company's general policy regarding sustainability issues, with an indication of any changes to the previously approved	24 AR Vol. II Sustainability Report > ESRS 2 SBM-1	21
	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.	24 AR Vol. II Sustainability Report > ESRS 2 BP-1 24 AR Vol. II Sustainability Report > ESRS 2 BP-2 24 AR Vol. II Sustainability Report > ESRS 2 GOV-5	14; 21
B – Business Model	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 organisation charts, graphics or functional tables).	24 AR Vol. II Sustainability Report > ESRS 2 SBM-1	21
		24 AR Vol. II Sustainability Report > ESRS 2 GOV-1	16
C - Main Risk Factors	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.	24 AR Vol. II Sustainability Report > ESRS 2 SBM-3 24 AR Vol. II Sustainability Report > ESRS 2 IRO-1	29; 36
	2. Indication of the way those risks are identified and managed by the company.	24 AR Vol. II Sustainability Report > ESRS 2 IRO-1	36
	1. Explanation on the internal functional distribution regarding competences, including the corporate bodies, committees, commissions, or divisions responsible for the identification/management/monitoring of the risks.	24 AR Vol. II Sustainability Report > ESRS 2 GOV-1 24 AR Vol. II Sustainability Report > ESRS 2 IRO-1	16; 36
	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.	24 AR Vol. II Sustainability Report > ESRS 2 SBM-3	29
	3. Indication and brief description of the main opportunities that are identified by the Company in the context of the themes object of reporting.	24 AR Vol. II Sustainability Report > ESRS 2 SBM-3	29
D - Implemented Policies			
i. ENVIRONMENTAL POLICIES	1. Description of the Company's strategic objectives and the main actions to be taken to achieve them.	24 AR Vol. II Sustainability Report > ESRS 2 SBM-1 24 AR Vol. II Sustainability Report > E1 Climate Changes 24 AR Vol. II Other sustainability information > Other environment information	21; 48-60; 182-187

Requirement		Chapter/section	36s
	2. Description of the main defined performance indicators.	24 AR Vol. II Sustainability Report > E1 Climate Changes 24 AR Vol. II Other sustainability information > Other environment information	48-60; 182-187
	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 iii. Circular Economy and waste management iv. Protection of biodiversity	24 AR Vol. II Sustainability Report > E1 Climate Changes 24 AR Vol. II Other sustainability information > Other environment information	48-60; 182-187
ii. SOCIAL AND POLITICAL POLICIES	1. Description of the Company's strategic objectives and the main actions to be taken to achieve them.	24 AR Vol. II Sustainability Report > ESRS 2 SBM-1 24 AR Vol. II Sustainability Report > S1 Own workforce 24 AR Vol. II Sustainability Report > S4 Consumers and final users 24 AR Vol. II Other sustainability information > Other economic and governance information 24 AR Vol. II Other sustainability information > Other social information	21; 61-85; 86-107; 135-143; 144-181
	2. Description of the main defined performance indicators.	24 AR Vol. II Sustainability Report > S1 Own workforce 24 AR Vol. II Sustainability Report > S4 Consumers and final users 24 AR Vol. II Other sustainability information > Other economic and governance information 24 AR Vol. II Other sustainability information > Other social information	61-85; 86-107; 135-143; 144-181
iii. EMPLOYEES AND GENDER EQUALITY AND NON DISCRIMINATION	1. Description of the Company's strategic objectives and the main actions to be taken to achieve them.	24 AR Vol. II Sustainability Report > ESRS 2 SBM-1 24 AR Vol. II Sustainability Report > S1 Own workforce	21; 61-85
	2. Description of the main defined performance indicators.	24 AR Vol. II Sustainability Report > S1 Own workforce	61-85
	3. Indication versus the previous year, of the degree of fulfilment of those objectives, at least by reference to: i. Office: ii. Work organisation iii. Health and Safety iv. Social Relations v. Training vi. Equality	24 AR Vol. II Sustainability Report > S1 Own workforce	61-85
IV. HUMAN RIGHTS	1. Description of the Company's strategic objectives and the main actions to be taken to achieve them.	24 AR Vol. II Sustainability Report > ESRS 2 SBM-1 24 AR Vol. II Sustainability Report > ESRS 2 IRO-1 24 AR Vol. II Sustainability Report > S1 Own workforce 24 AR Vol. II Sustainability Report > S4 Consumers and final users 24 AR Vol. II Other sustainability information > Other economic and governance information 24 AR Vol. II Other sustainability information > Other social information	21; 36; 61-85; 86-107; 135-143; 144-181

Requirement		Chapter/section	36s
	2. Description of the main defined performance indicators.	24 AR Vol. II Sustainability Report > S1 Own workforce 24 AR Vol. II Sustainability Report > S4 Consumers and final users 24 AR Vol. II Other sustainability information > Other economic and governance information 24 AR Vol. II Other sustainability information > Other social information	61-85; 86-107; 135-143; 144-181
	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	24 AR Vol. II Sustainability Report > S1 Own workforce 24 AR Vol. II Sustainability Report > S4 Consumers and final users 24 AR Vol. II Other sustainability information > Other economic and governance information 24 AR Vol. II Other sustainability information > Other social information	61-85; 86-107; 135-143; 144-181
V. FIGHT AGAINST CORRUPTION AND BRIBERY ATTEMPTS	1. Prevention of corruption	24 AR Vol. II Sustainability Report > ESRS 2 SBM-1 24 AR Vol. II Sustainability Report > G1 Business conduct	21; 109-118
	2. Prevention of money laundering (for issuing companies subject to this regime)	24 AR Vol. II Sustainability Report > G1 Business conduct	109-118
	3. Codes of Ethics	24 AR Vol. II Sustainability Report > G1 Business conduct	109-118
	4. Management of Conflicts of interest	24 AR Vol. II Sustainability Report > G1 Business conduct	109-118
Part II - Information on Standards/Guidelines followed			
1. IDENTIFICATION OF STANDARDS/GUIDELINES FOLLOWED IN THE REPORTING OF NON-FINANCIAL INFORMATION		24 AR Vol. II Sustainability Report > ESRS 2 BP-1 24 AR Vol. II Sustainability Report > ESRS 2 BP-2	14
2. IDENTIFICATION OF THE SCOPE AND METHODOLOGY TO CALCULATE THE INDICATORS		24 AR Vol. II Sustainability Report > ESRS 2 BP-1 24 AR Vol. II Methodology notes	14; 200-205

Report and Self-Assessment Model of Principles for Responsible Banking

In June 2022, Banco Comercial Português, S.A. subscribed the [United Nations Environment Programme - Financial Initiative \(UNEP-FI\)](#) and subscribed the [Principles for Responsible Banking \(PRB\)](#), having reported the first mandatory self-assessment model in its [2023 Sustainability Report](#). For 2024, the BCP Group reports its progress on the 6 Principles of Responsible Banking: 1. Alignment; 2. Impact and Definition of Goals; 3. Customers and Consumers; 4. Stakeholders; 5. Governance and Culture; 6. Transparency and Accountability.

Principle 1: Alignment



We will align our business strategy to be consistent with and contribute to the individual needs and the society goals, as expressed in the Sustainable Development Goals, the Paris Climate Agreement and relevant national and regional frameworks.

Business model

Describe (in general terms) your bank's business model, including the main customer segments covered, types of products and services provided, main sectors and types of activities in the main geographies in which your bank operates or provides products and services. Also quantify the information, indicating, for example, the distribution of your bank's portfolio (%) in terms of geography, segments (i.e. by balance sheet and/or off-balance sheet) or indicating the number of customers covered.

Answer

The BCP Group's decision-making centre is in Portugal, but the Bank is also present in the following markets: Poland, Mozambique and China (Macao). In Angola and France (through its shareholdings in Banco Millennium Atlântico and Banque BCP), the BCP Group has financial holdings that are consolidated using the asset consolidation method. In Portugal, it operates under the Millennium bcp brand - with the legal name of Banco Comercial Português, S.A. (BCP) - and is currently Portugal's largest private bank. The Group operates and acts with respect for people and institutions, with a focus on customers, 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 representative offices and/or commercial protocols.

The BCP Group carries out its banking and financial services activities in Portugal and abroad, with a special focus on the Retail Banking, Corporate Banking and Private Banking businesses. The Group offers a wide range of financial products and services: current accounts, payment systems, savings and investment products, private banking, asset management, investment banking and credit - including mortgages and personal loans - commercial banking, leasing, factoring and insurance, among others.

BCP Group in Portugal

In Portugal, Millennium bcp has 2.8 million customers and is focused on the retail and corporate markets, providing its customers with segmented services. The Bank provides products to customers through its network of branches and digital platforms, offering a wide range of products and services.

BCP Group in Poland

In Poland, Bank Millennium serves around 2.9 million customers and has a well-distributed network of branches and solid digital platforms, all supported by a modern multi-channel infrastructure, with a benchmark quality of service and high brand recognition.

BCP Group in Mozambique

In Mozambique, the BCP Group operates through Millennium bim, a universal bank with around 1.3 million customers. Millennium bim is the benchmark bank in this country, associated with innovation, strong penetration in digital banking and the ability to attract new customers, as well as being a benchmark in terms of profitability and capitalisation.

BCP Group in Macao

The activity of the existing branch in Macao was expanded in 2010, through the granting of a full licence (onshore) and has around 2.7 thousand Customers.

In 2024, the BCP Group reported that loans to individuals accounted for 63.3% of its total loans (home loans accounted for 79.4% and personal loans for 20.6%), while loans to companies represented 36.7% of the total portfolio (including activities in all geographies). For Portugal, these figures were 57.5% (88.5% home loans and 11.5% personal loans) and 42.5%, respectively. The main sectors of

Links and references

2024 BCP Annual Report - Volume I - "Business Model" Chapter

[website Millennium bcp](#)

Millennium bcp's credit portfolio are: Real estate activities (3.82%), Wholesale trade (3.65%), Retail trade (3.06%), Construction (2.78%), Financial intermediation (2.39%), Restaurants and hotels (2.34%) and Machinery, equipment and basic metallurgy (2.31%).	
Strategic alignment Does your business strategy identify and reflect sustainability as a strategic priority(s) for your bank? ☒ Yes ☐ No Describe how your bank has aligned and/or plans to align its strategy to be consistent with the Sustainable Development Goals (SDG), the Paris Climate Agreements and relevant national and regional frameworks. Does your bank also refer to any of the following sustainability report frameworks or regulatory requirements in its strategic priorities or policies for implementing them? ☒ United Nations Guiding Principles on Business and Human Rights ☒ Fundamental Conventions of the International Labour Organisation ☒ United Nations Global Compact ☐ United Nations Declaration on the Rights of Indigenous Peoples ☒ Any applicable regulatory requirements for reporting on environmental risk assessments, e.g. climate risks - specify which: European Union Environmental Taxonomy, Pillar 3 of EBA ☐ Any applicable regulatory requirements for reporting on social risk assessments, e.g. modern slavery - specify which: ----- ☐ None of the above options	
Answer The 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 (see chapter ESRS 2: General Disclosures). The Bank also includes Sustainability as one of the vectors of the 'Valorizar 28' (Add more value) Strategic Plan. After signing up to the Principles of the United Nations Global Compact in 2005, the BCP Group also committed itself to supporting its 10 Principles by establishing a set of values regarding Human Rights, Working Conditions, Environment, Ethics and Anti-Corruption. The BCP Group is committed to aligning its activities with the Paris Climate Agreements and the goal of limiting the increase in average temperature to less than 1.5°C. The Bank has signed the BCSD Portugal manifesto 'Towards COP27', which recognises the importance of decarbonising economic development models and complying with the Paris Agreements. The Bank 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 to promote sustainability objectives. In 2023, the BCP Group signed the Science Based Targets initiative (SBTi) Commitment Letter, and is currently undergoing an internal reassessment process, taking into account the evolving context and its specificities and requirements. In addition, the Bank recognises the importance of the United Nations Sustainable Development Goals (SDG), having identified the following SDG as priorities for the implementation of the 2030 Agenda for Sustainable Development: (i) SDG 4 - Quality education, (ii) SDG 7 - Clean and affordable energy, (iii) SDG 8 - Decent work and economic growth, (iv) SDG 10 - Reducing inequalities and (v) SDG 13 - Climate action.	Links and references 2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS 2: General Disclosures 2025-28 Strategic Plan "Valorizar 28" Environment Policy Policies and Corporate Principles of BCP Group 2024 BCP Annual Report - Volume II - Sustainability Report - Chapter Other Sustainability Information: SDG

Principle 2: Impact and Definition of Goals



We will continuously increase our positive impacts, reduce negative impacts and manage the risks to people and the environment resulting from our activities, products and services. To this end, we will define and publish objectives for the areas in which we can have the most significant impacts.

