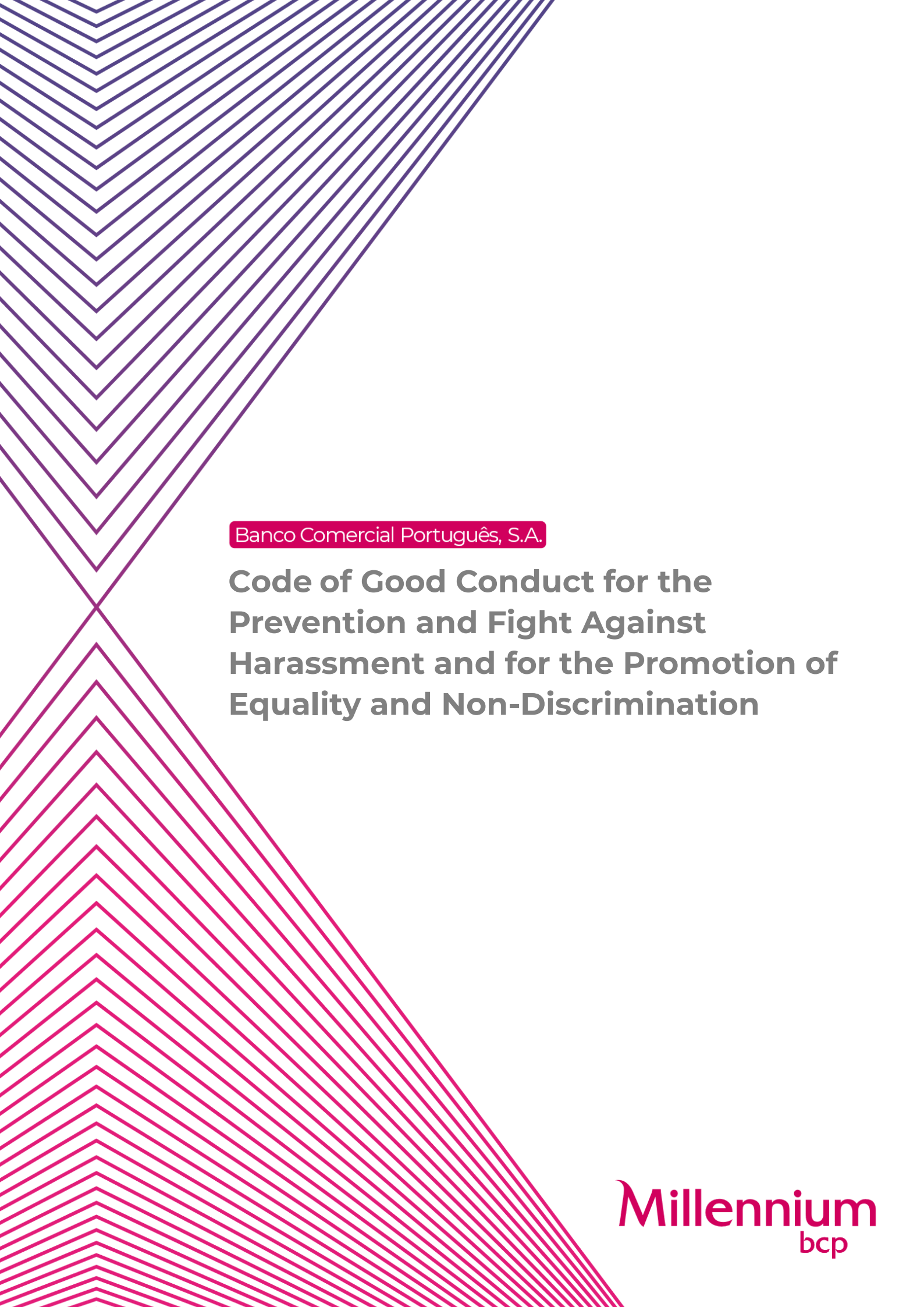




Banco Comercial Português, S.A.

**Code of Good Conduct for the
Prevention and Fight Against
Harassment and for the Promotion of
Equality and Non-Discrimination**

Millennium
bcp

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1. FRAMEWORK

The Code of Good Conduct for the Prevention and Fight against Harassment and for the Promotion of Equality and Non-Discrimination (hereinafter referred to as Code of Good Conduct), derives not only from a duty of the employer, as set forth in article 127 (l) (k) of the Labour Code¹, but also from the Bank's will in establishing a set of preventive guidelines to eliminate the possibility of practices of harassment and discrimination within the labour context.

