



Banco Comercial Português, S.A.

Policy for the Prevention and Management of Conflicts of Interests

Millennium
bcp

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1. CONTEXT

1. This Group Code defines the principles, governance model and fundamental processes adopted for the identification and management of situations of Conflicts of Interest (“Col”) that may occur within the scope of Banco Comercial Português, S.A. (hereinafter referred to as “the Bank” or “BCP”) or any entity direct or indirectly controlled by the Bank (hereinafter referred to as Entities), that are part of Group Banco Comercial Português (hereinafter referred to as “Group BCP” or “Group”).
2. This Group Code implements in Group BCP the guidelines issued by the European Banking Authority (EBA) about Governance¹ and other applicable regulations in force² and formalizes the principles of governance applicable to the provision of investment services and activities and ancillary services identified in articles 290 and 291, respectively, of the Securities Code.
3. This Group Code identifies the control process to allow for an effective and prudent management of Col at an institutional or personal level, including segregation of functions, information barriers and the specific process of deciding on transactions with “Related Parties”, in order to simultaneously defend the interests of all stakeholders and the interests of the Bank and of the Group.
4. It defines, also, the structure of responsibilities in the scope of the identification and management of Col, the involvement and responsibilities of internal control functions and the regular reporting model on this matter to the Group's management bodies.

2. APPROVAL PROCESS

The competence for the approval of this Group Code is exclusive to the Board of Directors, pursuant to a prior opinion from the Audit Committee.

¹ EBA/GL/2021/05.

² Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014, and correlated rulings (MiFID II). In Portugal, RGICSF, Cod.VM, BdP Notice 3/2020, Guidance on procedures for governance and monitoring of retail banking products and services.

3. SCOPE

1. This Group Code covers all situations of Col, which may arise within the framework of the various activities and functions of the Entities of Group BCP, of the provision of any banking services, investment services and ancillary services or combinations of these services, including those arising from the quality of producer or distributor of financial products.
2. This Group Code applies to all Employees, members of the governing bodies and service providers of Group BCP or any other “Relevant Party”.
3. The principles outlined in this Group Code are applicable to all Entities of Group BCP, and the references to the management and supervisory bodies of BCP, as well as to the Bank’s organic units, should be understood as references to the bodies and units equivalent at the level of the local Entities.
4. The adherence to the principles established in this Group Code shall be expressly referenced in the respective norms structure of each of the covered Entities, if applicable, and they have the right to modify or add new rules.

4. DEFINITIONS AND TYPOLOGY OF CONFLICTS

1. **Advantage** - Any direct or indirect benefit received by the Employee, or related Entity arising from the performance of their functions, originated from them or through their omission, by themselves or by an intermediary, with their consent or ratification leading to the violation of the direct or indirect interests of the Bank Group company or its Related Parties as well as any regulations applicable to them³.
2. **Conflicts of interest** - For the purposes of this policy, an actual, potential or apparent Col occurs when there is a situation (both of a personal or professional nature) in which the Bank, its Counterparties and other Stakeholders may, by virtue of a certain activity, operation or performance, obtain the satisfaction of their own interests or of third parties as well as Related Parties, to the detriment of the Bank’s interests, unduly influencing the Employee’s judgment, actions or decision-making within the scope of his/her functions performed at the Bank, from which he/she obtains an Advantage or creates a reputational damage in the Bank’s credibility or unfavourable legal or regulatory consequences for the Bank. A Col may be current (a present and real Col situation), potential (a situation that may result in a Col) or apparent (when there is a perception that the Employee is in a situation where there is a Col). The interests of the persons subject to this regulation are equated with those of the entities linked to it, and the following are qualified as such:
 - i) The spouse or unmarried partner;
 - ii) Parent or relative in a direct line;
 - iii) Other relatives, kin, or other natural or legal persons who, through their relationship with the person subject to this regulation, potentially allows them to influence the decision-making process to achieve a business relationship outside normal market conditions;
 - iv) Is directly or indirectly dominated by the person subject to it or by any person equivalent to it, or in which, for any other reason, the person subject to this regulation or equivalent may exercise a decisive influence;
 - v) The person subject to this regulation or equivalent to it is the beneficial owner of the transaction;

³ Notwithstanding the above mentioned, for the fact of being shareholder of an institution or hold private accounts or loans or other services from another institution, in case these situations are not material, that does not necessarily mean that an Employee is deemed as being in a Col situation.