2.1 Impact analysis (Key Stage 1)

Demonstrate that your bank has carried out an impact analysis of its portfolio(s) to identify its most significant impact areas and determine the priority areas for defining objectives. The impact analysis must be regularly updated³ and fulfil the following requirements/elements (a-d)⁴:

a) Scope: What is the scope of your bank's impact analysis? Describe which parts of the bank's main areas of activity, products/services in the main geographies in which the bank operates (as described in section 1.1) have been considered in the impact analysis. Also describe which areas have not yet been included and why.

Answer

In 2023, the BCP Group carried out an impact analysis of its portfolio in Portugal, which represents more than half of the Group's total business. The analysis included Millennium bcp's main business segments: its Retail, Business, Corporate and Investment portfolios.

The Bank used UNEP FI's Impact Analysis tool to carry out the impact assessment. The Context Module was filled in for Portugal and allowed to understand the reality of the country and its main areas of need. 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 once for Millennium bcp's Investment portfolio. The results of each module were analysed and overlaid to assess the priority impact areas/topics for the Bank.

The remaining portion of BCP's geographies has not yet been assessed due to the lack of data available to carry out a detailed analysis. The BCP Group plans to extend its impact analysis to include all the countries where it operates and to disclose this information in the future.

Links and references

b) Portfolio composition: Has your bank considered your portfolio composition (in %) in the analysis? Please provide the proportional composition of your portfolio globally and by geographical area

i) by sector and industry⁵ for business, corporate and investment banking portfolios (i.e. sector exposure or sector breakdown in %), and/or

ii) by products and services and by types of customers for consumer and retail banking portfolios.

If your bank has adopted another approach to determine the scale of the bank's exposure, please specify, in order to demonstrate how you have considered the location of the bank's core business/main activities in terms of industries or sectors.

Answer

The portfolio analysis carried out by Millennium bcp in 2023 included its Retail Banking and Institutional Banking portfolios, which represented 62.8% and 27.3%, respectively, of the Bank's total portfolio in Portugal. A more detailed description of the portfolio composition included in the Bank's analysis can be found in the Principles for Responsible Banking Self-Assessment Model reported by the Bank in its 2023 Sustainability Report.

Links and references

[Sustainability Report 2023](#)

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 customers operate?⁶ Describe how these were considered, including the stakeholders you involved to help substantiate this element of the impact analysis.

This step aims to put the impacts of your bank's portfolio in the context of society's needs.

³ This means that in cases where the initial impact analysis was carried out in a previous period, the information should be updated accordingly, the scope broadened, and the quality of the impact analysis improved over time.

⁴ Additional guidelines may be found on the [Interactive guidance on the impact analysis and target setting process](#).

⁵ The "key sectors" relating to different impact areas, i.e. the sectors whose positive and negative impacts are particularly strong, are particularly relevant in this context.

⁶ Global priorities can alternatively be considered for banks with highly diversified and international portfolios.

Answer Through the UNEP FI Impact Analysis Tool, the Bank has identified the following as the main areas of need (and respective topics) for Portugal: ▪ Availability, accessibility, capacity, quality of resources and services - Water, Housing and Health and Sanitation; ▪ Infra-structures; ▪ Climate; ▪ Biodiversity and Healthy ecosystems - Water bodies and Habitat; ▪ Circularity - Intensity of Resources and Waste. In addition to these results, the Bank considered the conclusions of its materiality and complementary exercises involving its stakeholders, which allowed for a more contextualised view of the financial year's results (for more information, see Principle 4: Stakeholders).	Links and references Sustainability Report 2023
Based on these first 3 elements of an impact analysis, what areas of positive and negative impact has your bank identified? Which (at least two) areas of significant impact have you prioritised to pursue your goal-setting strategy (see 2.2)? Please state.	
Answer Using the same tool, Millennium bcp identified the main areas of potential impact for its Retail, Business and Corporate, and Investment Portfolios separately. These areas of potential positive and negative environmental, social and economic impact were assessed by the Bank, as well as each corresponding potential impact topic. Each portfolio results were compared and then overlaid with the Context Module results (main areas of need for Portugal), as well as interpreted in the context of the Bank's activities and main strategies. The main result of this analysis was the identification of the three main impact topics for Millennium bcp: Climate (Climate change mitigation), Resources' Intensity and affordable and energy efficient Housing.	Links and references Sustainability Report 2023
d) For these (min. two priority impact areas) performance measures: Has your bank identified which sectors and industries, as well as types of customers financed or invested in, are causing the strongest real positive or negative impacts? Describe how you have evaluated its performance, using appropriate indicators related to areas of significant impact that apply to your bank's context. When determining the priority areas for setting objectives among the areas with the most significant impact, you should consider the bank's current performance levels, i.e. qualitative and/or quantitative indicators and/or indicators of the social, economic and environmental impacts resulting from the bank's activities and the offer of products and services. If you have identified climate and/or financial health and inclusion as your most significant impact areas, please also refer to the applicable indicators in the Annex. If your bank has adopted another approach to assess the intensity of the impact resulting from its activities and the provision of products and services, please describe it. The result of this step will also provide the baseline (incl. indicators) that you can use to set objectives in two areas of most significant impact.	
Answer Millennium bcp assessed its performance in all areas of potential impact of its portfolios, keeping the focus on the three main impact topics prioritised by the Bank. Climate (Climate change mitigation) Climate change mitigation has been a focus of the Bank's attention for years and is one of the main focuses of the Bank's sustainability strategy. BCP is committed to the Paris Agreement and the goal of limiting the increase in average temperature to below 1.5°C. It is also committed to achieving carbon neutrality by 2030 for its direct emissions. Millennium bcp's sustainability framework already includes a detailed analysis of the Bank's performance in several climate-related indicators. In 2024, the Bank has reduced its operational GHG emissions by 7% for its activities in Portugal. In Portugal, 100% of the electricity consumed comes from renewable sources, 20.4% of the fleet is already electric or hybrid and this number is expected to increase in the coming years. In 2022, Millennium bcp built its second photovoltaic plant in Portugal and in 2023 it approved the project to start building the third. The tender took place in 2024 and the decision on its actual construction will be taken in the second quarter of 2025.	Links and references 2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS E1 Climate Change 2024 BCP Annual Report - Volume II - Sustainability Report - Chapter Other Environmental Information

⁷ In order to prioritise the areas with the most significant impact, it will be important to overlay the quantitative analysis with a qualitative one, as described in a), b) and c), for example through stakeholders' involvement and greater geographical contextualisation.

Also in 2023, the Bank made significant progress in calculating its financed emissions, taking into account the guidelines of the Partnership for Carbon Accounting Financials (PCAF), and basing itself wherever possible on emissions reported by companies.

The Bank has also established a Framework of Green, Social and Sustainability Obligations. Regarding the sectors it finances, Millennium bcp has a list of projects and sectors excluded or with conditional access to credit due to their environmental impacts (e.g. coal-fired power generation).

[Principles of Responsible Financing](#)

[Framework of ESG obligations](#)

Resources Intensity

In relation to the impact theme “Resource Intensity”, the dematerialisation of operations has been one of the Bank’s main priorities in recent 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 activities related to the extraction and trade of wood derived from protected areas in native tropical forests).

With regard to the Bank’s own operations, there has been a reduction in printing, as well as in the consumption of water and materials. Over the last year, the Bank has marginally increased the water consumption of its own operations by 1% and reduced the use of materials by 18% (-17% use of card and paper and -40% of plastic).

Affordable and energy efficient housing

Housing is a topic of great concern to the Bank, since it is associated with the most significant share of the credit it grants to consumers. The results of the impact analysis of Millennium bcp’s portfolio show that “Home loan” is a product with a fundamental positive impact on the “Housing” topic and represents a substantial part of Millennium bcp’s Retail Banking credit. Of this amount, 20% is associated with homes with an A+, A or B energy rating, which takes into account real energy certificates (obtained via ADENE - Energy Agency) and estimated ones (using internal methodology). Millennium bcp offers special credit conditions for houses with an A+, A and B energy rating.

The Bank has launched housing-related consumer loans to promote the energy efficiency of properties, as well as a green real estate development product and, in social terms, the Bank also grants special mortgage loan conditions to its employees.

Self-assessment summary:

Which of the following components of the impact analysis has your bank carried out in order to identify the areas in which your bank has the most significant (potential) positive and negative impacts?⁸

Scope:	☒ Yes	☐ Ongoing	☐ No
Portfolio composition:	☒ Yes	☐ Ongoing	☐ No
Context:	☒ Yes	☐ Ongoing	☐ No
Performance measurement:	☒ Yes	☐ Ongoing	☐ No

What are the most significant impact areas identified for your bank as a result of the impact analysis?

Climate (Climate change mitigation), Resources’ Intensity and affordable and energy efficient Housing

How recent is the data used and disclosed in the impact analysis?

- ☐ Up to 6 months before the publication
- ☐ Up to 12 months before the publication
- ☐ Up to 18 months before the publication
- ☒ More than 18 months before the publication

Open text field to describe potential challenges, aspects not covered by the previous sections, etc: (optional)

⁸ You can answer “Yes” to a question if you have completed one of the steps described, for example, if the initial impact analysis has been carried out, if a pilot has been carried out.

2.2 Definition of objectives (Key stage 2)

Show that your bank has defined and published a minimum of two objectives that address at least two different areas of most significant impact that you identified in your impact analysis.

The objectives⁹ must be specific, measurable (qualitative or quantitative), achievable, relevant and timed (SMART). Please indicate the following elements of the definition of objectives (a-d), for each objective separately:

- a) **Alignment:** which international, regional or national policy frameworks have you identified as relevant¹⁰ to the alignment of your bank's portfolio? Show that the selected indicators and targets are linked to and drive alignment with and a greater contribution to the appropriate Sustainable Development Goals, the objectives of the Paris Agreement and other relevant international, national or regional frameworks.