All the recipients should accept and comply with this Code of Good Conduct and the individual observance of the same is required. This observance means the respect for the values, principles and norms that compose it, namely the dignity of the human being, the physical and moral integrity, equality and non-discrimination, the personality of each individual, safety at work, the right to work. The regular conduct of the employee should always be based on equal treatment between "peers".

The Bank shall adopt all the measures necessary to apply this set of values, principles and norms that compose this Code, disclosing its contents amongst its recipients and clarifying all the doubts that its application may raise.

No recipient may justify a conduct that goes against this Code of Good Conduct or a bad practice with an order coming from above or his/her unawareness of the provisions of this Code.

This Code complements the Code of Conduct in force at the Group (GR0021).

2. APPROVAL AND REVIEW

The Board of Directors shall be the body competent to approve this Code, after obtaining a prior opinion from the Executive Committee, the Audit Committee and from the Committee for Corporate Governance, Ethics and Sustainability.

The Executive Committee is also responsible for ensuring that this Code of Good Conduct is subject to periodic reviews, to be carried out at least two years and whenever there are changes in legislation and regulations that justify it.

¹ In Portugal (Law nrº 7/2009, of February 12)

3 APPLICATION SCOPE AND DEFINITIONS

ARTICLE 1. APPLICATION SCOPE

1. This Code of Good Conduct is directly applicable to the following "comprised entities":
 - a) the members of the Management and Supervisory Bodies
 - b) to all Employees of the group with a permanent work contract, or not;
 - c) to trainees;
 - d) to the Employees of the companies that provide services to the Group under the outsourcing regime;
 - e) to all legal persons that maintain professional, commercial or other type of relations with the Group.
2. This Code is directly applicable to all companies part of Group Banco Comercial Português, including Representation Offices and Branches headquartered abroad, with all required adjustments due to the legislative framework existing in each country where the companies operate, applying to all relations within the scope of the professional activity irrespective if the same are developed in or outside working hours or outside work, in person or remotely and in work trips.
3. Any recipient identified in number 1 commits to assume and acknowledge as his/her own, through its freely and voluntary acceptance, the values and principles enshrined in this Code.
4. No recipient, identified in number 1, will be allowed to cooperate, in a conscious manner, with third parties in the violation of any legal requirement, domestic or international, nor cooperate with these in actions or omissions able of compromising the principle of equality or able of, if known, cause damage to the Bank's reputation or to the one of its Employees.

ARTICLE 2 – DEFINITIONS

In this Code of Good Conduct, the following words shall have the following meaning:

- a) «Harassment», an unwanted behaviour, namely the one based on discrimination, exercised on the access to the job or on the job or professional training, having the effect of disturbing or constrain the person, affect his/her dignity, or creating an hostile, intimidating, degrading, humiliating or destabilizing environment;

- b) «Moral harassment», an unwanted behaviour that consists in making verbal or non-verbal attacks, with an unspecified nature but with an offensive or humiliating meaning or even physical attacks, which may include physical and/or psychological violence aiming at achieving the effects mentioned in the previous sub paragraph;
- c) «Sexual Harassment», an unwanted behaviour with a sexual nature or behaviours related to gender able of affecting the dignity of men and women at work. This definition includes any other unwanted physical behaviours, with a verbal nature, or not;
- d) "Discrimination»: any distinction, exclusion, restriction or preference, the purpose or effect of which is to annul or restrict the recognition, enjoyment or exercise, under equal conditions, of rights, freedoms and warranties or of social and cultural, namely, to any of the following discrimination factors:
 - i. Ancestry
 - ii. Age
 - iii. Sex
 - iv. Sexual Orientation
 - v. Gender identity
 - vi. Marital status
 - vii. Family situation
 - viii. Economic Situation
 - ix. Education
 - x. Origin or social condition
 - xi. Genetic heritage
 - xii. Reduced work capability
 - xiii. Disability
 - xiv. Chronic disease
 - xv. Nationality

- xvi. Racial or ethnic origin
 - xvii. Origin Territory
 - xviii. Language
 - xix. Religion
 - xx. Political or ideological convictions
 - xxi. Union membership
- e) «Direct discrimination», whenever, due a discrimination factor, an individual is subject to a less favorable treatment than the one given or is to be given to another individual in a comparable situation;
- f) «Indirect discrimination», whenever a determination, criteria or practice, seemingly neutral, is able of placing someone, due to a discrimination factor, in a position of disadvantage in comparison to other, unless such determination, criteria or practice is objectively justified by a legitimate purpose and the means to achieve it are adequate and necessary;
- g) «Equal work, the one according to which the functions performed at the service of the same employer are equal or objectively similar in terms of nature, quality and quantity;
- h) «Work of equal value» the one where the functions performed at the service of the same employer are equivalent, considering, namely, the required qualifications or experience, the responsibilities attributed, the physical or mental effort and the conditions under which the work is carried out."
- i) «Domination relations», it is considered that two companies have ownership links when one of them, the so-called dominant one, may exercise, directly or through companies or persons that comply with the requirements set forth in article 483 (2) of the Companies Code, on the other company, the so-called dominated one, a dominant influence.
- j) «Group», BCP and the companies controlled by it, regardless of the country of its registered office or main establishment;
- k) «Employees» - the Employees and other people working for BCP or for the companies with a control or group relation with it, regardless of their hierarchical function and/or

