

Diversity and Equal Opportunity Policy



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Introduction

In the principles and guidelines that embody the Policy for Diversity and Equal Opportunities of Banco Comercial Português, S.A. (or BCP Group or Bank), actions values and benchmarks are set up, in which it is valued, fostered and established:

- i) the right to equal access to employment and professional development;
- ii) the prohibition of discrimination based on ancestry, gender, sexual orientation, family status, nationality, place of birth, ethnic origin, religion, age, physical condition or disability, marital status, social status, trade union membership and political or ideological beliefs;
- iii) the diversity of experiences, skills, and competences as a basis for the development of the organisation.

BCP Group believes that respect for diversity and inclusion is fundamental to the pursuit of the Bank's objectives and commitments. It is in this sense that the importance of fostering an inclusive, fair, and flexible workplace is recognised, which ensures integrity treatment, promotes diversity and personal and professional growth, and values cultural plurality.

Diversity, in this context, includes characteristics such as personality, beliefs and values, sex, age, race, nationality, ethnic origin, religion, disability, sexual orientation, marital status, cultural identity, trade union membership and political affiliation.



Commitments

BCP Group aims to promote inclusion and equal opportunities, recognise differences without discriminating and value Employees. Our commitment is materialised by ensuring adequate conditions for Employees and consolidating a culture of respect for people, through practices aligned with principles of promoting inclusion, equality, and non-discrimination.

BCP Group, which ensures compliance with the applicable legislation on equality and diversity at work in the countries where it operates, respects the recommendations of the International Labour Organization and the guidelines of the voluntary commitments made in these matters.

The Bank, in Portugal, publishes its Plan for Gender Equality every year, a document through which it communicates the main objectives, targets and progress in terms of promoting equality and inclusion.

Promote equal opportunities and Employees development

BCP remains committed to fostering diversity and equal opportunities in access to employment, namely in the context of recruitment processes, respective selection criteria and hiring conditions, and at work, where it seeks to ensure that all Employees have the opportunity to develop their professional career, strengthening and improving skills and competences through equitable training programs. In addition to valuing generic and specific skills, and regardless of their diversity, the Bank fairly and clearly identifies Employees with the potential and talent to take on functions of increased responsibility and complexity.

Employees' remuneration is defined according to their function, professional background, and degree of achievement of the established objectives, promoting a salary ratio of 1:1 between men and women with comparable functions, levels of responsibility and professional paths.



Stimulate training and professional development

The development of Employees' professional skills and competences is a priority for BCP. In this sense, we seek to provide the necessary progression tools for Employees' development and the business Sustainability, giving priority to continuous training and programs to support professional growth and evolution.

At the same time, the Bank promotes regular training on equality, inclusion, non-discrimination, Human Rights and harassment prevention for all Employees and Outsourcers, in order to ensure that they understand the Bank's operating principles, as well as the best practices and mechanisms for reporting existing irregularities.

Promote non-discrimination

Regardless of their hierarchical or responsibility level, the Bank fosters a culture among all Employees that promotes and values fair and balanced actions, with zero tolerance for any situation and form of discrimination that is identified.

As a signatory to the 10 Global Compact Principles, proposed by the United Nations, BCP also recognises and supports freedom of association, the right to negotiate collective conventions agreements and rejects the existence of any form of forced and compulsory labour, as well as child labour or labour resulting from human trafficking.



Report of irregularities

Any Stakeholder or entity covered by this Policy (see section on 'Scope') that is aware of or suspects any action that violates the provisions of this Policy must report it in accordance with the provisions of the Policy on the Reporting of Irregularities.

The Bank also has available the Code of Good Conduct for the Prevention and Fight against Harassment and the Promotion of Equality and Non-Discrimination, applicable to Employees and Outsourcers, which defines rights and duties and provides details on the procedures for reporting irregularities on these matters.

Partnerships and external initiatives

The BCP Group participates, as an associate or member of associations, in working groups and/or discussions on diversity issues and compliance with guidelines established by various global standards and external initiatives, actively participating in building a more inclusive society:

- Charter for Diversity (in Portugal and Poland);
- United Nations Sustainable Development Goals;
- United Nations Global Compact (UNGC);
- UNGC Women's Empowerment Principles;
- iGen – Forum of Organizations for Equality;
- Charter of Principles of the Business Council for Sustainable Development Portugal (BCSD).

Disclosure, report, and monitoring

The Diversity and Equal Opportunity 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 diversity and equal opportunities is subject to regular follow-up and monitoring and is reported in the Sustainability Section of the Annual Report.

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

Governance Model

The Board of Directors (BoD), upon referral from the Corporate Governance, Ethics and Sustainability Committee (CGSES), is responsible for approving and ensuring the implementation of this Policy, delegating this power in the Executive Committees (EC), who, advised by their Human Resources and Sustainability Commissions, are responsible for managing issues related to the promotion of diversity and equal opportunities, namely establishing, implementing and monitoring this Policy, the Plan for Gender Equality and others related to the subject in the different geographies included within BCP Group's scope of activity.

Scope

This Policy is applicable by Banco Comercial Português, S.A. in all its operations in Portugal.

The BCP Group is committed to applying this Policy in all geographies where it operates, promoting the harmonization of practices through training, integration into local compliance systems and regular reporting to the Bank's governance structures.

In addition to being applicable to all Trainees, Employees, including Members of the Corporate Bodies (MOAFs) and Outsourcers of 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 the date of its approval and is reviewed every 2 years by Bank, or whenever necessary, with the Human Resources Division and the Office for Economic Research, Sustainability and Supervision Affairs 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”, “Partnerships and external Initiatives”, “Disclosure, report, and monitoring”, “Governance Model” and “Scope”.



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