Banco Montepio

SUSTAINABILITY POLICY

CONTENTS

I – CONTEXT

Sustainability is a structural pillar of Banco Montepio's identity, strategy and governance model. Reflecting its mutualist nature, the Bank has long promoted economic and social development in a responsible and inclusive manner, based on the creation of shared value, proximity to people and social cohesion. These principles are reflected in an integrated approach to sustainability, corporate social responsibility and environmental, social and governance (ESG) factors.

In a context of profound economic, social and environmental transformation, together with an evolving European regulatory and prudential framework, sustainability, as an overarching concept underpinning the sustainable development agenda, is assuming increasing strategic relevance within the banking sector. The growing integration of ESG factors into governance, strategy, risk management and decision-making processes, coupled with enhanced transparency and reporting requirements, calls for the adoption of clear and consistent governance models aligned with international best practices.

This Policy establishes the overarching framework for Banco Montepio and the entities comprising the Banco Montepio Group (GBM or Group) in matters relating to sustainability, corporate social responsibility, ESG and environmental factors. It defines guiding principles, responsibilities and implementation guidelines within an integrated and coherent approach, contributing to prudent conduct and reaffirming the Group's commitment to creating sustainable value over the medium and long term across all dimensions of its activities.

It also establishes common principles and guidelines for the development, implementation and coordination of ESG-related policies, plans and programmes, ensuring internal consistency, proportionality and alignment with the Sustainability Strategy and the Group's overall governance.

With regard to environmental and climate-related matters, the Group operationalises its commitment to climate change mitigation and adaptation through specific instruments. These include the Decarbonisation Plan, which sets targets and pathways for reducing greenhouse gas (GHG) emissions across its own operations and value chain, including financed emissions where applicable. The Plan is implemented in coordination with the Sustainability Strategy, risk management framework and applicable policies.

This governance model is aligned with other relevant policies, internal regulations and statements of commitment relating to sustainability, including the ESG Risk Management Policy, the Credit and Investment Policies, the Diversity and Inclusion Policy, the Code of Ethics and Conduct, internal governance regulations, and the public commitments undertaken by Banco Montepio and GBM. It does not replace or override those instruments but ensures their coherence and integration within the overall sustainability governance framework.

II – SCOPE

The Sustainability Policy applies to the Banco Montepio Group (GBM or Group), binding Banco Montepio and all Group entities within its consolidation perimeter. Its application is guided by the principle of proportionality, considering the corresponding governance models, organisational structures, size, complexity and nature of their activities, in accordance with the legal and regulatory framework applicable to each entity.

This Policy is adopted in full by all Group entities, without requiring transposition. Each entity is responsible for ensuring its effective implementation and operationalisation, in compliance with its respective governance model and organisational and functional specificities.

Where the bodies, committees or organisational units to which specific responsibilities are assigned under this Policy have not been established, or where no direct equivalent exists within a Group entity's organisational structure, such responsibilities shall be assumed by the governing body or functionally equivalent unit, as determined by the respective management body, to ensure functional continuity, segregation of duties and consistency with the sustainability governance model and the guiding principles established herein.

III – GUIDING PRINCIPLES

The Group's activities in the field of sustainability are guided by the principles set out below, which support the integration of environmental, social and governance (ESG) factors into strategy, governance, operations and stakeholder engagement, in line with its mutualist profile, the applicable prudential framework and international best practices.

a) **Creation of sustainable value in the medium and long term** – Sustainability is embedded in decision-making from a medium- and long-term perspective, with the objective of strengthening the resilience of the business model, financial soundness and the creation of shared value for stakeholders.

b) **Cross-cutting integration and strategic coherence** – ESG factors are integrated across the Group's strategy, policies, processes and key decisions, ensuring coherence between strategic direction, executive decision-making, operational execution and risk management.

c) **Social responsibility and positive impact** – The Group promotes responsible, inclusive and socially relevant conduct, contributing to social cohesion, financial inclusion, community development and the reduction of inequalities, in line with its mutualist vocation and corporate social responsibility principles.

d) **Prudent management of ESG risks and opportunities** – Risks and opportunities associated with ESG factors are identified, assessed and integrated into risk management processes, in coordination with the ESG Risk Management Policy and other applicable frameworks, ensuring a prudent and proportionate approach aligned with the Three Lines of Defence model.

