

# Anti-Corruption and Anti-Bribery Policy



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# Introduction

Banco Comercial Português, S.A. Group (“BCP Group” or “Group”) develops its activity in a referential context of ethical principles, rigour, compliance and transparency, in strict observance of the legal and regulatory framework applicable in each of its geographies to matters of corruption and bribery.

The Group seeks to develop responsible and transparent business practices, based on demanding internal standards of behaviour and conduct and underpinned by a commitment to “zero tolerance” of any acts or signs of corruption or bribery, a guideline that, being present in the essential core of the BCP Group's service culture, reflects the express and unequivocal rejection of all acts that may jeopardise the suitability and clarity of the BCP Group's relationship with its Stakeholders.



# Commitments

The Anti-corruption and Anti-bribery Policy (hereinafter the “Policy”) underlines Group BCP's commitment to proactively fight and prevent all forms of corruption and bribery, defining the principles and guidelines to prevent and manage these practices.

As a signatory to the Global Compact of the United Nations, Group BCP is committed to complying with the 10 Principles, including combating corruption in all its forms, namely bribery, extortion and facilitation payments (Principle 10).

The Policy complements the principles and rules of conduct established by the BCP Group in its [Code of Conduct](#)<sup>1</sup>, an internal regulation on which all Employees and Outsourcers receive regular training, regardless of their hierarchical position or place of work.

This Policy is also aligned with the principles set out in other internal regulations of the BCP Group, namely the [Policy on Related Parties](#)<sup>2</sup>, the [Policy for Prevention and Management of Conflicts of Interest](#)<sup>3</sup>, the [Plan for the Prevention of Corruption Risks and Related Infractions](#)<sup>4</sup> and the [Sustainability Guidelines for Suppliers](#)<sup>5</sup>.

<sup>(1)</sup> Code of Conduct (GR0021)

<sup>(2)</sup> Policy on Related Parties, applicable to the BCP Group in Portugal (OS0155)

<sup>(3)</sup> Policy for the Prevention and Management of Conflicts of Interests (GR0038)

<sup>(4)</sup> Plan for the Prevention of Corruption Risks and Related Infractions, applicable to the BCP Group in Portugal (MT0242)

<sup>(5)</sup> Sustainability Guidelines for Suppliers (MT0186)

# Principles and requirements

BCP Group defines as improper conduct, within the scope of each Employee and Outsourcer's daily activity, that which, among others, incorporates the following behaviours:

- Offering, promising, giving, requesting, agreeing to receive or accepting a bribe, including facilitation of payment;
- Offering or receiving donations (under the terms defined in the Group's Code of Conduct<sup>1</sup> that may affect (or are perceived to affect) business deals to be made or already made, as well as incentives paid or received in portfolio management and the provision of investment services<sup>3</sup>;
- Granting a charitable donation or sponsorship as a way to obtain or maintain an illicit advantage for the benefit of the company itself or any of its Employees;
- Establishing or maintaining business relations with the different *Stakeholders* in the awareness that they do not comply with the principles laid down in this policy;
- Offering internships, jobs or awarding contracts for the provision of goods/services that may constrain and/or influence transactions to be carried out or already carried out, in particular when they concern persons related to public entities;
- Intervening in the appraisal and decision of operations, the professional status of Employees and procedures for the acquisition of goods and services in which there is a risk of conflicts of interest or engaging in other activities that may lead to conflicts of interest, as outlined in the Policy for the Prevention and Management of Conflicts of Interest<sup>3</sup>. The procedures foreseen in these regulations are applicable, with the necessary adaptations, to transactions with related parties<sup>2</sup>.

The restrictions described apply to all forms of bribery and corruption, all negotiations and all business relationships and transactions in which BCP Group is part, in order to obtain or maintain any advantage of any kind for the benefit of the Bank or any other person or entity.

<sup>(1)</sup> Code of Conduct (GR0021)

<sup>(2)</sup> Policy on Related Parties, applicable to the BCP Group in Portugal (OS0155)

<sup>(3)</sup> Policy for the Prevention and Management of Conflicts of Interests (GR0038)

## Contributions to political entities

BCP Group does not provide any type of monetary, financial or in-kind support to political parties, regardless of the legal framework applicable in the geographies where the BCP Group operates.

## Lobbying and interest representation

BCP Group does not hire lobbying or interest representation services to express its position before the authorities. Its positions are expressed, namely in public consultation procedures, in the context of the associations to which it belongs or directly through legally established channels.

## Plan for the Prevention of Corruption Risks and Related Infractions ("PPCR")

The Group has a PPCR<sup>4</sup> that contains the identification, analysis and classification of risks and situations that may expose it to acts of corruption and related infractions, providing information on preventive and corrective measures that reduce the probability of occurrence and the impact of the risks identified therein.