- vi) Any non-legally personified reality in which the person subject or equivalent person is a beneficial owner or in which he/she/it exerts decisive influence, as, in particular, may be the case of Investment Funds, undisturbed or undisclosed inheritance, or reality of a fiduciary nature.
3. **Conflicts of interest at an Institutional Level** - They are the ones that result from the different activities and the different corporate purpose pursued by the Institution, the different Entities of the Group and the different lines of business or between the institution and its external stakeholders. Included here:
- i) Col between shareholders and the Bank;
 - ii) Col between the Group's Entities and their Clients, as a result of their business model and/or the various services provided and activities developed by these Entities;
 - iii) Col among the Group's Clients;
 - iv) Col between the Group Entities.
4. **Conflicts of interest related with a Relevant Party or Related Party** - Are those resulting from real or potential situations of conflict between the interests of the institution and the private interests of an Employee (including members of the corporate bodies), and those of his/her direct relatives, which may negatively influence the performance of the duties and responsibilities of that Employee in particular. Are included therein those resulting from personal or professional relationships, both past and current, namely:
- i) Of an economic and/or financial nature (for example, shares, financial holdings and other economic interests in Clients, intellectual property rights, contracting services or purchasing goods or loans granted by an entity of the Group to a company held by a Relevant Party, Related Party or his/her relatives);
 - ii) Of personal or professional relationship with the holders of qualified stakes in any company part of the Group;
 - iii) Personal or professional relationships with Employees of the Group or of any Entity included within the prudential consolidation scope;
 - iv) Any other positions held in the past and past personal and professional relationships that have occurred in the last 36 months;
 - v) Personal or professional relations with relevant external interested parties such as suppliers, advisers or other service providers; and
 - vi) Political influence or political relations.
5. **Relevant Party** - Comprises the following groups of persons or Entities:
- i) Members of governing bodies, senior management and key function holders of the Entities subject to this regulation;
 - ii) Statutory Auditor ⁴ as well as any other members belonging or associated with its Group;
 - iii) All Employees of the Entities subject to this regulation;
 - iv) Any person providing services to the Entities comprised and who, under their control or responsibility, ensures the provision of banking services and distribution of financial products;
 - v) Any person involved in the provision of services or supply of goods to the entities subject to this regulation in a contract or subcontract regime;

⁴ Or of any equivalent statutory body.

- vi) Spouses, relatives or similar in the 2nd degree or any companies directly or indirectly controlled by them.

6. **Related Party** - Comprises the following groups of persons or Entities:

- i) Members of the management and supervisory bodies of the Group Banks headquartered in Portugal and:
 - a. The spouse or unmarried partner (rebuttable before the granting of credit or legally equivalent transaction);
 - b. Relatives or relatives in a straight line in the first degree (parents and children), rebuttable before the granting of credit or legally equivalent transaction;
 - c. People who permanently share the same household for more than six months (rebuttable before the granting of credit or legally equivalent operation);
 - d. The persons identified in paragraph i), above, that hold a participation of no less than 10% ⁵ of the share capital or rights voting or in which such persons exercise significant influence, have the ability to appoint more than half of the members of the governing bodies or hold senior management positions or management or supervisory functions;
 - e. Entities in relation to which there is a relationship of economic interdependence, namely due to their insertion in a cross-shareholding relationship with several other entities or which, because they are in such a way linked to the institution, in the event of one of them encountering financial problems, the institution will also have financial difficulties;
 - f. Persons or entities, including, in particular, depositors, creditors, debtors, entities participated by the institution, Employees of the institution or employees of other entities belonging to the same group, whose relationship with the institution potentially allows them to influence its management, in the sense of achieving a business relationship outside of normal market conditions;
- ii) Qualified participants of the institution and other persons or entities covered by specific regime(s) in each geography.