type or duration of the tie and it may comprise due to a legal, regulatory or conventional proviso, the attorneys, commissioners and any other individuals providing permanent or occasional outsourcing services.

ARTICLE 3 – OBJECTIVES

The objectives of this Code of Good Conduct are:

- a) Enhance the equality measures in effect at the Bank that, in a transversal manner, ensure the implementation of the principle of equality in all Bank's policies, in all its procedures and in all its levels;
- b) Enhance the preventive measures in effect at Bank aiming at preventing the occurrence of harassment and /or discrimination practices and, if they occur, to ensure the application of adequate measures to hold accountable those responsible and prevent their recurrence.
- c) Contribute so that the workplace is recognised as an example of integrity, responsibility and rigor aiming at ensuring the safeguard of the moral integrity of the workers/Employees and ensure their right to work conditions that respect their individual dignity.

ARTICLE 4 - DUTIES OF THE EMPLOYEES/RECIPIENTS IN TERMS OF EQUALITY, HARASSMENT AND NON-DISCRIMINATION

- 1. Without damaging any other duties, any entity comprised within the scope of this Code has the duty to:
 - a) Respect the physical and moral integrity of the co-workers and of any persons that establish relations with the Bank;
 - b) Respect and treat the Bank, his/her senior officers and/or hierarchical subordinates, co-workers and the individuals that establish relations with the Bank, with dignity, urbanity and probity;
 - c) Comply with the orders and instructions of the employer concerning the execution or discipline of the work, as well as the safety and health at work, which are not contrary to their rights or guarantees;
 - d) Not submit false accusations;

- e) Refrain from all acts of violence or physical and psychological coercion on his/her co-workers;
 - f) Promote or execute the actions to improve the Bank's productivity as well as the human, professional and social promotion of the employee, co-workers and of any individuals that establish relations with the Bank;
 - g) Adopt an ethical and straightforward behaviour in all his/her actions and avoid any behaviour that, even if it does not breach the law, may harm the Bank's reputation and negatively affect its interests, reputation, brand and public image.
 - h) Act, whenever possible, in a way that prevents the occurrence, or repetition of behaviours able of being considered harassment, that the employee/ recipient witness or becomes aware of.
2. The practice of acts by any entity comprised within the scope of this Code, which constitute harassment or discrimination, is forbidden.
 3. Any employee exercising a management and/or leading position, a member of the corporate bodies, has the special duty to apply and endeavor for the compliance with the principles set forth in this Code.

ARTICLE 5 - DUTIES OF THE BANK IN TERMS OF EQUALITY, HARASSMENT AND NON-DISCRIMINATION

1. Whenever the Bank becomes aware of alleged situations of harassment at work and/or of discriminatory acts and/or of those that infringe the rights in terms of equality and non-discrimination, the Bank is obliged to file a disciplinary procedure, carried out in accordance with the law.
2. The Bank will ensure that the complainant Employee and the witness(es) he/she names cannot be subject to disciplinary procedures, unless, the information is intentionally wrong, without prejudice to the exercise of the right to contradictory and being guaranteed that their identity remains confidential.
3. The Bank assumes the commitment that no Employee will be object of a change of status, of harassment or of any other form of discrimination due to the conveyance of information in good faith.
4. The Bank, namely, its Board of Directors, assumes the commitment to assess the risks in all its organic units in order to identify possible psychosocial risks related

with eventual harassment practices;

5. The Bank, namely, its Board of Directors, provides information and training to its staff, Employees, holders of senior positions and members of the Board of Directors, namely through the disclosure of this code through the most appropriate and swifter means

ARTICLE 6 - RIGHTS OF THE EMPLOYEES IN TERMS OF EQUALITY, HARASSMENT AND NON-DISCRIMINATION

1. Any employee of the bank is entitled to equal opportunities and equal treatment in terms of training and promotion or professional careers and to work conditions.
2. No Employee of the Bank may be privileged, receive benefits, harmed or be deprived from any right or exempt from any duty, in particular due to:
 - i. Ancestry
 - ii. Age
 - iii. Sex
 - iv. Sexual Orientation
 - v. Gender identity
 - vi. Marital status
 - vii. Family situation
 - viii. Economic Situation
 - ix. Education
 - x. Origin or social condition
 - xi. Genetic heritage
 - xii. Reduced work capability
 - xiii. Disability
 - xiv. Chronic disease
 - xv. Nationality

- xvi. Racial or ethnic origin
- xvii. Origin Territory
- xviii. Language
- xix. Religion
- xx. Political or ideological convictions
- xxi. Union membership.

