SUSTAINABILITY POLICY

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ATLANTICO EUROPA

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1. Purpose

The Sustainability Policy of Banco Atlântico Europa, S.A., or the Bank, reflects its commitment to adopting best practices in environmental, social and governance (ESG) matters across all its activities, from internal management to customer service, including its relationships with stakeholders. We believe this is the best way to offer innovative and sustainable financial solutions, and to position ourselves as a responsible and sustainable institution.

This Policy sets out guidelines based on international best practice in these areas, thereby embedding the concept of sustainability within the Bank's operations from an internal perspective, whilst also influencing (from an external perspective) its entire ecosystem.

2. Scope

This Policy serves as a reference document for the Bank's entire activity. It underpins policies, programmes and initiatives that enshrine the Sustainable Development Goals (SDGs), which form part of the United Nations' 2030 Agenda. The SDGs define priorities and aspirations for global sustainable development, seeking to mobilise efforts – including at a global level – towards common goals.

Banco Atlântico Europa thus takes an active role in contributing to the objectives set out in the 2030 Agenda, by offering innovative banking services with sustainable solutions and opportunities that contribute to these aims.

3. General Principles

3.1. Vision

The Bank's Sustainability Policy aims to:

- Ensure the integration of environmental, social and governance considerations into its strategy;
- Contribute to raising awareness of the Sustainable Development Goals, by actively identifying and promoting ways to help achieve the defined targets, and incorporating them throughout its value chain;
- Encourage commitment, transparency and reporting on sustainable finance issues.

3.2. Guiding Principles

Operations, Products and Services

- Ensure the definition of bank-wide sustainability criteria for the exclusion and/or restriction of transactions;
- Promote the inclusion and continuous improvement of environmental, social and governance (ESG) risk assessments in the risk assessment of products, services and customers, as well as the Bank's own portfolio;

- Promote the provision of financial products and solutions that incorporate responsible environmental and social components;
- Encourage the adoption of digital solutions across all the Bank's activities, with particular emphasis on the provision of products and services for its customers.

People

- To promote good working conditions and a healthy work-life balance;
- Promote financial literacy and inclusion;
- Promote the implementation of an Annual Social Impact Plan;
- Ensure that social impact assessment is incorporated into the selection of suppliers.

Environment

- Ensure a strategy and the implementation of measures that minimise the environmental impact resulting from the Bank's operations;
- Promote environmental literacy through the involvement of staff, the community and stakeholders;
- Contribute financial products and solutions that promote eco-efficiency and minimise the carbon footprint;
- Ensure that environmental impact assessments are incorporated into the selection and appointment of suppliers

3.3. Communication

The Sustainability Policy is communicated to all the Bank's staff.

Practices and assessments of environmental, social and governance performance are reported periodically and are included in the Sustainability Report or the Integrated Report.

As part of the Bank's portfolio of risk profile indicators, ESG indicators are also defined annually and monitored on a quarterly basis.

3.4. Governance Model

The Board of Directors has ultimate responsibility for the Sustainability Policy of Banco Atlântico Europa, S.A..

To put this into practice and establish the Bank as a leading financial player in sustainability, the Environmental, Social and Governance (ESG) department was created. The team comprising this department is entirely dedicated to sustainability and 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 Bank's Board of Directors and may be amended by resolution of that body. It will be reviewed whenever deemed appropriate or at least twice a year.