

Anticorruption Policy

Introduction

Activities of the Bank Millennium S.A. Group (hereinafter: "Bank Millennium Group") is conducted in a responsible and transparent manner, strictly observing the legal and regulatory framework, as well as maintaining the highest standards of ethics, responsibility and transparency. The Bank Millennium Group has formulated appropriate internal regulations defining standards of employee behavior, assuming a "zero tolerance" approach to behavior constituting any form of corruption.

The Approach of Bank Millennium S.A. Group assumes intolerance towards all manifestations of corruption, which can be reduced in short to the situation of accepting or giving benefits (both financial and non-material), aimed at achieving a specific behaviour or omission by the other party. The Bank Millennium Group clearly and unequivocally rejects any actions that may threaten the transparency of its relations with Stakeholders and undertakes to comply with the established principles, including the fight against corruption in all its forms.

The activity of the Bank Millennium Group assumes compliance with applicable laws and internal regulations, as well as maintaining the highest standards of ethics, responsibility, transparency, rigour and professionalism.

Bank Millennium S.A. has implemented a regulation on corruption - "Counteracting Corruption in Bank Millennium S.A. Principles and Guidelines" (hereinafter: "Principles"). The principles comprehensively regulate issues related to the subject of corruption.

Definition of corruption

According to the approach adopted in the Bank Millennium Group, corruption should be understood as an act:

- involving giving promises, offering or giving, by any person, directly or indirectly, any undue benefits to another person for gain of such person or any other person in return for an action or omission within the function performed by such person (so-called active corruption),
- involving demanding or accepting by a person directly or indirectly of any undue benefits for such person or any other person, or accepting proposals or promises of such benefits, in return for an action or omission within the function performed by such person (so-called passive corruption).

Roles and responsibilities of individual persons, individuals and bodies of the Bank

Responsibility for corruption prevention rests in the hands of every Bank employee i.e. employees are obliged, in case of a suspected action of this kind, to immediately inform the appropriate services of the Bank, also with observing anonymity. *The Principles* also define the roles of the Management Board and the Supervisory Board of the Bank, which should supervise the implementation process and periodic assessment of the adequacy and effectiveness of the implemented anti-corruption system. The Bank has also established the function of the Coordinator, responsible for the implementation of the anti-corruption process and independent monitoring of compliance with the rules imposed by the above-mentioned regulation.

Areas of commitment and action

The Bank Millennium Group considers as inappropriate such behavior of every employee and co-worker, which includes, among others, the following behaviors:

- Offering, promising, giving, requesting, agreeing to receive or accept a benefit, including facilitating other parties to perform similar actions.
- Offering or accepting benefits that may influence (or are perceived to influence) business transactions to be entered into or already entered into.
- Making donations to charity or sponsorship as a way to obtain or maintain benefits for a company from the Bank Millennium Group or any of its employees.
- Establishing or maintaining business relationships with the knowledge that they are not consistent with the rules of conduct specified in the Bank Millennium Group document.
- Offering internships, jobs or establishing relationships with suppliers that may limit or influence transactions to be carried out or have already been carried out, particularly where they involve public office holders.

Relations with counterparties

We consider proper relations with counterparties as the basis for the efficient and transparent functioning of the Bank Millennium Group and the provision of individual services to clients. This imposes a special obligation on entities from the Bank Millennium Group to analyse contractors, both at the stage of establishing the relationship and throughout its duration.

Relations with other organisations

In the case of political parties, the Group has adopted a policy of total neutrality, which means not undertaking the financing of political parties and providing non-monetary benefits, either directly or indirectly. While adhering to the principle of political neutrality, we do not in any way support or enable any political activity in the space we manage. This principle applies to us and our employees when performing their official duties.

With regard to non-profit organisations (such as charities or foundations), the Group allows funding for such organisations in accordance with its internal regulations.

Relations with officials

Such relations are considered by the Bank in two aspects, i.e. employment and interaction at the official level. As far as the first aspect is concerned, the Bank, in employing such persons, exercises every diligence in the field of counteracting conflicts of interest, taking into account the legitimate interests of these persons and the provisions of generally applicable law (especially in the areas of personal data protection and labour law). In the second case, the Bank made an absolute decision to prohibit the giving or receiving of benefits, regardless of their value and nature; which also means prohibiting such occasional benefits, usually given or received on such occasions.

Giving and receiving benefits

The bank divides benefits into three main categories, i.e. gifts, representative and business events. Depending on the type of benefit, the path of action varies. However, the main principle is to record benefits, and in certain situations specified in the regulation - their prior approval by the competent services of the Bank. All this is to be used to seal the circulation process of various types of benefits that can be received or transferred by the Bank's employees.

Reporting incidents of violations

Each Employee who has information or reasonable suspicions that there has been a violation of the law, applicable policies, procedures or the Code of Ethics is obliged to immediately report this fact via dedicated reporting channels to the President of the Bank's Management Board or the Bank's Supervisory Board in the event of violations committed by a Member of the Management Board.

We provide anonymous reporting channels, confidentiality of all reports, and we do not take any action against a person who, in good faith, reports information regarding potential violations of the law and applicable policies, procedures or Code of Ethics, or who participates in the report verification procedure, unless the report is false or the information was provided in bad faith.

Lobbying and representing the interests of the Bank Millennium Group

We conduct lobbying activities in accordance with the provisions of law regulating this type of activity, professionally and based on transparent and rational argumentation. Our goal is to advocate the interests of the BM Group and the banking community towards decision-making centers.

Violation of the provisions of the Anti-Corruption Policy

The legal, financial and reputational risks associated with bribery and corruption practices are extremely serious and have a significant impact on both the Bank Millennium Group companies and the persons who may be involved in these activities.

Scope of validity

This document has been approved by the Management Board of Bank Millennium and is binding for all companies from the Bank Millennium Group.