3. The right to equality mentioned in the previous numbers of this article, concerns, namely:

- a) Selection criteria and engagement conditions in any sector of activity, comprising all hierarchical levels;
- b) Access to all types of professional orientation, training and re-conversion of any level, including the acquisition of practical experience;
- c) Retribution and other pecuniary payments, promotion to all hierarchical levels and criteria for the selection of Employees to dismiss;
- d) Membership or participation in collective representation structures or in any organization wherein the members exercise a determined occupation, including the benefits attributed by it.
- e) Decision-making based on algorithms or other artificial intelligence systems.

4. All the comprised Entities are entitled to be treated with dignity.

5. Any employee that, allegedly, becomes a victim of and/or becomes aware of practices able of substantiating harassment and/or discrimination is entitled to submit a complaint in the way described below.

6. The right to equality does not harm the application by the Bank of:

- a) legal requirements relating to the exercise of a professional occupation by a foreigner or a stateless person;
- b) requirements related with the special protection of genetic heritage, pregnancy, parenting, adoption and other situations linked with the conciliation of the professional activity with family life.

7. The practice of harassment or discrimination cannot be implicitly or explicitly used as grounds for the making of a decision which will affect the access of that person to a job, a promotion, salary or for any other decision concerning the job and/or if such conduct generates an intimidating, hostile or humiliating work environment for the recipient.
8. Behavior based on a discriminatory factor which constitutes a justifiable and determining occupational requirement as per nature of the activity in question or the context in which it is carried out shall not constitute discrimination, and i) the objective must be legitimate and aimed at achieving a legitimately recognised objective, i.e. correcting staff imbalances or promoting vocational training; ii) it must be demonstrated that there is a strict necessity and there are no other equally effective but less restrictive solutions, iii) the requirement must be proportionate and the possible negative impact on third parties is limited and adjusted to the intended benefits (whether in terms of protecting people or promoting employment policies), iv) the criteria must have a direct connection to the activity or context, with requirements inherent to the nature of the job or the specific conditions in which it is carried out, in order to prevent excessive or arbitrary applications. Furthermore, differences of treatment based on age which are necessary and appropriate for the pursuit of a legitimate aim, such as employment policy, the labour market or vocational training, shall be permitted. Provisions in laws or collective labour regulation instruments that justify this behaviour must be assessed periodically and revised if they are no longer justified.

ARTICLE 7 - DUTIES OF THE RECIPIENTS / CLAIM PROCEDURE / CONFIDENTIALITY

1. Any Entity, comprised within the scope of this Code, that becomes aware and/or suspicious that any rule of the Code of Good Conduct concerning equality, harassment and non-discrimination issues is not being complied with or that there is the possibility of their non-compliance, is obliged to inform, preferably and by the following order:
 - a) Verbally:
 - i. to the direct hierarchical superior;
 - ii. the Head of the Human Resources Division;
 - iii. The Employee Ombudsman;
 - iv. the Board of Directors/ Bank's Senior Management;

- b) Send in writing, using for that purpose the channel for the communication of irregularities available in each entity, a description, as detailed as possible, of the facts that he/she is aware of and that on his/her opinion, violate this Code, namely on the circumstances, author(s), date(s), time, witness(es), as well as the means of testimonial, documentary and expert evidence that eventually exist.
2. Any Entity comprised within the scope of this Code that becomes aware and or suspicious that any rule of this chapter of the Code of Good Conduct is not being observed and that there is a possibility that the same may not be observed, may report that irregularity anonymously being, in that case, guaranteed to the above identified interlocutors, the confidential nature of the facts reported.
3. When handling with alleged sexual harassment, the Bank should limit the request for information and/or the making of statements by the complainant employee, linked with the facts occurred, to the strict minimum needed to obtain proof for the purposes of filing a disciplinary proceeding in accordance with the provisions of the law.
4. If it is an alleged sexual harassment, the Bank will try not to request to the complainant employee to submit the facts more times that what is strictly necessary since the Bank is aware that the description of such experience may be difficult and able of harming his/her dignity.
5. The situations and behaviours able of substantiating harassment to an employee of the Bank, within the scope of his/her activity, practiced by third parties who are not exercising functions at the Bank, should be object of a complaint to be made by the direct hierarchical superior of the victim, by the victim or by any other employee that becomes aware of the discriminatory practice, in accordance with the provisions of number 1 (a and b) of this article.