It can be based on the context items in section 2.1

Answer

Millennium bcp signed up to two documents "Guidelines for accelerating sustainable financing in Portugal" and "Letter of Commitment for Sustainable Financing in Portugal", issued as part of the "Think tank on Sustainable Financing in Portugal", promoted by the Ministries of Environment, Finance and Economy in the context of the "Portuguese Route to Carbon Neutrality" in 2050. The Bank also signed up to the "Lisbon European Green Capital Commitment", promoted by the 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.

In 2022, and as part of the initiatives promoted by BCSD Portugal, Millennium bcp signed up to the manifest "Towards COP27", recognising the importance of this conference for the global dialogue on decarbonisation of development models and for compliance with the Paris Agreement on climate, and also signed up to the manifest "For an Agreement at COP15", in this case pointing out the urgency of adopting a Global Biodiversity Strategy to stop the loss of biodiversity by 2030 and promote the recovery of natural ecosystems.

The sustainability-related objectives already established by the Bank are aligned with these frameworks and commitments, as well as with the Sustainable Development Goals (SDG) associated with each impact theme: SDG 13 - Climate action (Climate), SDG 12 - Responsible consumption and production (Resource intensity) and SDG 11 - Sustainable cities and communities (Housing).

Links and references

2024 BCP Annual Report - Volume II - Sustainability Report - Annex 10 – Commitments Table

- a) **Reference base:** Have you determined a baseline for the selected indicators and assessed the current level of alignment? State the indicators used, as well as the year of the reference base.

You can base it on the performance assessment carried out in 2.1 to determine the baseline for your objective.

A set of indicators for climate change mitigation and financial health and inclusion has been developed to guide and support banks in defining their objectives and their implementation path. A summary of the indicators can be found in the Annex to this template.

If your bank has prioritised climate change mitigation and/or financial health and inclusion as (one of) its most significant impact areas, it is strongly recommended that you report the indicators in the Annex, using a general table like the one below, which includes the impact area, all relevant indicators and the corresponding indicator codes:

Impact area	Indicator code	Answer
Mitigating climate change	...	
	...	
	...	
Impact area	Indicator code	Answer
Health and financial inclusion	...	
	...	
	...	

If you have identified other indicators and/or additional indicators as relevant for determining the baseline and assessing the level of alignment with the impact-oriented objectives, please disclose them.

Answer

Millennium bcp is currently working on developing SMART targets for each of the three most significant impact topics chosen by the Bank and following the UNEP FI guidelines on target setting.

The indicators currently used to assess the Bank's performance in these areas and their respective benchmarks are:

Climate (Climate change mitigation):

- GHG emissions (Scope 1): 1,866 tCO₂e (2024)
- GHG emissions (Scope 2): 0 tCO₂e (2024)
- Percentage of the fleet that is hybrid/electric: 20.4% (2024)
- Percentage of ecological financing: 38.9% (2024)

Links and references

Impact area	Indicator code	Answer
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 goal of limiting the increase in average temperature to below 1.5°C. It is also committed to achieving 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 that promote electric mobility; Consumer loans for renewable energies; Line of Credit for Decarbonisation and Circular Economy; Green Real Estate Development Credit; ESG/SRI investment funds.
Resources intensity e) Water consumption: 132.633 m³ (2024) f) Materials consumption: 549 t (2024)		
Affordable and energy efficient housing g) Percentage of credit for houses with A+, A or B energy certifications (real and estimated): 20% (2024)		

- c) **SMART objectives** (inc. key performance indicators (KPI))¹¹: Indicate the objectives for your first and second most significant impact areas, if they already exist (as well as other impact areas, if any). What KPIs are you using to monitor progress towards the objective? Please state.

Answer	Links and references
Millennium bcp is currently working on developing SMART targets for each of the three most significant impact topics chosen by the Bank and following the UNEP FI guidelines on target setting. The current objectives set by the Bank are as follows: Climate (Climate change mitigation): - Carbon neutrality of direct emissions by 2030 (Portugal); - Set alignment targets (scopes 1, 2 and 3) according to the SBTi; - Fleet with 80% hybrid/electric cars by 2030; >50% reduction in exposure to coal and oil products; >50% Financing of ecological projects; - Increase the issuance of sustainability-linked bonds (SLB) and ESG bonds. Resources intensity - Implement solutions that allow water to be reused. Affordable and energy efficient housing - Aligning home loan requirements with the EU directive on the energy performance of buildings, introducing minimum standards based on the energy performance of new and existing buildings and promoting renovations to improve energy efficiency.	2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS E1 Climate Change

⁹ Operational objectives (concerning, for example, water consumption in office buildings, gender equality on the bank's board of directors or greenhouse gas emissions related to business travel) are not covered by the PRB.

¹⁰ Your bank should consider the main challenges and priorities in terms of sustainable development in its main country(ies) of activity for the purposes of setting objectives. These can be found in national development plans and strategies, international goals such as the SDG or the Paris Climate Agreement, and in regional frameworks. Alignment means that there should be a clear link between the bank's objectives and these frameworks and priorities, thus showing how the objective supports and drives contributions to national and global objectives.

¹¹ Key performance indicators are indicators chosen by the bank to monitor progress towards objectives.

- d) **Action plan:** what actions, including intermediate objectives, have you defined to achieve the targets set? Describe them. Also show that your bank has analysed and acknowledged the significant indirect (potential) impacts of the targets set in the impact area or other impact areas and that it has defined relevant actions to avoid, mitigate or compensate for potential negative impacts.

Answer

Millennium bcp has developed a Sustainability Master Plan that defines, in line with the strategy, the actions and initiatives to achieve its environmental, social and governance objectives and targets. Within the scope of these objectives, the Bank intends to rationalise and improve its consumption profile, namely of energy, water and materials, based above all on a logic of dematerialising processes and preserving natural resources.

Millennium bcp approved the construction of its third solar power plant in 2023. The tender took place in 2024 and the decision on its actual construction will be taken in the second quarter of 2025.

In an effort to reduce Scope 1 emissions, the Bank promotes a bus service between Tagus and Lisbon, as well as a hybrid way of working (the option of working from home on some days of the week) to reduce emissions from transportation. Practices such as reducing local printing and scan input processes, with operations being opened directly in systems and applications, contribute to reducing material consumption.

The Bank also intends to continue increasing the supply of mortgage loan that promote sustainable living standards.

Within the scope of Millennium bcp's credit portfolio, the Bank seeks to increase the percentage of financing for environmentally sustainable projects and organisations, having published in 2021 the Principles for Responsible Financing which identify, among other aspects, the excluded projects and the sectors/projects conditioned within the scope of the financing policy promoted by the Bank. The sustainable activities financed include wind, water, solar and biomass energy, as well as financing investments in urban waste collection and treatment plants, drinking water distribution and wastewater treatment networks (ETAR), waste treatment plants, among others.

Links and references

[Principles of Responsible Financing](#)

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- Volume II - Sustainability Report - Chapter GOV-4

Summary of the self-assessment

Which of the following components of objective setting, in line with PRB requirements, has your bank completed or is currently in the process of assessing for your...

	First most significant impact area: Climate	Second most significant impact area: Resources intensity	Third most significant impact area: Housing
Alignment	☐ Yes ☒ On going ☐ No	☐ Yes ☒ On going ☐ No	☐ Yes ☒ On going ☐ No
Reference base	☐ Yes ☒ On going ☐ No	☐ Yes ☒ On going ☐ No	☐ Yes ☒ On going ☐ No
SMART targets	☐ Yes ☒ On going ☐ No	☐ Yes ☒ On going ☐ No	☐ Yes ☒ On going ☐ No
Action plan	☐ Yes ☒ On going ☐ No	☐ Yes ☒ On going ☐ No	☐ Yes ☒ On going ☐ No

2.3 Implementation and monitoring of objectives (Key Stage 2)

For each objective separately:

Show that your institution has implemented the actions previously defined to achieve the target set.

Report on the progress made by your institution since the last report towards achieving each of the targets set and the impact resulting from this progress, using the indicators and KPIs for monitoring progress defined in section 2.2.

Or, in the case of changes to implementation plans (only relevant for the 2nd and subsequent reports): describe the potential changes (changes to priority impact areas, changes to indicators, acceleration/revision of objectives, introduction of new milestones or reviews to action plans) and explain why these changes have become necessary.

Answer	Links and references
Millennium bcp has been gradually implementing the measures defined in its Sustainability Master Plan (SMP), as well as monitoring its environmental, social and governance commitments. The BCP Group continues to work on the development of SMART targets for each of the three most significant impact topics, following the UNEP FI guidelines on target setting, and including the definition of action plans to achieve these targets. Millennium bcp plans to disclose detailed information on the implementation and monitoring of these targets in subsequent reports.	

Principle 3: Customers and Consumers



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

3.1 Customers' engagement

Does your bank have a customers and consumers engagement policy or process¹² to encourage sustainable practices?

☒ Yes ☐ Ongoing ☐ No

Does your bank have a policy for the sectors in which it has identified the greatest (potential) negative impacts?

☒ Yes ☐ Ongoing ☐ No

Describe how your bank has worked and/or plans to work with its customers and consumers to encourage sustainable practices and enable sustainable economic activities¹³. It should include information on relevant policies, actions planned/implemented to support customers' transition, selected indicators on customers engagement and, where possible, the impacts achieved.

This should be based on and in line with the impact analysis, goal setting and action plans implemented by the bank (see P2).

Answer

The BCP Group places sustainability and ethical, inclusive and responsible business practices as cardinal points in the mapping of its values and corporate culture, focussing on its customers and working together with them to create lasting and consistent social value, protecting the environment, climate and biodiversity.

The BCP Group's Code of Conduct applies to all of the Bank's Business Divisions and geographies and guarantees that the Bank treats its customers and consumers responsibly and with integrity at all times. The BCP Group works to offer a quality service to its customers, which is increasingly digital and with high levels of security. The Bank is also certified by laws and regulations such as MiFID II, which ensure that the Bank follows the required processes and control mechanisms and help to identify problems and action areas.

Every two years, the Bank carries out a stakeholder consultation process, which allows the Bank to get to know its Customers' perception of the importance 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, which addresses different dimensions related to Customers. (remeter para o capítulo que detalha a análise de materialidade e o PDS).

The BCP Group constantly endeavours to be close to its Customers through diversified distribution channels in order to respond adequately 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 Customers and Employees on sustainability-related topics, including the sustainable/ESG products it provides.

Links and references

[Code of Conduct](#)

[Customer Charter](#)

2024 BCP Annual Report -
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Report - Chapter GOV-4

¹² A customer engagement process is a process of supporting customers to transition their business models in line with sustainability objectives, accompanying them strategically through a variety of customer relationship channels.

¹³ Sustainable economic activities promote the transition to a low-carbon, more resource-efficient and sustainable economy.

3.2 Business Opportunities

Describe the strategic business opportunities in relation to increasing positive impacts and reducing negative impacts that your bank has identified and/or how it has worked on these opportunities 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 its portfolio, and which SDG or impact areas it endeavours to have a positive impact on (e.g. 'green' mortgages - climate, social bonds - financial inclusion, etc.).

Answer

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.

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 of environmental performance, in the Bank's offer of products and services.

In the geographical areas in which it operates, products and services have been developed which take environmental aspects into account or which are developed considering their environmental impact, and which aim to promote the adoption by Customers of greener choices, promoting more sustainable lifestyles.

