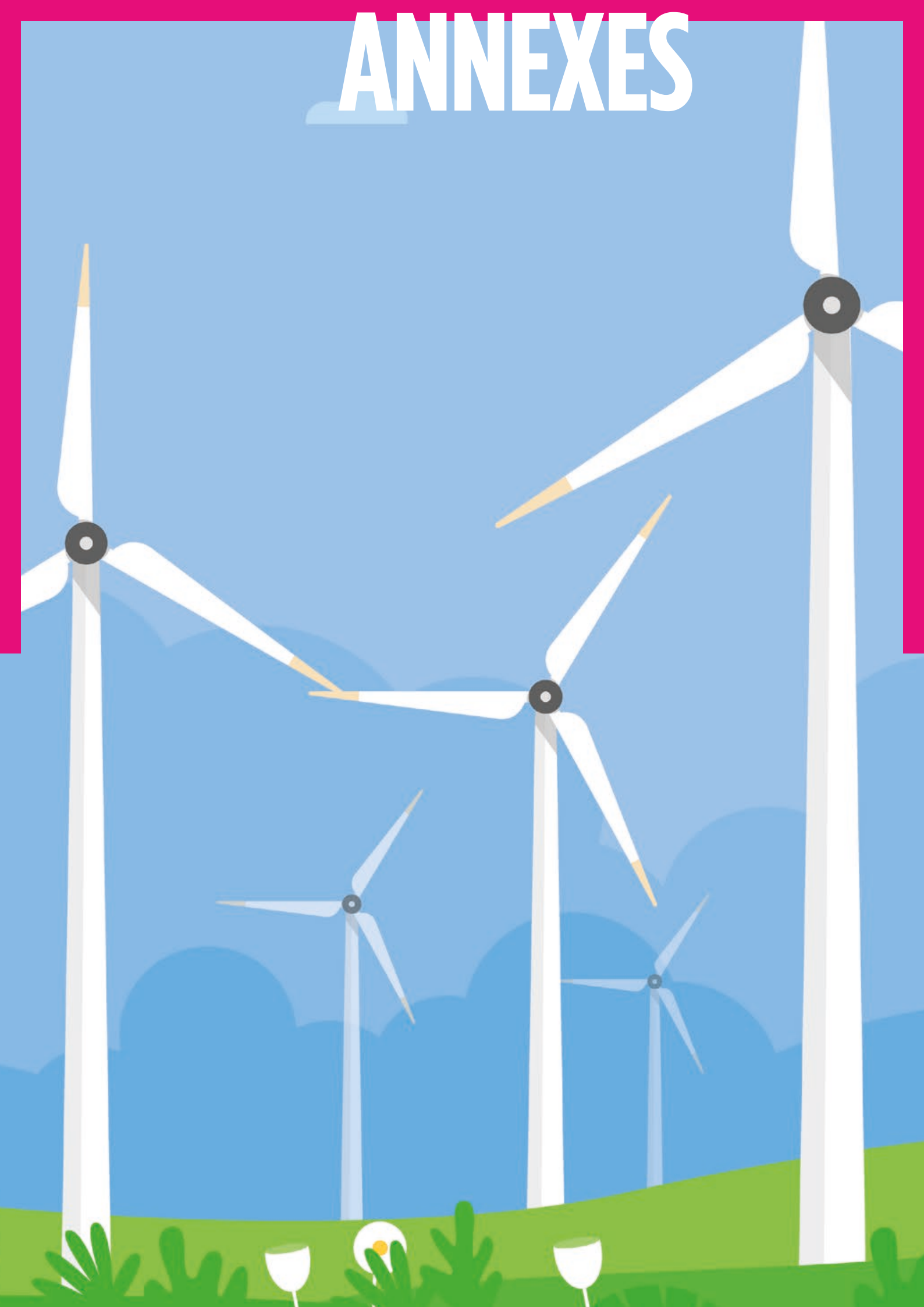


ANNEXES



GRI TABLE – Sustainability Report 2020

Information sources:

AR – Annual Report 2020

SR – Sustainability Report 2020

Site – millenniumbcp.pt – Sustainability

General Standard contents

In the present table, an additional analysis was made regarding the alignment of BCP's report with the CMVM Report model for the disclosure of non-financial information by companies issuing securities admitted to trading on a regulated market was carried out. The general GRI disclosures respond in part to the Introduction, Business model and main risk factors defined in the Non-financial information model.