e) **Responsible financing and investment** – The Group's financing and investment activities are guided by sustainability principles, promoting positive societal outcomes and contributing to the mitigation of environmental impacts. They also support the prudent management of ethical, environmental, social and governance risks and factors, including, where applicable, the consideration of climate transition pathways and the progressive management of emissions profiles associated with financing and investment activities, in line with approved instruments and targets. Within this framework, the following principles apply:

   i) Principle of coherence – ensuring alignment of decisions with the international sustainability commitments and principles adopted by the Group;

   ii) Principle of precaution – avoiding support for activities likely to generate significant adverse impacts and applying enhanced ESG risk assessments where appropriate;

   iii) Principle of positive conditionality – promoting sustainable transition through financing and investment solutions that incentivise responsible practices, environmental innovation and positive social impact, including support for sectors or activities in transition, provided that they are subject to enhanced ESG criteria.

These principles are operationalised through specific policies, processes and instruments applicable to financing, investment and risk management activities, without replacing or superseding internal regulations.

f) **Good governance, ethics and integrity** – The Group's approach to sustainability is based on high standards of ethics, transparency and integrity, ensuring appropriate segregation of duties, clear accountability and a robust governance framework.

g) **Proportionality, transparency and continuous improvement** – The implementation of sustainability is guided by the principle of proportionality, considering the nature, scale and complexity of the Group's activities, and is subject to ongoing monitoring, continuous improvement, and appropriate communication and transparency towards relevant stakeholders.

IV – PILLARS OF THE SUSTAINABILITY STRATEGY

The Group's Sustainability Strategy is structured around four (4) pillars that support the implementation of sustainability principles and the Group's commitment to corporate social responsibility, ensuring the integration of environmental, social and governance (ESG) factors into value creation, in a manner proportionate to the specificities of each Group entity and to the extent permitted by available data and established processes.

a) People

The Group promotes socially responsible conduct and places people and communities at the centre of its sustainability approach, namely through:

I. Supporting the communities in which it operates by strengthening partnerships and initiatives that promote social inclusion, community development and social cohesion.

II. Promoting an organisational culture based on diversity, social mobility, equity and inclusion, as well as the well-being of its people, employees and other workers, including work-life balance, while respecting work organisation models agreed between the parties.

III. Promoting gender equality and equal opportunities in access to training, professional development and management and leadership roles.

IV. Supporting the continuous development and upskilling of its people, in alignment with the evolution of the banking sector and the present and future needs of clients.

V. Respecting human rights in its operations and across the value chain, including the rejection of any form of harassment, violence, discrimination, forced labour or child labour.

b) Planet

The Group promotes the integration of environmental and climate considerations into its activities, contributing to climate change mitigation and adaptation, the management of environmental and climate risks and the sustainable transition of the economy, in line with applicable international frameworks and the prudential framework of the banking sector, by:

I. Integrating environmental and climate considerations into strategy, governance, strategic planning, the business model and the Group's activities, including the identification, assessment and management of risks associated with climate change.

II. Managing and reducing the environmental footprint associated with its own operations, including direct and indirect GHG emissions associated with those operations, in accordance with recognised international frameworks, and promoting energy efficiency and the use of renewable energy sources.

III. Considering environmental and climate impacts across the value chain, including relevant indirect GHG emissions, including those associated with financing and investment activities, in accordance with recognised international frameworks and in coordination with risk management, strategic planning and other applicable policies or internal rules.

IV. Contributing to the energy transition and the decarbonisation of the economy by supporting clients in their transition processes and progressively integrating environmental criteria into financing and investment decisions, in line with the Group's strategy and risk profile.

These guidelines are implemented through instruments such as the Bank's Decarbonisation Plan, which establishes targets, pathways and priorities for reducing emissions associated with its own operations and financing and investment activities.

c) Principles of Governance

The Group conducts its activities in accordance with principles of ethics, integrity and transparency in corporate governance, supported by an appropriate framework of policies, procedures and oversight mechanisms, while recognising that ESG factors and ESG-related risks may significantly affect its activities, clients and other stakeholders, and that their management is essential to the long-term resilience of its business model. In particular, the Group is guided by:

I. Alignment with applicable international practices in the areas of integrity, ethics and the prevention of unlawful conduct.

