

Introduction

Banco Comercial Português, S.A., (hereinafter referred to as “Company, Bank, BCP, Millennium bcp”) structured this Corporate Governance Report regarding the financial year of 2020 (hereinafter referred to as “Report”), in compliance with the principles and recommendations of the Corporate Governance Code issued by Instituto Português de Corporate Governance (IPCG) that adopted in 2020, and in compliance with the guidelines set forth in circular from CMVM - “The supervision of the of the Corporate Governance recommendations regime - new rules and procedures for 2019”, of 11 January 2019 - and the Attachment to the CMVM Regulations 4/2013 of August 1 2013.

Were also taken into account, among other, the following rulings: the Legal framework for Credit Institutions and Financial Companies (LFCIFC), the Securities Code (SC) , with the alterations introduced by Law 50/2020 of August 25, the Companies Code, Law 62/2017 of 1 August, Law Nr. 15/2019 of February 12, the Regulation of CMVM 7/2018, the guidelines from the European Banking Authority EBA/GL/2017/11, EBA/GL/2017/12, both from 26 September 2017 and the EBA/GL/2015/22, 27/06/2016, the Regulation (EU) 596/2014 of 16 April 2014, the Implementing Regulation (EU) 2016/523 from the Commission of 10 March 2016 and the Delegated- Regulation (EU) 604/2014 of the Commission of 4/3/2014, amended by the Delegated Regulation 2016/861 of 18 February 2016.

In July 2020, Banco de Portugal issued the Notice 3/2020 with the purpose of handling, in an integrated manner, and further detail the several matters related with organizational culture, corporate governance and internal control. This new Notice establishes a six-month deadline for institutions to adopt its provisions and, therefore, its full adoption will only have an impact on the 2021 financial year. We must, however, underline that the Bank has already complied, in 2020, with several of the procedures imposed by the new notice, namely those deriving from the EBA guidelines, which are now materialised and deepen by Banco de Portugal and, to that purpose, and before the approval of this report, in 2020, BCP will adopt, observing the principle of proportionality and adequacy, the new procedures established by the Portuguese regulator, in terms of its corporate governance model and those new procedures will be part of the 2021 corporate governance report.

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This Report is composed of two parts:

PART I - Items 1 to 92 of Annex I of the CMVM Regulation 4/2013 - regarding information on the shareholding structure, company’s organization and governance, including information regarding the recommendations from the Corporate Governance Code from IPCG which do not have corresponding text in those Regulations.

PART II - Evaluation of the Compliance with the Recommendations and sub-recommendations from the Corporate Governance Code from IPCG.