BCP Group in Portugal

In 2021, Millennium bcp established its Green, Social and Sustainability Bond Framework, with the aim of financing projects that lead to important and positive environmental and social effects, within the scope of UN SDG 1, 4, 7, 8, 10 and 13. The Bank also provides the following products with ESG criteria: Green mortgage loan; Credit, leasing and renting, promotion of electric mobility; Credit for renewable energy consumption; Decarbonisation and Circular Economy Credit Line; Green Real Estate Development Credit; ESG/SRI investment funds.

The Bank seeks to increase the prevalence of financing environmentally sustainable projects and organisations, having published in 2021 the [Principles for Responsible Financing](#) which identify, among other things, the excluded projects and the sectors/projects conditioned within the scope of the financing promoted by the Bank. In 2024, the percentage of "green" financing in the total project finance portfolio was 38.9%.

BCP Group in Mozambique

Millennium bim has developed Smart IZI, a fully digital service in the form of a Mobile Banking application, through which private Customers can obtain information and carry out operations wherever and whenever they need (including subscription, registration and use). Over the last year, the Bank has invested in improving the provision of services in this channel, simplifying the channel subscription flow and making documents available, such as current account statements and proof of debit and credit. By making this type of document available completely digitally and free of charge, and in conjunction with the other IZI functionalities, the Bank has contributed to saving resources and reducing negative environmental impacts, while improving accessibility to the Bank's services.

BCP Group in Poland

Bank Millennium launched the EU's strategic green financing project, under which it prepared product and process infrastructures to effectively support companies in their sustainable development, the implementation of green investments and the energy transition. It has thus 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 finance new projects, and these restrictions were expressed in the Environmental Policy.

Links and references

2024 BCP Annual Report -
Volume II - Sustainability Re-
port - Chapter ESRS S4

Principle 4: Stakeholders



We will consult, involve and associate the relevant stakeholders in a proactive and responsible manner in order to achieve the company's objectives.

4.1 Identifying and consulting Stakeholders

Does your bank have a process for identifying and regularly consulting, collaborating and partnering with stakeholders (or groups of stakeholders¹⁴) that it has identified as being relevant in relation to the impact analysis and goal-setting process?

☒ Yes

☐ Ongoing

☐ No

Describe which stakeholders (or groups/types of stakeholders) it has identified, consulted, involved, collaborated with or established partnerships with in order to implement the Principles and improve the impacts of your credit institution. This should include a high-level overview of how the credit institution has identified relevant stakeholders, the issues addressed/results achieved and how they have been taken into account in the action planning process.

Answer

The BCP Group defines strategies and pursues dynamic policies adjusted to the new challenges imposed by the interested parties with which it relates, materialising a business model based on an ongoing and transparent dialogue enabling to interpret, understand and comply with its Stakeholders expectations.

Every two years Millennium bcp consults its stakeholders. This process involves, through a representative sampling, the main stakeholders, 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 relevant issues for the Bank, reflected in the Materiality Matrix and the Sustainability Master Plan.

Links and references

2024 BCP Annual Report - Volume II - Sustainability Report - Chapter GOV-4

¹⁴ Such as regulators, investors, governments, suppliers, customers, academia, civil society institutions, communities, representatives of the indigenous population and non-profit organisations

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 implementing the Principles

Does your bank have a governance system that incorporates PRB?

☒ Yes

☐ Ongoing

☐ No

Please describe the main governance structures, policies and procedures that your credit institution has/plans to implement to manage significant positive and negative (potential) impacts and support the effective application of the principles. Include information on

- which commission is responsible for the sustainability strategy, as well as for approving and monitoring targets (including information on the highest level of governance to which the PRB is subject),
- information on the chairman of the commission and the process and frequency with which the board of directors supervises the implementation of the PRB (including corrective measures in the event that targets or milestones are not met or unexpected negative impacts are detected), as well as
- remuneration practices linked to sustainability objectives.

Answer

Within the scope of 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 Committee (CS), 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.

In 2022, within the scope of the Board of Directors (BoD) Committees, the new name and new regulations of the present Corporate Governance, Ethics and Sustainability Committee (CGSES) 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 Risk Assessment Committee (CAR) has also seen its competences and duties increased to include the ESG risks supervision, including climate risks.

In addition, in line with the aim of strengthening the governance model of the topics included in the Sustainability perimeter, the BoD also has competences in the sustainability area.

BCP's Remunerations Policy includes a set of rules of good governance, in the sense that it contemplates provisions aimed at ensuring an alignment of its senior managers 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 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 BCP Group Employees and management and supervisory bodies.

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).

Links and references

2024 BCP Annual Report - Volume II - Sustainability Report - Chapter GOV-1

2024 Corporate Governance Report

[Remuneration Policy for BCP Group Employees](#)

5.2 Promoting a responsible banking culture:

Describe your bank's initiatives and measures to promote a culture of responsible banking among its employees (e.g. capacity building, e-learning, sustainability training for customer-oriented roles, inclusion in remuneration structures and performance management and leadership communication, among others).

Answer

BCP's Code of Conduct guarantees that the Group's entities and the members of its Management and Supervisory bodies, as well as its employees, guide their actions by the principles of respect for people's rights, the preservation of social and environmental sustainability and institutional culture and values, committing themselves to behave with integrity and honesty in all the relationships they establish with each other, with customers, or any other person or entity with whom they relate.

Links and references

2024 BCP Annual Report - Volume II - Sustainability Report - Chapter GOV-1

In 2021, with the aim of promoting the Bank's commitment to strengthening training in Sustainable Financing aimed at its employees at different levels of the organisation, Millennium bcp carried out universal training on Sustainability in Portugal, which now integrates the courses given to new Employees. In 2022, and in order to ensure that the Board of Directors has sufficient knowledge to effectively manage sustainability issues, training on sustainability and co-sourcing was provided by the Internal Audit area. The aim of this training is to demonstrate how to integrate the sustainability areas into the Bank's internal processes. The development of personal and professional skills 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 organisation. Seeking to promote excellence in Customer relationships, the Bank recognises the importance of continuous training to ensure the business sustainability and strives to provide its employees with the tools they need to carry out their activities.	Code of Conduct Anti-Corruption and Anti-Bribery Policy
• Due Diligence policies and proceedings Does your bank have policies in place that address environmental and social risks in its portfolio? ¹⁵ Please describe them. Please describe the due diligence processes your bank has put in place to identify and manage the environmental and social risks associated with its portfolio. This may include aspects such as the identification of significant/prominent risks, mitigation of environmental and social risks and definition of action plans, monitoring and reporting on risks and any complaint mechanism in place, as well as the governance structures you have in place to supervise these risks.	
Answer BCP has an annual process for identifying, assessing and managing more than 60 types of risk. This process includes ESG risk drivers, which have become increasingly important within the scope of the Bank's activity. The Risk Officer leads the annual risk identification and assessment process, with the support of other Group Divisions. The process consists of a self-assessment exercise of risk impacts for the BCP Group and its subsidiaries, through formal risk identification workshops and expert discussion panels, to provide an informed opinion on risk factors, probability and materiality for the BCP Group's capital position and liquidity. Additionally, the Bank developed its first materiality assessment of climate and environmental materiality, 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. The BCP Group's priorities and ambitions in terms of social and environmental risks are also addressed in its Sustainability Master Plan.	Links and references 2024 BCP Annual Report - Volume I 2024 Market Discipline Report 2025-28 Strategic Plan "Valorizar 28" 2024 BCP Annual Report - Volume II - Sustainability Report - Chapter GOV-4

Self-assessment summary Does the CEO or other executives have regular supervision of the implementation of the Principles through the bank's governance system? ☒ Yes ☐ No Does the governance system involve structures to supervise the implementation of PRB (e.g. including impact analysis and target setting, actions to achieve these targets and corrective action processes in case targets/interim milestones are not reached or unexpected negative impacts are detected)? ☒ Yes ☐ No Does your bank have measures in place to promote a culture of sustainability among employees (as described in section 5.2)? ☒ Yes ☐ Ongoing ☐ No	
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¹⁵ Applicable examples of policy's types are: exclusion policies for certain sectors/activities; zero deforestation policies; zero tolerance policies; gender-related policies; social due diligence policies; stakeholder engagement policies; whistleblower policies, etc., or any applicable national guidelines related to social risks.

Principle 6: Transparency and Accountability



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

6.1 Certification

Has this publicly disclosed information about its commitments to PRB been certified by an independent body?

☐ Yes ☐ Partially ☒ No

If applicable, please include the link or description of the certification statement.

Answer

Links and references

6.2 Report on other frameworks

Does your bank disclose information on sustainability in any of the standards and frameworks listed below?

- ☒ GRI
- ☒ SASB
- ☒ CDP
- ☐ IFRS Sustainability Disclosure Standards (to be published)
- ☒ TCFD
- ☒ Other: UNGP

Answer

The Bank's Sustainability Report is prepared in accordance with the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS). Millennium bcp also reports in accordance with the 2012 Global Reporting Initiative (GRI) Standards, the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD) and responds to the Carbon Disclosure Project (CDP) questionnaire.

Links and references

2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS 2: General Disclosures

6.3 Prospects

What are the next steps that your credit institution will take in the next 12-month reporting period (in particular with regard to impact analysis¹⁶, target setting¹⁵ and the governance structure for implementing PRB)? Please give a brief description

Answer

Millennium bcp intends to continue the analysis of its portfolio, using the Assessment Module of the UNEP FI Impact Analysis Tool and deepening the targets for its three priority impact themes. The Bank will continue to work on the improvement and implementation of its sustainability strategy and the achievement of the sustainability targets established, continuing to focus on its alignment with the Paris Agreement, the UN SDG and the Principles for Responsible Banking.

Links and references

6.4 Challenges

Here is a short section to find out more about the challenges your bank is possibly facing when it comes to implementing the Principles for Responsible Banking. Your feedback will be useful in contextualising the collective progress of PRB signatory banks.

¹⁶ For example, outlining plans to increase the scope by including areas that have not yet been covered, or planned steps in terms of portfolio composition, context and performance measurement

¹⁵ For example, defining plans for measuring the initial situation, developing targets for (more) impact areas, defining intermediate targets, developing action plans, etc.

What challenges have you prioritised to address when implementing the Principles for Responsible Banking? Please choose what you consider to be the three main challenges that your bank has prioritised addressing in the last 12 months (optional question).