II. Integration of ESG factors into risk management processes, strategic planning and operational control, as well as into the Group's activities, organisational culture and relationships with counterparties and suppliers.

III. Promotion of a governance culture based on ethics, transparency and accountability, including disclosure of sustainability and corporate social responsibility performance.

IV. Protection of clients and other stakeholders, notably through digital security mechanisms, data protection and information quality.

V. Accountability of governing bodies and management structures for fulfilling their fiduciary duties towards stakeholders and complying with this Policy, sustainability practices and applicable legislation.

d) Prosperity

The Group contributes to a strong, inclusive and sustainable economy by supporting households, businesses, the social economy and local communities, and by promoting the creation of long-term economic value, in line with its mutualist roots, through:

I. Aligning business objectives with the needs of the communities in which it operates, ensuring service quality and a culture of continuous improvement based on dialogue with stakeholders.

II. Supporting the Social and Solidarity Economy, social entrepreneurship and social innovation through tailored financial solutions and partnerships with organisations in the social and solidarity sector.

III. Promoting innovation and the technological transformation of clients and the Group's own activities.

IV. Participating in internal and external discussions on sustainability and relevant strategic matters, contributing to the dissemination of best practices and to a sustainable economic and social transition.

V – CHIEF SUSTAINABILITY OFFICER (CSO)

In line with international practices in sustainability governance within the financial sector, the Chief Sustainability Officer (CSO) role has been established to lead the ESG strategy and support the integration of environmental, social and governance considerations across Banco Montepio and GBM.

The CSO is appointed by the Executive Committee. The role is performed *ex officio* by the Sustainability Office (GS), acting as the corporate function responsible for sustainability coordination, strategic integration and reporting.

The CSO reports hierarchically to the Executive Committee and is responsible for defining, coordinating and implementing the Sustainability Strategy, consolidating ESG information and preparing sustainability reporting, including compliance with the regulatory requirements referred to in the Sustainability Governance Model section of this Policy. In addition, the CSO may, where applicable, monitor the Group-wide implementation of climate transition instruments, including the Decarbonisation Plan, in coordination with the relevant governance structures.

VI – SUSTAINABILITY GOVERNANCE MODEL

The corporate sustainability governance model is based on recognised international practices and recommendations and is designed to ensure the integration of ESG factors into strategic planning, decision-making, business models, risk management and day-to-day operations. It is structured around the separation of oversight, executive decision-making, strategic integration, operational execution and control functions, in line with the Three Lines of Defence principle, and is applied proportionately across the Group's entities.

Aligned with the Group's sustainability-related policies, internal regulations and statements of commitment, the model provides a coherent framework for their implementation and articulation. These include the ESG Risk Management, Credit and Investment, and Diversity and Inclusion Policies; the Code of Ethics and Conduct; internal governance rules; and the public commitments adopted by Banco Montepio and GBM. The model does not replace or override these instruments; rather, it provides a coherent framework through which they are implemented and applied.

Board of Directors (BoD)

The Board of Directors is responsible for the oversight of sustainability matters, within the scope of its internal governance responsibilities and with the support of specialised committees established for this purpose, namely:

a) Approving the Sustainability Policy and the Sustainability Strategy at Group level.

b) Monitoring the integration of ESG factors into strategy, the governance model and risk management.

c) Overseeing ESG performance and key ESG risks and opportunities from a long-term perspective.

d) Approving the appointment of the CSO, an executive officer of Banco Montepio with a Group-wide mandate in sustainability, ESG and corporate social responsibility and managerial responsibility for the Sustainability Office (GS).

Evaluation, Nominations, Ethics, Sustainability and Governance Committee (CANESG)

CANESG supports the Board of Directors in carrying out these responsibilities, having regard to the long-term interests of the institution, the interests of its stakeholders and the public interest.

Executive Committee (ExCo)

The Executive Committee holds delegated responsibility for executive management, decision-making and monitoring the implementation of the Sustainability Strategy. It ensures the integration of ESG factors into management processes, the institution's positioning on sustainability matters and the development of a business model and financial offering aligned with ESG principles.