GRI STANDARDS		Content, page or link	UNGC Principles	CMVM
GENERAL DISCLOSURES				
102-1	Name of the organization	Banco Comercial Português, S.A.,		X
102-2	Activities, brands, products, and services	SR – Page 75-82 AR – Page 35-40		X
102-3	Location of headquarters	SR – Page 113 AR – Page 841		X
102-4	Location of operations	SR – Page 29; 32-33; 96-98 AR – Page 42-43		
102-5	Ownership and legal form	AR – Page 14-17		
102-6	Markets served	SR – Page 29; 32-33; 96-98 AR – Page 42-43		
102-7	Scale of the organization	SR – Page 9 AR – Page 11-13		
102-8	Information on employees and other workers	SR – Page 9-11; 38-40; 47-48 AR – Page 13	6	
102-9	Supply chain	SR – Page 9; 89 AR – Page 13; 186		
102-10	Significant changes to the organization and its supply chain	SR – Page 13; 111-112 AR – Page 11-13; 18-19		
102-11	Precautionary Principle or approach	AR – Page 113-123		X
102-12	External initiatives	SR – Page 13-15; 109		
102-13	Membership of associations	www.millenniumbcp.pt Institutional > Sustainability		
STRATEGY				
102-14	Statement from senior decision-maker	SR – Page 5-7 AR – Page 5-8		X
ETHICS AND INTEGRITY				
102-16	Values, principles, standards, and norms of behaviour	SR – Page 48-50	10	
GOVERNANCE				
102-18	Governance structure	AR – Page 764-771		X
STAKEHOLDER ENGAGEMENT				
102-40	List of stakeholder groups	www.millenniumbcp.pt Institutional > Sustainability > Stakeholders Engagement SR – Page 26-27		
102-41	Collective bargaining agreements	SR – Page 9 AR – Page 13	3	
102-42	Identifying and selecting stakeholders	www.millenniumbcp.pt Institutional > Sustainability > Stakeholders Engagement SR – Page 26-27		

102-43	Approach to stakeholder engagement	www.millenniumbcp.pt Institutional > Sustainability > Stakeholders Engagement SR - Page 26-27, 52-57 AR - Page 158
102-44	Key topics and concerns raised	www.millenniumbcp.pt Institutional > Sustainability > Stakeholders Engagement SR - Page 26-27, 52-57 AR - Page 158

REPORTING PRACTICE

102-45	Entities included in the consolidated financial statements	AR - Page 211-212	X
102-46	Defining report content and topic boundaries	SR - Page 13; 26-27	X
102-47	List of material topics	SR - Page 26-27	X
102-48	Restatements of information	SR - Page 13-14	X
102-49	Changes in reporting	SR - Page 13-14	X
102-50	Reporting period	SR - Page 13-14	X
102-51	Date of most recent report	SR - Page 13-14	X
102-52	Reporting cycle	SR - Page 13-14	X
102-53	Contact point for questions regarding the report	RS - Page 113	X
102-54	Claims of reporting in accordance with the GRI Standards	This report was prepared in accordance with the GRI Standards: Core option (essential)	X
102-55	GRI content index	Present GRI content Index	X
102-56	External assurance	AR - Page 731-733	X

GRI STANDARDS	Content, page or link	UNGC Principles	CMVM
CATEGORY: ECONOMIC			
ECONOMIC PERFORMANCE			
201-1	Direct economic value generated and distributed	AR - Page 10-11; 47	
201-2	Financial implications and other risks and opportunities due to climate change	AR - Page 187-193 https://www.cdp.net > Search responses > Banco Comercial Português SA	
201-3	Defined benefit plan obligations and other retirement plans	SR - Page 83-88 AR - Page 168-169	
MARKET PRESENCE			
02-1	Ratios of standard entry level wage by gender compared to local minimum wage	SR - Page 9 AR - Page 13	6
INDIRECT ECONOMIC IMPACTS			
203-1	Infrastructure investments and services supported	SR - Page 60-82 AR - Page 174-185	X
203-2	Significant indirect economic impacts	SR - Page 60-82 AR - Page 174-185	X
PROCUREMENT PRACTICES			
204-1	Proportion of spending on local suppliers	SR - Page 9; 89 AR - Page 13; 186	
ANTI-CORRUPTION – MATERIAL ISSUE			
103-1; 103-2; 103-3	Management approach	SR - Page 13-14; 26-27; 48-49	X
205-2	Communication and training about anti-corruption policies and procedures	SR - Page 41-44	10 X
205-3	Confirmed incidents of corruption and actions taken	RS - Page 48-51	10 X