5. ACTIVITIES WHICH MAY GENERATE CONFLICTS OF INTEREST

- 1. All those involving Relevant or Related Parties, that act for their own benefit or interest or that of a third party directly or indirectly related to them, namely:
 - i) Economic and financial ties;
 - ii) Personal relationships with holders of qualifying holdings in the Group;
 - iii) Personal relationships with Employees or Entities included in the prudential consolidation perimeter;
 - iv) Personal or professional relationships with relevant external stakeholders, such as circumstances of association with service providers;
 - v) Other jobs and previous jobs in the last five years (and if there is no extended term resulting from a legal provision);
 - vi) Political influence or political relationships.
- 2. Considering the global offer of products and services by the Group's Entities, including investment products and services, as well as associated activities, the Col may occur in different situations, such as:
 - i) The reception, transmission and execution of orders on behalf of Clients;

⁵ Or 5% in companies admitted to trading on a regulated market.

- ii) Management of assets / portfolios on a third party's behalf;
 - iii) Dealing on own account;
 - iv) Investment advice;
 - v) The drawing up of investment studies, financial analysis or other general recommendations relating to transactions in financial instruments;
 - vi) The services and activities related with underwriting and placement, with or without guarantee;
 - vii) The assistance in a public offer regarding products or financial instruments;
 - viii) Distribution of banking, financial or insurance services or products;
 - ix) In granting credit and providing, or confirming, guarantees, regardless of how they are carried out;
 - x) In the transactions involving rights over properties held by the Group or other entities covered by this regulation;
 - xi) Provision of services or supply of goods to the Group's Entities in a contract or subcontract regime.
3. Some examples of typical situations able of generating Col, in connection with the Bank's investment services are:
- i) The Entity develops businesses and activities connected with the trading of financial instruments for its own portfolio and/or on behalf of Clients whilst, at the same time, other Clients are trading in the same financial instruments with different or conflicting intentions;
 - ii) The Entity may supply investment-advising services or make the discretionary management of portfolios of its Clients and, simultaneously, recommend to those Clients the purchase/sale for those managed portfolios, products that are directly or indirectly issued by it or by its subsidiary companies;
 - iii) The Entity may make and disclose investment studies on individual companies wherein it holds own portfolio positions;
 - iv) The Entity may grant credit to the Managing Companies of the Group;
 - v) Circumstances relating to economic interests, such as shares, other property rights, corporate holdings, financial holdings, and other economic interests in commercial Clients, intellectual property rights, loans granted by the institution to a company owned by Employees or members of the governing bodies, participation or property of a body or entity with conflicting interests.
4. While producing banking products and financial instruments, the Entity must ensure that their design complies with the requirements for a satisfactory management of Col, including the respective remuneration.
5. Particularly, the Entity must ensure that the design of banking products, financial products and financial instruments, including their characteristics, do not adversely affect the final Clients or lead to problems in terms of market integrity, namely by allowing the entity to reduce and/or eliminate its own risks or the exposure to the underlying assets of the product, when the entity already holds the underlying assets in its own portfolio.
6. Whenever an instrument is produced, the Entity must dispose of mechanisms and procedures to assess potential Col. These will enable the entity to evaluate if the financial instrument generates a situation where the final Clients may be negatively affected.
7. The Entity must have adequate mechanisms to identify, distinguish and address Col that persist and must be managed permanently and occasional Col that can be adequately managed through a specific measure.

8. As a depositary of collective investment schemes, the Entity may not carry out activities relating to these collective investment undertaking or the Entity responsible for its respective management, that may create Col between the participants, the Entity responsible for management and the depositary itself, unless it has functionally and hierarchically separated the performance of its functions as depositary for other potentially conflicting functions and that potential Col are duly identified, managed, monitored and disclosed to the participants of the collective investment organization.