The Sustainability Committee (COMSESG), delegated by the Executive Committee, operates at Group level and brings together representatives from relevant business and support areas and from the entities within its scope. It is responsible for monitoring:

a) Strategy, planning and performance in sustainability, sustainable finance, ESG and corporate social responsibility.

b) Implementation of policies, voluntary codes and Group-wide initiatives, as well as integration of sustainability principles into management, organisational culture and operations.

Chief Sustainability Officer (CSO) / Sustainability Office (GS)

The Group's sustainability function is led by the CSO and operationalised through the Sustainability Office (GS), which acts as the corporate unit for coordination and strategic integration. It supports governance bodies and the relevant areas of the Bank and Group, in coordination with the different lines of defence and while safeguarding the independence of control functions. Its responsibilities include:

a) Proposing to the Executive Committee, for subsequent approval by the Board of Directors, the Sustainability Strategy of Banco Montepio and GBM, as well as the corresponding sustainability master plans.

b) Coordinating the development and implementation of the Sustainability Strategy and Sustainability Master Plan, ensuring coordination with business areas, risk functions and other relevant structures.

c) Ensuring coordination with COMSESG and functional alignment with specialised committees in sustainability, ESG and sustainable finance.

d) Supporting the integration of ESG factors into strategy, business model, planning and risk management, in coordination with the competent functions.

e) Coordinating, in conjunction with GS and relevant areas, materiality and double materiality assessments at BM and GBM levels.

f) Representing, by delegation of the Executive Committee, Banco Montepio and GBM in forums, initiatives and external commitments related to sustainability, ESG and sustainable finance.

g) Monitoring commitments undertaken with national and international entities, as well as developments in best practices and relevant trends.

h) Performing any other duties assigned by the Executive Committee or Board of Directors within the scope of this Policy.

The CSO safeguards the functional independence of risk, compliance and internal audit functions and maintains appropriate coordination on matters related to double materiality, ESG risk management and regulatory compliance.

Business Areas and Other Organisational Units

Business areas and other organisational units are responsible for the operational execution of the Sustainability Strategy, integrating ESG factors into day-to-day activities, products and services, internal processes, and relationships with clients, suppliers and other relevant stakeholders, including ESG due diligence in financing and investment activities. They are also responsible for implementing the established guidelines and ensuring the availability of the necessary resources and capabilities.

Risk and Compliance Functions

The above-mentioned functions are responsible for defining frameworks, methodologies and limits; monitoring and validating ESG risks, including climate and environmental risks; and ensuring compliance with applicable regulatory requirements, in accordance with the ESG Risk Management Policy and other applicable internal regulations.

Internal Audit Function

The Internal Audit Function is responsible for independently assessing the adequacy and effectiveness of the sustainability governance model, the related internal controls and the underlying governance and management processes.

VII – CORPORATE SOCIAL RESPONSIBILITY

Corporate Social Responsibility (CSR) is an integral part of the GBM Sustainability Strategy, supporting the creation of social value, financial inclusion, and social and territorial cohesion. The definition, implementation and monitoring of CSR initiatives are undertaken within the sustainability governance framework, in alignment with the Group's relevant policies and commitments and in accordance with the principle of proportionality and the Group's approved strategic guidelines.

CSR initiatives are implemented, monitored and disclosed through dedicated instruments and programmes and are therefore not further developed in this Policy.

VIII – PERFORMANCE, MONITORING AND REPORTING

Corporate sustainability performance is managed through a coordinated and proportionate approach, aligned with the Sustainability Strategy, the governance model and applicable internal standards, under the coordination of Banco Montepio as the Group's lead entity.

The Policy is implemented through the Sustainability Master Plan, approved annually and tailored to the characteristics of the Group's entities, reflecting their size, complexity and business model while supporting the implementation of the strategic sustainability pillars.

Banco Montepio is responsible for consolidating information required for governance, monitoring and reporting purposes, incorporating contributions from Group entities in a proportionate manner and in accordance with the segregation of duties across the different lines of defence. Consolidated information is disclosed in the Management Report, which forms part of the Annual Report and Accounts, and, where relevant, through other institutional disclosures, in accordance with applicable legal and regulatory requirements. Sustainability reporting required for regulatory compliance, together with the independent external assurance of sustainability information, is carried out by an external entity in accordance with applicable legal and regulatory requirements.