If you wish, you can elaborate on the challenges and how you are addressing them:

- | | |
|--|--|
| ☐ Incorporate PRB supervision into governance | ☐ Customer engagement |
| ☐ Increase or maintain dynamism at the bank | ☐ Stakeholders engagement |
| ☐ First steps: where to start and what to focus on at first | ☒ Data availability |
| ☒ Carry out an impact analysis | ☒ Data quality |
| ☐ Assessment of negative environmental and social impacts | ☐ Access to resources |
| ☐ Choose the right performance measurement methodology(ies) | ☐ Report |
| ☐ Establish targets | ☐ Certification |
| ☐ Others: ... | ☐ Prioritizing actions internally |

If you wish, you can explain the challenges and how you are addressing them:

Commitments Table

COMMITMENTS AND PRINCIPLES ASSUMED BY MILLENNIUM BCP

	Commitments	Objective in terms of time	Fulfilment / Report
LISBON Green Capital (2020)	Led lighting - Installation of LED lighting in all buildings (indoor and outdoor, if applicable).	Dec. 2025	90% ⁽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%	20.36% (electric: 87; hybrid: 39)
	Car Pool - have at the Employees' disposal a pool of cars that can be reserved and used as needed for business trips.	Dec. 2020	21,6% of the current fleet (134 units)
	Commitments	Objective in terms of time	Fulfilment / Report
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%	20.36% (electric: 87; hybrid: 39)
	Car Pool - have at the Employees' disposal a pool of cars that can be reserved and used as needed for business trips.	Dec. 2020	21,6% of the current fleet (134 units)
	Commitments	Objective in terms of time	Fulfilment / Report
Letter Commitment for the Financing Sustainable (Min. Environment, Finances 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 (BoD), so that these risks and opportunities are considered in the definition of the respective strategies.	2030	i. Reinforcement of the commitment to Sustainability set out in the "Valorizar 28" 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 / 2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS S1.
	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 in this area within the scope of the annual meeting held on the review of the PME Líder and PME Excelência criteria, in which the Banks and Other partners participate, and also took part in a meeting organised by the Portuguese Banking Association in the 4 th Quarter of 2024 on the subject.
	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 2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS GOV-1.
	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 / 2024 BCP Annual Report - Volume II - Sustainability Report - Chapter Other Sustainability Information – Partnerships.

	Principles	Objective in terms of time	Fulfilment / Report
Women's Empowerment Principles (2020)	1. Establish a high-level corporate leadership for Gender Equality.	Ongoing	i. 2024 Equality Plan; ii. Feminine leadership - "Value 28" commitment; iii. 2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS S1.
	2. Treat women and men fairly at work - respect and support Human Rights and non-discrimination.		i. 2024 Equality Plan; ii. Diversity and Equal Opportunities Policy; iii. Human Rights Policy; iv. 2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS S1; Chapter Other Sustainability Information – Participate and Share; 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; ii. Training in Occupational Health and Safety; iii. 2024 RS: 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. 2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS S1.
	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 offer, female empowerment initiatives/conferences; iii. 2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS S1 e S4.
	6. Promote equality through community initiatives and advocacy.		i. Member of the Steering Committee of WEP Portugal; ii. Initiatives/conferences of female empowerment; iii. 2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS S1.
	7. Measure and publicly report the organization's progress in terms of gender equality.		i. 2024 Equality Plan; ii. 2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS S1.

	Principles	Objective in terms of time	Fulfilment / Report
UN Global Compact (2005)	Human Rights	Ongoing	i. Human Rights Policy; ii. Diversity and Equal Opportunities Policy; iii. Self-assessment Human Rights (bi-annual realisation); iv. RS2024: 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.		
	Human Rights		
	2. Companies must ensure they are not complicit in human rights abuses.		i. Human Rights Policy; ii. Sustainability Guidelines for Suppliers;

			iii. RS2024: Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "UNGP - UN Guiding Principles Reporting Framework". i. Collective Labour Agreements; ii. Sustainability Guidelines for Suppliers; iii. 2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS S1 and Annex "UNGP - UN Guiding Principles Reporting Framework". i. Human Rights Policy; ii. Sustainability Guidelines for Suppliers; iii. RS2024: Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "UNGP - UN Guiding Principles Reporting Framework". i. Human Rights Policy; ii. Sustainability Guidelines for Suppliers; iii. 2024 RS: Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "UNGP - UN Guiding Principles Reporting Framework". i. Human Rights Policy; ii. Diversity and Equal Opportunities Policy; iii. RS2024: Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "UNGP - UN Guiding Principles Reporting Framework". i. Environmental Policy; ii. Principles of Responsible Financing; iii. Sustainability Policy; iv. Inclusion of C&A risks in the financing process; v. 2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS E1. 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 Organisation), inclusion of C&A risks in the financing process (as a Financing entity); ii. Environmental Policy; iii. Principles of Responsible Financing; iv. Sustainability Policy; v. 2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS E1. 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 Organisation), inclusion of C&A risks in the financing process (as a Financing entity); ii. Environmental Policy; iii. Principles of Responsible Financing; iv. Sustainability Policy; v. 2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS E1. i. Anti-Corruption and Anti-Bribery Policy; ii. Code of Conduct; iii. 2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS S1, Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "UNGP - UN Guiding Principles Reporting Framework".
	Work 3. Companies must defend freedom of association and the effective recognition of the right to collective bargaining. Work 4. The elimination of all forms of forced and compulsory labour. Work 5. The effective abolition of child labour. Work 6. The elimination of discrimination in relation to employment and occupation. Environment 7. Companies must support a preventative approach to environmental challenges. Environment 8. Companies should undertake initiatives to promote greater environmental responsibility. Environment 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.		
	Commitments	Objective in terms of time	Fulfilment / Report

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	2024 RS: Annex "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.		2024 RS: Annex "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.		2024 RS: Annex "Principles for Responsible Banking"
	4. Proactively and responsibly consult, engage and partner with relevant stakeholders to achieve the company's goals.		2024 RS: Annex "Principles for Responsible Banking"
	5. Implement commitments to these principles through effective governance and a responsible banking culture.		2024 RS: Annex "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.		2024 RS: Annex "Principles for Responsible Banking"

TCFD (2019)	Recommendations	Objective in terms of time	Fulfilment / Report
	Recommended climate-related financial disclosures: Governance, Strategy, Management, Metrics and objectives.	Ongoing	2024 RS: Annex "Task Force on Climate related Financial Disclosures"

CEO Guide to Human Rights - WBCSD (2019)	Recommendations	Objective in terms of time	Fulfilment / Report
	Protect 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	2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS S1; Chapter Other Sustainability Information – Participate and Share; Annex "UNGP - UN Guiding Principles Reporting Framework"
	Respect 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.		2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS S1; Chapter Other Sustainability Information – Participate and Share; Annex "UNGP - UN Guiding Principles Reporting Framework"
	Remediate 3. Affected people must have access to remediation. States and companies have roles to play in ensuring access to remediation when negative impacts occur.		2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS S1; Chapter Other Sustainability Information – Participate and Share; Annex "UNGP - UN Guiding Principles Reporting Framework"

Charter of Principles from BCSD Portugal (2018)	Principles	Objective in terms of time	Fulfilment / Report
	1. Ethics and Legal Compliance 1.1 RESPECT in its activity the 10 Principles of the United Nations Global Compact, the Universal Declaration of Human Rights and the Fundamental Principles and Rights at	Ongoing	i. Corporate Policies and Principles (Main Corporate Policies and Principles - Millennium bcp); ii. Articles of Association and main rules and regulations (Articles of Association and main rules and regulations of the Bank - Millennium bcp);

Work of the International Labour Organisation. 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.		iii. 2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS GOV-1; Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "SASB - Sustainability Accounting Standards Board".
2. Human Rights H2.1 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 Policies and Principles (Main Corporate Policies and Principles - Millennium bcp); ii. Articles of Association and main rules and regulations (Articles of Association and main rules and regulations of the Bank - Millennium bcp); iii. 2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS GOV-1; Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "SASB - Sustainability Accounting Standards Board", UNGP - UN Guiding Principles Reporting Framework".
3. Labour rights 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 recognise and value the qualifications acquired to perform their duties.		i. Corporate Policies and Principles (Main Corporate Policies and Principles - Millennium bcp); ii. Articles of Association and main rules and regulations (Articles of Association and main rules and regulations of the Bank - Millennium bcp); iii. 2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS GOV-1; Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "SASB - Sustainability Accounting Standards Board", UNGP - UN Guiding Principles Reporting Framework".
4. Prevention, Health and Safety 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 Policies and Principles (Main Corporate Policies and Principles - Millennium bcp); ii. Articles of Association and main rules and regulations (Articles of Association and main rules and regulations of the Bank - Millennium bcp); iii. 2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS GOV-1; Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "SASB - Sustainability Accounting Standards Board", UNGP - UN Guiding Principles Reporting Framework".
5. Environment		i. Corporate Policies and Principles

	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.		(Main Corporate Policies and Principles - Millennium bcp); ii. Articles of Association and main rules and regulations (Articles of Association and main rules and regulations of the Bank - Millennium bcp); iii. 2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS GOV-1; Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "SASB - Sustainability Accounting Standards Board", UNGP - UN Guiding Principles Reporting Framework".
	6. Management 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 ENCOURAGE the involvement with interested parties by listening and dialogue.		i. Corporate Policies and Principles (Main Corporate Policies and Principles - Millennium bcp); ii. Articles of Association and main rules and regulations (Articles of Association and main rules and regulations of the Bank - Millennium bcp); iii. 2024 BCP Annual Report - Volume II - Sustainability Report - Chapter ESRS GOV-1; Annexes "GRI - Global Reporting Initiative and UNGC - United Nations Global Compact", "SASB - Sustainability Accounting Standards Board", UNGP - UN Guiding Principles Reporting Framework".

	Commitments	Objective in terms of time	Fulfilment / Report
Letter Portuguese for Diversity - AP-PDI (Portuguese Association for Diversity and Inclusion) (2024)	Assume, at the level of top management and the other hierarchical levels of the organisation, the creation of the conditions for understanding, respecting and promoting Diversity by all people;	Ongoing	i. Human Rights Policy; ii. Diversity and Equal Opportunities Policy; iii. Remuneration Policy for BCP Group Employees; iv. 2024 Equality Plan
	Develop an organisational culture based on mutual respect, recognition and appreciation of talents and individual differences;		
	Promote people management practices that support the principles of Diversity and Inclusion with a special focus on equal treatment and opportunities in the recruitment and selection process, in training and professional development, in evaluation, in career progression and in remuneration;		
	Promote Diversity as a source of development and learning beyond economic growth, but also as a means of achieving a more satisfying intellectual, emotional, moral and spiritual existence;		
	Favour the creation of work teams based on the principles and values of this charter, valuing the distinctive characteristics and merit of each person;		
	Promote and respect Diversity through methodologies, management tools and conditions, including working hours, that encourage people to develop according to their needs and characteristics;		
	Ensure that the Charter and related activities are communicated to employees, customers, suppliers, partners and society in general in order to foster engagement and commitment to its principles;		

	Promote opportunities for reflection, learning and the development of practices that promote Diversity, whether internally, by sharing among the several signatory organisations or in public moments;		
	Analyse, assess and share the activities carried out and the results achieved under this Charter, promoting its dissemination and contributing to its strengthening at national and international level.		

(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 1 MW of power in Taguspark, doubling its own energy production capacity.

(3) Common goals with Lisbon European Green Capital

European Union (EU) Taxonomy alignment tables (UE)

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 CA-PEX	% 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)
Main KPI	Green asset ratio (GAR) stock	2 617	3.8%	4.3%	65.7%	25.3%	34.3%

		Total environmentally sustainable assets (Million EUR)*	KPI turnover	KPI CA-PEX	% 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)
Additional KPIs	GAR (flow)	1 292	5.1%	5.8%	96.7%	29.4%	3.3%
	Trading book	n.a.	n.a.	n.a.			
	Financial guarantees	0	n.a.	n.a.			
	Assets under management	261	24.1%	28.4%			
	Fees and commissions income	n.a.	n.a.	n.a.			

* These values are based on the turnover KPI.