CATEGORY: ENVIRONMENT				
MATERIALS – MATERIAL ISSUE				
103-1; 103-2; 103-3	Management approach	SR - Page 13-14; 26-27; 100-102 AR - Page 187-194		X
301-1	Materials used by weight or volume	SR - Page 105-106 AR - Page 191-192	7, 8	X
ENERGY – MATERIAL ISSUE				
103-1; 103-2; 103-3	Management approach	SR - Page 13-14; 26-27; 100-102 AR - Page 189		X
302-1	Energy consumption within the organization	SR - Page 103-104 AR - Page 190	7, 8	X
302-3	Energy intensity	SR - Page 103-104 AR - Page 190	8	X
302-4	Reduction of energy consumption	SR - Page 95-105 AR - Page 189, 190	8, 9	X
WATER AND EFFLUENTS – MATERIAL ISSUE				
103-1; 103-2; 103-3	Management approach	SR - Page 13-14; 26-27; 94-95; 98; 105 AR - Page 187; 191		X
303-1	Interactions with water as a shared resource	Most of the water consumed in the BCP is associated with human use, and part of it is also used for irrigation in the facilities. In 2021, all water for irrigation of green spaces in Taguspark will come from the water-hole, which will have a strong impact on the volume of water intake. The Group is concerned with reducing its environmental impact, which includes reducing water consumption in all geographies where it operates. BCP does not identify areas of water stress relevant to this report in its direct operation.		X
303-2	Management of water discharge-related impacts	The effluent management at the Bank is carried out by third parties, and most of the liquid effluents produced by the Group are discarded into public wastewater networks, and subsequently subjected to treatment and quality monitoring by the responsible entities.		X
303-3	Water withdrawal	SR - Page 105 AR - Page 191	7, 8	X
BIODIVERSITY				
304-1	Operational sites owned, leased or managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	The Bank's operations have no significant direct impact on biodiversity, in protected or restored habitats, which justifies the non-relevance of this indicator.	8	
304-2	Significant impacts of activities, products and services on biodiversity	The Bank's operations have no significant direct impact on biodiversity, in protected or restored habitats, which justifies the non-relevance of this indicator.	8	
304-3	Habitats protected or restored	The Bank's operations have no significant direct impact on biodiversity, in protected or restored habitats, which justifies the non-relevance of this indicator.	8	
EMISSIONS – MATERIAL ISSUE				
103-1; 103-2; 103-3	Management approach	SR - Page 13-14; 26-27; 94-95; 101 AR - Page 187; 188		X
305-1	Direct (Scope 1) GHG emissions	SR - Page 11; 101 AR - Page 188	7, 8	X
305-2	Energy indirect (Scope 2) GHG emissions	SR - Page 11; 101 AR - Page 188	7, 8	X
305-3	Other indirect (Scope 3) GHG emissions	SR - Page 11; 101 AR - Page 188	7, 8	X
305-4	GHG emissions intensity	SR - Page 101 AR - Page 188	8	X
305-5	Reduction of GHG emissions	SR - Page 100-102 AR - Page 189	8, 9	X

WASTE				
306-1	Waste generation and significant waste-related impacts	The production of waste at BCP is mostly associated with office waste (paper, cardboard and plastic). The Group is concerned with reducing its environmental impact, which includes reducing waste production in all geographies where it operates. This concern is materialized in the development of operational efficiency initiatives, reported throughout the Reports.		X
306-2	Management of significant waste-related impacts	The Bank invests in recycling waste; in the progressive elimination of non-reusable products, as was the example of replacing coffee cups and the respective plastic spoons with ceramic cups and metal spoons in all Central Services cups; and raising employee awareness to minimize waste production at the Bank.		X
306-3	Waste generated	SR - Page 9; 106 AR - Page 13	8	X

CATEGORY: SOCIAL

EMPLOYMENT – MATERIAL ISSUE

103-1; 103-2; 103-3	Management approach	SR - Page 13-14; 26-27; 38-40; 83-88 AR - Page 13; 165-167		
		SR - Page 9; 48-49 AR - Page 13; 169-170	6	
401-1	New employees hired and employee turnover	Recruitment 2020	Men	Women
		<30	47	59
		[30-50[16	9
		>=50	0	1
		Total	63	69
				132
				X
		Turnover 2020	Men	Women
		<30	19	19
		[30-50[38	29
		>=50	163	54
		Total	220	102
				322
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Data for Portugal SR - Page 83-88 AR - Page 168-169		6
		The benefits identified in the Reports are granted to the Bank's employees (full or part time) but are not extended to interns or outsourcers.		