Strategic sustainability coordination at Group level is ensured by the Sustainability Office (GS), in accordance with the established governance model.

IX – COMMUNICATION AND STAKEHOLDER ENGAGEMENT

Communication and engagement with stakeholders play a key role in the Group's approach to sustainability, promoting transparency, structured dialogue and the consideration of relevant expectations in the definition and implementation of the Sustainability Strategy.

For the purposes of materiality assessment, Banco Montepio coordinates stakeholder engagement in support of the identification of risks, impacts and opportunities, as well as the quality of disclosed information.

Stakeholder engagement is governed through the Statement of Commitment on Stakeholder Engagement, which sets out the relevant principles, objectives and mechanisms and is aligned with this Policy and the sustainability governance model.

X – CONTACT POINT

For additional information regarding this Policy or sustainability matters, the Sustainability Office (GS) should be contacted at: gabinetesustentabilidade@bancomontepio.pt.

XI – DOCUMENTATION AND RETENTION

Documentation relating to the implementation of this Policy is retained on a durable medium that enables its faithful and complete reproduction, in accordance with document management rules, internal personal data protection regulations, and applicable legal retention requirements.

XII – FINAL PROVISIONS

The Sustainability Office (GS) is responsible for reviewing this Policy and submitting it for approval by the Board of Directors (BoD), following prior submission to the Executive Committee (ExCo) and consideration by CANESG.

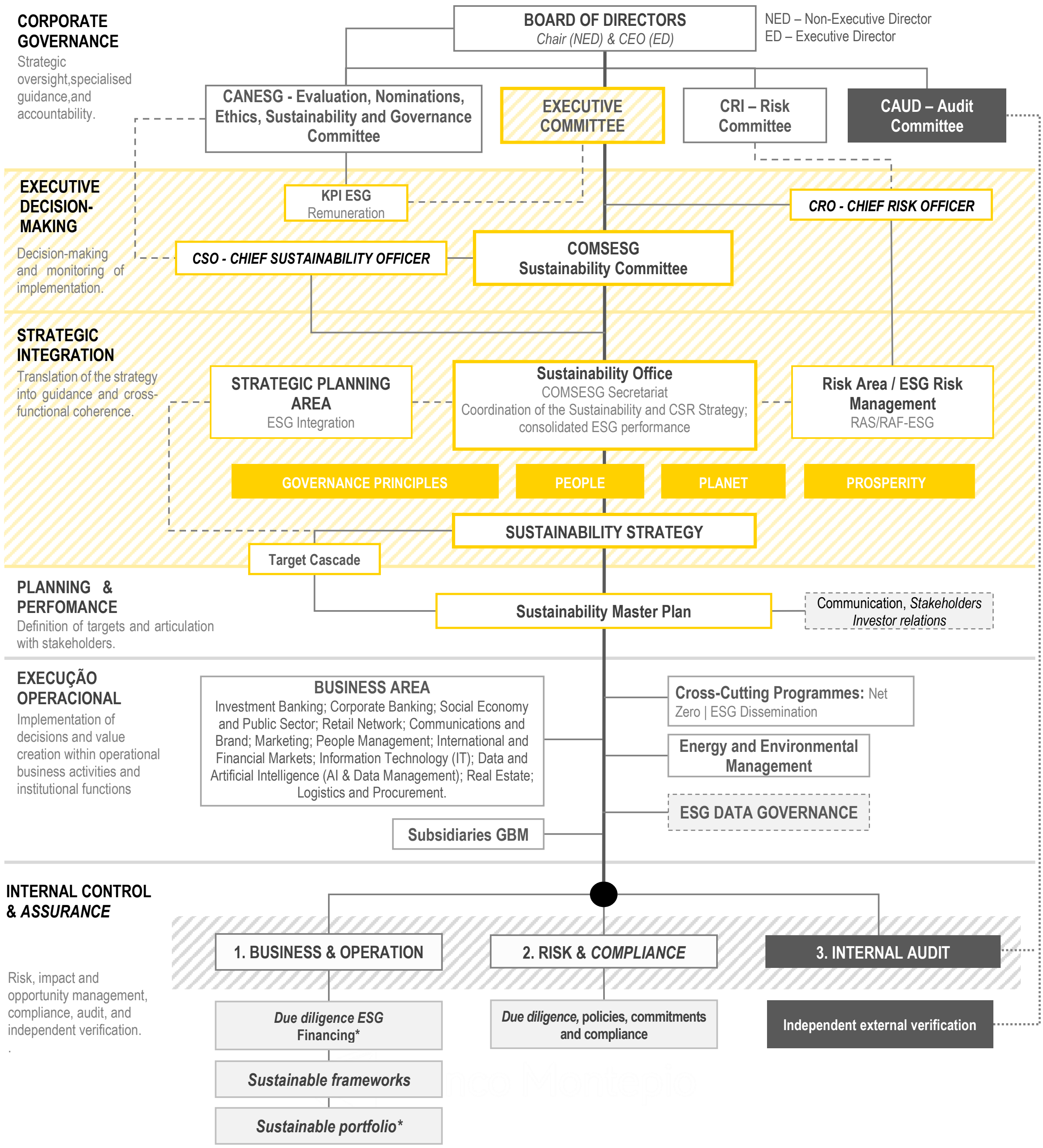
This Policy is reviewed every three (3) years or whenever deemed necessary.