1.1 Assets for calculating GAR based on turnover (KPI turnover) - 31 Dec 2024

Million EUR		31 December 2024																														
		Total (gross) carrying amount	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)				
			Of which towards Taxonomy-relevant sectors (Taxonomy-eligible)					Of which towards Taxonomy-relevant sectors (Taxonomy-eligible)				Of which towards Taxonomy-relevant sectors (Taxonomy-eligible)				Of which towards Taxonomy-relevant sectors (Taxonomy-eligible)				Of which towards Taxonomy-relevant sectors (Taxonomy-eligible)				Of which towards Taxonomy-relevant sectors (Taxonomy-eligible)				Of which environmentally sustainable (Taxonomy-aligned)				
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (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			
GAR - Covered assets in both numerator and denominator																																
1	Loans and advances, debt securities and equity instruments not IHT eligible for GAR calculation	42 708	17 727	2 617	2 487	0	4	565	0	0	0	0	0	0	309	0	0	0	0	0	0	0	11	0	0	0	18 612	2 617	2 487	0	4	
2	Financial undertakings	3 616	692	196	196	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	0	0	0	703	196	196	0	0		
3	Credit institutions	2 086	129	129	129	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	129	129	129	0	0		
4	Loans and advances	529	0	0	0	0	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	1 557	129	129	129	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	129	129	129	0	0		
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		
7	Other financial corporations	1 530	563	67	67	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	0	0	0	574	67	67	0	0		
8	of which investment firms	498	217	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	217	0	0	0	0		
9	Loans and advances	226	217	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	217	0	0	0	0		
10	Debt securities, including UoP	227	0	0	0	0	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	45	0	0	0	0	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	21	0	0	0	0	0	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	0	0	0	0	0	0	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	21	0	0	0	0	0	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	41	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	0	
17	Loans and advances	8	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4	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	33	0	0	0	0	0	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	Non-financial undertakings	1 369	330	141	10	4	194	0	0	0	0	0	0	193	0	0	0	0	0	0	0	0	0	0	0	716	141	10	0	4		
21	Loans and advances	430	122	7	0	3	12	0	0	0	0	0	0	188	0	0	0	0	0	0	0	0	0	0	0	322	7	0	0	3		
22	Debt securities, including UoP	939	208	134	10	0	181	0	0	0	0	0	0	5	0	0	0	0	0	0	0	0	0	0	0	394	134	10	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	Households	36 621	16 600	2 280	2 280	0	0	0	0	0	0	0	0	116	0	0	0	0	0	0	0	0	0	0	0	16 716	2 280	2 280	0	0		
25	of which loans collateralised by residential immovable property	27 339	16 444	2 280	2 280	0	0	0	0	0	0	0	0	57	0	0	0	0	0	0	0	0	0	0	0	16 501	2 280	2 280	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	
27	of which motor vehicle loans	27	27	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	27	0	0	0	0	0	
28	Local governments financing	945	2	0	0	0	0	371	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	373	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	
30	Other local government financing	945	2	0	0	0	0	371	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	373	0	0	0	0	0	
31	Collateral obtained by taking possession: residential and commercial immovable properties	156	104	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	104	1	1	0	0	0	
32	Assets excluded from the numerator for GAR calculation. (covered in the denominator)	26 654	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
33	Financial and Non-financial undertakings	19 078																														
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	18 695																														
35	Loans and advances	16 375																														
36	of which loans collateralised by commercial immovable property	3 535																														
37	of which building renovation loans	0																														
38	Debt securities	2 222																														
39	Equity instruments	98																														
40	Non-EU country counterparties not subject to NFRD disclosure obligations	383																														
41	Loans and advances	375																														
42	Debt securities	8																														
43	Equity instruments	0																														
44	Derivatives	69																														
45	On demand interbank loans	251																														
46	Cash and cash-related assets	666																														
47	Other categories of assets (e.g. Goodwill, commodities etc.)	6 589																														
48	Total GAR assets	69 362	17 727	2 617	2 487	0	4	565	0	0	0	0	0	309	0	0	0	0	0	0	0	11	0	0	0	18 612	2 617	2 487	0	4		
49	Assets not covered for GAR calculation	36 157																														
50	Central governments and Supranational issuers	27 253																														
51	Central banks exposure	7 229																														
52	Trading book	1 676																														
53	Total assets	105 519	17 727	2 617	2 487	0	4	565	0	0	0	0	0	309	0	0	0	0	0	0	0	11	0	0	0	18 612	2 617	2 487	0	4		
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																																
54	Financial guarantees	291	47	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	48	0	0	0	0	0	
55	Assets under management	1 084	312	259	0	0	11	7	2	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	318	261	0	0	12	0	
56	Of which debt securities	341	53	10	0	0	9	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	55	10	0	0	0	0	
57	Of which equity instruments	743	259	248	0	0	2	5	2	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	264	250	0	0	0	3	

1.1. Assets for calculating the GAR based on turnover (KPI turnover) - 31 Dec 2023

Million EUR		Total (gross) carrying amount	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)			
			Of which towards Taxonomy-relevant sectors (Taxonomy-eligible)			Of which towards Taxonomy-relevant sectors (Taxonomy-eligible)			Of which towards Taxonomy-relevant sectors (Taxonomy-eligible)			Of which towards Taxonomy-relevant sectors (Taxonomy-eligible)			Of which towards Taxonomy-relevant sectors (Taxonomy-eligible)			Of which towards Taxonomy-relevant sectors (Taxonomy-eligible)														
			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (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 transitional	Of which enabling							
GAR - Covered assets in both numerator and denominator																																
1	Loans and advances, debt securities and equity instruments not HfF eligible for GAR calculation	40 320	17 024	1 934	1 826	0	0	657	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0					
2	Financial undertakings	2 686	486	158	158	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0					
3	Credit institutions	912	158	158	158	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0					
4	Loans and advances	239	0	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	673	158	158	158	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0					
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					
7	Other financial corporations	1 773	328	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0					
8	of which investment firms	691	199	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	Loans and advances	328	199	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	196	0	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	167	0	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	9	7	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	8	7	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	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					
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					
16	of which insurance undertakings	17	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					
17	Loans and advances	17	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					
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					
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					
20	Non-financial undertakings	1 216	376	115	11	0	0	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0					
21	Loans and advances	444	165	8	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0					
22	Debt securities, including UoP	773	212	108	11	0	0	11	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					
24	Households	35 222	15 934	1 657	1 657	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	26 268	15 772	1 656	1 656	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					
27	of which motor vehicle loans	28	28	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	Local governments financing	971	2	0	0	0	0	646	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					
30	Other local government financing	971	2	0	0	0	0	646	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0					
31	Collateral obtained by taking possession: residential and commercial immovable properties	226	226	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0					
Assets excluded from the numerator for GAR calculation. (covered in the denominator)		25 499	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0					
33	Financial and Non-financial undertakings	19 666																														
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	18 725																														
35	Loans and advances	16 938																														
36	of which loans collateralised by commercial immovable property	99																														
37	of which building renovation loans	0																														
38	Debt securities	1 776																														
39	Equity instruments	11																														
40	Non-EU country counterparties not subject to NFRD disclosure obligations	941																														
41	Loans and advances	835																														
42	Debt securities	53																														
43	Equity instruments	53																														
44	Derivatives	41																														
45	On demand interbank loans	337																														
46	Cash and cash-related assets	689																														
47	Other categories of assets (e.g. Goodwill, commodities etc.)	4 767																														
48	Total GAR assets	65 819	17 024	1 934	1 826	0	0	657	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0					
49	Assets not covered for GAR calculation.	19 471																														
50	Central governments and Supranational issuers	14 791																														
51	Central banks exposure	3 857																														
52	Trading book	823																														
53	Total assets	85 290	17 024	1 934	1 826	0	0	657	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0					
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																																
54	Financial guarantees	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0					
55	Assets under management	673	41	6	0	0	4	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0					
56	Of which debt securities	237	34	3	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0					
57	Of which equity instruments	423	7	3	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0					

1.2. Assets for calculating GAR based on CapEx (KPI CapEx) - 31 Dec 2024

Million EUR		Total (gross) carrying amount	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)										
			Of which towards Taxonomy-relevant sectors (Taxonomy-eligible)			Of which towards Taxonomy-relevant sectors (Taxonomy-eligible)			Of which towards Taxonomy-relevant sectors (Taxonomy-eligible)			Of which towards Taxonomy-relevant sectors (Taxonomy-eligible)			Of which towards Taxonomy-relevant sectors (Taxonomy-eligible)			Of which towards Taxonomy-relevant sectors (Taxonomy-eligible)													
			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (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								
GAR - Covered assets in both numerator and denominator																															
	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	42 708	17 824	2 990	2 487	0	5	667	0	0	0	0	0	0	310	1	0	0	0	0	0	0	11	0	0	0	18 811	2 991	2 487	0	6
2	Financial undertakings	3 616	692	471	196	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	0	0	0	703	471	196	0	0
3	Credit institutions	2 086	129	129	129	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	129	129	129	0	0	
4	Loans and advances	529	0	0	0	0	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	1 557	129	129	129	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	129	129	129	0	0	
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	
7	Other financial corporations	1 530	563	342	67	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	0	0	0	574	342	67	0	0	
8	of which investment firms	498	217	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	217	0	0	0	0	
9	Loans and advances	226	217	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	217	0	0	0	0	
10	Debt securities, including UoP	227	0	0	0	0	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	45	0	0	0	0	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	21	0	0	0	0	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	0	0	0	0	0	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	21	0	0	0	0	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	
16	of which insurance undertakings	41	4	0	0	0	0	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	8	0	0	0	0	
17	Loans and advances	8	4	0	0	0	0	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	8	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	
19	Equity instruments	33	0	0	0	0	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	Non-financial undertakings	1 369	426	238	10	0	5	294	0	0	0	0	0	193	1	0	0	0	0	0	0	0	0	0	0	913	239	10	0	6	
21	Loans and advances	430	132	18	0	0	3	26	0	0	0	0	0	188	0	0	0	0	0	0	0	0	0	0	0	345	18	0	0	3	
22	Debt securities, including UoP	939	294	221	10	0	2	268	0	0	0	0	0	6	1	0	0	0	0	0	0	0	0	0	0	568	221	10	0	2	
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	
24	Households	36 621	16 600	2 280	2 280	0	0	0	0	0	0	0	0	116	0	0	0	0	0	0	0	11	0	0	0	16 716	2 280	2 280	0	0	
25	of which loans collateralised by residential immovable property	27 339	16 444	2 280	2 280	0	0	0	0	0	0	0	0	57	0	0	0	0	0	0	0	0	0	0	0	16 501	2 280	2 280	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	
27	of which motor vehicle loans	27	27	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	27	0	0	0	0	
28	Local governments financing	945	2	0	0	0	0	373	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	373	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	
30	Other local government financing	945	2	0	0	0	0	373	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	373	0	0	0	0	
31	Collateral obtained by taking possession: residential and commercial immovable properties	156	104	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	104	1	1	0	0	
32	Assets excluded from the numerator for GAR calculation, (covered in the denominator)	26 654	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
33	Financial and Non-financial undertakings	19 078																													
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	18 695																													
35	Loans and advances	16 375																													
36	of which loans collateralised by commercial immovable property	3 535																													
37	of which building renovation loans	0																													
38	Debt securities	2 222																													
39	Equity instruments	98																													
40	Non-EU country counterparties not subject to NFRD disclosure obligations	383																													
41	Loans and advances	375																													
42	Debt securities	8																													
43	Equity instruments	0																													
44	Derivatives	69																													
45	On demand interbank loans	251																													
46	Cash and cash-related assets	666																													
47	Other categories of assets (e.g. Goodwill, commodities etc.)	6 589																													

