

# Social Impact Policy



Millennium  
bcp

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# Introduction

Group BCP assumes as an integral part of its business model, the objective of creating social value by, developing actions to and with the various Stakeholder groups, with the goal of contributing to the development of the countries in which it operates. It is within this context of proximity to the local Communities that its Policy of Social Responsibility is materialised, giving priority to its intervention on cultural, educational and social support initiatives.

## Goals

Within a context of partnership and involvement with the Communities - internal and external - Group BCP constitutes itself as an active player in the social development of the spaces and territories in which it is located, either through support for initiatives in the fields of culture, education and financial literacy or the carrying out of social support and volunteering actions, either through the provision to its Employees of sports and cultural activities, together with a facilitated access to health products and services, well-being and leisure.

**External Community** – assuming a clear commitment to support the development of the Communities where it operates, BCP Group, either directly through the activity carried out by the Banks held or, as is the case of Portugal, Poland and Mozambique, through autonomous institutions, the Foundations Millennium bcp and Bank Millennium, positions itself as an agent of social value creation, innovation and Sustainability and promotion of a plural, responsible and inclusive citizenship.

In the development of its activity, Group BCP seeks to promote policies and initiatives that respond to the challenges that arise in the social, environmental and corporate governance fields, aligning its decision-making and the development of its activity with the Group's Sustainability strategy.

**Internal Community** – Group BCP seeks to contribute so that each Employee is able to achieve balance between the professional and personal life. This balance is essential for motivation and productivity and is seen as a priority in people management and in the organisation of teamwork.



## Commitments and performance areas

Group BCP ensures the alignment of its performance and the performance of all those to whom this Policy applies with the legislation of the countries in which it operates and with the main references, principles, and commitments in terms of social responsibility.

Group BCP aligns its actions with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, ensuring respect for affected Communities in all its geographies of operations.

Additionally, recognises the importance of the 10 Principles of the Global Compact and the Sustainable Development Goals (SDGs) of the United Nations, actively assuming a commitment to contribute to sustainable, socially inclusive, and environmentally responsible development in all countries where it operates.

Our direct involvement in the realisation of the SDGs is, first and foremost, sought in the Bank's strategic matrix, in particular in the relation of proximity established with People and in the ability to add social value, but also in the search for innovative and inclusive products and distribution channels and in the spirit of Customer service, namely by creating a positive impact with regard to the following aspirational goals:

- Reducing inequality;
- Quality education;
- Decent work and economic growth.

These goals are materialised in the following commitments:

- **Support for the work-life balance of its Employees** – ensuring a number of social benefits that contribute to maintain an adequate level of well-being of the Employees, alongside the provision of structures to facilitate their participation in Community life;



- **Offer of products and services that contribute to financial inclusion and incorporate social principles** - providing products and services that promote the inclusion and widespread access of the population to financial products, which support entrepreneurship and the ability to respond to situations of financial vulnerability, including the support to sectors of society with less capacity to use Digital Banking solutions;
- **Development of actions to support education and financial literacy** - fostering education, sharing of knowledge and financial literacy, contributing to a more informed and entrepreneurial society, with a greater decision-making capacity and promoter of innovation and change;
- **Development of actions to support culture and preserve cultural heritage** - promote culture, in its different manifestations, and the preservation of historical and museum heritage, ensuring a democratic access to all audiences;
- **Development of social support actions** - support institutions and initiatives that promote a better quality of life in the most deprived or unprotected segments of society, also promoting corporate volunteering actions with the Community;
- **Promote education as a vehicle for Sustainability** - investment in the ongoing training of Employees to promote a culture of Sustainability throughout the organisation, seeking to ensure the development of skills, allowing them to be ambassadors and promoters of social responsibility and volunteering actions in the Community;
- **Response to emergency situations** - participate in helping People and Communities in situations of public disaster, helping to minimise the impacts on the affected areas and to accelerate the process of recovering social normality.

In situations where the laws in force in the regions in which BCP Group or its Suppliers operate are in conflict with the subscribed commitments and benchmarks, compliance with local legislation is considered as a minimum requirement, always promoting the respect and adoption of best Human Rights practices.

Whenever negative impacts resulting from the BCP Group's activities in Communities are identified, remediation mechanisms will be activated to manage them.



## Relations with Interested Parties

**Relations with the Community** – BCP Group supports the promotion of social responsibility actions in the surrounding Communities, aimed at the most needy, vulnerable or unprotected segments of society, where, in close cooperation with local or national entities, it seeks to contribute to development and social mobility, also ensuring the control and minimization of any impacts that may arise from its activity in the Communities where it operates and with which it interacts.

To ensure alignment between the social actions developed and the real needs of the Communities, ensuring their effectiveness and relevance, the BCP Group promotes regular consultation processes with the Communities in which it operates.

**Relations with Customers** – BCP Group promotes respect for Human Rights in its relations with Customers through the provision of financial products and services designed to support social inclusion and non-discrimination.

In addition, in its marketing and contractual instruments, it provides accurate, complete and/or understandable information.

**Relations with Suppliers and Partners** – BCP Group promotes alignment with the fundamental Principles of Human Rights with its Suppliers and Partners,



in order to ensure that the Human Rights of all those involved in them are respected within the scope of its relationships.

## Disclosure, report and monitoring

The Social Impact Policy is available on the BCP Group website at:

[Millenniumbcp/Institutional/Sustainability/Policies](https://www.millenniumbcp.com/Institutional/Sustainability/Policies)

It is also available to Employees on corporate intranets.

Report on BCP Group's performance in terms of social impact is subject to regular follow-up and monitoring, and is reported in the [Sustainability Section of the Annual Report](#).

The indicators for monitoring BCP Group's performance under this Policy are established by the Sustainability Commissions of the different geographies of BCP Group.

## Reporting of irregularities

Reporting any irregularities or violations of this Policy will be subject to the terms of the Procedures applicable to the Bank's handling of reports of irregularities, as set forth in the [Policy on the reporting of irregularities \(Whistleblowing\)](#).

## Governance Model

The Board of Directors (BoD) approves, upon referral from the Corporate Governance, Ethics and Sustainability Committee (CGSES), and ensures the implementation of this Policy, delegating this power in the Executive Committees (EC), assisted by the relevant Commissions.

## Scope

This Policy is applicable by Banco Comercial Português, S.A. in all its operations in Portugal. BCP Group also promotes its adoption by its international business operations subject to possible adjustments necessary to comply with local law and regulatory framework.



## Validity and review process of the Policy

The Policy enters into force from its approval date and is reviewed every 2 years by Banco Comercial Português, S.A., or whenever necessary, with the Office for Economic Research, Sustainability and Supervision Affairs and the Human Resources Division being the internal entities responsible for reviewing its contents.

**Approval date:** 17/12/2025

**Approving body:** Board of Directors

**Main changes made compared to the previous version:** The Corporate Policies of Banco Comercial Português, S.A. Group are reviewed at least every two years. In the current review were introduced minor changes, such as simplifying and rewording the text of the sections “Commitments and performance areas”, “Relations with Interested Parties”, “Disclosure, report, and monitoring”, “Reporting of Irregularities” and “Governance Model”.



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Banco Comercial Português, S.A. Head Office: Praça D. João I, 28, 4000-295 Porto  
Share Capital: 3.000.000.000 Euros - under the single registration and tax identification  
number 501525882 (Registered at the Commercial Registry Office of Oporto).