It is disclosed through publication on BM's Intranet and public website, as well as on the websites of the GBM entities.

The Corporate Governance Department (DGC) formally communicates the Sustainability Policy to the governing bodies of the GBM entities, which are responsible for its adoption and disclosure, in accordance with the principle of proportionality and the terms set out herein.

This Policy enters into force on the business day following its publication.

ANNEX I – SUSTAINABILITY GOVERNANCE MODEL



*UNDER DEVELOPMENT AND UNDER THE SUPERVISION OF THE BOARD OF DIRECTORS.

ANNEX II – INTERNATIONAL STANDARDS AND COMMITMENTS

This Sustainability Policy is aligned with and informed by widely recognised international and European frameworks that guide best practices in sustainability, governance, human rights, and corporate responsibility, including:

a) **United Nations and related instruments**

   i. **United Nations Global Compact (UNGC)** – principles in the areas of human rights, labour, environment, and anti-corruption;

   ii. **Sustainable Development Goals (SDGs)** – 2030 Agenda;

   iii. **United Nations Guiding Principles on Business and Human Rights (UNGPs)** – “Protect, Respect and Remedy”;

   iv. **Women’s Empowerment Principles (WEPs)** – promoting women’s empowerment in the workplace, marketplace, and community.

b) **Governance and value creation best practices**

   i. **Charter for Responsible Business**, issued by the World Savings and Retail Banking Institute (WSBI) and the European Savings and Retail Banking Group (ESBG);

   ii. **World Economic Forum (WEF) – Stakeholder Capitalism Metrics** (as a reference framework for measuring and communicating stakeholder value creation, where applicable).

c) **Relevant prudential and sectoral frameworks (supporting the banking context)**

   i. **EBA and ECB prudential guidelines** on ESG risk integration (providing guidance on governance, risk integration, and internal control, without prejudice to specific applicable regulations).

Note: The selection and application of these frameworks are undertaken in a proportionate manner and in alignment with the internal regulations of Banco Montepio and the Group’s entities.

ANNEX III – RELATED POLICIES, COMMITMENTS AND SUPPORTING TOOLS

Without prejudice to other applicable requirements, this Policy is aligned with the following policies, commitments and implementation instruments, as illustrated below:

1) Corporate policies and codes (structural frameworks)
   i. Code of Ethics and Conduct
   ii. Diversity and Inclusion Policy
   iii. ESG Risk Management Policy
2) Thematic statements of commitment (policy-related statements)
   i. Human Rights Statement
   ii. Environmental Statement
   iii. Sustainability Commitment for Suppliers
   iv. Statement of Commitment on Stakeholder Engagement
   v. Social Commitment Charter
   vi. Commitments and principles adopted by Banco Montepio, at national and international levels, which can be consulted in documents and other information made available through official channels.
3) Implementation and reporting instruments (execution tools)
   i. Sustainability Master Plan (approved annually and coordinated by Banco Montepio as the Group's lead entity);
   ii. The Group's Decarbonisation Plan, which establishes targets, pathways, and priorities for reducing emissions associated with its own operations and financing and investment activities;
   iii. Management Report, which forms part of the Annual Report and Accounts, and other applicable disclosures, including sustainability reporting where applicable.

