ENVIRONMENTAL POLICY

September 2026

ATLANTICO EUROPA

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1. Subject

The current and potential impacts arising from climate change, resource scarcity and the pressures placed on the environment are among the greatest challenges currently facing humanity.

The sustainable management of ecosystems is a global challenge that requires urgent and comprehensive action, combining regulatory measures with the adoption of best practices by institutions and their leaders, investors and individuals.

Banco Atlântico Europa, S.A., hereinafter also referred to as the Bank or ATLANTICO Europa, recognises the importance of sustainable practice and is committed to embedding environmental values into its processes, operations and developments.

2. Scope

This Policy applies to the entire Bank and serves as a reference document for all its activities; it is thus intended to be a key contribution to the adoption of best environmental practices, driving the definition and implementation of specific measures across the various areas.

3. General Principles

3.1. Objectives

In view of these challenges, Banco Atlântico Europa is committed to making its best contribution:

- In encouraging our staff to adopt best environmental practices, both in the course of their professional activities and in their personal lives;
- By monitoring and setting targets aimed at reducing environmental impacts and promoting environmentally sustainable measures;
- By reducing greenhouse gas emissions throughout the entire life cycle of our products and services (e.g. through the selection of materials used in the production of debit and credit cards or the digitisation of processes), as well as in our operational activities (e.g. business travel, video conferencing and building management, including the use of recyclable consumables wherever possible and minimising paper usage);
- In promoting innovative solutions, through the provision of products and services, which enable our customers to contribute to minimising environmental impacts;
- In assessing environmental risks associated with the products and services provided, in credit risk assessment, in the management of the Bank's securities portfolio, and in particular in project financing, by defining criteria aligned with those that promote improved financial conditions for projects with a positive impact;
- In applying supplier selection criteria aligned with the Bank's environmental criteria;

- To raise environmental awareness, by engaging our suppliers in adhering to best practices in environmental protection, as well as the community and other stakeholders.

3.2. Methodology

Achieving these objectives involves establishing metrics and targets that enable us to assess the progress of the Bank's contribution, as well as defining exclusion lists and restricted sectors for the purposes of project financing.

The metrics are derived from cross-referencing GRI (Global Reporting Initiative) indicators – or any others that form part of initiatives we may adopt – with the specific activities of each area of the Bank, and may be incorporated into assessment questionnaires aimed at the various *stakeholders*.

Based on the results obtained, and taking into account aspects such as the starting point for this assessment and the nature of the Bank's activities, the targets to be adopted are set, always with a view to continuous improvement.

3.3. Targets

The Bank monitors water and energy consumption, as well as the generation of solid waste in the building(s) it occupies.

It also calculates annually CO_2 emissions under Scope 1 (direct emissions), Scope 2 (emissions from the generation of purchased electricity) and Scope 3 (indirect emissions).

Targets are also defined using indicators set out in the Bank's Risk Profile, which is approved annually by the Board of Directors.

3.4. Communication

The Bank's Environmental Policy is communicated to all its staff.

Environmental practices and performance assessments are reported periodically and form part of the Sustainability Report or the Integrated Report.

3.5. Management Framework

The Environmental Policy is one of the cornerstones of the Bank's sustainability and impact strategy. The Board of Directors bears ultimate responsibility for this resolution, which forms part of the transformations outlined by the United Nations: 'Transforming our world: the 2030 Agenda for Sustainable Development', in force since 1 January 2016.

The *Environmental, Social and Governance* (ESG) department is operationally responsible for its implementation, working in close and ongoing coordination with all areas of the Bank.

4. Final Provisions

This Policy is approved by the Board of Directors and may be amended by resolution of that body. This Policy will be reviewed at least twice a year and is disseminated internally and via the Bank's website.