OCCUPATIONAL HEALTH AND SAFETY

403-1	Occupational health and safety management system	Millennium bcp has published a regulation that establishes the general principles related to the prevention of occupational risks, the protection of the safety, hygiene and physical and mental health of the Employees, regardless of the type of contractual relationship, of the facilities and workplaces where exercise their activity, and to information, consultation, participation and training in this area, without prejudice to the legal rules applicable in this field. These rules are available for consultation on the Bank's internal portal. The Occupational Health and Safety Management System was implemented in response to specific legislation in this area (Law No. 102/2009 of 10 September, amended by Law 3/2014 of 28 January, with the updates introduced by DL No. 88 / 2015 of May 28, by Law No. 146/2015 of September 9 and by Law No. 28/2016 of August 23) but its scope, namely in the area of health, goes beyond the legally determined limits.		X
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403-2	Hazard identification, risk assessment and incident investigation	<p>In order to ensure adequate surveillance of Employees' health, Millennium bcp conducts admission tests, periodic examinations differentiated according to gender and age group - up to 50 years old, the frequency is every two years, being annual after that age - occasional and complementary, as well as activities to promote health at work, keeping clinical records and other information related to the health of each employee organized. Following the check-up, a consultation is made with the Health Doctor at work, where all the information on the Employee's health status is provided and the necessary recommendations are made.</p> <p>In the field of security, risk assessment audits are carried out, the reports of which are forwarded to the Purchasing and Means Department, which, after their analysis, issues recommendations to the Areas whose intervention is justified with a view to resolving the recommendations made.</p> <p>All Employees are alerted to the importance of ensuring their safety and health, as well as the safety and health of people who may be affected by their actions or omissions at work, as well as the need to report immediately to the employer any work situation that presents a serious and immediate danger to safety or health, and any defect registered in the protection systems.</p> <p>The current Regulation determines that Employees in the event of serious, immediate and unavoidable danger, have the right to leave their workplace or a dangerous area, and cannot be harmed by this fact.</p>	X
403-3	Occupational health services	<p>There is a team of medical doctors at work and nurses available every day at the Bank's premises in Taguspark and a doctor and a nurse at the Bank's facilities in Porto. The coordination of this team is ensured by the doctor who performs the duties of Clinical Responsible, and who reports to the Human Resources Department.</p> <p>The topics of occupational health and well-being are considered at every moment, bearing in mind the importance of providing a set of services that contribute to a better balance between professional and personal life. In this domain, the following services are available:</p> <p>Curative Medicine Services - the medical and nursing acts covered by these services are available free of charge to all Employees. Analysis collection services are also available.</p> <p>Nutrition and Psychology Consultations - consultations implemented for the importance they can play in the health and well-being of Employees, as a personalized diet plan is prescribed through strategies adapted to the lifestyle of each one, allowing for change and adaptation. acquisition of healthy habits gradually.</p> <p>Campaigns for Health Promotion and Healthy Living Habits - in this context, a series of actions are carried out with the objective of informing and sensitizing Employees to the importance of adopting, in their day-to-day, healthy living habits.</p> <p>Provision of a Physiotherapy Center at Taguspark facilities, in agreement with SAMS and Médis.</p> <p>Social Benefits and Support - through the definition of a policy of social benefits and support, detailed in the internal Human Resources Portal, the Bank has sought to encourage support for work-family reconciliation, support for education and incentive to mobility.</p>	X
403-4	Worker participation, consultation and communication on occupational health and safety	<p>The performance of internal satisfaction surveys with the various services and the possibility of making comments, allows the periodical monitoring the Employees' opinion on the quality of the services provided.</p>	X