6. MITIGATION OF CONFLICTS OF INTERESTS

1. To address “conflicts of interest at an institutional level”, the following fundamental mitigation measures should be taken into account:
 - i) The establishment of a suitable segregation of functions, entrusting to different persons the activities able of generating Col in the different stages of transactions processing or provision of services, or the responsibilities for the supervision and information regarding those activities;
 - ii) The establishment of barriers to the transmission of information, for example through the physical separation of certain segments of activity or of determined units;
 - iii) The establishment of specific procedures for the making of operations with Related Parties⁶, that allow the management body to ensure that decisions are taken objectively and impartially, and that the respective operations are carried out under market conditions without any inappropriate benefit whatsoever for the Related Party in question, applying all the relevant internal control procedures;
 - iv) The establishment of a remunerations policy for specific functions, namely for individuals exercising the supervision and control functions, so as not to compromise the objectivity and independence attached to the exercise of these functions;
 - v) The establishment and maintenance of a comprehensive and up-to-date registry that records all Col addressed;
 - vi) Maintain a registry of all disclosures, which should be reviewed and updated regularly.⁷
2. In the field of Col at the Employee level, the Group requires the internal communication of situations that may result or have already resulted in a Col considering that it is a duty of the Employee. The Employee should also avoid situations that could give rise to Col.
3. This way, the Group must ensure that those having personal interests or exercise an activity outside the Bank must abstain from participating, or in any way influence, decisions or have other type of intervention able of favouring those interests or activities to the detriment of the interests of the Bank or its Stakeholders.
4. This duty is extended, especially, to the members of the governing bodies, including the committees providing support to those bodies, guaranteeing that all current or potential Col are duly documented and reported to the chairperson of the respective body and analysed, decided and managed in order to ensure the non-existence of situations able of harming the capacity of the members of the governing bodies of making objective and impartial decisions.
5. Another factor that must also be taken into consideration is the fact that there are Col which have a temporary nature and are related with a single event (for example, a

⁶ Entities must document the adopted procedures to identify Related Parties, as well as the update frequency and availability to supervisory authorities whenever requested.

⁷ The aforementioned in v) and vi) is ensured by the Compliance Office.

transaction, the selection of a service provider, etc.) which are able of being managed with a one-off measure. There are also Col that persist and must be managed on an ongoing basis.

6. The Group must establish procedures to effectively manage both ongoing and occasional conflicts, such as the establishment of barriers to prevent information flows between different departments or persons.

7. RELATED PARTIES

1. Group BCP Entities must approve a Related Parties Policy, that must include, at least, the following controls:
 - i. The definition of the criteria used for the identification of Related Parties;
 - ii. The description of the process used for the collection of information, generation, update and disclosure of Related Parties;
 - iii. The description of the decision process for transactions with Related Parties, as well as its related responsibilities and competencies.
2. BCP sends to its subsidiaries, on a quarterly basis, or whenever there is a new update, its Related Parties list in order to ensure that all Group BCP Entities may identify and ask BCP for a prior opinion before any operation with a BCP Related Party.
3. All Group BCP Entities share with BCP, on a quarterly basis, or whenever there is a new update, their Related Parties list.
4. Group BCP Entities must implement an approval circuit that ensures:
 - i. The approval, by the appropriate management body, after the opinion of the supervisory body, the risk management function and compliance function, of transaction with local Related Parties;
 - ii. The prior engagement with BCP, whenever transactions involve BCP Related Parties, for the issuance of a non-opposition opinion from BCP's management body.
5. All Group BCP Entities share with BCP, on a monthly basis, the description of transactions with local Related Parties that have been analyzed, including the description of the transactions and the issued opinion (explicitly stating if the transaction was approved or refused).
6. Group Entities may establish simplified approval procedures for specific transactions with local Related Parties, which must include the engagement with the compliance and risk management functions. These simplified procedures must account for the existence of thresholds and risk profile of transactions and must be approved by the management body after a prior opinion from the supervisory body.

8. INCENTIVES PAID OR RECEIVED IN PORTFOLIO MANAGEMENT OR PROVISION OF INVESTMENT SERVICES

Portfolio management and independent investment advisory service

1. In accordance with the applicable legal framework, Group Entities providing portfolio management or independent investment advisory services, will return, in full, to Clients any fees, commissions or any monetary benefits paid or provided by any third party or person acting on behalf of a third party in relation to the services provided to that Client as soon as reasonably possible after receipt.