ANNEX IV – GLOSSARY

Note: This list is indicative and may be updated to reflect changes to the internal governance framework, applicable commitments and regulatory requirements.

Sustainability	The integration of environmental, social, and governance dimensions, aimed at creating long-term value and promoting economic and social development without compromising environmental balance.
Sustainable Development	Development that meets the needs of present generations without compromising the ability of future generations to meet their own needs.
ESG – *Environmental, Social, and Governance*	The set of environmental, social, and governance factors considered relevant for assessing the institution's sustainable performance and that of its activities.
Environmental Impact	Any change, whether positive or negative, direct or indirect, in the environment resulting from the institution's activities, products, services, or value chain.
Climate Change	Changes in climate patterns caused by natural processes or human activity, with significant impacts on environmental, economic, and social resilience.
Sustainable Finance	Financial practices, products, and decisions that integrate environmental, social, and governance criteria, promoting the transition to a sustainable economy.
Energy Efficiency	The set of practices or technologies aimed at reducing energy consumption while maintaining the quality and performance levels of operations.
Human Rights	The set of internationally recognised fundamental rights and freedoms that the institution seeks to respect throughout its operations and value chain.
Diversity, Equity and Inclusion (DEI)	The principle of promoting equal opportunities, representation, respect, and inclusion, ensuring a fair and non-discriminatory working environment.
Gender Equality	The principle that ensures equal access to opportunities, participation, career progression, remuneration, and leadership roles regardless of gender.
Social Economy	The set of organisations whose activities aim to create social and community value, with a positive impact on people and society.
ESG Risk	Any actual or potential risk arising from environmental, social, or governance factors that may affect the institution's activities, reputation, counterparties, clients, or performance.
ESG Risk Management	The process aimed at identifying, assessing, monitoring, and mitigating ESG risks, integrating them into decision-making processes and management culture.
Environmental Risk Management	The continuous, systematic, and integrated process of identifying, assessing, monitoring, and mitigating risks arising from environmental factors - such as ecosystem degradation, pollution, natural resource scarcity, and biodiversity loss - with potential impacts on the institution's operations, assets, value chain, counterparties, reputation, or business continuity.
Climate Risk Management	The structured and ongoing process aimed at identifying, assessing, monitoring, and mitigating risks arising from climate change, including both physical and transition risks, ensuring the resilience of the institution's operations, business models, portfolios, and counterparties.
Corporate Governance	The set of structures, practices, and processes that ensure the ethical, transparent, and responsible management of the institution.
Regulatory Compliance	Compliance with the legal, regulatory, and internal requirements applicable to the matters covered by this Policy.

Business Ethics	The set of principles and values that guide the responsible conduct of the institution and its people, in alignment with the Code of Ethics and Conduct.
Anti-Corruption	The set of mechanisms aimed at preventing and mitigating practices such as corruption, bribery, fraud, money laundering, and terrorist financing.
Data Protection / Digital Security	The set of measures aimed at ensuring the security, integrity, and confidentiality of personal data and information assets processed or managed by the institution.
Stakeholders	All entities, individuals, or organisations that may influence or be influenced - directly or indirectly, positively or negatively - by the institution's activities.
Value Chain	The set of internal and external activities that contribute to the delivery of the institution's services, including suppliers, partners, and other related entities.
Dercarbonisation Plan	A corporate instrument that establishes, over a defined time horizon, the targets, pathways, and initiatives for reducing greenhouse gas (GHG) emissions associated with the institution's own operations and value chain, including, where applicable, financed emissions, ensuring their integration into planning and decision-making processes and their monitoring through appropriate tracking and reporting mechanisms.

Version Control

Version	Revision Objective	Review Date	Effective Date	Summary of Revisions
V0.2023	Initial version	2023	2023	N/A
V1.2026	Strengthening of the Sustainability Governance Framework	MAY, 2026	19 JUN 2026	• Introduction of the Sustainability Governance Model; • Formalisation of the Chief Sustainability Officer (CSO) function; • Reinforcement of the Policy's application across Group entities.

Banco Montepio

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