ARTICLE 8 – INVESTIGATION

1. After receiving the complaint, the Bank commits to initiate, within 5 working days, an investigation on the facts. The Audit Division will be responsible for conducting the investigation.
2. The Bank commits to verify the facts reported to it on alleged situations of harassment and discrimination, committing also to file a disciplinary proceeding whenever there is enough evidence of the practice of such acts. Those who made accusations in bad faith will also subject to a disciplinary proceeding.

3. Retaliatory attacks made by an employee to another who is being object of a disciplinary proceedings, which is underway or reached its end, constitutes also a serious violation of this Code and, as harassment and discrimination, are subject to disciplinary proceedings.
4. The investigation made by the Bank will be conducted in an independent and objective manner, observing all the rights of the complainant and of the alleged transgressor(s).

ARTICLE 9 - MEANS OF PROOF

Any party may appoint witnesses who are aware of the alleged situation and are able, for that reason, to contribute for unearthing the truth and solve the case.

ARTICLE 10 – PROCEDURES

1. Liberty alongside with responsibility will imply that Entity comprised within the scope of this Code reporting acts linked with eventual violations of the provisions on Equality, Harassment and Non- Discrimination of the Code of Good Conduct will do so in good faith, under penalty of interfering with the principles of this Code.
2. The Bank commits to follow-up and revise the files of harassment and/or discrimination files with the purpose of checking if the procedures that it is applying are efficient.
3. The practice of harassment gives the victim the right to receive a compensation, for pecuniary and non-pecuniary damages, in accordance with the provisions of article of the Labour Code on matters of compensation for an act of discrimination.
4. The responsibility for repairing the damages due to professional illnesses resulting from the practice of harassment belongs to the employer entity and the Social Security assumes the responsibility for paying the reparation of the damages caused by those professional illnesses, in accordance with the law, remaining, however, subrogated to the worker's rights, in the extent of the payments made, plus future interest payments, to the employer entity.

ARTICLE 11 -LEGAL PRESUMPTIONS

It is presumed to be unfair, the dismissal or application of other sanction to punish an infraction up to one year after the accusation or other form of exercise of the rights related with equality, non-discrimination and harassment.

ARTICLE 12 - EARLY TERMINATION OF THE WORK AGREEMENT WITH FAIR CAUSE

It is a fair cause for the early termination of the work contract by the employee, the offence to his/her physical and mental integrity, freedom, honour, or dignity, punishable by law, including the practice of harassment reported to the service with investigation competences in the labour areas practiced by the employer or its representative.

ARTICLE 13 - PREVENTIVE MEASURES

The Bank commits to implement specific acts to prevent harassment and discrimination at work, namely:

- a) Put in place a strategy of specific information and disclosure on the prevention and fight against harassment and discrimination at work, making reference to the internal mechanisms to communicate irregularities, ensuring that the same comply with the legal requirements, namely in terms of confidentiality of the process of information processing and the existence of reprisals against the complainant/participants;
- b) Disclose this Code to all Employees;
- c) Include in admission processes a statement on awareness and acceptance of the rules set forth in this Code of Good Conduct;
- d) The Bank should train all the Employees on the identification of factors that provide a work environment free of harassment and discrimination practices as well as on the awareness of their responsibilities within the context of the policy of the Bank regarding the fight against and prevention of harassment and discrimination practices.
- e) The Bank should implement a regular process of consultation of all the Employees, ensuring the follow-up and assessment of the effective resolution of the situations reported and the making of proposals for the adoption of measures for the identification of risks and proposals to prevent, fight against and eliminate those situations.

ARTICLE 14 - PUBLICATION AND DISCLOSURE

This Code shall be published by means of the bank's internal website, on Documentation.

ARTICLE 15 – REVISION

This Code shall be revised in accordance with the Bank's internal regulations on the revision and update of documentation made available on the bank's internal website, at Documentation.

ARTICLE 16 - ENTRANCE INTO FORCE

This Group Code shall enter into effect, after its approval, on the date the same is published and disclosed to all the Bank's Employees.

Approval date: March 25th, 2025

Approving body: Board of Directors

Main changes compared to previous content: Inclusion in Chapter 2 of information on the review of the Group Code. Adjustments in Chapter 3, Articles 2 and 6, as a result of supervening legal amendments.