1.2. Assets for calculating GAR based on CapEx (KPI CapEx) - 31 Dec 2023

[illegible]

2.1. GAR sector information based on turnover (only 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	Million EUR	Of which environmentally sustainable
22.22 Manufacture of plastic packing goods	1	0			1	0			1	0			1	0			1	0			1	0			1	0				
23.41 Manufacture of ceramic household and ornamental articles	1	0			1	0			1	0			1	0			1	0			1	0			1	0				
27.51 Manufacture of electric domestic appliances	3	0			3	0			3	0			3	0			3	0			3	0			3	0				
29.32 Manufacture of other parts and accessories for motor vehicles	0	0			0	0			0	0			0	0			0	0			0	0			0	0				
33.20 Installation of industrial machinery and equipment	1	0			1	0			1	0			1	0			1	0			1	0			1	0				
35.11 Production of electricity	197	114			197	0			197	0			197	0			197	0			197	0			197	114				
41.20 Construction of residential and non-residential buildings	2	0			2	0			2	0			2	0			2	0			2	0			2	0				
42.11 Construction of roads and motorways	40	0			40	0			40	0			40	0			40	0			40	0			40	0				
42.12 Construction of railways and underground railways	16	0			16	0			16	0			16	0			16	0			16	0			16	0				
42.13 Construction of bridges and tunnels	15	0			15	0			15	0			15	0			15	0			15	0			15	0				
42.99 Construction of other civil engineering projects n.e.c.	1	0			1	0			1	0			1	0			1	0			1	0			1	0				
43.21 Electrical installation	0	0			0	0			0	0			0	0			0	0			0	0			0	0				
46.76 Wholesale of other intermediate products	106	6			106	0			106	0			106	0			106	0			106	0			106	6				
49.10 Passenger rail transport, interurban	28	0			28	0			28	0			28	0			28	0			28	0			28	0				
49.20 Freight rail transport	9	0			9	0			9	0			9	0			9	0			9	0			9	0				
49.31 Urban and suburban passenger land transport	2	0			2	0			2	0			2	0			2	0			2	0			2	0				
50.20 Sea and coastal freight water transport	3	0			3	0			3	0			3	0			3	0			3	0			3	0				
52.21 Service activities incidental to land transportation	10	0			10	0			10	0			10	0			10	0			10	0			10	0				
53.10 Postal activities under universal service obligation	0	0			0	0			0	0			0	0			0	0			0	0			0	0				
60.20 Television programming and broadcasting activities	3	0			3	0			3	0			3	0			3	0			3	0			3	0				
61.30 Satellite telecommunications activities	8	0			8	0			8	0			8	0			8	0			8	0			8	0				
62.02 Computer consultancy activities	2	0			2	0			2	0			2	0			2	0			2	0			2	0				
70.10 Activities of head offices	560	20			560	0			560	0			560	0			560	0			560	0			560	20				
77.39 Renting and leasing of other machinery, equipment and tangible goods n.e.c.	0	0			0	0			0	0			0	0			0	0			0	0			0	0				
80.30 Security systems service activities	1	0			1	0			1	0			1	0			1	0			1	0			1	0				
84.13 Regulation of and contribution to more efficient operation of businesses	49	0			49	0			49	0			49	0			49	0			49	0			49	0				
86.10 Hospital activities	1	0			1	0			1	0			1	0			1	0			1	0			1	0				

2.2. GAR sector information based on CapEx (only 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)	
	[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
22.22 Manufacture of plastic packing goods	1	0			1	0			1	0			1	0
23.41 Manufacture of ceramic household and ornamental articles	1	0			1	0			1	0			1	0
27.51 Manufacture of electric domestic appliances	3	0			3	0			3	0			3	0
29.32 Manufacture of other parts and accessories for motor vehicles	0	0			0	0			0	0			0	0
33.20 Installation of industrial machinery and equipment	1	0			1	0			1	0			1	0
35.31 Production of electricity	197	118			197	0			197	0			197	118
41.20 Construction of residential and non-residential buildings	2	0			2	0			2	0			2	0
42.31 Construction of roads and motorways	40	0			40	0			40	0			40	0
42.32 Construction of railways and underground railways	16	0			16	0			16	0			16	0
42.33 Construction of bridges and tunnels	15	0			15	0			15	0			15	0
42.99 Construction of other civil engineering projects n.e.c.	1	0			1	0			1	0			1	0
43.21 Electrical installation	0	0			0	0			0	0			0	0
46.76 Wholesale of other intermediate products	106	53			106	0			106	0			106	53
49.10 Passenger rail transport, interurban	28	0			28	0			28	0			28	0
49.20 Freight rail transport	9	0			9	0			9	0			9	0
49.31 Urban and suburban passenger land transport	2	0			2	0			2	0			2	0
50.20 Sea and coastal freight water transport	3	0			3	0			3	0			3	0
52.21 Service activities incidental to land transportation	10	0			10	0			10	0			10	0
53.10 Postal activities under universal service obligation	0	0			0	0			0	0			0	0
60.20 Television programming and broadcasting activities	3	0			3	0			3	0			3	0
61.30 Satellite telecommunications activities	8	0			8	0			8	0			8	0
62.02 Computer consultancy activities	2	0			2	0			2	0			2	0
70.10 Activities of head offices	560	67			560	0			560	0			560	68
77.39 Renting and leasing of other machinery, equipment and tangible goods n.e.c.	0	0			0	0			0	0			0	0
80.20 Security systems service activities	1	0			1	0			1	0			1	0
84.13 Regulation of and contribution to more efficient operation of businesses	49	0			49	0			49	0			49	0
86.10 Hospital activities	1	0			1	0			1	0			1	0

3.1. GAR stock based on the turnover KPI - 31 Dec 2024

% (compared to total covered assets in the denominator)		31 December 2024																														
		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 assets covered
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	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling		
GAR - Covered assets in both numerator and denominator																																
1	Loans and advances, debt securities and equity instruments not HTF eligible for GAR calculation	42%	6%	6%	0%	0%	1%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	44%	6%	6%	0%	0%	40%	
2	Financial undertakings	19%	5%	5%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	19%	5%	5%	0%	0%	3%	
3	Credit institutions	6%	6%	6%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	6%	6%	6%	0%	0%	2%	
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%	1%	
5	Debt securities, including UoP	8%	8%	8%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	8%	8%	8%	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%	
7	Other financial corporations	37%	4%	4%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	38%	4%	4%	0%	0%	1%	
8	of which investment firms	44%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	44%	0%	0%	0%	0%	0%	
9	Loans and advances	96%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	96%	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%	
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%	
12	of which management companies	0%	0%	0%	0%	0%	0%	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	0%	0%	0%	0%	0%	0%	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%	
16	of which insurance undertakings	10%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	10%	0%	0%	0%	0%	0%	
17	Loans and advances	49%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	50%	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%		0%	0%	0%		0%	0%		0%	0%		0%	0%		0%	0%		0%	0%	0%		0%	0%	0%	
20	Non-financial undertakings	24%	10%	1%	0%	0%	14%	0%	0%	0%	0%	0%	0%	14%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	52%	10%	1%	0%	0%	1%	
21	Loans and advances	28%	2%	0%	0%	1%	3%	0%	0%	0%	0%	0%	0%	44%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	75%	2%	0%	0%	1%	0%	
22	Debt securities, including UoP	22%	14%	1%	0%	0%	19%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	42%	14%	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%	
24	Households	45%	6%	6%	0%	0%	0%	0%	0%	0%				0%	0%	0%	0%			0%	0%					46%	6%	6%	0%	0%	35%	
25	of which loans collateralised by residential immovable property	60%	8%	8%	0%	0%	0%	0%	0%					0%	0%	0%	0%									60%	8%	8%	0%	0%	26%	
26	of which building renovation loans	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%	
28	Local governments financing	0%	0%	0%	0%	0%	39%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	39%	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%	
30	Other local government financing	0%	0%	0%	0%	0%	39%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	39%	0%	0%	0%	0%	1%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	67%	1%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	67%	1%	1%	0%	0%	0%	
32	Total GAR assets	26%	4%	4%	0%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	27%	4%	4%	0%	0%	66%	

3.2 GAR stock based on the CapEx KPI - 31 Dec 2024

% (compared to total covered assets in the denominator)		31 December 2024																																
		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)			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 I	Of which enabling	Of which Use of Proceeds	Of which transitional I	Of which enabling	Of which Use of Proceeds	Of which transitional I	Of which enabling	Of which Use of Proceeds	Of which transitional I	Of which enabling	Of which Use of Proceeds	Of which transitional I	Of which enabling	Of which Use of Proceeds	Of which transitional I	Of which enabling	Of which Use of Proceeds	Of which transitional I	Of which enabling	Of which Use of Proceeds	Of which transitional I	Of which enabling	Of which Use of Proceeds	Of which transitional I	Of which enabling	Of which Use of Proceeds	Of which transitional I	Of which enabling					
GAR - Covered assets in both numerator and denominator																																		
1	Loans and advances, debt securities and equity instruments not HTT eligible for GAR calculation	42%	7%	6%	0%	0%	2%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	44%	7%	6%	0%	0%	40%			
2	Financial undertakings	19%	13%	5%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	19%	13%	5%	0%	0%	3%			
3	Credit institutions	6%	6%	6%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	6%	6%	6%	0%	0%	2%			
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%	1%			
5	Debt securities, including UoP	8%	8%	8%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	8%	8%	8%	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%			
7	Other financial corporations	37%	22%	4%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	38%	22%	4%	0%	0%	1%			
8	of which investment firms	44%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	44%	0%	0%	0%	0%	0%	0%			
9	Loans and advances	96%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	96%	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%	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%			
12	of which management companies	0%	0%	0%	0%	0%	0%	0%	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	0%	0%	0%	0%	0%	0%	0%	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%	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%		
16	of which insurance undertakings	10%	0%	0%	0%	0%	10%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	20%	0%	0%	0%	0%	0%	0%		
17	Loans and advances	49%	0%	0%	0%	0%	50%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	99%	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%	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%		
20	Non-financial undertakings	31%	17%	1%	0%	0%	21%	0%	0%	0%	0%	0%	0%	14%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	67%	17%	1%	0%	0%	1%	1%		
21	Loans and advances	31%	4%	0%	0%	1%	6%	0%	0%	0%	0%	0%	0%	44%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	80%	4%	0%	0%	1%	0%	0%		
22	Debt securities, including UoP	31%	23%	1%	0%	0%	29%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	60%	24%	1%	0%	0%	1%	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%		
24	Households	45%	6%	6%	0%	0%	0%	0%	0%	0%				0%	0%	0%	0%				0%	0%	0%			46%	6%	6%	0%	0%	0%	35%		
25	of which loans collateralised by residential immovable property	60%	8%	8%	0%	0%	0%	0%	0%	0%				0%	0%	0%	0%				0%	0%	0%			60%	8%	8%	0%	0%	0%	26%		
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%		
27	of which motor vehicle loans	100%	0%	0%	0%	0%								0%	0%	0%	0%				0%	0%	0%											
28	Local governments financing	0%	0%	0%	0%	0%	39%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	40%	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%	0%	0%	0%		
30	Other local government financing	0%	0%	0%	0%	0%	39%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	40%	0%	0%	0%	0%	0%	1%		
31	Collateral obtained by taking possession: residential and commercial immovable properties	67%	1%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	67%	1%	1%	0%	0%	0%	0%		
32	Total GAR assets	26%	4%	4%	0%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	27%	4%	4%	0%	0%	0%	66%		