2. Group Entities providing portfolio management or independent investment advisory service shall not accept non-monetary benefits that do not qualify as acceptable minor non-monetary benefits. Benefits qualify as acceptable minor non-monetary benefits only if they are:
 - i) Information or documentation relating to a financial instrument or an investment service, that is generic in nature or personalized to reflect the circumstances of an individual Client;
 - ii) Written material from a third party that is commissioned and paid for by a corporate issuer or potential issuer to promote a new issuance by the company, or where the third party firm is contractually engaged and paid by the issuer to produce such material on an ongoing basis, provided that the relationship is clearly disclosed in the material and that the material is made available at the same time to any investment firms wishing to receive it or to the general public;
 - iii) Participation in conferences, seminars and other training events on the benefits and features of a specific financial instrument or an investment service;
 - iv) Offers and other benefits or rewards established in the Code of Conduct ([GR0021](#)).
3. Acceptable minor non-monetary benefits shall be reasonable and proportionate and of such a scale that they are unlikely to influence the Entity behavior in any way that is detrimental to the interests of the relevant Client.

Other investment services

4. Group Entities paying or being paid any fee or commission or providing or being provided with any non-monetary benefit in connection with the provision of other investment services or ancillary services to the Client need to ensure that:
 - i) It is considered to enhance the quality of the service provided to the Client; and
 - ii) It does not interfere in the Entity's duty of acting in an honest, fair and professional manner in order to better serve its Client's interests.
5. A fee, commission or non-monetary benefit is designed to enhance the quality of the relevant service to the Client if all the following conditions are met:
 - i) It is justified by the provision of an additional or higher-level service to the relevant Client, proportional to the level of inducements received, such as:
 - a) the provision of non-independent investment advice and access to a wide range of suitable financial instruments including an appropriate number of instruments from third party product providers having no close links with the investment firm;
 - b) the provision of non-independent investment advice combined with either: (i) an offer to the Client, at least on an annual basis, to assess the continuing suitability of the financial instruments in which the Client has invested; (ii) or with another ongoing service that is likely to be of value to the Client, such as advice about the suggested optimal asset allocation of the Client; or
 - c) the provision of access, at a competitive price, to a wide range of financial instruments that are likely to meet the needs of the Client, including an appropriate number of instruments from third party product providers having no close links with the investment firm, together with either the provision of added-value tools, such as objective information tools helping the relevant Client to take investment decisions or enabling the relevant Client to monitor, model and adjust the range of financial instruments in which they have invested, or providing periodical reports of the performance and costs and charges associated with the financial instruments.
 - ii) It does not directly benefit the recipient Entity, its shareholders, or employees without tangible benefit to the relevant Client;

- iii) It is justified by the provision of an on-going benefit to the relevant Client in relation to an on-going inducement.
- 6. A fee, commission, or non-monetary benefit shall not be considered acceptable if the provision of relevant services to the Client is biased or distorted as a result of the fee, commission or non-monetary benefit.
- 7. Group Entities must keep evidence that any remunerations, fees, commissions, and non-monetary benefits paid or received are designed to increase the quality of the service in question provided to the Client.
- 8. Group Entities must also keep an internal list of all remunerations, fees, commissions, and non-monetary benefits received from a third party due to the provision of investment services or ancillary services, recording the way the remunerations, fees and non-monetary benefits are paid or received or those the Entity intends to use, can improve the quality of the services provided to the Clients in question, as well as the measures adopted to enable the Entity to comply with its duty to act in an honest, fair and professional manner, serving its Client's best interests.
- 9. Before providing the investment or ancillary service in question, the Group Entities discloses to the Client information on any payment or benefit received from third parties or paid to third parties, without damaging the observance of the remaining applicable information duties.