The PPCR assumes that the prevention of risks of corruption and related offences is addressed in the organisation through 4 main macro-activities:

- i. Prevention Mechanisms;
- ii. Corruption Prevention Training and Culture;
- iii. Communication and Reporting Circuits;
- iv. Assessment System.

Within the framework of this PPCR, the Group produces an annual report entitled "Annual report on the implementation of the internal control system to fight corruption", which focuses on the implementation, execution and assessment of this Plan, as well as a mid-term report for high-risk situations that occur during the year.



## Communication of irregularities

Any practice of corruption and/or bribery, potential or real, or very serious suspicions must be immediately reported through the system for reporting irregularities (whistleblowing system) defined in the [Policy on the reporting of irregularities \(Whistleblowing\)](#)<sup>6</sup> with the necessary adaptations to the circumstances of corruption (as provided for in the PPCR), namely with the communication to the Group Compliance Officer, so that he/she can, within a maximum of two working days, notify the Board of Directors, the Executive Committee and the Audit Committee of BCP (as well as the management and supervisory bodies of the Group Entity, if applicable). The Compliance Officer issues an opinion identifying the situation and the mitigation measures he/she considers necessary.

The reporting of irregularities (whistleblowing) can be made anonymously by Employees, attorneys, agents, or any other persons who provide services to them, on a permanent or occasional basis, in any entity of the Group, shareholders and any other persons. The insufficiency of information, evidence or supporting documentation does not exempt an employee from the duty to report.

## Dissemination, reporting and monitoring

The Anti-Corruption and Anti-Bribery Policy can be consulted by Employees on the Bank's internal portals, as well as by Customers and external entities on the Bank's institutional website.

The BCP Group regularly reviews, evaluates and controls its performance in this area, reporting annually, in the Sustainability Report, non-financial information on its performance and measures to prevent corruption.

The performance monitoring indicators of the BCP Group within the framework of this Policy are established by the Sustainability Commissions of the different geographies of the BCP Group.

<sup>(6)</sup> Policy on the Reporting of Irregularities (Whistleblowing), applicable to the BCP Group in Portugal (OS0131)

## Policy breach

The legal, financial and reputational risks associated with bribery and corruption practices are extremely serious and have significant impacts both for the Bank and for the people who may be involved in these activities.

Any circumstance that may, directly or indirectly, amount to the crime of corruption or its related infractions, shall constitute a disciplinary offence punishable under the applicable regime, which may be compounded by criminal and civil sanctions under the legislation in force.

## Scope of application

The Policy is prepared by Banco Comercial Português, S.A. ("BCP") and is applicable to all its operations in Portugal and its branch in Macau. BCP Group also promotes its adoption by 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.

In addition to being applicable to all trainees, Employees, including Members of the Corporate Bodies (MOAFs) and Outsourcers of the BCP Group, this Policy applies to Suppliers, Service Providers, Institutional Organisations, Customers and other Stakeholders who, directly and/or indirectly, are involved in the Bank's activity.

## Validity and review process of the Policy

The Policy enters into force from its approval date and is reviewed every 2 years by BCP, or whenever necessary, with the Compliance Office and the Sustainability Division being the internal entities responsible for reviewing its contents.

The responsibility for approving the Anti-Corruption and Anti-Bribery Policy is assigned to BCP's Board of Directors, following the opinion of its Committee for Corporate Governance, Ethics and Sustainability.

This document version was approved on 27 of December 2023.



## Main definitions

“Corruption” or “bribery”, offering, promising, giving, requesting, agreeing to receive or accepting a donation or promise of an undue advantage of any nature in order to obtain or maintain a business or other illicit advantage.

“Facilitation payment”, the offer of a payment of a low amount made to someone - Employee, public official or private entity - with the intention of procuring or expediting the execution of a routine or necessary action to which the party making the payment is entitled.

“Conflicts of interests”, a situation wherein someone has a secondary interest in the outcome of a determined action and that interest is contrary to that of the Bank or of its Clients or remaining Stakeholders and it may damage its financial stability and remaining interests, inclusive legal ones to which it is bound to observe and comply with.

“Related party” are the persons and entities described in the rule Identification of Related Parties in Banco Comercial Português Group.

“Gifts”, such as goods, services, advantages, favours, arrangements or any other form of offer.

“Employees” are the persons with a contractual link to BCP, regardless of their hierarchical position and/or type or duration of the link and it may cover due to a legal, regulatory or conventional proviso, the attorneys, agents and any other individuals providing permanent or occasional outsourcing services.





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