3.2 GAR stock based on the CapEx KPI - 31 Dec 2023

% (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 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 assets covered	
		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 I	Of which enabling			Of which Use of Proceeds	Of which transitional I	Of which enabling			Of which Use of Proceeds	Of which transitional I	Of which enabling			Of which Use of Proceeds	Of which transitional I	Of which enabling			Of which Use of Proceeds	Of which transitional I	Of which enabling			Of which Use of Proceeds	Of which transitional I	Of which enabling						
GAR - Covered assets in both numerator and denominator																																			
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%	0%	0%	0%	47%		
2	Financial undertakings	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%	0%	0%	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%	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%	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%	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%	
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%	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%	0%	0%	29%	0%	0%	0%	0%	1%
9	Loans and advances	61%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	61%	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%	
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%	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%	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%	
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%	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%	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%	
20	Non-financial undertakings	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%	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%	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%	0%	32%	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	Households	45%	5%	5%	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%												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%
27	of which motor vehicle loans	100%	0%	0%	0%	0%																													
28	Local governments 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%	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%	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%	0%	67%	0%	0%	0%	0%	1%
31	Collateral obtained by taking possession: residential and commercial immovable properties	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%	100%	1%	0%	0%	0%	0%
32	Total GAR assets	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%	0%	27%	3%	3%	0%	0%	47%

4.2. GAR flow based on the CapEx KPI

% (compared to flow of total eligible assets)		31 December 2024																														
		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 new assets covered
		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)			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	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling				
GAR - Covered assets in both numerator and denominator																																
1	Loans and advances, debt securities and equity instruments not HTF eligible for GAR calculation	33%	8%	7%	0%	0%	32%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	74.72%	
2	Financial undertakings	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	5.67%	
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%	5.43%	
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%	2.26%	
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%	3.18%	
6	Equity instruments	0%	0%		0%	0%	0%	0%		0%	0%	0%		0%	0%		0%	0%		0%	0%		0%	0%		0%	0%		0%	0%	0.00%	
7	Other financial corporations	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%	1%	0%	0%	0%	0%	0.24%
8	of which investment firms	0%	0%	0%	0%	0%	0%	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%	
9	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%	0.00%	
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%	0.00%	
11	Equity instruments	0%	0%		0%	0%	0%	0%		0%	0%		0%	0%	0%		0%	0%		0%	0%		0%	0%		0%	0%		0%	0%	0.18%	
12	of which management companies	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.05%	
13	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%	0.00%	
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%	0.05%	
15	Equity instruments	0%	0%		0%	0%	0%	0%		0%	0%		0%	0%	0%		0%	0%		0%	0%		0%	0%		0%	0%		0%	0%	0.00%	
16	of which insurance undertakings	26%	0%	0%	0%	0%	27%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	53%	0%	0%	0%	0%	0.01%
17	Loans and advances	26%	0%	0%	0%	0%	27%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	53%	0%	0%	0%	0%	0.01%
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%	0.00%	
19	Equity instruments	0%	0%		0%	0%	0%	0%		0%	0%		0%	0%	0%		0%	0%		0%	0%		0%	0%		0%	0%		0%	0%	0.00%	
20	Non-financial undertakings	28%	21%	0%	0%	0%	22%	0%	0%	0%	0%	0%	0%	13%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	63%	21%	0%	0%	0%	3.74%
21	Loans and advances	13%	1%	0%	0%	0%	4%	0%	0%	0%	0%	0%	0%	72%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	89%	1%	0%	0%	0%	0.63%
22	Debt securities, including UoP	31%	25%	0%	0%	0%	26%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	57%	26%	0%	0%	0%	3.11%
23	Equity instruments	0%	0%		0%	0%	0%	0%		0%	0%		0%	0%	0%		0%	0%		0%	0%		0%	0%		0%	0%		0%	0%	0.00%	
24	Households	36%	8%	8%	0%	0%	36%	0%	0%	0%				0%	0%	0%	0%										72%	8%	8%	0%	0%	32.55%
25	of which loans collateralised by residential immovable property	70%	15%	15%	0%	0%	0%	0%	0%	0%				0%	0%	0%	0%										70%	15%	15%	0%	0%	16.46%
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%	0.00%	
27	of which motor vehicle loans	100%	0%	0%	0%	0%																										
28	Local governments financing	36%	8%	8%	0%	0%	36%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	72%	8%	8%	0%	0%	32.55%
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%	0.00%
30	Other local government financing	36%	8%	8%	0%	0%	36%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	72%	8%	8%	0%	0%	32.55%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0%	0%	0%	0%	0%	0%	0%	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%
32	Total GAR assets	24%	6%	5%	0%	0%	24%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	49%	6%	5%	0%	0%	100%

5.1. KPI off-balance exposures based on KPI turnover

% (compared to total eligible off-balance sheet assets)		31 December 2024																												
		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)				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		
1	Financial guarantees (FinGuar KPI)	16.26%	0.00%	0.00%	0.00%	0.00%	0.12%	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%	16.37%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	28.76%	23.88%	0.00%	0.00%	1.00%	0.64%	0.20%	0.00%	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%	29.39%	24.08%	0.00%	0.00%	1.06%

5.2. KPI off-balance exposures based on KPI CapEx

% (compared to total eligible off-balance sheet assets)		31 December 2024																													
		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)					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	
1	Financial guarantees (FinGuar KPI)	16.26%	0.00%	0.00%	0.00%	0.00%	0.12%	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%	16.37%	0.00%	0.00%	0.00%	0.00%	
2	Assets under management (AuM KPI)	33.01%	28.05%	0.00%	0.55%	4.11%	1.96%	0.33%	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%	34.97%	28.37%	0.00%	0.55%	4.13%	

6. Disclosures in accordance with Annex XII - Activities related to nuclear energy and fossil gas**6.1. Activities related to nuclear energy and fossil gas**

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 + WTR + CE + PPC + BIO		Climate change mitigation (CCM)		Climate change adaptation (CCA)		Water and marine resources (WTR)		Circular economy (CE)		Pollution (PPC)		Biodiversity and Ecosystems (BIO)	
	Million EUR	Amount	%	Amount	%	Amount	%	Amount	%	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 denominator of the applicable KPI	0	0%	0	0%	0	0%	0	0%	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%	0	0%	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%	0	0%	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%	0	0%	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%	0	0%	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%	0	0%	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 denominator of the applicable KPI	2,628	100%	2,617	100%	0	0%	0	0%	0	0%	0	0%	11	100%
8	Total green asset ratio, Turnover	2,628	4%	2,617	4%	0	0%	0	0%	0	0%	0	0%	11	0%

Row	Economic activities based on KPI CAPEX	Amount and proportion													
		CCM + CCA + WTR + CE + PPC + BIO		Climate change mitigation (CCM)		Climate change adaptation (CCA)		Water and marine resources (WTR)		Circular economy (CE)		Pollution (PPC)		Biodiversity and Ecosystems (BIO)	
	Million EUR	Amount	%	Amount	%	Amount	%	Amount	%	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 denominator of the applicable KPI	0	0%	0	0%	0	0%	0	0%	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%	0	0%	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%	0	0%	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%	0	0%	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%	0	0%	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%	0	0%	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 denominator of the applicable KPI	3,002	100%	2,990	100%	0	100%	0	0%	1	100%	0	0%	11	100%
8	Total green asset ratio, CAPEX	3,002	4%	2,990	4%	0	0%	0	0%	1	0%	0	0%	11	0%

6.3. Aligned activities - numerator

Row	Economic activities based on KPI Turnover	Amount and proportion													
		CCM + CCA + WTR + CE + PPC + BIO		Climate change mitigation (CCM)		Climate change adaptation (CCA)		Water and marine resources (WTR)		Circular economy (CE)		Pollution (PPC)		Biodiversity and Ecosystems (BIO)	
		Amount	%	Amount	%	Amount	%	Amount	%	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%	0	0%	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%	0	0%	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%	0	0%	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%	0	0%	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%	0	0%	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%	0	0%	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	2,617	100%	2,617	100%	0	0%	0	0%	0	0%	0	0%	0	0%
8	Total amount and proportion of Taxonomy-aligned economic activities in the numerator of the total green asset ratio based on turnover	2,617	100%	2,617	100%	0	0%	0	0%	0	0%	0	0%	0	0%

Row	Economic activities based on KPI CapEx	Amount and proportion													
		CCM + CCA + WTR + CE + PPC + BIO		Climate change mitigation (CCM)		Climate change adaptation (CCA)		Water and marine resources (WTR)		Circular economy (CE)		Pollution (PPC)		Biodiversity and Ecosystems (BIO)	
		Amount	%	Amount	%	Amount	%	Amount	%	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%	0	0%	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%	0	0%	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%	0	0%	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%	0	0%	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%	0	0%	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%	0	0%	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	2,991	100%	2,990	100%	0	100%	0	0%	1	100%	0	0%	0	0%
8	Total amount and proportion of Taxonomy-aligned economic activities in the numerator of the total green asset ratio based on turnover	2,991	100%	2,990	100%	0	0%	0	0%	1	0%	0	0%	0	0%

6.4. Eligible but non-aligned activities

Row	Economic activities based on KPI Turnover	Amount and proportion													
		CCM + CCA + WTR + CE + PPC + BIO		Climate change mitigation (CCM)		Climate change adaptation (CCA)		Water and marine resources (WTR)		Circular economy (CE)		Pollution (PPC)		Biodiversity and Ecosystems (BIO)	
	Million EUR	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%
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%	0	0%	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%	0	0%	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%	0	0%	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%	0	0%	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%	0	0%	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%	0	0%	0	0%	0	0%	0	0%
7	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	15 991	100%	15 106	100%	565	100%	0	0%	309	100%	0	0%	11	100%
8	Total amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activities in the denominator of the eligible ratio based on turnover	15 995	86%	15 110	81%	565	3%	0	0%	309	2%	0	0%	11	0%

Row	Economic activities based on KPI Capex	Amount and proportion													
		CCM + CCA + WTR + CE + PPC + BIO		Climate change mitigation (CCM)		Climate change adaptation (CCA)		Water and marine resources (WTR)		Circular economy (CE)		Pollution (PPC)		Biodiversity and Ecosystems (BIO)	
	Million EUR	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%
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	0	0	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	0	0	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	0	0	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	0	0	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	0	0	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	0	0	0	0	0	0	0	0
7	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	15719	1	14834	1	565	1	0	0	309	1	0	0	11	1
8	Total amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activities in the denominator of the eligible ratio based on turnover	15719	1	14834	1	565	0	0	0	309	0	0	0	11	0

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	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	50 724	100%
8	Total amount and proportion of Taxonomy-non-eligible economic activities in the denominator of the applicable KPI (non-eligible ratio turnover)	50 750	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	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	50 525	100%
8	Total amount and proportion of Taxonomy-non-eligible economic activities in the denominator of the applicable KPI (non-eligible ratio turnover)	50 551	73%

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