Investment research

- 10. The production of investment research by third parties to the Group Entities providing portfolio management or other investment or ancillary services to Clients is not considered an incentive if Group Entities make direct payments using their own resources or in accordance with the rules previewed in that Entities jurisdiction.⁸

9. GIFTS AND EXTRAPROFESSIONAL ACTIVITIES

- 1. The acceptance of gifts must comply with the provisions of the Code of Conduct ([GR0021](#)), and the following rules must be observed by all employees, including the members of the governing bodies of the Group BCP:
 - i) Any Employee, including members of the managing bodies of the Group BCP, must refrain from accepting, for their own benefit or that of third parties, offers and other benefits or rewards in any way related to the functions performed, and they must be refused and returned, except as provided for in the following paragraph;
 - ii) The above-mentioned persons may accept offers and other benefits or rewards of mere hospitality in accordance with social uses, provided that they do not constitute a material or non-patrimonial Advantage and within the limits present in [GR0021](#);
 - iii) Any and all offers, and other benefits or rewards must be communicated to the Compliance Office, for analysis regarding the form of performance and corresponding registration.
- 2. Situations of Col from the accumulation of functions by any Employee or the performance of activities not related to the Group are governed by the provisions of the Code of Conduct ([GR0021](#)):
 - i) Any of the people covered by this regulation must, prior to the acceptance of a function or position to be held in conjunction with the position held at the Bank, inform the human resources area of the Entity⁹, so that it can issue an opinion on

⁸ As transposed from article 13 of Commission Delegated Directive (EU) 2017/593 or other applicable and equivalent regulation.

⁹ In Portugal the Human Resources Department.

the specific situation, requiring an opinion of the Compliance Office and of the Member of the Board of Directors that is responsible for that Employee's area of special responsibility;

- ii) When Compliance Office issues the above-mentioned opinion on the non-incompatibility it may list any mitigating measures to which the Employee or any other person covered by this regulation is subject by the accumulation of position;
- iii) Any change in circumstances regarding the position or function held in accumulation with the functions exercised at the Bank by the people identified in i) above, must be communicated immediately to the human resources area for it to carry out the respective assessment.

10. PROCEDURES FOR THE IDENTIFICATION OF SITUATIONS OF CONFLICTS OF INTEREST

1. The Compliance Office is responsible for the development of the approaches and methods enabling the identification of Col.
2. The procedure for the identification of Col should be based on the intervention by the Compliance Office in the assessment of changes to the supply of products and services, in the context of the Policy for the Approval of New Products (PANP) ([GRO033](#)), changes of operating procedures, changes of the organizational structure and in the assessment of operations with "Related Parties", as well as other situations which may trigger Col.
3. The Compliance Office should, at least once a year, carry out a global analysis to identify situations of Col at an institutional level and report to the Board of Directors and to the Audit Committee its respective findings, identifying the measures necessary to correct the situations therein identified.
4. This analysis should also include the assessment on the persistence of situations of Col that last in time and which have been previously identified and recorded, especially in cases when the Col situation was accepted.
5. The Entity must produce a quarterly report identifying the Col situations and the respective mitigation measures.

11. INTERNAL COMMUNICATION OF CONFLICTS OF INTEREST

1. In a situation of current or potential Col, the Employee must immediately inform his superior¹⁰, who must analyse it and if he considers it necessary to send it to the human resources area of the Entity.
2. The reporting of Col situations made by the hierarchical superior as well as by any Employee, must present a minimum content of the information to be transmitted for the assessment on the existence of a conflict situation, current or potential, including a description as detailed as possible of the facts that constitute the conflict and the identification of all the involved parties.
3. All situations reported by this means will be analyzed by the Compliance Office which will develop the necessary steps to assess the reported situation, informing the relevant Departments and the Audit Committee of the respective conclusions.
4. For the situations identified or reported by any other via, the Entities keep a specific registry indicating, among other relevant information, the respective measure adopted,

¹⁰ If the hierarchical superior is involved in a Col situation, he/ she must report the situation to the Entity's Compliance Office.

namely if the Col was eliminated, satisfactorily mitigated or was disclosed to the Clients, in order to allow its continuous monitoring and evaluation.

5. Concerning the members of the corporate bodies of the Group Entities, the secretariat and support areas for the corporate bodies of the same¹¹, must keep a record of all relationships, including those involving the direct family members of the governing bodies, and must be subsequently updated and registered in the Bank's computer system.