403-5	Worker training on occupational health and safety	Within the scope of the training provided in these matters, topics such as automatic defibrillation, training of security delegates, emergency response teams, self-protection measures, contingency plan (related to the measures regarding the COVID-19 pandemic were addressed), practical guide to return safely and confidently.		X
403-6	Promotion of worker health	Employees are invited to check-ups in accordance with the rules established and already stated. Following the check-up, they are subsequently summoned to the health consultation at work. All other consultations, curative medicine, psychology, nutrition, as well as clinical analyses, are scheduled at the initiative of the Employee through contact with the Bank's medical services. Physiotherapy sections are scheduled through direct contact with the service provider. Clinical information is recorded in an autonomous application, with restricted access, in order to guarantee the confidentiality of all data.		X
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	No information available.		X
403-9	Work-related injuries	SR - Page 9; 83-85 AR - Page 13; 169		X
403-10	Work-related ill health	Millennium bcp has preventive medicine units, however, there is no information on the number of employees with serious illnesses.		X
TRAINING AND EDUCATION – MATERIAL ISSUE				
103-1; 103-2; 103-3	Management approach	SR - Page 13-14; 26-27; 41-44 AR - Page 167		
404-1	Average hours of training per year per employee	SR - Page 41-44 AR - Page 167	6	X
404-2	Programmes for upgrading employee skills and transition assistance programmes	SR - Page 41-44 AR - Page 167		
404-3	Percentage of employees receiving regular performance and career development reviews	SR - Page 46-47 AR - Page 168	6	
DIVERSITY AND EQUAL OPPORTUNITY – MATERIAL ISSUE				
103-1; 103-2; 103-3	Management approach	SR - Page 13-14; 26-27; 38-40 AR - Page 13; 165-166		
		SR - Page 9; 38-40 AR - Page 13; 165-166	6	
405-1	Diversity of governance bodies and employees	Additionally, BCP identifies and reports its employees with disabilities. In 2020, in Portugal, the Bank had 65 males and 75 women with disabilities.		X
		SR - Page 38 AR - Page 13; 165-166	6	
405-2	Ratio of basic salary and remuneration of women to men	Senior Management 0,9 Management 1,0 Commercials 0,8 Technicians 0,9 Other 0,9		X
		Data for Portugal		

NON-DISCRIMINATION				
406-1	Incidents of discrimination and corrective actions taken	In 2020, there were no reported cases of discrimination. The bank's Code of Conduct comprises anti-discriminatory behaviours and duties.	6	X
FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING				
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	SR - Page 9; 38 AR - Page 13	3	
CHILD LABOR				
408-1	Operations and suppliers at significant risk for incidents of child labour	SR - Page 38; 89 AR - Page 165	5	
HUMAN RIGHTS ASSESSMENT				
412-1	Operations submitted to Human Rights assessments	No Human Rights assessments were carried out in 2020.		
LOCAL COMMUNITIES – MATERIAL ISSUE				
103-1; 103-3	103-2; Management approach	SR - Page 13-14; 26-27; 60-74 AR - Page 176-185		X
413-1	Operations with local community engagement, impact assessments, and development programmes	SR - Page 11; 60-74 AR - Page 13; 176-185	1	X
FS13	Access points in low-populated or economically disadvantaged areas by type	SR - Page 5-6, 9; 27; 32 AR - Page 13		
FS14	Initiatives to improve access to financial services for disadvantaged people	SR - Page 5, 9; 27; 32 AR - Page 13		
PUBLIC POLICY				
415-1	Political contributions	No contributions are made to political parties.		
MARKETING AND LABELING – MATERIAL ISSUE				
103-1; 103-2; 103-3	Management approach	SR - Page 13-14; 26-27; 48-57 AR - Page 171-172		
417-1	Requirements for product and service information and labelling	SR - Page 48-57 AR - Page 171-172		
SOCIOECONOMIC COMPLIANCE				
419-1	Non-compliance with laws and regulations in the social and economic area	SR - Page 48-57		X

SECTOR SUPPLEMENT

PRODUCTS PORTFOLIO – MATERIAL ISSUE

103-1; 103-2; 103-3 Management approach SR - Page 13-14; 26-27; 75-82

FS6 Percentage of the portfolio for business lines, in total volume, by specific region and size AR - Page 364-365

FS7 Monetary value of products and services designed to deliver a specific social benefit for each business line SR - Page 75-82
AR - Page 174-175

FS8 Monetary value of products and services designed to deliver a specific environmental benefit for each business line SR - Page 75-82
AR - Page 174-175

AUDIT

FS10 Percentage and number of companies held in the institution's portfolio with which the reporting organization has interacted on environmental or social issues SR - Page 75-82
AR - Page 174-175

FS11 Percentage of assets subject to environmental or social screening SR - Page 77-81
AR - Page 174-175