12. MANAGEMENT OF CONFLICTS OF INTEREST

1. The Group assumes, as a general rule, that, and whenever possible, when a situation of Col is identified, the same must be promptly and satisfactorily eliminated or mitigated.
2. The procedures mentioned hereinafter and the measures to adopt were conceived in a way so as to ensure that "Relevant Persons" involved in different commercial activities which imply a situation of Col able of damaging the interests of one or more Clients, exercise those activities with a level of independence that matches the size and the activities of the Group and the risk of damaging the interests of Clients.
3. Entities belonging to the Group BCP must ensure adequate segregation of duties, assigning to different people the activities that give rise to Col in the processing of operations or the provision of services, or assigning the responsibilities of supervising and reporting conflicting activities to different people.
4. In effect, and in order to ensure the required level of independence, the Group:
 - i) Establishes procedures to prevent or control the exchange of information between "Relevant Parties" engaged in activities involving a risk of a Col, whenever the exchange of that information may damage the interests of one or more Clients;
 - ii) Defines that there isn't a direct link between the remuneration of "Relevant Parties" mainly involved in one activity and the remuneration or revenues generated by different "Relevant Parties" involved in another activity, wherein a Col may arise in relation to those activities;
 - iii) Introduces measures to prevent or limit the exercise by any person of inappropriate influence on the way according to which a "Relevant Party" carries out investment or ancillary services or activities;
 - iv) Adopts measures to prevent or control the simultaneous or sequential involvement of a "Relevant Party" in services or activities, other than investment or ancillary services or activities, and where such involvement may compromise the satisfactory management of Col.
5. The Bank and the Group's Relevant Parties keep and regularly update a record of the types of investment or ancillary services, or investment activities carried out by the entities, or on their behalf, which originated a Col implying a material risk of damage to the interests of one or more Clients or, in the case of an ongoing service or activity wherein a Col is likely to happen.
6. In cases where a Col becomes current, the Bank (or any Entity) takes prompt action to eliminate or mitigate the conflict, including the procedures mentioned in point 3 of this chapter.
7. In the event of non-compliance with the mitigation measures issued by the Bank's bodies (or the Entity) or in case of non-communication of a Col, the Compliance Office shall inform the Audit Committee in order to evaluate the incident and the need to apply additional measures.

¹¹ In Portugal, the Company Secretariat.

13. SITUATIONS OF CONFLICTS OF INTEREST - DISCLOSURE

1. Whenever the organizational or administrative arrangements adopted by the Entities to avoid Col which may harm the interests of its Clients are not sufficient, the entity in question shall clearly inform the Client, before making a transaction on his/her/its behalf, on the general nature and/or sources of Col and on the measures adopted to mitigate those risks.
2. The information is provided to the Client in a lasting support and is, taking into account the Client's nature, sufficiently detailed to enable the Client to make an informed decision with respect to the investment or ancillary service in the context of which the Col arises. This disclosure made to the Client:
 - i) Clearly indicates that the organizational and administrative mechanisms set forth by the Entity to prevent or manage that conflict are not sufficient to ensure, with a reasonable degree of certainty, that the risk of damaging the Client interests will be avoided;
 - ii) Includes a specific description of the Col that may arise in the provision of investment services and/or ancillary services, taking into account the nature of the Client to whom the disclosure is addressed to;
 - iii) Explains the general nature and the different origins of the Col as well as the risks for the Client arising from Col situations and the measures adopted to mitigate those risks, with a sufficient degree of detail in order to enable that Client to make an informed decision regarding the investment or ancillary service wherein Col may arise.

14. FINAL PROVISIONS

Publication

This Policy is disclosed and is permanently available to all employees through the internal website and is publicly disclosed at the Entity's website www.millenniumbcp.pt.

Approval Date: 31/07/2024

Body that approved: Board of Directors

Main changes to previously published content: In Chapter 1 there is an update on the EBA Guidelines that are considered applicable; In Chapter 3 it is now included service providers within the entities that are covered by the scope of this policy; In Chapter 4 is organized alphabetically; In Chapters 5 and 6 it is included some circumstances and requirements that stem from Banco de Portugal regulation and from EBA Guidelines; In Chapter 7 there is a new paragraph pertaining the procedures concerning simplified approval procedures; In Chapter 8 there is a clarification between portfolio management / independent investment advisory service and other investment services